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MINIMISING THE UK GAMBLING BLACK MARKET

SUMMARY OF KEY MESSAGES AND POLICY
RECOMMENDATIONS FROM THE COMMUNITY
CARE GAMING RESEARCH PAPERS



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This is a policy briefing paper drawing on the Community Care Gaming's Code of Conduct for Influencers, Principles for Gambling Operators and six supporting research papers the illegal back market covering advertising, influencer marketing, AI, crypto gambling, ethics, transparency and social media challenges. This project has been enabled by bringing together a collaboration stakeholders including Paul Dolan, Professor of Behavioural Science in the Department in Psychological and Behavioural Science at the London School of Economics and Political Science; Intrepid Partners; Social Intent; Influencer Marketing Trade Body (IMTB); Incorporate Society of British Advertisers (ISBA); International Social Games Association (ISGA); Content Creators, people with Lived Experience and the research team from Community Care Gaming.

Central policy ask: make it harder for illegal operators to reach, recruit and monetise UK consumers, while making the regulated market visibly safer, easier to identify and commercially attractive enough to channel consumers away from the black market.

Executive summary

Across six research papers and stakeholder engagement activity, a recurring concern emerged: regulatory systems designed for traditional gambling environments are increasingly struggling to respond to platform-driven and cross-border illegal gambling ecosystems. The UK gambling black market is no longer a marginal enforcement issue. It is a digital, social and cross-border problem accelerated by influencers, affiliate links, crypto payments, weak age assurance, gamified design, AI personalisation and the ability of unlicensed operators to look almost identical to regulated brands.

The principal policy challenge must be to consider the unintended consequence of further consumer restrictions on regulated, licensed gambling operators. Overly blunt restrictions on regulated operators will unintentionally make unlicensed (black market) sites more attractive. A stronger response should combine enforcement, platform accountability, payments disruption, influencer standards, consumer education and a clearer "trusted regulated market" proposition.

Our research strongly support a co-created Code of Conduct for influencers who wish to promote legal gambling and digital badge; Principles for Gambling Operators and a Trusted Regulated Market Digital Badge and a set of Principles for platforms whom host gambling content, together with a Trusted Regulated Market Digital Badge. These should begin as voluntary frameworks but be designed so that core parts can become enforceable through licence conditions, advertising rules, platform terms, payment-provider obligations and procurement standards if required.

This policy briefing paper is structured to support broader stakeholder efforts to reduce the growth and impact of the gambling black market. The opening section summarises the key themes emerging from the evidence and identifies areas requiring immediate action. A second section presents concise policy arguments to support intervention and decision-making. The paper then outlines the principal societal challenges identified through the evidence base before setting out policy recommendations, a proposed implementation roadmap, and suggested stakeholder actions. It concludes with a series of key messages and proposed measures of success to support monitoring, accountability, and impact assessment

Key messages from the evidence base

Theme	Key message	Policy implication
Digital regulation is behind the market	The current advertising framework was built around more traditional advertising and struggles with livestreams, Discord, Kick, Telegram, crypto casinos, AI avatars and cross-border affiliate marketing.	Regulation must become platform-aware, technology-responsive and cross-border, rather than relying only on traditional advertising complaints.
Influencers are a major route to the black market	Influencers can make illegal gambling feel like entertainment, lifestyle content or trusted peer advice rather than advertising. Affiliate links and offers create direct financial incentives to drive traffic from legal sites.	Platforms should be taken on a journey to adopt a set of co-created principles which will see these platforms remove black market content.
Young and vulnerable people are exposed	Our research identifies weak age verification across platforms and highlight that young or vulnerable can access gambling streams, casino content and related content created communities without meaningful checks.	Platforms should be taken on a journey to adopt a set of co-created principles which will see these platforms remove black market content.
Black market sites are attractive by design	Unlicensed sites often offer anonymity, easier sign-up, larger bonuses, crypto payments, fewer checks and features that encourage rapid or prolonged gambling.	Policy must reduce the attraction and availability of unlicensed sites while avoiding measures that unnecessarily push consumers out of the regulated market.
Crypto and dark web gambling increase enforcement difficulty	Crypto, blockchain, VPNs, decentralised hosting and encrypted communities can bypass licensing, KYC, affordability controls and consumer redress.	Payment disruption, crypto-exchange duties, domain blocking, international intelligence-sharing and cybercrime capacity are essential.
AI is both a risk and a tool	AI enables hyper-personalised marketing, virtual influencers and behavioural nudging, but can also support age estimation, content moderation, risk detection and compliance audits.	Require explainable AI, human oversight, audit logs and disclosure of synthetic or AI-generated gambling promotions. This currently happens within regulated markets and a red flag for black market operators.
A safer regulated market is part of the solution	The papers recognise that appropriate advertising of legal gambling can channel consumers to safer, protected environments.	Regulated operators should be allowed to distinguish themselves clearly through a trusted badge, safer gambling messaging and transparent consumer protections.

