



Gambling  
Reform  
APPG



## **Gambling Advertising, Marketing and Sponsorship: Recommendations for Reform**

**Gambling Reform APPG & Peers for Gambling Reform**

## Foreword

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In this report, the All-Party Parliamentary Group on Gambling Reform, together with Peers for Gambling Reform, sets out a series of recommendations to address the significant and growing proliferation of gambling advertising across the United Kingdom.

This is an issue that has, for too long, been insufficiently addressed by successive governments. The scale of the challenge is clear and cannot be understated. The gambling industry now spends around £1.5 - £2 billion annually on advertising, marketing and sponsorship employing increasingly sophisticated methods to reach consumers across a wide range of platforms. Advertising is not a peripheral activity within the sector; it is fundamental to its commercial model and continued growth.

The APPG has consistently drawn attention to the relationship between gambling advertising and gambling-related harm. We have repeatedly heard compelling evidence from individuals for whom such advertising is not simply ambient background noise, but a persistent and damaging influence – one that actively undermines attempts to reduce or cease gambling altogether.

Despite this evidence, meaningful reform has been slow to emerge. The response to date has too often relied on partial measures, voluntary codes that are inconsistently applied, and a broader reluctance to engage with the issue at the scale required. It is particularly concerning that the Government has tasked the Betting and Gaming Council – the industry's own trade body – with reporting on the advertising and sponsorship rules governing its members. The lack of transparency surrounding this work, coupled with indications that it is informing policy development, raises serious questions about credibility and independence. This approach is no longer tenable.

At the same time, it is evident that the United Kingdom is increasingly out of step with international counterparts. A number of jurisdictions have adopted more robust regulatory frameworks, including comprehensive restrictions on advertising exposure and stronger enforcement measures to prevent unlicensed operators from accessing domestic markets. By contrast, the UK system has struggled to address illegal-market advertising effectively or to ensure consistent oversight across the digital advertising supply chain.

The APPG's and PGR's joint position remains clear and consistent: where there is credible evidence of harm, it is incumbent upon policymakers to act with proportionate and effective measures. This requires ensuring that the regulator is adequately empowered, that rules are enforceable in practice, and that all operators seeking to profit from UK consumers are subject to rigorous and meaningful scrutiny.

This report sets out the case for reforming gambling advertising in the United Kingdom - and for doing so without delay. It reflects not only the findings of our work, but also a growing expectation, both within Parliament and across wider society, that this issue can no longer be overlooked.

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**The Rt Hon. The Lord Foster of Bath** | Chair, Peers for Gambling Reform

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## Executive Summary

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This report is jointly prepared by the All-Party Parliamentary Group on Gambling Reform (GRAPPG) and Peers for Gambling Reform (PGR).

The purpose of this report is to bring together research into gambling advertising, marketing and sponsorship and the role it plays in causing gambling-related harm, and to set out a series of recommendations for reform. It forms one part of a wider inquiry we are undertaking into “*The Future of Gambling Regulation in the United Kingdom*”, which will report later this year.

The report seeks to outline the following:

- An assessment of the academic and policy evidence on how advertising contributes to gambling harms;
- An evaluation of the effectiveness of the current regulatory framework; and
- A set of practical, deliverable recommendations for Government.

The GRAPPG and PGR has undertaken detailed examination of both the scale of gambling advertising and its societal impact. Both groups were deeply concerned that the previous Government’s 2023 White Paper on Gambling did not include meaningful or comprehensive proposals to address advertising, marketing and sponsorship – particularly at a time when the UK is falling behind many other European jurisdictions that have adopted more precautionary and proactive regulatory approaches.

The GRAPPG and PGR have expressed concern over the Government’s decision to withhold publication of the Betting and Gaming Council’s recent report on gambling advertising, arguing that transparency is essential where industry-produced evidence is being used to inform public policy. We have warned that relying on research commissioned by an industry with clear commercial interests – and without independent scrutiny – risks undermining confidence in the evidence base and have called for both the report’s publication and the commissioning of further independent academic research to support future policy development.

Recent reporting by the Guardian suggests that the gambling industry now spends approximately £2 billion annually on advertising.<sup>1</sup> The House of Lords previously reported that £1.5bn a year was being spent on advertising, marketing and sponsorship.<sup>2</sup> While a report from the Betting and Gaming Council (BGC) outlined that a combined £1.25 billion was spent on advertising and sponsorship by its members from October 2023 to September 2024.<sup>3</sup>

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<sup>1</sup> Davies, R. and Sweney, M. (2025). *UK gambling firms spent ‘astronomic’ £2bn on advertising last year*. [online] The Guardian. Available at: <https://www.theguardian.com/society/2025/nov/23/uk-gambling-firms-advertising-rachel-reeves-budget> [Accessed 4 Feb. 2026].

<sup>2</sup> House of Lords (2020) *Select Committee on the Social and Economic Impact of the Gambling Industry Gambling Harm - Time for Action*. Available at: <https://publications.parliament.uk/pa/ld5801/ldselect/ldgamb/79/7902.htm> [Accessed: 17 February 2026].

<sup>3</sup> Designline, P.A. (2026) *Gambling Advertising and Sponsorship Report 2025, Betting & Gaming Council*. Available at: <https://bettingandgamingcouncil.com/news/gambling-advertising-and-sponsorship-report-2025> [Accessed: 17 February 2026].

Academic research, public health studies, and Gambling Commission data demonstrate that exposure to advertising increases participation, encourages higher-risk behaviours, and triggers relapse among those already experiencing harm. Children and young people remain particularly vulnerable with studies confirming that repeated exposure influences perceptions of gambling and the likelihood of future participation.

This report argues that the UK's current regulatory framework is inadequate. Reliance on industry self-regulation has repeatedly failed to prevent harmful exposure, particularly in sports and online environments. The so-called "whistle-to-whistle" ban in football has been breached extensively, with thousands of gambling messages appearing throughout broadcast football matches.

We were also seriously concerned to see reports of FIFA's recently announced partnership with betting platform Stats Perform. This agreement grants the company the right to live stream all 104 matches of the 2026 Men's World Cup as their first official betting data and streaming rights distributor, allowing UK licensed bookmakers' websites to broadcast every game live. Football World Cups, have long inspired national pride and unity, bringing together communities, religions, and generations behind the success of our national teams, this is what these events should be about rather than being used as mechanisms to promote gambling.

Content marketing and influencer promotion now account for a significant proportion of advertising, yet regulatory bodies such as the Advertising Standards Authority (ASA) have failed to enforce existing codes effectively. More concerningly, the industry has frequently breached their own voluntary codes on responsible advertising allowing children and young people to continually be exposed to sophisticated marketing that is often not recognised as advertising.

The growth of advertising by black and grey market operators also requires serious consideration, but not at the expense of taking action on licensed operators. We noted the Government's increasing focus on illegal gambling marketing, including comments by Baroness Twycross indicating that this is viewed as the primary risk area for children and vulnerable people in correspondence to the GRAPPG and PGR, dated 18<sup>th</sup> February 2026. While illegal operators do pose clear dangers, this emphasis risks overlooking the well-documented and widespread harms arising from within the regulated sector. A balanced approach is essential to ensure that efforts to tackle unlicensed activity do not come at the expense of addressing the systemic issues present in the licensed market.

The growth of gambling advertising, marketing and sponsorship acts to stimulate demand for gambling. If more gambling leads to greater harm – and the evidence suggests it does<sup>4</sup> – this trajectory sits in direct tension with the Government's stated manifesto commitment to reduce gambling-related harm. Without meaningful action to curb this expansion, there is a growing disconnect between policy ambition and real-world outcomes, raising serious questions about whether current commitments are being effectively delivered.

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<sup>4</sup> Zendle D, Newall P. The relationship between gambling behaviour and gambling-related harm: A data fusion approach using open banking data. *Addiction*. 2024;119(10):1826–1835. <https://doi.org/10.1111/add.16571>

Recent experience also highlights how this gap between commitment and delivery is reflected in practice at other levels. For example, despite a clear 2021 mayoral pledge to extend restrictions on harmful advertising across the Transport for London (TfL) network, gambling companies have since run over 500 advertising campaigns at a cost of approximately £4.6 million<sup>5</sup>. This continued volume of advertising, despite stated commitments to reduce exposure, underscores the limitations of voluntary or politically signalled approaches when not backed by clear, enforceable rules. While some individual adverts have been removed following intervention, the overall presence of gambling advertising has persisted, demonstrating that piecemeal action is insufficient to deliver meaningful change.

Public concern on this issue is clear. Polling conducted by Survation found that 78% of respondents believe under-18s should not be exposed to gambling advertising.<sup>6</sup> Further polling by More in Common found that 70% of people support stronger restrictions on advertising and sponsorship. Within that survey, 27% of people appear to have expressed stronger reservations about gambling altogether, stating that gambling companies shouldn't be allowed to promote themselves in any form. Notably, when More in Common posed a forced-choice question – asking respondents to choose directly between permitting or banning gambling advertising, promotion and sponsorship – 52% said they would like to see all gambling advertising, promotion and sponsorship banned in the UK.<sup>7</sup>

In addition to this many local authorities and powerful campaign groups such as the Coalition to End Gambling Advertising, Gambling with Lives, Gam Learn, Brent Council, along with esteemed public health professionals such as Prof. Henrietta Bowden Jones OBE, Dr. Matt Gaskell and many more are collectively calling for strong action on gambling advertising across the country to prevent harm and protect children and young people. The World Health Organization has also called for an end to “gambling advertising, promotion and sponsorship of sports and other cultural activities”.<sup>8</sup>

This report sets out the following policy recommendations, focused around two central priorities. Firstly, a series of targeted measures designed to protect children and young people from continued exposure to gambling advertising, sponsorship and marketing. Secondly, a package of reforms aimed at tackling the most egregious and harmful forms of gambling advertising, including high-risk product promotion, exploitative marketing practices and the facilitation of illegal-market activity. Almost all these recommendations can be implemented by Ministers under their existing wide powers to make regulations controlling the advertising of gambling (Section 328 of the Gambling Act 2005).

