

CODE OF CONDUCT FOR SOCIAL MEDIA INFLUENCERS AND PRINCIPLES FOR REGULATED GAMBLING OPERATORS IN ORDER TO MINIMISE THE ILLEGAL BLACK GAMBLING MARKET



**Community
Care
Gaming**

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In today's digital landscape, influencers are not merely entertaining or promoting a product; they are active participants in framing the attitudes, thinking and behaviours within the culture they manage as gatekeepers. These particular influencers hold power and privilege; and in the case of gambling, they are essential in either perpetuating the potential harms of gambling or reducing them. Influencers of such status might consider the benefits to their audience of co-creating inclusive, constructive, harm-minimising actions through an initial, voluntary Code of Conduct. This will pave the way for (i) regulated and legalized gambling only to be offered to their audience and (ii) do this in a safe and responsible manner.

Introduction

In today's digital landscape, influencers play a significant role in shaping people's beliefs and behaviors. In the context of gambling, depending on what they promote, influencers have the ability to influence gambling-related outcomes, including risks. By adhering to a co-created voluntary code of conduct (CoC), influencers can ensure that, at a minimum, they promote regulated gambling sites in their jurisdiction, and that they are promoting safer gambling tools and safer gambling messaging across their content. Against the background of a growing unregulated gambling sector, greater opportunities for gambling through esports, crypto etc. and easier access to impressionable or vulnerable people, this document sets out the core elements of a CoC for influencers and operators in the gambling space.

This document is structured into five principle sections:

- Code of Conduct for Influencers
- Principles for Gambling Operators Working with Social Media Influencers.
- Our research to examine the evidence used to frame the Codes and implementation.
- Code Implementation.
- International precedents

Collectively working together over a six-month period; and with the additional scrutiny and insight from an independent Advisory Group, we are delighted to share the outcome of our work which is ready for real-world implementation. We are looking forward to working with all stakeholders as we move to that important implementation phase. We have a shared commitment to ensure this work takes full account of its myriad impacts and ultimately minimise harm for young and vulnerable people.



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EXECUTIVE SUMMARY

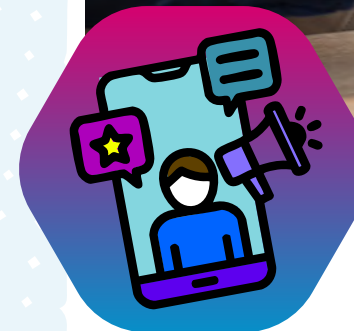


Executive Summary

The creator economy in the UK is thought to employ around 45,000 people and contributed more than £2bn to the country in 2024, according to [research by YouTube and Public First](#). Influencer marketing is a significant part of the UK's creative industries, generating substantial revenue. Unlike several other creative sectors, there is no official government body or 'best practice' framework specifically for influencers. Influencer marketing is treated as all other advertising or marketing channels under the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP) code. Advertising Standards Agency (ASA) rulings have tended to focus on hidden advertising (i.e. disclosure of sponsored content). By involving some of the key stakeholders in the development of an initial voluntary CoC, all parties will have meaningful guidance about best practice. Moreover, the influencers will be more likely to follow standards that are set in a co-created CoC.

One of the principal challenges with the co-creation of a CoC for gambling is that very few influencers will be familiar with the nuances of the Gambling Act 2025 (UK statistics indicate that 32% of self-defining influencers say they do it part-time and 24% as a hobby), licensing objectives and consumer protection measures. There is also precious little awareness of unlicensed (or Black) markets such that many influencers may well inadvertently promote illegal sites. On the upside, we would hope most influencers would welcome a CoC to guide their promotion activities as instinctively they want to do the right thing by their fan base or audience. A gambling-specific CoC has the potential to provide influencers with certain expectations, protects them from unintentionally violating the law and ensures they are genuinely looking out for the welfare of their fan base and audience.

Gambling operators will be concerned about any CoC that may restrict advertising reach and reduced customer acquisition. However, forward-thinking operators can gain competitive advantages through enhanced brand reputation, reduced



regulatory risk, and potentially lower compliance costs in jurisdictions with harmonized standards. We know from others forms of advertising that society and customers are more looking for ethical businesses which they are able to engage with and support.