Document-by-document summary

Document	Contribution to the policy argument
Code of Conduct for Social Media Influencers and Principles for Regulated Gambling Operators	Sets out a practical conduct framework for influencers and operators: transparency, disclosure, age verification, avoiding misleading claims, safer gambling messaging, regulated-only promotion, training, reporting and a digital badge.
Paper 1: Responsible Gambling Requires Responsive Regulation	Shows that the regulatory landscape is fragmented and hard to regulate across platforms and borders. Highlights the need to update and build upon UK standards for social media, esports, AI, VR, crypto and influencers through consumer insight from Generation ALPHA (those born between 2010 and 2025). These predominantly the children of Millennials and are the first generation to be born entirely in the 21st century; defined by their immersion in technology, social media, and artificial intelligence
Paper 2: The Prospects for Digital Gaming	Explains how gaming and gambling are converging through loot boxes, skins, microtransactions, missions, leaderboards, metaverse casinos and crypto payments, especially for digitally native younger audiences.
Paper 3: The Impact of AI and Virtual Influencers on Gambling	Explores AI-driven targeting, virtual influencers, personalisation, behavioural nudging and compliance automation. Calls for cross-platform oversight, age verification technology, AI disclosure and explainable AI.
Paper 4: The Gambling Harms of Influencer Marketing	Focuses on youth exposure, parasocial relationships, affiliate links, weak age-gating and the role of influencers in normalising or directing traffic to unregulated gambling sites.
Paper 5: Adopting a Responsible and Transparent Approach	Frames the issue ethically: gambling is a legitimate adult activity, but marketing must minimise harm. Transparency, odds/risk communication, vulnerable-customer protection and black-market prevention are central.
Paper 6: Influencers and Illicit Crypto Gambling	Examines crypto, dark web and encrypted-platform gambling. Recommends coordinated action by platforms, regulators, charities, international partners and influencers.

Problem statements

- Illegal operators can reach UK consumers through social media, livestreaming, affiliate websites, encrypted messaging groups and search engines faster than regulators can remove them.
- Consumers do not know whether a gambling site is licensed, especially where black market operators copy the look, feel and language of regulated operators.
- Young and vulnerable consumers face particular risks because social media content can be entertaining, peer-led and algorithmically amplified.
- Crypto payments and VPN use weaken conventional consumer-protection tools including KYC, self-exclusion, affordability checks, dispute resolution and transaction monitoring.
- Influencer economics reward traffic, sign-ups and gambling losses, creating a direct incentive to normalise high-risk gambling and promote unlicensed sites.
- The UK response needs to avoid unintended consequences: if the regulated market becomes too difficult or burdensome to access, consumers will migrate to unregulated operators.

Policy recommendations

The following recommendations are designed as a whole-system response. No single intervention will stop the black market; the objective is to reduce reach, reduce trust, reduce monetisation and increase consumer movement towards licensed operators.