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<sup>5</sup> Davies, R. (2025). Gambling firms spent nearly £5m to advertise on TfL since London mayor's ban pledge. [online] the Guardian. Available at: <https://www.theguardian.com/society/2025/dec/29/gambling-firms-spent-nearly-5m-to-advertise-on-tfl-since-london-mayors-ban-pledge>.

<sup>6</sup> Cega.org.uk. (2024). *Time for action as poll finds over half the public want gambling ads banned*. – CEQA. [online] Available at: <https://cega.org.uk/time-for-action-as-poll-finds-over-half-the-public-want-gambling-ads-banned/> [Accessed 4 Feb. 2026].

<sup>7</sup> More in Common UK (2026) *Ending a Losing Streak, Ending a Losing Streak: Public opinion on gambling, addiction and regulation*. Available at: <https://www.moreincommon.org.uk/our-work/research/ending-a-losing-streak/> [Accessed: 17 February 2026].

<sup>8</sup> World Health Organization (2024). Gambling. [online] World Health Organization. Available at: <https://www.who.int/news-room/fact-sheets/detail/gambling>

## **Recommendations to protect children and young people**

Children and young people are exposed to gambling advertising across broadcast, online, at sporting events, on billboards and even public transport. The evidence demonstrates that current safeguards are insufficient, particularly in the digital world where content marketing, influencer promotion and algorithmic targeting blur the lines between entertainment and advertising.

This report set out the following recommendations to reduce children's exposure to gambling advertising, strengthen accountability, and ensure that child protection is embedded as a primary objective of gambling advertising policy.

1. End gambling advertising in the pre 9pm watershed period across TV, radio, social media and internet platforms, including an end to paid for and unpaid online advertising.
2. End all gambling sponsorship in sports (but excluding horseracing and greyhound racing as this is not primarily attended by or enjoyed by children) including an end to gambling messages featured in, and within close proximity to, stadia hosting sporting events. This includes any related domain name that may be used by an operator.
3. End all gambling sponsorship of TV and radio programmes.
4. End all gambling related 'content' marketing
5. Work to prevent 'influencers' and 'content creators' from advertising or promoting gambling on social media or streaming platforms such as Twitch or Kick.
6. End gambling advertising, sponsorship and marketing in children's video games with a PEGI rating of lower than 18.
7. Ensure the 'Growing up in the online world' consultation leads to a statutory duty for online platforms that ensures those under 18 are not exposed to gambling advertising, sponsorship and marketing.

## **Recommendations tackling the most egregious forms of gambling advertising**

Alongside broad exposure concerns, particular forms of gambling advertising are especially harmful. These include the promotion of high-risk products, aggressive direct marketing practices, cross-selling strategies, and advertising linked to illegal operators. The following recommendations are designed to address the most exploitative and misleading practices in both the licensed and unlicensed sectors, and to close regulatory gaps that currently allow harms from advertising to persist.

8. End advertising and marketing of the most harmful form of gambling products online, land-based casino (slot) content and an end to cross-selling of products.
9. End all direct marketing, moving beyond the current 'opt in' system as well as inducements such as so-called 'free' bets, free spins and bet boosts.

10. The Government and Gambling Commission must work with social media companies to prevent illegal-market operators from advertising to UK consumers.

**a. Prohibit operators not licensed in the UK from advertising in the UK.**

Illegal, unlicensed operators should not be able to promote their brands through UK sport or media. High-profile examples such as Stake.com's sponsorship of Everton Football Club demonstrate how unlicensed operators currently appear in environments heavily consumed by children and young adults, despite falling outside regulatory oversight.

We note the Government's recent consultation on sports sponsorship. While greater clarity on the application of existing rules is welcome, particularly in relation to unlicensed operators, it is not clear that further consultation is necessary given that the legal position should already prohibit such arrangements. The priority should be ensuring that current regulations are properly understood, consistently interpreted, and effectively enforced.

In the meantime, the regulator should take a more proactive and robust approach to enforcement. This includes fully enforcing the existing ban, seeking additional powers where required, and taking decisive action against both licensed and unlicensed operators that facilitate or profit from illegal-market activity.

**b. Introduce mandatory 'Know Your Customer' (KYC) requirements across the online advertising supply chain.**

If the Government is serious about preventing unlicensed operators from advertising to UK consumers, it is essential that KYC requirements form part of its approach. Applying KYC standards across the digital advertising ecosystem would ensure that all actors are verified, increase transparency over who is profiting from gambling advertising, and prevent unlicensed operators from accessing UK audiences. These checks – already standard practice in sectors such as banking – could be implemented with minimal burden and would significantly strengthen oversight, enforcement, and the integrity of the regulated market.

The Government must act swiftly and decisively. Gambling advertising drives harm, children and young people are particularly vulnerable, and voluntary or self-regulatory measures have consistently failed. As discussed later in this report, other countries have already taken decisive action; the UK must now follow suit. The Government already has the powers necessary to implement the vast majority of these changes without the need for primary legislation, and international experience demonstrates that decisive intervention can reduce exposure and protect public health. A coherent, precautionary, and forward-looking regulatory framework is essential to safeguard individuals and communities, prevent preventable harm, and restore public confidence in the governance of gambling in the UK.

## Evidence Base: The Relationship Between Advertising and Gambling Harm

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*The academic, public health and lived experience evidence establishing a clear relationship between gambling advertising and gambling harm is consistent and compelling. Exposure to gambling advertising increases participation, normalises high-risk behaviour, intensifies frequency of play, and triggers relapse among those already experiencing harm. With the Government having accepted that gambling is a public health issue there is well-established precedent for action on a precautionary basis where commercial promotion poses risks to public health. This has been seen in the regulation of tobacco, alcohol and high-fat, salt and sugar products and the same must now be done for gambling.*

### Advertising leads people to gamble and can cause harm

Gambling Commission (GC) figures show that 2.7% of adults<sup>9</sup> – and, more disturbingly, 1.2% of young people – experienced problem gambling in 2024.<sup>10</sup> Among adults who had gambled in the past 12 months, 1.6% reported relationship breakdown as a result of their own gambling, while 6% admitted to lying to family members about their gambling habits. Taken together, these figures reinforce the strength of the existing evidence base and underline the significant and well-established harms associated with gambling – both to the individual and affected others.

One of the key reasons cited by the previous Government for taking limited action on gambling advertising, marketing and sponsorship was the perceived absence of a clear causal link between advertising and gambling-related harm.

The 2023 White Paper outlined that:

*“The limited high-quality evidence we received shows a link between exposure to advertising and gambling participation, but there was little evidence of a causal link with gambling harms or the development of gambling disorder.”*

This position was reinforced by the former Minister in evidence to a Select Committee session, stating that ‘there’s little evidence to suggest that exposure to advertising alone causes people to enter into gambling harm’.<sup>11</sup>

However, this is largely due to the methodological challenges of investigating causal links between advertising and harm. Controlled experiments are the main methodology for investigating causality, but any contrived laboratory-based experiment will be unable to speak

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<sup>9</sup> Gambling Commission. (2025). *Statistics on gambling participation – Annual report Year 2 (2024): Official statistics*. [online] Available at: <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/statistics-on-gambling-participation-annual-report-year-2-2024-official> [Accessed 4 Feb. 2026].

<sup>10</sup> Gambling Commission. (2025a). *Latest figures on young people and gambling released*. [online] Available at: <https://www.gamblingcommission.gov.uk/news/article/latest-figures-on-young-people-and-gambling-released> [Accessed 4 Feb. 2026].

<sup>11</sup> House of Commons (2023). *Culture, Media and Sport Committee Oral evidence: Gambling regulation*. [online] Available at: <https://committees.parliament.uk/oralevidence/13584/pdf/> [Accessed 4 Feb. 2026].

to advertising's effect in naturalistic environments. Furthermore, any experiment that exposes participants to advertising would be ethically dubious, since it would be putting participants at potential risk of harm.<sup>12</sup>

Despite these challenges, there is a substantial and growing body of evidence demonstrating that gambling advertising has a significant influence on gambling behaviour, propensity to gamble, and the experience of harm. Previous research undertaken by the Gambling Commission found that:

- 34% of British bettors admitted to being influenced by advertising
- 16.3% claimed that advertising caused them to increase their gambling
- An additional 13% said advertising led them to initially take up gambling
- 14.7% said viewing ads resulted in them taking up gambling again after taking a break.<sup>13</sup>

Concerns about the relationship between gambling advertising and harm have also been acknowledged by regulators. In its response to the Conservative's Gambling Review in 2023, the Advertising Standards Authority (ASA) noted:

*"The emerging body of dedicated research explored the impact of advertising on behaviour. In general, it suggests some level of impact on particular groups. Several studies found associations between advertising exposure and the behaviour of problem and at-risk gamblers. Other studies looking at risk factors for different gambling activities identified particular at-risk groups or characteristics such as young men."*<sup>14</sup>

There is already particularly strong evidence supporting regulatory intervention to protect children and young people from gambling advertising, marketing and sponsorship. International studies of comparable countries such as Australia have also testified to this potential harm capacity. A study published in the Addictive Behaviours Report 16 in December 2022 identified gambling advertising as a predictor of at-risk and problem gambling in secondary school children.<sup>15</sup>

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<sup>12</sup> Newall, P., Allami, Y., Andrade, M., Ayton, P., Baker-Frampton, R., Bennett, D., Browne, M., Bunn, C., Bush-Evans, R., Chen, S., Collard, S., De Jans, S., Derevensky, J., Dowling, N., Dymond, S., Froude, A., Goyder, E., Heirene, R.M., Hing, N., . . . Roberts, A. (2023). 'No evidence of harm' implies no evidence of safety: Framing the lack of causal evidence in gambling advertising research. *Addiction*, 119(2). doi:<https://doi.org/10.1111/add.16369>.