Advertising agencies and media platforms face similar tensions, potentially losing lucrative gambling advertising contracts while gaining opportunities to develop more creative, responsible marketing approaches that could command enhanced rates. On a broader scale, consumer protection organisations, treatment providers and the general public stand to benefit from reduced gambling-related risks.

The trade-offs between short-term advertising revenue losses and the cost of implementation of a CoC, is weighed against the long-term gains from more professional and responsible operators and marketers, and even reduced social costs of gambling problems. Key barriers include enforcement challenges across digital platforms, international coordination difficulties, and industry resistance to further advertising restrictions, while opportunities lie in technological solutions for age verification, AI-driven responsible advertising, and the potential for responsible gambling practices to become a market differentiator that attracts socially conscious consumers and investors.





CODE OF CONDUCT FOR INFLUENCERS

Code of Conduct for Influencers

Purpose:

To ensure the safe, sustainable and responsible promotion of gambling activities by social media influencers. The following requirements should be met to adhere to the new Code of Conduct:

1. Transparency and Disclosure

- Social Media Influencers need to clearly disclose any partnerships, sponsorships, or paid promotions related to gambling or related activities. The [CAP](#) and [CMA](#) guidance on what constitutes paid-for content or advertising is the benchmark.
- This should be demonstrated by the use of #ad on screen or spoken in a video at the start of the post, and clarification on the commercial relationship at the end of the post if it is part of a wider partnership.
- Influencers should be equally transparent about any non-monetary benefits – including commission, referral earnings or gifts – that they receive for their work.
- Influencers should disclose where AI tools and technology have been used in content production, if not doing so could mislead the consumer. This also applies to the use of virtual influencers.



2. Misinformation and Misrepresentation

- Content should avoid misleading claims about the odds of winning or the benefits of gambling. This will include hyperbole around luck, chance and probability as well as images associated with winning a large amount of money.
- Influencers should refrain from depicting gambling as a means to solve financial problems, enhance social status, guarantee a win, be risk free, free bets or achieve happiness. They should also avoid showcasing an excessive lifestyle that could influence followers to gamble irresponsibly.



3. Age Verification

- Influencers should aim to ensure all content is directed toward an audience that is legally allowed to gamble, using tools available online for this purpose in line with CAP guidance. They should also advocate for strict adherence to age restrictions.
- Influencers should also regularly remind followers about the importance of age verification in line with the legal age to gamble (age 18 plus and possibly carry at 18 logo too). This should include fraudulent misrepresentation of this.



4. Ensure Content Appropriateness

- Influencers should ensure that all content is suitable for their audience and does not glamorize or trivialize gambling behavior. They should also avoid using language or imagery that could be interpreted as encouraging risky behavior.
- No advertisements should be aimed at under-18s (and should have a content advisory).
- Content should not feature under-18s and tone should not appeal to under-18s above all other audience segments. This responsibility relies on all stakeholders in the value chain of influencer lead marketing of gambling products and all should work towards preventing under 18s exposure to this content. This should be in line with [CAP guidance](#).
- Filters and audience targeting should be used to exclude under-18s from receiving the content.
- Careful consideration should be given when creating content to ensure that the influencer or celebrity doesn't have a profile or personality that is skewed towards the under-18 market and the age of the influencer themselves is 18 plus, evidenced potentially by some formal ID



5. Promote Responsible Gambling

- Influencers should encourage followers to gamble responsibly by promoting tools, such as setting limits, taking a break, and recognizing when to stop.
- Influencers should be able to share resources and support services for problem gambling, such as helplines and local support organisations when appropriate.



6. Engagement with Followers

- Influencers should never artificially inflate their number of followers or the level of engagement on specific posts.
- Influencers should be aware of comments or messages regarding gambling from followers and, where necessary, provide links to guidance and support as appropriate in individual cases.
- They should also be able to create a supportive community by fostering discussions around responsible gambling practices. In addition, influencers should consider supporting gambling industry wide efforts around safer gambling, such as Safer Gambling Week and support gambling industry-led initiatives



7. Partnership Criteria

- Influencers should collaborate only with regulated gambling brands and social media platforms that share a commitment to promoting safer gambling practices and are licensed in their jurisdiction.
- They should evaluate partnerships based on the company's track record with responsible gambling initiatives.