1. Create a statutory-backed Code of Conduct for gambling influencers and affiliates

Adopt the Community Care Gaming Code of Conduct as the basis for an industry-wide standard. Start with voluntary adoption by operators, agencies, influencer bodies and platforms, then convert core requirements into enforceable licence, advertising and platform obligations. Minimum requirements should include #ad disclosure, visible 18+ messaging, no promotion of unlicensed operators, no fake wins, no claims that gambling solves financial problems, clear safer gambling signposting and disclosure of AI-generated content. This in itself will set the illegal and legal sectors apart.

2. Make platform accountability explicit

Require platforms hosting UK-facing gambling content to identify, label, age-gate, de-amplify and remove illegal gambling promotion. This should include livestreams, Shorts/Reels/TikToks, Discord servers, Telegram links, Kick streams, YouTube descriptions, affiliate link aggregators and mirror domains. Platforms should publish transparency reports on removals, repeat offenders and response times. This work through be structured through a Principles for Platforms document and digital badge, so this sector can be involved in the co-creation.

3. Introduce a “licensed UK operator” trust mark and advertised public verification tool

Develop a (UK Gambling Commission backed) digital badge and searchable verification tool that lets consumers confirm whether an operator, affiliate, influencer campaign or gambling link is legal. Search engines and platforms should display licensing status prominently and warn consumers when links point to unlicensed or high-risk domains.

4. Disrupt payments and affiliate monetisation

Place stronger duties on payment providers, banks, e-wallets, crypto exchanges and affiliate networks to detect and block payments or commissions linked to illegal gambling. Introduce penalties for companies that knowingly facilitate unlicensed UK-facing gambling, including payment processing, ad placement or affiliate tracking.

5. Regulate gambling-like gaming features where there is staking, chance and transferable value

Treat skins betting, NFT loot boxes, crypto wagering, paid random rewards and gambling-style mechanics as within scope where consumers stake money or value for chance-based rewards. This will also reduce skin trading on third party sites. Require odds disclosure, spending controls, parental controls and restrictions on marketing to children.

6. Create a specialist cross-platform illegal gambling enforcement unit

A UK Gambling Commission Black market taskforce has been established. Its remit should include rapid takedown, domain disruption, influencer/affiliate enforcement, data sharing, crypto-wallet intelligence and repeat-offender sanctions.

7. Require AI transparency and human accountability

Mandate disclosure of virtual influencers, synthetic media and AI-generated gambling promotions. Require explainable AI, audit trails and human-in-the-loop review for gambling marketing, risk profiling, age estimation and behavioural interventions.

8. Build consumer and professional awareness campaigns

The evidence suggests the growth of black-market activity may represent an increasingly significant public health challenge, particularly where young and vulnerable consumers are exposed without safeguards. Consider public campaigns explaining how to identify legal gambling operators, why black market sites are risky and how affiliate links work. Campaigns should use trusted creators, micro-influencers and short-form formats rather than relying only on traditional public health messaging. Marketing should also be Generation ALPHA informed.

9. Preserve a viable regulated market that can channel consumers safely

Ensure regulated consumer-protection reforms are proportionate and tested for behavioural consequences before any rollout. The regulated market should be able to communicate its safer protections clearly, while avoiding exploitative marketing. This reduces the appeal of illegal sites and supports channelisation into protected environments.

10. Monitor outcomes and adapt policy

Create a live black-market strategy and monitoring framework: domain removals, search visibility, social media impressions, affiliate-link traffic, payment blocks, consumer awareness, youth exposure and migration between regulated and unregulated markets. Publish quarterly dashboards.

Implementation roadmap

Phase	Lead actors	Priority actions	Success measures
0-3 months	UKGC, ASA/CAP, Ofcom, platforms, CCG, BGC, IMTB, ISBA	Convene taskforce; agree Code of Conduct principles; map high-risk platforms, domains and affiliate networks; begin creator awareness campaign.	Stakeholder agreement; draft code; baseline illegal-domain and social-media monitoring.
3-6 months	Platforms, operators, agencies, banks, payment firms	Launch voluntary code and digital badge pilot; require campaign disclosure templates; start platform reporting on illegal gambling removals.	Number of signatories; takedown time; badge adoption; reduction in visible unlicensed links.
6-12 months	Government, UKGC, Ofcom, payment regulators	Convert core code provisions into enforceable obligations; introduce payment and affiliate disruption duties; establish illegal gambling enforcement unit.	Enforcement actions; payment blocks; affiliate network removals; reduced search/social visibility.
12-24 months	International regulators, platforms, UK enforcement partners	Formalise international data-sharing; publish quarterly black-market dashboard; review unintended consequences.	Lower consumer awareness gaps; lower youth exposure; stable or improved channelisation to licensed operators.