<sup>13</sup> Gambling Commission (2021). *Understanding how consumers engaged with gambling advertising in 2020*. [online] Gambling Commission. Available at: <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/understanding-how-consumers-engaged-with-gambling-advertising-in-2020> [Accessed 4 Feb. 2026].

<sup>14</sup> ASA submission to Labour Party review: NHS treatment of gambling addiction. (2018). Available at: <https://www.asa.org.uk/static/uploaded/e0291e74-d97e-421f-a550f4516de2114c.pdf> [Accessed 4 Feb. 2026].

<sup>15</sup> Noble, N., Freund, M., Hill, D., White, V., Leigh, L., Lambkin, D., Scully, M. and Sanson-Fisher, R. (2022). Exposure to gambling promotions and gambling behaviours in Australian secondary school students. *Addictive Behaviors Reports*, [online] 16(16), p.100439. doi:<https://doi.org/10.1016/j.abrep.2022.100439>.

Researchers conducted by Ipsos Mori and the University of Stirling found that 96% of people aged 11-24 had seen gambling marketing messages in the last month and were more likely to gamble as a result. The study also concluded that regular exposure to gambling promotions can shape perceptions and associations of gambling over time and impact the likelihood that young people will gamble in the future.<sup>16</sup>

Exposure among children in the UK is already widespread and deeply concerning. The Gambling Commission's Young People and Gambling Report found that 79% of children recall seeing gambling adverts or promotions, most commonly on television, apps and social media.<sup>17</sup>

Boys are significantly more likely than girls to encounter gambling advertising, with exposure rates of 53% compared to 31% on YouTube, and 57% compared to 37% at sports events. Alarming, 31% of children who saw gambling-related content on social media reported that influencers promoted gambling to them.<sup>18</sup>

Further research from the University of Liverpool highlights the heightened risk associated with gambling at the ages of 17–21, with a particularly high incidence of new cases of problem gambling between the ages of 17 and 20 when gambling becomes legally accessible.<sup>19</sup> This pattern may be linked to long-term exposure and the normalisation of gambling behaviours, often driven by advertising and sponsorship.

### **Government prioritisation of a causal link**

*The Government's prioritisation should not delay action on the basis of establishing a definitive causal link prior to taking action on gambling advertising, marketing and sponsorship. As noted above, there is already an abundance of evidence illustrating the clear link between gambling advertising and harm.*

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<sup>16</sup> Ipsos MORI on behalf of GambleAware (2020). *Final Synthesis Report The impact of gambling marketing and advertising on children, young people and vulnerable adults Final Synthesis Report The effect of gambling marketing and advertising on children, young people and vulnerable adults* Written by Ipsos MORI on behalf of GambleAware. [online] Available at: <https://www.ipsos.com/sites/default/files/ct/publication/documents/2020-03/gambling-marketing-advertising-effect-young-people-final-report.pdf> [Accessed 4 Feb. 2026].

<sup>17</sup> Gambling Commission (2025) Young People and Gambling 2025: Official Statistics. Available at: <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/young-people-and-gambling-2025-official-statistics> [Accessed: 17 February 2026]]

<sup>18</sup> Gambling Commission. (2025c). *Young People and Gambling 2025: Official statistics*. [online] Available at: <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/young-people-and-gambling-2025-official-statistics> [Accessed 4 Feb. 2026].

<sup>19</sup> D. Forrest, I. McHale. Gambling and problem gambling among young adults: Insights from a longitudinal study of parents and children (2018) <https://www.gambleaware.org/our-research/publication-library/articles/gambling-and-problem-gambling-among-young-adults-insights-from-a-longitudinal-study-of-parents-and-children/>

The limitations of establishing causality within social science research have long been well understood and clearly communicated to Government. Indeed, fifty leading academics in the field of gambling advertising research have explicitly challenged what they described as the “misleading framing of the underlying evidence base” implied by this approach. They noted that the purported lack of causal evidence “is simply an absence of evidence due to methodological difficulties inherent to gambling advertising research”.<sup>20</sup> This position has also been acknowledged by Government itself. The previous Gambling Minister observed that “drawing a causal link between the level of advertising and problem gambling is exceptionally difficult to do”.<sup>21</sup>

Dr Heather Wardle, an expert in gambling behaviour at the University of Glasgow, has similarly argued that the expectation on researchers to evidence a clear causal link between advertising and harm sets ‘an impossible standard’. By its very nature, social science research cannot fully meet such a threshold, particularly in complex and multifactorial areas such as gambling-related harm.

Given these inherent difficulties in establishing a causal link, recognised by both the Government and those conducting research, it seems illogical that the Government should refrain from implementing much-needed reform to the advertising, sponsorship, and marketing landscape because of a supposed lack of causal evidence.

Moreover, we have noted that the requirement for a causal link has not served as a precondition for previous decisions to introduce further measures to reduce harm. In 2022, for example, the ASA and Committee on Advertising Practice (CAP) decided to impose tougher content restrictions on gambling and lottery advertisements to prevent potential risks of harm to young people. These measures were adopted on a precautionary basis, responding to research which, in their words, “indicated that regulatory changes could help continue to protect under-18s from gambling-related advertising harms”.<sup>22</sup>

A similar precautionary approach was taken in 2018 with the introduction of robust and life-saving reforms to Fixed-Odds Betting Terminals (FOBTs). Despite significant industry pressure and the availability of alternative measures, the Government acted decisively to reduce the maximum stake to £2. Commenting on the decision, the then Minister observed:

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<sup>20</sup> Newall, P., Youssef Allami, Andrade, M., Ayton, P., Baker-Frampton, R., Bennett, D., Browne, M., Bunn, C., Reece Bush-Evans, Chen, S., Collard, S.B., Steffi De Jans, Derevensky, J.L., Dowling, N.A., Dymond, S., Froude, A., Goyder, E., Heirene, R., Hing, N. and Liselot Hudders (2023). ‘No evidence of harm’ implies no evidence of safety: Framing the lack of causal evidence in gambling advertising research. *Addiction*. [online] doi:<https://doi.org/10.1111/add.16369>.

<sup>21</sup> House of Commons (2023). *Culture, Media and Sport Committee Oral evidence: Gambling regulation*. [online] Available at: <https://committees.parliament.uk/oralevidence/13584/pdf/> [Accessed 4 Feb. 2026].

<sup>22</sup> Practice, A.S.A. | C. of A. (2022). *New content restrictions on gambling and lotteries ads*. [online] [www.asa.org.uk](http://www.asa.org.uk). Available at: <https://www.asa.org.uk/news/new-content-restrictions-on-gambling-and-lotteries-ads.html> [Accessed 4 Feb. 2026].



*“When faced with the choice of halfway measures or doing everything we can to protect vulnerable people, we have chosen to take a stand.”<sup>23</sup>*

In contrast, the previous Government’s preoccupation with establishing a clear causal link between advertising and harm has served to unnecessarily delay the introduction of much-needed reforms to gambling advertising. Instead, a consistent and coherent regulatory approach should be adopted, with changes to gambling advertising, marketing and sponsorship implemented on the same precautionary basis that has previously been accepted to protect individuals from the risks of harm.

The Government’s recent decision to introduce a ban on junk food advertising to children – explicitly on public health grounds and in recognition of the cumulative impact of advertising exposure – demonstrates that such a precautionary approach is both possible and politically deliverable. Against this backdrop, the continued liberal treatment of gambling advertising increasingly appears to be the outlier in the UK’s wider public health and consumer protection framework.

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<sup>23</sup> Department for Digital, Culture, Media & Sport (2018). *Government to cut Fixed Odds Betting Terminals maximum stake from £100 to £2*. [online] GOV.UK. Available at: <https://www.gov.uk/government/news/government-to-cut-fixed-odds-betting-terminals-maximum-stake-from-100-to-2> [Accessed 4 Feb. 2026].

## **Regulatory Failure: The Inability of the UK to Successfully Prevent Harmful Advertising**

*The current model of reliance on industry self-regulation has not reduced harmful exposure to advertising and has allowed advertising intensity to expand across broadcast, digital and sports environments.*

*Self-regulatory codes and the industry's own voluntary codes have proved insufficient to protect children and other groups, while enforcement remains piecemeal. Meanwhile, several European countries have adopted more precautionary restrictions on sponsorship, inducements and broadcast promotion. The evidence is clear: the existing system is not fit for purpose, and a new regulatory framework is required to meaningfully reduce harm.*

### **The insufficiency of self-regulation during sports**

*Rather than introducing stronger regulation to reduce gambling-related harm, both the current and previous Governments have relied heavily on models of industry self-regulation to deliver on harm reduction objectives. The insufficiency of this approach is a matter on which both the GRAPPG and PGR has engaged with Government on numerous occasions. A particularly clear example can be seen in the regulation of gambling marketing around the Premier League, where successive self-regulatory measures have failed to reduce exposure or meaningfully protect children and other vulnerable groups.*

An annual research series conducted by the University of Bristol between 2023<sup>24</sup> and 2025<sup>25</sup> examined gambling marketing during the opening weekends of the Premier League. Across three consecutive studies using consistent methodology, the findings show clear and repeated failures of self-regulation.