8. Reporting Concerns Procedure

- Influencers should encourage followers to report any problematic content or behaviors related to gambling within the community.
- They should take immediate action when addressing any concerns about irresponsible gambling promotions using an identified procedure.

9. Legal Compliance

- Influencers should abide by all local, national, and international laws and regulations regarding gambling advertising and promotion..
- They should ensure that the promotion aligns with the standards set by relevant gambling authorities and with the Advertising Standards Authority.
- Influencers should ensure that they are partnering with a licensed UK Gambling Operator.
- They should ensure that they are not promoting black market gambling organisations and should have suitable ways of checking this before beginning advertising.
- Influencers should commit to ongoing education about gambling regulations and responsible promotion practices, as well as the latest research and statistics related to gambling addiction and responsible gaming.



10. Agents and agencies

- Representatives and agents for Influencers should apply this Code to all their influencer clients.
- Marketing and advertising agencies are expected to outline the disclosure requirements and the terms of the Code of Conduct when engaging an influencer.
- They should ensure that they notify gambling authorities immediately should they become aware of any irregularities.



PRINCIPLES FOR REGULATED GAMBLING OPERATORS WORKING WITH SOCIAL MEDIA INFLUENCER

Principles for Gambling Operators Working with Social Media Influencers

This document establishes a set of core principles for licensed gambling operators who are onboarding or considering social media influencers and content creators for marketing and promotional activities. The objective is to ensure that all such partnerships are conducted in a manner that is socially responsible, ethical and transparent. It is proposed these principles apply to all influencer-led advertising, sponsorships, affiliate arrangements, and content collaborations across digital platforms.

Ethical Partnerships and Due Diligence

Gambling operators should undertake formal due diligence before engaging any influencer or content creator. This due diligence could include such things as an assessment of their audience demographics (including age profile), a recent (i.e. 12 month) review of previous content for compliance and reputational risks, and an evaluation of alignment with the operator's ethical standards.

Responsible Content and Tone

Gambling operators should satisfy themselves as part of the onboarding process that influencer content reflects gambling as a form of entertainment, not a financial activity. In particular, operators should satisfy themselves that influencers or creators are not portraying gambling as a way to achieve social status, success, or personal fulfilment. Furthermore content must not encourage excessive or reckless gambling behaviour. Operators should also consider how the inclusion of safer gambling messaging might be used by the influencer.

Illegal Gambling Markets

Gambling operators should consider reviewing influencer and creator content as part of the onboarding process to ascertain if they have ever promoted illegal market activity. Operators should work with law enforcement and regulators to notify them of the promotion of such practice.

Prevention of Misleading Claims

Gambling operators should consider giving guidance to influencers and creators as part of the onboarding process to minimise the prospect of their promotional content being presented as a source of income, financial solution, or alternative to employment. Furthermore operators should satisfy themselves that influencers and creators will not exaggerate the likelihood of winning, suggest guaranteed success and imply that skilful consumption can eliminate risk in games of chance. Any reference to winnings must be proportionate, contextualised, and not glamorised.

Protection of Children and Young Persons

Gambling content must not be created, presented or distributed in a way that is directed at, or likely to have particular appeal to, anyone under the legal gambling age. Before appointing an influencer or content creator, Gambling operators should undertake appropriate due diligence on their follower base. Influencers should provide current platform analytics demonstrating the age profile of their audience, supported where appropriate by reliable publicly available data. Gambling operators should also consider the estimated number, not only the percentage, of under-18 followers and assess the influencer's content, style, imagery, language and wider cross-platform presence for potential appeal to children and young people. Audience demographics should never be considered in isolation. Even where



at least 75% of an influencer's audience is aged 18 or over, operators must still assess whether the influencer, their content or their overall public profile is likely to appeal strongly to under-18s. Decisions should be informed by current ASA and CAP requirements, relevant regulatory rulings and evidence from all platforms on which the influencer operates.