Stakeholder-specific actions

Stakeholder	Action required
Government and regulators	Modernise regulation for social media, AI, crypto and gaming-gambling convergence; fund a specialist enforcement unit; require data sharing and transparency reporting.
Gambling Commission	Maintain the licensing register, support a consumer-facing trust mark, coordinate takedowns and require operators to manage influencer and affiliate risk.
Ofcom and platforms	Apply online safety duties to gambling promotion, age-gate content, restrict recommendation to minors and remove illegal gambling pathways.
ASA/CAP and advertising bodies	Strengthen influencer-specific gambling guidance and require disclosure of commercial relationships, affiliate codes, virtual influencers and AI-generated content.
Operators	Use only compliant influencers and affiliates, monitor partners continuously, terminate non-compliant relationships and make safer gambling protections prominent.
Influencers and agents	Promote only licensed operators, disclose all financial relationships, avoid misleading content, include 18+ and safer gambling signposting and refuse black-market sponsorships.
Banks, payment firms and crypto exchanges	Block known illegal gambling merchants, share intelligence, strengthen suspicious transaction monitoring and prevent commission payments to black-market affiliates.
Charities and public health bodies	Co-create awareness campaigns with credible creators and test messages for behavioural impact, not just knowledge recall.

Suggested public-facing key messages

- Illegal gambling sites are not safer, fairer or more private; they are unlicensed businesses operating without UK consumer protection.
- A gambling link shared by a popular creator is still advertising when money, gifts, commission or affiliate rewards are involved.
- If a site does not appear on the UK Gambling Commission register, UK consumers should treat it as high risk.
- Crypto payments can remove the protections that consumers expect from regulated gambling, including identity checks, self-exclusion and dispute resolution.
- The goal is not to stop adults gambling legally; it is to stop illegal operators targeting UK consumers without safeguards.
- The regulated market, platforms and influencers all have a role in making legal gambling easier to identify and illegal gambling harder to access.

Measures of success

- Reduced visibility of unlicensed gambling domains in UK search and social media results.
- Faster removal of illegal gambling links, mirror domains and affiliate codes.
- Higher consumer recognition of licensed versus unlicensed operators.
- Reduced under-18 exposure to gambling streams and gambling-related influencer content.
- Increased proportion of gambling influencer content carrying clear disclosure, 18+ signposting and safer gambling information.
- More payment blocks and affiliate network terminations linked to illegal gambling.
- Evidence that consumer-protection interventions do not unintentionally increase migration to unlicensed sites.

Conclusion

The gambling black market is no longer solely a gambling issue. It is also an online safety issue, a payments issue, a social media issue and increasingly a cybercrime issue. It sits at the intersection of advertising, social media, influencer culture, online safety, crypto payments, cybercrime, young and vulnerable people safeguarding and international enforcement. The strongest policy response is therefore a coordinated channelisation strategy: restrict the reach and monetisation of illegal operators, improve the visibility and credibility of licensed operators, and place clear duties on the intermediaries that make black-market gambling discoverable, trusted and profitable.

The uploaded Community Care Gaming research provides a strong platform for this approach.

Source documents

Code of Conduct for Social Media Influencers and Principles for Regulated Gambling Operators

Paper 1: Responsible Gambling Requires Responsive Regulation

Paper 2: The Prospects for Digital Gaming

Paper 3: The Impact of AI and Virtual Influencers on Gambling

Paper 4: The Gambling Harms of Influencer Marketing

Paper 5: Adopting a Responsible and Transparent Approach

Paper 6: Influencers and Illicit Crypto Gambling



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