In response to mounting public concern and growing evidence of excessive exposure to gambling marketing the Premier League, The English Football League, the Women's Super League (the 'Competitions') and The FA agreed to a new Code of Conduct for Gambling Related Agreements in Football to be applied across all of professional football and those matches played by clubs who are members of the Competitions in 2024.<sup>26</sup> However, the University of Bristol's subsequent studies found that, rather than reducing exposure, gambling marketing remained pervasive and, in several respects, worsened after the introduction of the Code of Conduct and other self-regulatory measures:

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<sup>24</sup> Rossi, R., Wheaton, J., Moxey, M., and Tozzi, E. (2023). New season, more self-regulation, more marketing. Available at: <https://www.bristol.ac.uk/media-library/sites/business-school/documents/BRISTOL-UNI-GAMBLING-Report2023-2.pdf>

<sup>25</sup> Rossi, R., Moradipour, S., Wheaton, J., Lin, R., and Moxey, M., (2025). Gambling marketing and the Premier League: Continued saturation and failed self-regulation. Available at: <https://www.bristol.ac.uk/media-library/sites/business-school/documents/EPL%20Premier%20League%20Report%202025.pdf>

<sup>26</sup> Segal, M. (2024). *Code of Conduct for Gambling Related Agreements in Football (the 'Code')*. [online] Premier League. Available at: <https://resources.premierleague.com/premierleague/document/2024/07/24/9bb99b06-fedd-40ea-821e-cb3d5d271628/Code-of-Conduct-for-Gambling-Related-Agreements-in-Football-190724.pdf> [Accessed 4 Feb. 2026].

1. The research found that the **Sponsorship Code of Conduct** has failed to reduce exposure or ensure meaningful compliance with its own principles. In 2023, before the Code was introduced, the University of Bristol recorded 10,999 gambling messages during the Premier League opening weekend. By 2025, after the Code had come into force, this had risen to 27,440 messages. including 21,815 during live match broadcasts alone, equivalent to 12.6 gambling messages per minute of coverage<sup>27</sup>. Crucially, the research found that the Code also failed in one of its clearest stated aims: preventing sponsorship arrangements with unlicensed operators. Despite this, 8.6% of gambling messages in live broadcasts and 12.1% on Sky Sports News promoted operators without a UK licence. In addition, responsible gambling messaging remained far below expectations, appearing in only 12.1% of televised gambling ads.
2. The research found that the so-called “**whistle-to-whistle**” ban is vastly inefficient as it is too narrow by design and does not reflect how gambling marketing operates in sport. Introduced in 2019 to limit advertising before 9pm, the policy applies only to TV commercials, while leaving dominant formats such as pitch side hoardings, shirt sponsorship, and stadia branding unaffected. As a result, the majority of exposure remains untouched – such as up to 52.3% of gambling logos being on pitch-side hoardings<sup>28</sup>. In 2025, 13,262 gambling messages – 60.79% of all messages recorded during live broadcasts<sup>29</sup> – occurred during the restricted period, demonstrating that the policy is easily circumvented and ineffective in practice.
3. The research found that the forthcoming **front-of-shirt sponsorship** ban will have only a limited effect on overall exposure. Due to come into effect at the end of the 2025/26 season, the ban aims to reduce the visibility of gambling brands on players’ shirts, However, research shows that front-of-shirt sponsorship accounts for only a small proportion of total exposure. In 2025, such placements represented just 9.66%<sup>30</sup> of all gambling messages recorded during broadcasts, whilst research by Torrance et al. (2023)<sup>31</sup> found that it accounts for just 6.9%.

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<sup>27</sup> Rossi, R., Moradipour, S., Wheaton, J., Lin., R., and Moxey, M., (2025). Gambling marketing and the Premier League: Continued saturation and failed self-regulation. Available at: <https://www.bristol.ac.uk/media-library/sites/business-school/documents/EPL%20Premier%20League%20Report%202025.pdf>

<sup>28</sup> Newall, P., Torrance, J. and Heath, C. (2023). *Gambling, cryptocurrency, and financial trading sponsorship in high-level men’s soccer leagues: An update for the 2023/2024 season*. *Gaming Law Review*. [online] University of Bristol. Available at: [https://research-information.bris.ac.uk/ws/portalfiles/portal/381504461/Torrance\\_et\\_al\\_2023\\_GLR.pdf](https://research-information.bris.ac.uk/ws/portalfiles/portal/381504461/Torrance_et_al_2023_GLR.pdf) [Accessed 6 Feb. 2026].

<sup>29</sup> Rossi, R., Moradipour, S., Wheaton, J., Lin., R., and Moxey, M., (2025). Gambling marketing and the Premier League: Continued saturation and failed self-regulation. Available at: <https://www.bristol.ac.uk/media-library/sites/business-school/documents/EPL%20Premier%20League%20Report%202025.pdf>

<sup>30</sup> Rossi, R., Moradipour, S., Wheaton, J., Lin., R., and Moxey, M., (2025). Gambling marketing and the Premier League: Continued saturation and failed self-regulation. Available at: <https://www.bristol.ac.uk/media-library/sites/business-school/documents/EPL%20Premier%20League%20Report%202025.pdf>

<sup>31</sup> Torrance, J., Heath, C., Andrade, M. and Newall, P. (2023). *Gambling, cryptocurrency, and financial trading app marketing in English Premier League football: a frequency analysis of in-game logos*. [online] Osf.io. Available at: [https://osf.io/preprints/osf/uv974\\_v1](https://osf.io/preprints/osf/uv974_v1) [Accessed 4 Feb. 2026].

Dr Raffaello Rossi, Senior Lecturer in Marketing and Co-Director of the Bristol Hub for Gambling Harms Research concluded:

*“The evidence is overwhelming: self-regulation has failed. Voluntary codes are protecting profits, not fans.”<sup>32</sup>*

Policy	Intended aim	2025 findings
<b>Sponsorship Code of Conduct (introduced in 2024)</b>	Limit overall gambling exposure to children and vulnerable groups	27,440 messages, nearly 3x higher than 2023
	Restrict sponsorship agreements to UK licensed operators only	8.6% of TV ads and 12.1% on Sky Sports News promoted unlicensed operators
	Ensure substantial share of responsible gambling messages	Only 12.1% carried harm reduction messages (vs 20% target set by the gambling industry)
<b>Front-of-shirt ban (commencing 2026/27)</b>	Reduce exposure to gambling marketing by removing front-of-shirt sponsorships	Front-of-shirt accounts for only 9.6% of total exposure; ban will have limited effect.
<b>Whistle-to-Whistle Ban</b>	Reduce exposure to gambling marketing during live play.	13,262 messages occurred during the restricted periods, rendering the policy ineffective.

### The UK is behind other European countries in regulating gambling advertising

*In response to similar rising levels of gambling advertising, marketing and sponsorship, a growing number of European countries have introduced significant restrictions – often despite having more limited academic evidence than is available in the UK to inform policy decisions. The Netherlands, for example, has imposed stringent restrictions, while Belgium, Spain, and Italy have implemented far-reaching bans on gambling marketing and sponsorship. In addition,*

<sup>32</sup> Bristol.ac.uk. (2025). *October: Premier League gambling ads | News and features | University of Bristol.* [online] Available at: <https://www.bristol.ac.uk/news/2025/october/premier-league-gambling-ads-2025.html> [Accessed 6 Feb. 2026].

*some jurisdictions have never permitted widespread gambling advertising at all, reflecting a longstanding precautionary approach to consumer protection. Such measures are becoming the norm and considered standard practice in Europe; however, Great Britain remains a notable exception.*

A comparative study conducted by the University of Bristol examining Italy, Spain, Germany, the Netherlands, Belgium and Australia found that, with the exception of Australia, all of the countries reviewed had recently introduced new restrictions on the marketing of gambling products.<sup>33</sup>

However, since the publication of the study mentioned above, Australian Prime Minister, Anthony Albanese, has now declared that the government would be taking “strong and decisive actions” to curb gambling advertisements and plans to introduce wide-ranging restrictions aimed at protecting children and vulnerable groups.<sup>34</sup> A recent report published by the Office of Impact Analysis (OIA) suggests that the proposed partial ban in Australia would only reduce the amount that bettors wagered by only 0.8% each year.<sup>35</sup> Furthermore, even a comprehensive ban on gambling advertising would reduce overall wagering by just 1.4%,<sup>36</sup> indicating that concerns about disproportionate economic impact are regularly overstated and should be used to prevent necessary reforms.

In each of these jurisdictions, the University of Bristol study found that the decision to regulate gambling marketing was an explicit political choice, underpinned by the introduction of significant primary legislation. In each case, governments presented a clear public health argument that increased gambling participation had led, or would lead to, increased harm, and that the promotion of gambling risked normalising the activity for children and young people. On this basis, limits were placed on how gambling could be advertised and promoted.

Recent developments in the Netherlands further illustrate this trend. The country’s new minority government has set out plans to move towards a comprehensive ban on gambling advertising and consider restrictions on the total number of online gambling licences permitted in the market. In its agreement, published on 30<sup>th</sup> January, the three-party coalition

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<sup>33</sup> Wilson, J., Rossi, R., Bransden, N., Amos, M. and Sakis, P. (2024). *Drivers of Gambling Marketing Restrictions - An International Comparison*. [online] Available at: <https://www.gambleaware.org/media/bjgev1hx/drivers-of-gambling-marketing-restrictions-an-international-comparison-v3.pdf> [Accessed 6 Feb. 2026].