Avoidance of Harm and Exploitation

As part of the onboarding process, Gambling operators should ensure themselves that the influencer or creator does not exploit or target vulnerable individuals or engage audiences displaying indicators of vulnerability.



Compliance with Legal and Regulatory Requirements

Gambling operators should consider having a review process with influencers or creators to periodically review content to ensure it is compliant.

Transparency and Disclosure

Gambling operators should consider giving guidance to influencers and creators as part of the onboarding process to include that content is clearly identifiable as advertising with all promotional content including prominent and unambiguous disclosures (e.g. #ad, #sponsored or similar) if appropriate. Disclosures should be clearly visible and not obscured, abbreviated, or hidden within other text.



Monitoring, Oversight, and Enforcement

Gambling operators should consider implementing a periodic monitoring process of influencer activity to ensure continued compliance. Depending on the influencer rosters and number of brands, operators may consider randomised sampling to be conducted periodically. Contractual terms must outline expectations, compliance requirements, frequency of randomised sampling and consequences of breaches and noncompliant activity must be addressed promptly, including removal of content and potential termination of partnerships.

Data Protection and Self-Exclusion Compliance

These principles clearly distinguish between operator-controlled and influencer-controlled channels when addressing (i) self-excluded customers and (ii) individuals who have opted out of gambling marketing.

Operator-controlled channels: When a Gambling operator publishes or promotes influencer content through its own channels, including paid social media, it should apply all available controls to exclude self-excluded customers, including those registered with GAMSTOP, and individuals who have opted out of receiving marketing.

Influencer-controlled channels: When influencers publish content through their own accounts, operators cannot apply the same customer-level exclusions. Operators should not share self-exclusion or marketing-suppression data with influencers, as doing so could create significant data-protection concerns.

Gambling operators should place clear contractual obligations on influencers to comply with age-gating requirements, use available platform controls responsibly, and avoid targeting, or using methods likely to reach children, self-excluded individuals or other potentially vulnerable audiences.

Implementation and Governance

Gambling operators should consider establishing internal frameworks to support these principles, including writing influencer marketing policies, the value of mandatory compliance training for marketing teams and partners, pre-engagement approval processes and ongoing audit and reporting mechanisms.





THE CHANGING LANDSCAPE OF GAMBLING AND INFLUENCER MARKETING

The changing landscape of gambling and influencer marketing

1. Following the evidence

1.1 The rise of online gambling

In 2023/24, the UK market alone generated a gross gambling yield (GGY) of £15.6 billion ([UK Gambling Commission, April 2023 to March 2024](#)). In the same year, an estimated £2.7bn was wagered by UK consumers on the Black Market ([Frontier Economics, September 2024](#)).



1.2 Reach and responsibility

Social media influencers have a central role in guiding the purchasing decisions of online consumers. Roughly 85% of individuals aged 16 to 24 follow at least one social media influencer. Moreover, this demographic is particularly susceptible to ingrained marketing, including the promotion of gambling ([Ofcom, 2023](#)). Compared to traditional advertising, influencer marketing carries great weight; behavioral science principles tell us that the messenger is far more important than the message for reaching an audience. Paid endorsements through influencers can be seen as recommendations from trusted and valued friends, making them more persuasive. An Ipsos MORI survey commissioned by [GambleAware](#) reported in 2022 that 25% of 11 to 16-year-olds had seen gambling ads on social media sites, and that influencers were among the most utilized advertising sources. These platforms do not typically enforce robust age-verification systems or provide dis-allowance statements warning against the potential risks of gambling. Just whose responsibility it is to manage these issues is not clearly defined. Adding to the complexity of this issue is one of jurisdiction, and differing codes of practice in different countries. For example, the UK has the Advertising Standards Authority (ASA) and the Committee of Advertising Practice (CAP) who write the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing framework. Social media content is potentially too loosely regulated to apply to platforms such as TikTok live-streams, YouTube vlogs, Instagram stories, Kick Live-stream or Discord sponsorships.. The absence of regulatory mechanisms determining responsibility concerning influencers and the platforms calls for clear guidelines for all parties.

2. Issues for the new code of conduct

2.1 Grey aspects of gambling and gaming

There are some blurred lines between traditional gambling and some elements of video gaming.