<sup>34</sup> Prime Minister of Australia. (2026). Strong action to tackle gambling harms. [online] Available at: <https://www.pm.gov.au/media/strong-action-tackle-gambling-harms> [Accessed 9 Apr. 2026].

<sup>35</sup> Pmc.gov.au. (2026). Wagering Advertising Reforms | The Office of Impact Analysis. [online] Available at: <https://oia.pmc.gov.au/published-impact-analyses-and-reports/wagering-advertising-reforms> [Accessed 9 Apr. 2026].

<sup>36</sup> Pmc.gov.au. (2026). Wagering Advertising Reforms | The Office of Impact Analysis. [online] Available at: <https://oia.pmc.gov.au/published-impact-analyses-and-reports/wagering-advertising-reforms> [Accessed 9 Apr. 2026].

government adopted a notably firm stance on gambling, explicitly drawing parallels to sex work in the country.

	Germany	Belgium	Italy	Spain	The Netherlands	GB
Sponsoring (sports)	✓	✓	✗	✗	✗	✓
Commercials during sport broadcasts	✗	✗	✗	✗	✗	✓
Public posters	✓	✗	✗	✗	✗	✓
Online advertising	✗	✗	✗	✗	✗	✓
TV & Radio advertising	✗	✗	✗	✗	✗	✗
Social media influencers	✗	✗	✗	✗	✗	✓
Targeted Ads	✓	✗	✗	✗	✗	✓

✗ = Banned    ✓ = Permitted    ✗ = Permitted with limitations

Source: Rossi & Ipsos, 2024

## Examples of Regulatory Failure

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*As the current regulatory system has failed to constrain harmful advertising effectively, the market has evolved in ways that increase risk and reduce accountability. Regulatory gaps have enabled the growth of practices such as loot boxes, content and influencer marketing, affiliate ecosystems, and new hybrid forms of gambling that blur the boundaries between gaming, entertainment and betting.*

*These developments are symptoms of a system that permits innovation without adequate safeguards. The proliferation of such models demonstrates that the existing framework is unable to anticipate, prevent or respond to emerging harms.*

### **Content marketing and the failure of current advertising, sponsorship, and marketing codes**

Content marketing now accounts for around half of all organic social media advertising by gambling brands. Unlike conventional advertising, content marketing does not directly ask audiences to gamble, but instead uses entertaining, humorous, or emotionally engaging posts to build positive connections with a brand without explicitly telling consumers to act. In *Priming Young Minds*, Rossi and Nairn<sup>37</sup> reported research with 653 participants, including 210 children aged 11-17, and found that gambling content marketing was four times more appealing to children than to adults, while also being much less likely to be recognised as advertising. Research has shown that, within a single weekend, the ten largest betting operators generated over 20 million views through content marketing on social media, making it one of the most prolific and effective forms of gambling advertising in the UK.<sup>38</sup> It is precisely this scale, reach and effectiveness that makes the regulation of gambling content marketing so urgent.

Researchers at the University of Bristol, the GRAPPG, PGR and many others have been raising concerns about content marketing practices for several years. Yet, despite repeated evidence submissions, parliamentary debates, media investigations, and even repeated mentions of the issue in Parliament, the ASA has not published a single substantive ruling, or intervened meaningfully, in relation to gambling content marketing.

The timeline of inaction is stark. Concerns were first raised in 2019, reinforced by the Ipsos synthesis report in 2020, and have since been supported by a succession of peer-reviewed academic studies, major media exposés, repeated correspondence from parliamentarians, and multiple parliamentary debates.<sup>39</sup> The University of Bristol alone has reported over 150

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<sup>37</sup> Rossi, R., & Nairn, A. (2024). *Priming young minds: The appeal of gambling advertising to children and young people*. Available at: <https://psycnet.apa.org/record/2024-79219-008>

<sup>38</sup> Rossi, R, Wheaton, JJ, Moxey, M, Moradipour, S, Tozzi, E & Singer, J (2024). *Gambling Marketing and the Premier League: The Continued Failure of Industry Self-Regulation*. University of Bristol. [Accessed 6 Feb. 2026].

<sup>39</sup> Smith, J. (2019). *Biddable Youth Sports and esports Gambling Advertising on Twitter: Appeal to Children, Young & Vulnerable People*. [online] Available at: [https://www.bristol.ac.uk/media-library/sites/news/2019/aug/D1261\\_Home\\_DEMOS\\_Management%20report\\_2019\\_web.pdf](https://www.bristol.ac.uk/media-library/sites/news/2019/aug/D1261_Home_DEMOS_Management%20report_2019_web.pdf) [Accessed 6 Feb. 2026].

examples of gambling content marketing to the ASA since 2021. The ASA has acknowledged many of these cases, and on several occasions confirmed that investigations were underway, yet no rulings or outcomes have been delivered.

In correspondence dated 15th August 2025, the ASA promised that “rulings were imminent.” Shortly afterwards, complainants were informed that the rulings had to be “delayed”. This investigation had been underway for a year at this point. More recently, the ASA confirmed investigations into Bet365, Ladbrokes and Betfred content marketing advertisements published in 2024, even circulating draft rulings that suggested clear breaches. This pattern of delay is not new. In October 2021, when Channel 4’s Joe Lycett’s Got Your Back highlighted gambling content marketing aimed at children, the ASA publicly promised action at that point, stating:

*“People are concerned about children seeing inappropriate gambling ads and some of these examples do appear to break the rules. (...) We are reviewing this content now and will take further action, including sanctions, if appropriate.”*<sup>40</sup>

Despite this assurance, no ruling or sanction has followed.

Beyond this pattern of delay and broken commitments in relation to content marketing, the GRAPPG and PGR are especially troubled by the ASA’s admission that, until September 2025, hundreds of thousands of social media marketing posts from the majority of major gambling brands were considered outside their remit because the companies were registered abroad. This regulatory loophole – previously highlighted by ourselves and other stakeholders over many years – has allowed the bulk of gambling advertising on social media (including content marketing) to escape their scrutiny altogether.

Although the CAP Code has now been amended to close this loophole, this change came only after years during which children and young people were exposed to gambling advertising that was effectively unregulated. The ASA owes stakeholders clear answers: what took them so long to close this loophole, why warnings from parliamentarians, researchers and charities were not acted on earlier, and how they intend to learn from these failures to ensure similar regulatory gaps do not persist in the future.

Compounding this, the ASA’s position on gambling content marketing has also been marked by inconsistency ever since 2019. Initially arguing that content marketing was entirely out of remit,<sup>41</sup> only to then reverse this view in 2022 by declaring that “the vast majority” of gambling

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<sup>40</sup> Channel 4 Entertainment (2021). *Joe Lycett Calls Out Paddy Power’s DANGEROUS Ads | Joe Lycett’s Got Your Back | Channel 4*. [online] YouTube. Available at: <https://www.youtube.com/watch?v=Kx-gaES3Lm8> [Accessed 6 Feb. 2026].

<sup>41</sup> Andrew Taylor (2019). *Gambling-and-children-update-response-to-GambleAware*. [online] [www.asa.org.uk](http://www.asa.org.uk). Available at: <https://www.asa.org.uk/static/c389c59b-8d64-4f39-affbd93dca42df6/Gambling-and-children-update-response-to-GambleAware.pdf> [Accessed 6 Feb. 2026].

content marketing is within remit.<sup>42</sup> Yet, when presented with specific examples since, it has continued to rule many of them out of remit - including, most recently, 20 Midnite advertisements reported on by ITV.<sup>43</sup>

More recently, the ASA has relied on the “directly connected” test, under which only posts with a clear relation to the product or service are deemed advertising. But this logic completely undermines the concept of content marketing itself. If content marketing openly promotes betting or gambling, then it ceases to be content marketing and is simply conventional advertising. By applying this test, the ASA excludes precisely the type of marketing it had previously admitted constitutes the vast majority of cases, leaving around half of gambling marketing on social media outside their remit.

A recently published study shared with the GRAPPG and PGR furthers the evidence on how strongly appealing content marketing is to kids, whilst being less recognisable than conventional social media advertisements. Gambling content marketing was found to be **four times more** appealing than traditional adverts, and only 7% of participants correctly identified it as ‘advertising’, according to a study using biometric testing with 58 children aged 11–17. Crucially, educational interventions, such as programmes delivered by organisations like YGAM, had no significant impact on reducing the appeal or improving recognition of content marketing.<sup>44</sup>

We have now reached a point where further delay is indefensible. Experts increasingly recommend that gambling content marketing should be banned, given its particular appeal to children and not being clearly recognisable as advertising – as demonstrated above. At the very least, communication from gambling brands on social media should carry a prominent “Advertising” label so that users can clearly distinguish it. Researchers and parliamentarians alike have tried exhaustively to convince the ASA of these basic steps, but we have failed. Time is now running out.

There is also growing evidence that existing codes are failing even within their stated scope. During the assessment of gambling messages in the opening weekend of the 2023/24 Premier League season, for example, it was observed that 92% of content marketing advertisements shared by major gambling brands were not clearly identifiable as advertising, thus breaching codes established by the ASA.<sup>45</sup> If confidence cannot be placed in the consistent and effective

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<sup>42</sup> Practice, A.S.A. | C. of A. (2022b). *Remit statement: ‘content marketing’ for gambling products online*. [online] [www.asa.org.uk](http://www.asa.org.uk). Available at: <https://www.asa.org.uk/news/remit-statement-content-marketing-for-gambling-products-online.html> [Accessed 6 Feb. 2026].