Some popular games such as FIFA and Counter-Strike: Global Offensive (CS: GO), include features like loot boxes and skin betting where money is spent for a chance to win an add-on to the game. Even though elements like this are not regarded as gambling by the UK gambling regulator, certain behavioral triggers and gamification nudges in the games could lead to compulsive behaviors and gambling-like activities. Influencers frequently market in-game purchases on different social media platforms, and younger or vulnerable or impressionable viewers do not necessarily make the connection with potentially harmful behavior. The UK video gaming sector is currently looking at new revenue models to move away from loot boxes. It is believed that it's the unregulated gambling black market which is more of a threat to consumer protection.



2.2 The black market

Operating outside the bounds of regulation, black market economy poses significant risks to customers, operators, and governments alike. From financial crime to compromised customer protections, the black market undermines the integrity of the legal betting sector. [Frontier Economics](#) found around 2.1% of online stakes are placed with unregulated operators in Britain, which equates to £2.7 billion staked annually online. Additionally, they found 1 in 12 gamblers are already engaging with black market sites. Greater public awareness is needed about what defines black market operators, the risks they pose and how influences may inadvertently be sign posting to these sites.

2.3 Accountability

The primary platforms for disseminating influencer marketing content are social media outlets such as Meta (Facebook and Instagram), TikTok, YouTube, Kick, Discord and Twitch. Although these platforms receive a considerable amount of revenue from gambling advertisements, they tend to have inconsistent policies regarding the promotion of gambling.



2.4. Advocacy

As potential promoters of safer gambling, and armed with a CoC, influencers should take the role of educators, both for other influencers and customers.

They could integrate real-life data into their content, debunk some of the myths surrounding gambling, explain the actual chances of winning, and promote a safer gambling approach, including time and financial boundaries, taking breaks, abstinence during periods of intoxication or stress, and referral to high- quality awareness information. For example, if an influencer/messenger is doing a live-stream on sports betting, they might also tell their audience about places to find safer gambling support such as GamCare and remind their fans to bet within limits. There is an opportunity here for influencers to co-create safer-gambling content with experts – which could increase the uptake of safer gambling tools and further promote awareness. Alongside raising awareness, influencers could reduce the stigma associated with seeking help for problematic behaviors.

More than half of content creators have asked for a voice in policy-making concerning their input on digital rights, revenue allocation, and ethics ([Creator Consultation](#)). A co-created CoC should result in higher adoption and compliance in the sector and enable influencers to have a CoC to give them a voice with Parliamentarian's on this important issue as they have requested. Brand collaboration deals can then be better scrutinised by influencers and the social media platforms to ensure adherence to ethical practices. This might eventually result in the addition of a "Digital 'Badge'" which is one of the aims of CoC.



3. The benefits of a code of conduct

The CoC will strategically and systematically benefit all stakeholders within gambling and the world of influencers.

3.1 Clear and consistent guidelines for influencers

Generally, there is widespread confusion regarding what qualifies as legally acceptable sponsored advertisement gambling promotion. Essentially, influencer marketing does not take a traditional form of advertising such as TV spot or an online served ad. It involves sponsorship which is technically not covered by the ASA except for labelling (hash tag ad). Influencers need to be trained and supported to ensure they are acting legally, including checking the license and jurisdiction under which the betting operator is governed. Promotional content that is compliant, transparent, and authentic will benefit all parties.

3.2 Reducing liabilities for gambling companies

Operators should ensure their advertising adheres to the Advertising Standards Authority (ASA) and Gambling Commission guidelines: using influencers who adhere to the same best practices will reduce risk. In turn, consumers will increasingly recognise companies that are socially responsible, providing thoughtful content and relevant harm reduction messaging.

3.3 Easier monitoring by platform providers

An official Code facilitates the attention, checking, or erasure of wrongful gambling material due to clear criteria – ideally rolled out through awareness and training for platform moderation staff. The evolving restrictions on advertising in the digital space has made it possible for online platforms to be bound to international best practices on responsible marketing. Adoption of a co-created Code is positive and proactive reputation management, protecting consumers, and creating a safer and more sustainable digital gambling environment.

4. Standards, training and reporting

It is recommended that the criteria and standards within a Code of Conduct are binding (if adopted), and compliances can be enhanced by an accreditation or trust mark in the form of a 'Digital Badge'. This certification and quality assurance process could be implemented and administered by an independent authoritative third party, with clear penalties for infringements. The adoption of the Code without the Digital Badge element should also be an option.

Training of both gambling operators and social media influencers will be the first step in achieving a 'Digital Badge'. This could be a two hour online workshop delivered by a training organisation, examining the code of conduct, discussing content and looking at how to meet standards. This could be an annual workshop for those organisations, which allows partners to update the Code as the industry develops. Independent quality assurance will help to maintain confidence and trust in the process. A successful submission will allow an organisation or individual to display the 'Digital Badge' of certification allied to the new code of conduct and be a trusted partner.



4.1 Direct and spillover benefits

Safer and more transparent regulated gambling environments protect consumers through better odds transparency, clearer terms and conditions, and stronger dispute resolution mechanisms. Industry oversight also ensures fairer playing and reduces predatory practices like misleading advertising or illegal sites. Operators that support safer and more transparent gambling habits will see better customer retention and potentially greater return for stakeholders.

The economic spillovers are significant. Problem gambling imposes substantial costs on families and communities through increased debt, bankruptcy, and social services usage. When gambling environments are safer, these social costs decrease, reducing the burden on public services and potentially lowering taxes or freeing up resources for other public services. This really does highlight the risks of the growing black market which is what this CoC is intended to minimise.

Financial institutions benefit from reduced bad debt and fewer gambling-related financial crimes, which can translate to better credit availability and lower fees for all consumers. Healthcare systems see reduced demand for mental health or treatments services related to gambling addiction, creating capacity for other patients and potentially lowering healthcare costs broadly.

Consumer protection standards developed for gambling often influence broader financial services regulation, creating precedents for transparency and fair dealing that benefit consumers across multiple industries. The technological innovations in identity verification and fraud prevention developed for gambling oversight frequently find applications in other sectors, enhancing overall consumer security.

Additionally, safer gambling environments reduce the normalization of high-risk financial behaviors, contributing to better overall financial literacy and decision-making across the population.



5. Recommendations

To help ensure the effective implementation of the CoC along with its lasting impact, the following recommendations may be considered:

Adoption of the code: It is recommended that the Betting & Gaming Council (BGC), Incorporated Society of British Advertisers (ISBA), the Influencer Marketing Trade Body (IMTB) and individual influencers and their agents shall adopt a resolution that incorporates the Code to create an industry-wide code of conduct.

Platform integration: It is recommended that social media platforms embed the provisions of the Code into their advertising and influencing policies for better awareness and enforcement.

Influencer engagement: The influencer community should be more active in the enhancement of the Code and in the formulation of safer gambling messaging. This is critical and their perspective and insight from reaching millions of customers would bring a fresh and positive prospective and could revolutionize safer gambling awareness of legal markets and minimise black market activity. Activities such as Safer Gambling Weeks globally would be transformed with such high levels of public engagement via influencers.

Public awareness: The principles and rights around gambling promotions require awareness which could be achieved through a targeted multimedia campaign, led by and organised by the influencer community themselves.

6. Conclusion

The speed of development in digital gambling and influencer marketing requires immediate attention to raise standards, remove illegal activity, educate and prevent further misunderstanding between legal and illegal gambling.

There are millions of young consumers engaging daily with influencer content and the chances that they encounter unregulated, glorified gambling have reached an unprecedented level. The Code of Conduct is a proactive response designed as a (transnational) multi-stakeholder initiative balancing social and corporate responsibility concerning innovation.

The Code will outline the responsibilities and expectations for influencers, gambling operators, and platform providers, thus serving as a blueprint for ethical advertising, consumer protection, and harm minimization. Adherence to the Code will give Influencers the ability to educate their audiences through leading by example and responsible actions, and through regulation cooperation.



CODE OF CONDUCT DIGITAL BADGE



Code of Conduct Digital Badge

The section frames the certification process for Influencers and gambling operators to secure a 'Digital Badge'. We have developed a 'Digital Badge' which is expedient, streamlined, efficient, and flexible to attain.