<sup>43</sup> Abbey, J. (2025). *Online gambling firm Midnite accused of breaking rules banning adverts that appeal to children*. [online] ITV News. Available at: <https://www.itv.com/news/2025-06-18/gambling-firm-accused-of-breaking-rules-banning-adverts-appealing-to-children> [Accessed 6 Feb. 2026].

<sup>44</sup> Rossi, R., E. Tozzi, and A. Nairn. 2026. “Cognitive Overload and Emotional Arousal: Why Gambling Content Marketing Appeals to Children and Resists Established Educational Interventions.” *Psychology & Marketing* 0: e70122. <https://doi.org/10.1002/mar.70122>.

<sup>45</sup> [www.bristol.ac.uk](http://www.bristol.ac.uk). (2023). *September: Premier League football gambling advertising | News and features | University of Bristol*. [online] Available at: <https://www.bristol.ac.uk/news/2023/september/premier-league-football-gambling-advertising.html> [Accessed 6 Feb. 2026].

application of existing codes to address known and well-documented harms, there is little hope to believe that they will be capable of regulating future developments in gambling advertising.

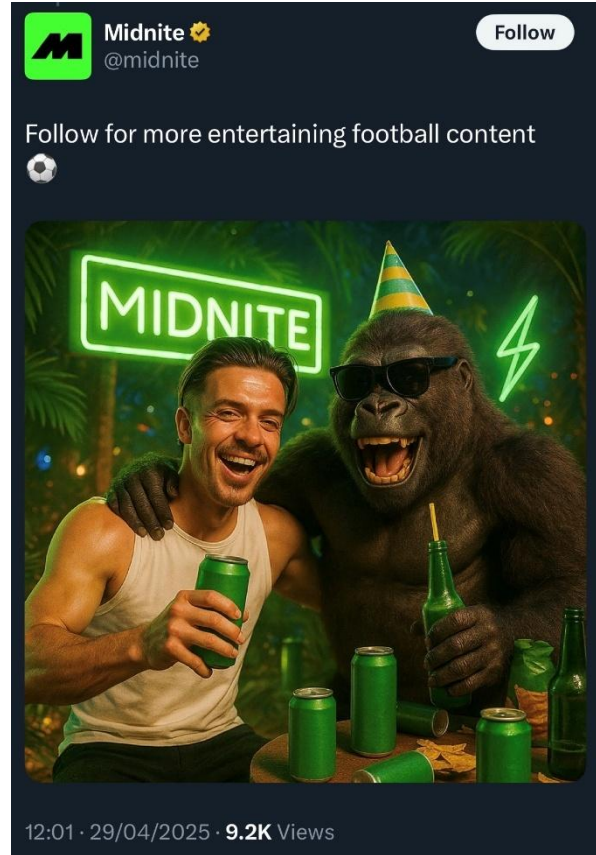
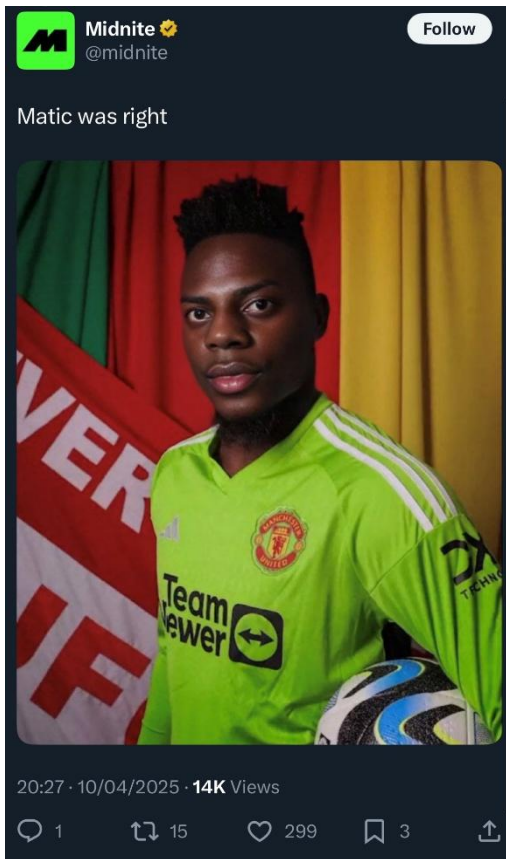
The inability of pre-existing codes to keep pace with the changing advertising and marketing landscape is another area of great concern. Social media now sits at the heart of the gambling industry's marketing strategy, yet current rules remain rooted in an outdated, offline model. Leading researchers have therefore called for new online-specific advertising regulations<sup>46</sup>. The scale of the problem is clear: in the opening weekend of the 2023/24 Premier League Season, conducted by the University of Bristol, it was found that the social media accounts of the 10 largest betting companies made over 34 million 'impressions' – meaning how many times the advertisement is seen – via social media in just a single weekend.<sup>47</sup>

To illustrate these concerns, we have included two notable examples below that demonstrate the strong appeal of gambling content marketing to children and young people, particularly through the use of celebrities and high-profile personalities. However, these examples represent only a small snapshot of a systemic issue. Researchers have identified hundreds of similar cases across platforms, underlining that this is not an isolated problem, but a universal feature of how gambling is now promoted online.

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<sup>46</sup> Rossi, R., & Nairn, A. (2024). Navigating the digital age: The need for online-specific gambling marketing regulations. Available at: <https://psycnet.apa.org/record/2025-11680-012>

<sup>47</sup> Rossi, R, Wheaton, JJ, Moxey, M & Tozzi, E (2023). *New Season, More Self-Regulation, More Marketing. The Prevalence of Gambling Adverts during the Opening Weekend of the English Premier League 2023/2024*. University of Bristol. <https://www.bristol.ac.uk/media-library/sites/business-school/documents/BRISTOL-UNI-GAMBLING-Report2023-2.pdf> [Accessed 6 Feb. 2026].



### Loot boxes

Recent academic studies have examined the relationship between engagement with loot boxes in video games and subsequent participation in more conventional forms of gambling. Research conducted by Brooks and Clark (2023) and by González-Cabrera et al. (2023) explored this relationship over six-month periods, analysing young adult video gamers and adolescent players respectively. Both studies found a clear association between loot box engagement and later gambling behaviour. Brooks and Clark (2023) concluded that “loot box use predicted gambling initiation six months later”,<sup>48</sup> while González-Cabrera et al. (2023) similarly found “a positive relationship between the purchase of loot boxes and online gambling six months later”.<sup>49</sup>

However, randomised reward mechanics extend beyond loot boxes to include other widely used systems such as Gacha, where players pay for chance-based rewards in digital games.

<sup>48</sup>Brooks, G.A. and Clark, L. (2023). The gamblers of the future? Migration from loot boxes to gambling in a longitudinal study of young adults. *Computers in Human Behavior*, [online] 141, p.107605. doi:https://doi.org/10.1016/j.chb.2022.107605.

<sup>49</sup> González-Cabrera, J., Basterra-González, A., Ortega-Barón, J., Caba-Machado, V., Díaz-López, A., Pontes, H.M. and Machimbarrena, J.M., 2023. Loot box purchases and their relationship with internet gaming disorder and online gambling disorder in adolescents: A prospective study. *Computers in Human Behavior*, 143, p.107685.

Similar mechanics also appear in physical consumer products - such as blind boxes and trading card packs - popular among children and young people and increasingly subject to regulation in jurisdictions including Singapore.

Further research has highlighted concerns around the monetisation and tradability of loot box rewards. Studies led by Dr Leon Xiao (2024) examined the ability of players to “cash out” loot box prizes via the Steam Community Market – a platform that allows users to buy and sell games and other digital items.<sup>50</sup> Of the 135 game entries analysed, 35 were identified as “offering loot boxes that would be illegal according to the gambling regulator’s interpretation of current gambling law”. Of these, 32 games were found to contain “transferable” loot boxes, meaning both the loot box and its contents could be traded or sold.

Despite this growing evidence base, the previous Conservative Government chose to rely on industry-led protections rather than legislative reform of the Gambling Act 2005 to regulate loot boxes. In July 2023, UK Interactive Entertainment (UKIE) published a set of principles and guidance on loot boxes, described as being “designed to meet UK Government objectives to improve protections for all players”.<sup>51</sup>

However, the credibility of this self-regulatory approach has since been significantly undermined. Several members of the DCMS-convened working group responsible for developing these voluntary measures have subsequently been found to have breached advertising rules, as ruled by the Advertising Standards Authority (ASA). Alarming, such breaches continued as recently as November 2025, calling into question the effectiveness and integrity of the self-regulatory framework.

Evidence also suggests widespread non-compliance with existing disclosure requirements. Research published in the *Journal of Behavioural Addictions* found that only 8.4% of 394 popular mobile, console and PC games containing loot boxes correctly disclosed their presence in advertisements shown in the United Kingdom.<sup>52</sup>

While the ASA has occasionally taken action against major companies for non-compliance, enforcement is frequently pursued through informal resolution. This approach lacks transparency and carries no meaningful consequences, failing to deter repeat breaches or drive systemic change.

At present, there also appears to be a clear regulatory gap between the respective roles and responsibilities of the ASA and the Gambling Commission. Neither regulator has taken

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<sup>50</sup> Xiao, L. Y. and Henderson, L. L. (2024) ‘Illegal video game loot boxes with transferable content on steam: a longitudinal study on their presence and non-compliance with and non-enforcement of gambling law’, *International Gambling Studies*, 24(3), pp. 498–524. doi: 10.1080/14459795.2024.2390827.

<sup>51</sup> UKIE. (2023). *New loot box principles agreed by industry - Ukie*. [online] Available at: <https://ukie.org.uk/news/new-loot-box-principles-agreed-by-industry> [Accessed 6 Feb. 2026].

<sup>52</sup> Xiao, L.Y., Deery, C., Petrovskaya, E., Park, S., & Newall, P. (2025). Widespread illegal video game advertising in the UK and South Korea: Many adverts not disclosing loot box presence found using Meta’s ad repository. *Journal of Behavioral Addictions*. doi: 10.1556/2006.2025.00057

effective ownership of enforcement in cases where loot box practices may breach consumer protection or gambling law. This lack of regulatory clarity and coordination has allowed potentially harmful practices to persist unchecked.

### **Direct marketing**

As set out in the Gambling White Paper, new Gambling Commission rules to improve consumer choice on direct marketing came into force on 1<sup>st</sup> May 2025. Remote operators are now required to provide all new and existing customers with clear opt-in options for direct marketing on a per product and per channel basis. These new rules do not apply to land-based gambling and lottery operators due to the focus being on remote gambling marketing and the significant complexities faced by land-based and lottery operators to develop such tools.

More recently, the Gambling Commission set out its plans to ensure that incentives such as free bets and bonuses are constructed in a socially responsible manner and do not encourage excessive or harmful gambling. From 19<sup>th</sup> December 2025, operators were banned from the mixing of products within individual incentives and will be limited to applying wagering requirements to a maximum of 10 times.

A recent study by Rockloff et al. (2026) employed a novel and robust methodology to examine the causal impact of direct marketing. Participants were asked to report their actual betting behaviour over a two-week period. One group continued as normal, while another group completed the same surveys after opting out of receiving direct marketing offers from their active gambling accounts. The study found significant reductions in the number of bets placed, total amounts wagered and reported harm over the two-week period.<sup>53</sup>

This evidence further undermines the suggestion that existing regulatory measures are sufficient. Both the GRAPPG and PGR have long argued that direct marketing represents a particularly high-risk form of gambling promotion and that voluntary opt-outs and partial restrictions do not go far enough. The growing body of evidence, now including robust causal findings, demonstrates that stronger action is required to meaningfully reduce gambling-related harm.

### **Advertising of emerging forms of gambling**

*Looking ahead, significant work is needed to ensure that both current and future regulatory frameworks can deliver effective harm reduction. It is clear that the existing landscape remains woefully ill-equipped to address the challenges posed not only by traditional gambling advertising, but also by the promotion and marketing of new and rapidly emerging forms of gambling.*

Both groups have heard evidence relating to the increasing popularity of new and emerging forms of gambling activity such as crypto-casinos, and the growing sponsorship, advertising,

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<sup>53</sup> Rockloff M, Browne M, Hing N, Russell AMT, Rawat V, Newall P. Direct gambling marketing, direct harm: A randomised experiment. *Addiction*. 2026. <https://doi.org/10.1111/add.70369>

and marketing of this form of gambling activity via online livestreams and celebrity endorsements on platforms such as Twitch and Kick. A recent Bloomberg Businessweek investigation, which analysed hundreds of hours of livestreamed gameplay featuring high-profile ambassadors like Drake and Adin Ross, found that they appeared to record unusually frequent “big wins” compared with other players on the same platform<sup>54</sup>. This raises serious concerns that such broadcasts may give misleading impressions of the likelihood of winning and blur the line between entertainment and promotional content.

Of particular concern is evidence that many of those promoting these platforms actively showcase the ease with which illegal operating sites could be accessed by the public. Notably, these sites are devoid of even the most basic consumer protections, including limits on spin speeds and staking levels, and therefore present a heightened risk of harm.<sup>55</sup>

Statistics produced as part of an investigation by Sky News showed that websites hosting these livestreams were accessed more than 80,000 times from UK-based devices in August 2023 alone<sup>56</sup>, indicating that significant numbers of individuals are being exposed to unregulated and high-risk gambling activity. While precise figures and user demographics are difficult to establish – particularly due to the use of Virtual Private Networks (VPNs) – we remain deeply concerned that this form of gambling is especially accessible and appealing to children and young people.

This evidence underlines the urgent need for a regulatory framework that is sufficiently agile, robust and forward-looking to address both existing and emerging gambling products and their promotion, rather than continuing to lag behind developments in the market.

### **Advertising in children’s video games**

The GRAPPG and PGR remain deeply concerned by the targeting of children with gambling advertising within video and online games that are explicitly rated as suitable for those under the age of 18. In January 2025, iNews reported that children using some of the most popular free-to-play mobile games available through the Apple App Store were being exposed to gambling advertising.<sup>57</sup> The investigation identified promotions from operators including Unibet and Tombola being displayed to users while playing games rated as low as PEGI 3.

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<sup>54</sup> D’Anastasio, C., Solon, O. and Yin, L. (2026). Drake, Adin Ross Have Unusual Win Rates at Crypto Casino Stake. [online] Bloomberg.com. Available at: <https://www.bloomberg.com/features/2026-stake-drake-crypto-casino-adin-ross-gambling/>

<sup>55</sup> Andrade, M., Sharman, S., Xiao, L.Y., & Newall, P.W.S. (2022). Safer gambling and consumer protection failings among 40 frequently visited cryptocurrency-based online gambling operators. *Psychology of Addictive Behaviors*. doi: 10.1037/adb0000885

<sup>56</sup> Burgess, S. (n.d.). ‘I lost half-a-million dollars, but I kept playing’: Inside the new online gambling craze. [online] Sky News. Available at: <https://news.sky.com/story/from-drake-to-fake-money-inside-the-wild-world-of-crypto-casinos-12964330> [Accessed 6 Feb. 2026].

<sup>57</sup> Burgess, S. (2025). *Mobile games Bus Out and Supermarket Simulator push gambling ads to kids*. [online] The i Paper. Available at: <https://inews.co.uk/news/mobile-games-bus-out-supermarket-simulator-gambling-ads-kids-3497198> [Accessed 6 Feb. 2026].

Although the Advertising Standards Authority (ASA) has since launched an investigation into the matter, we remain concerned by the slow pace of its decision-making processes, the lack of any action on this matter, as well as by the lack of clarity surrounding the scope of its remit and enforceability of its rulings.

It is unlawful for individuals under the age of 18 to participate in gambling activities. It is therefore wholly unacceptable, and fundamentally inconsistent with licensing conditions and the stated objectives of gambling regulation, that gambling operators are able to deliver targeted advertising to children within games that are explicitly rated as appropriate for young audiences.

### **Advertising of illegal gambling**

As the gambling industry evolves, it is right that regulators and policymakers remain vigilant to the risks posed by the illegal market. Recent analysis by Yield Sec suggests that illegal operators now account for around 9% of the online betting market, up from 2% in 2022.<sup>58</sup> The illegal sector comprises roughly 700 unlicensed operators promoted by more than 1,600 affiliates, compared with 2,000 licensed operators and nearly 7,000 affiliates in the regulated market.

However, much of this growth appears to be driven not by widespread migration from licensed operators, but by unlicensed sites deliberately targeting self-excluded individuals and under-18s. In particular, many of these operators explicitly market themselves as being “not on GAMSTOP”, directly appealing to individuals who have taken steps to restrict their own gambling and are therefore among the most vulnerable to harm.

In practice, the vast majority of gamblers in Great Britain continue to use regulated operators. Those who turn to illegal operators typically do so as a last resort and are often individuals already experiencing severe harm or attempting to circumvent self-exclusion as outlined above.

Both the GRAPPG and PGR have been notified of existing concerns over the Gambling Commission’s ability to appropriately tackle the illegal market. Therefore, we welcome the additional £26 million awarded to the Commission to strengthen its ability to tackle illegal gambling. This investment should enhance compliance activity, enforcement capability, and data infrastructure, and it is no doubt an important step in disrupting unlicensed operators.

That said, while addressing the illegal market is essential, its scale is frequently overstated in an attempt to distract from the far greater and better-evidenced harms occurring within the regulated sector. Licensed operators still dominate the market, and most gambling-related harm originates within that regulated environment.

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<sup>58</sup> Barber, B. (2025). *Welcome To Zscaler Directory Authentication*. [online] Racingpost.com. Available at: [https://www.racingpost.com/news/britain/black-market-gambling-increases-by-345-per-cent-according-to-shocking-new-report-aCkcD3V4UvxE/?utm\\_source=copilot.com](https://www.racingpost.com/news/britain/black-market-gambling-increases-by-345-per-cent-according-to-shocking-new-report-aCkcD3V4UvxE/?utm_source=copilot.com) [Accessed 6 Feb. 2026].

Industry-commissioned estimates of illegal-market activity are highly uncertain. By definition, the illegal sector is opaque and difficult to reliably measure, and the Gambling Commission itself has previously cautioned that claims about illegal-market growth are often exaggerated and must be kept in proportion. Industry figures, including Paddy Power co-founder Stewart Kenny, have openly acknowledged that the threat of the illegal market has long been inflated to resist regulation and tax reform.

Despite this, the illegal argument continues to be deployed to oppose policy change. Ahead of the UK's November Budget, for example, the BGC claimed that tax increases would drive consumers to illegal operators.<sup>59</sup> These assertions relied on outdated research and ignored evidence from other jurisdictions where operators have absorbed tax rises while remaining commercially viable. More recently, both DCMS and industry representatives have argued that maintaining a highly visible regulated sector – supported by continued advertising – will help protect against the growth of the illegal market. This claim warrants scrutiny. Expanding the reach of the legal market does not simply channel existing demand, it also stimulates new participation. A larger market will inevitably produce more harmed and self-excluded individuals, some of whom may then be exposed to unlicensed operators operating outside of UK consumer protections.

The illegal market does pose real risks, particularly to children and young people who are targeted through online streamers and gaming environments. However, regulatory focus must remain proportionate. Gambling advertising, wherever it appears, contributes to the wider normalisation of gambling and increases overall participation. Greater exposure does not distinguish neatly between legal and illegal operators; it increases familiarity, social acceptability, and demand across the board. Therefore, directing regulatory attention heavily towards the illegal market at the expense of addressing well documented harms in the regulated sector risks undermining effective, evidence-based reform. The existence of illegal operators cannot be used as a justification for delaying higher standards, suppressing taxation, or postponing long overdue reforms to the licensed sector.

Finally, the notion of a clear and distinct 'illegal market' is often a false dichotomy. The boundaries between licensed and unlicensed operators are frequently blurred: licensed companies operate in grey or illegal markets overseas; some unlicensed operators are subsidiaries of licensed firms; and licensed technology providers, supply software to unlicensed operators. This further makes the case for the need of robust, enforceable regulation across the entire gambling ecosystem.

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<sup>59</sup> Betting & Gaming Council. (2025). *BGC warns Treasury Select Committee: tax hikes risk jobs, growth, and...* [online] Available at: <https://bettingandgamingcouncil.com/news/bgc-warns-treasury-select-committee-tax-hikes-risk-jobs-growth-and-safer-gambling-statement> [Accessed 6 Feb. 2026].

## Remedies and Recommendations

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*Having repeatedly raised these concerns with successive governments, the GRAPPG and PGR has consistently warned of the risks associated with the current regulatory approach to gambling advertising. These warnings have too often gone unheeded, and in the absence of meaningful reform, gambling-related harms have continued to grow. Having established the clear link between gambling advertising and harm, demonstrated that the current regulatory framework is not fit for purpose, and illustrated the market distortions that have resulted from this failure, the report now sets out the required reforms.*

*The recommendations that follow are proportionate, evidence-based and consistent with international precedent. They are not speculative or ideological interventions, but necessary measures to reduce preventable harm and restore effective regulatory oversight. Almost all these recommendations can be implemented by Ministers under their existing wide powers to make regulations controlling the advertising of gambling (Section 328 of the Gambling Act 2005). The Government must not repeat the mistakes of the past by delaying action or deferring to calls for further evidence where the case for reform is already clear.*

### Measures to protect children and young people

1. End gambling advertising in the pre 9pm watershed period across TV, radio, social media and internet platforms, including an end to paid for and unpaid online advertising.
2. End all gambling sponsorship in sports (including e-sports but excluding horseracing and greyhound racing as this is not primarily attended by or enjoyed by children) including an end to gambling messages featured in, and within close proximity to, stadia hosting sporting events. This includes any related domain name that may be used by an operator.
3. End all gambling sponsorship of TV and radio programmes.
4. End all 'content' marketing
5. Stop 'influencers' and 'content creators' from advertising or promoting gambling on social media or streaming platforms such as Twitch or Kick.
6. End gambling advertising, sponsorship and marketing in children's video games with a PEGI rating of lower than 18.
7. Ensure the 'Growing up in the online world' consultation leads to a statutory duty for online platforms that ensures those under 18 are not exposed to gambling advertising, sponsorship and marketing.

### Tackling the most egregious forms of gambling advertising

Alongside broad exposure concerns, particular forms of gambling advertising are especially harmful. These include the promotion of high-risk products, aggressive direct marketing practices, cross-selling strategies, and advertising linked to illegal operators. The following

recommendations are designed to address the most exploitative and misleading practices in both the licensed and unlicensed sectors, and to close regulatory gaps that currently allow harms from advertising to persist.

8. End advertising and marketing of the most harmful form of gambling products online, land-based casino (slot) content and an end to cross-selling of products.
9. End all direct marketing, moving beyond the current 'opt in' system as well as inducements such as so-called 'free' bets, free spins and bet boosts.
10. The Government and Gambling Commission must work with social media companies to prevent illegal -market operators from advertising to UK consumers.

**a. Prohibit operators not licensed in the UK from advertising in the UK.**

Illegal, unlicensed operators should not be able to promote their brands through UK sport or media. High-profile examples such as Stake.com's sponsorship of Everton Football Club demonstrate how unlicensed operators currently appear in environments heavily consumed by children and young adults, despite falling outside regulatory oversight.

We note the Government's recent consultation on sports sponsorship. While greater clarity on the application of existing rules is welcome, particularly in relation to unlicensed operators, it is not clear that further consultation is necessary given that the legal position should already prohibit such arrangements. The priority should be ensuring that current regulations are properly understood, consistently interpreted, and effectively enforced.

In the meantime, the regulator should take a more proactive and robust approach to enforcement. This includes fully enforcing the existing ban, seeking additional powers where required, and taking decisive action against both licensed and unlicensed operators that facilitate or profit from illegal-market activity.

**b. Introduce mandatory 'Know Your Customer' (KYC) requirements across the online advertising supply chain.**

If the Government is serious about preventing unlicensed operators from advertising to UK consumers, it is essential that KYC requirements form part of its approach. Applying KYC standards across the digital advertising ecosystem would ensure that all actors are verified, increase transparency over who is profiting from gambling advertising, and prevent unlicensed operators from accessing UK audiences. These checks – already standard practice in sectors such as banking – could be implemented with minimal burden and would significantly strengthen oversight, enforcement, and the integrity of the regulated market.

## Annex

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### **About the Gambling Reform APPG (GRAPPG)**

The All-Party Parliamentary Group for Gambling Reform was created to provide a forum for discussion and further investigation into the wider impact of gambling related harm in our communities. The Group ensures that legislative and regulatory frameworks keep pace with the rapid evolution of the gambling industry, particularly in the digital age.

The Group's statement of purpose is:

*“To assess how the gambling industry should be reformed to prevent harm”*

Our work is informed by collaboration with leading academics, public health professionals, charities, and advocacy organisations, as well as individuals with lived experience of gambling harm. Crucially, the Government must consider how its manifesto commitment to reduce gambling harms can be prioritised in the context of its current work to drive growth of industry. It is simply not possible to seek to promote the growth of the gambling industry and simultaneously drive down harms.

### **About Peers for Gambling Reform (PGR)**

Peers for Gambling Reform (PGR) was formed in 2020 to ensure the recommendations made in the House of Lords Social and Economic Impact of the Gambling Industry Select Committee Report 'Gambling Harm: Time for Action' were carried forward and implemented by Government, the Gambling Commission or other relevant bodies.

The Group is working in parliament, and with others, to ensure that Government and the Gambling Commission take immediate action to implement necessary changes to our gambling regulation.

PGR is made up of over 150 cross-party members of the House of Lords, making it the largest 'interest' group in the Upper Chamber.

### **How Gambling Advertising is Regulated**

Gambling advertising has been permitted across all British media since 2007, but some are concerned that advertising could encourage harmful or excessive gambling.

Gambling operators selling into the British market must have a Gambling Commission licence to transact with, and advertise to, British consumers. The commission's licence conditions and codes of practice require operators to comply with the advertising codes, administered by the Advertising Standards Authority (ASA). The codes aim to ensure that gambling adverts do not:

- portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm.

- exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children, young persons or other vulnerable persons.
- suggest that gambling can be a solution to financial concerns.
- link gambling to seduction, sexual success or enhanced attractiveness.
- be of strong appeal to children or young persons, especially by reflecting or being associated with youth culture.
- feature anyone gambling or playing a significant role in an advert if they are under 25 years old (or appear to be under 25).

Adverts that breach the codes have to be amended or withdrawn. If serious or repeated breaches occur, the ASA can refer advertisers to the Gambling Commission and broadcasters to Ofcom.

Gambling advertising has increased substantially since the Gambling Act 2005 came into force in September 2005. This has led to concerns about the impact of advertising on children, young people, and vulnerable adults.

The UK's Committee of Advertising Practice (CAP) recently refreshed its guidance on protecting under 18s in gambling advertising, focusing on the application of the "strong appeal" test introduced in 2022.<sup>60</sup> CAP's clarification of its guidance on social media "appeal" to children in UK gambling offers clearer metrics and revised sports categories for operators to assess ads.<sup>61</sup>

Where an advert includes content with a potential strong appeal to under 18s, the ASA has confirmed that this content should appear only where under 18s can be entirely excluded from the audience. In rulings centred on youth appeal, the ASA consistently refers to Ofcom data and research that confirms that the self-declaration of age on most social media platforms is not robust to prevent high under-18 usage.

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<sup>60</sup> Advertising Standards Authority | Committee of Advertising Practice (2025). *Gambling and lotteries advertising: protecting under-18s*. [online] Asa.org.uk. Available at: <https://www.asa.org.uk/resource/gambling-and-lotteries-advertising-protecting-under-18s.html> [Accessed 6 Feb. 2026].

<sup>61</sup> Smithson, O. (2025). *Welcome To Zscaler Directory Authentication*. [online] Osborneclarke.com. Available at: <https://www.osborneclarke.com/insights/cap-clarifies-guidance-social-media-appeal-children-uk-gambling-ads> [Accessed 6 Feb. 2026].