Training

The 'Digital Badge' is framed around an up to two-hour, on-line workshop dealing with standards for either gambling operators or social media influencers.

Training is a mandatory part of achieving the final Code of Conduct 'Digital Badge' alongside evidence of meeting the applicable standards. Community Care Gaming can create both the training workshops and manage the certification process using an embedded, public facing Virtual Learning Environment (VLE).

Workshops places will be open sessions on a rolling-monthly bases, unless booked independently by a large organisation. The workshop content to include:

- Code of Conduct rationale and background
- Overview of research papers as well as focus on unregulated markets
- Focus on Code of Conduct 'Digital badge' value including ethical and commercial considerations
- Language of Code of Conduct to be considered including key definitions
- Case studies & videos of good and bad practice, discussion rooms and interactive sessions to be included
- Approach to certification and collecting evidence
- Process of checking against standards to be discussed
- Annual attendance at workshops to be mandated
- Q & A

Community Care Gaming will deliver the training and is in charge of the certification process to ensure consistency.



This process of awarding a 'Digital Badge' will be referenced to as 'Due Diligence' and include checking/sampling the evidence submitted, along with participation of the on-line workshop. This can be managed by Community Care Gaming's experienced team of moderators, which should also include neutral arbitrators appointed externally.

- Social Media Influencers:** will have to evidence the overall standards (see appendix a) with suggested evidence. This will include straight-forward pro forma supportive of each standard and its sub-sections. e.g. signed statement of ethics and transparency. These can be checked against the digital footprint of the social media influencer using their online profile(s) by the certification body before the award of the final certificate.
- Gambling Operators:** will have to evidence the overall standard (see appendix A) with suggested supporting evidence. This will include a straight-forward pro forma supportive of each standard and its sub-sections. e.g. signed statement of ethics and transparency. These can also be checked against online evidence from the operator such as website, contents and online advertising.

Time

Mandatory attendance of the on-line workshop (2hrs), a simple pro-forma evidence upload to the VLE (1hr) and Community Care Gaming's diligence and desk evaluation (2hrs) would be sufficient to achieve the 'Digital Badge'. For influencers and operators this should take no more than three hours – four hours to achieve (3 hours, plus an additional hour to allow for Q&A of clarification from Community Care Gaming).

Community Care Gaming must have discretion if to award, or not award, a 'Digital Badge' and every effort will be made to work with the influencer or gambling operator to facilitate this.



Adoption

To award the 'Digital Badge', Community Care Gaming may consider the following critical path:

1. Gambling business or individual influencer completes the on-line training workshop and is registered on Community Care Gaming's VLE. Up to two-hours is required.
2. Gambling business or individual influencer completes internal moderation process and signs each of the pro forma provided in line with standards. Up to one-hour is required to submit the evidence.
3. Submission is completed online by uploading documents and signing off on the process by the gambling business or individual influencer.
4. Community Care Gaming will processes submission and undertakes desk analysis within four working weeks of evidence. Up to two hours is required for an individual influencer, more hours for a gambling operator.
5. Digital badge awarded or an ask for more evidence or clarification from Community Care Gaming.
6. Digital badge to be renewed annually, with an annual two-hour workshop to keep ahead of trends and changing digital landscape.





Complaints

A complaints procedure will also need to be considered, to include how the public can report a violation. This would need to be robust and selective with regard to who can access and report a violation / complaint and the adoption of neutral arbitrators of any complaints process.

A nuanced approach to any non-financial sanctions (likely 'Digital Badge' removal) will be considered as part of this process. The aim of the 'Digital Badge' should be to raise safer gambling standards and minimise of black market gambling. Financial sanctions are not appropriate for those who violate the spirit of the 'Digital Badge',



Adopt the CoC, but not the 'Digital Badge'

It should be possible to adopt the Code of Conduct without accessing training or meeting standards but in this case, no 'Digital Badge' should be awarded or shown. Clearly this would meet the ethical and business needs of the Code of Conduct but it would be more attractive for a business or individual to access training and submit for the 'Digital Badge' as proof of their enthusiasm for the Code as well as promoting its usage. In an ideal world, the respect for the 'Digital Badge' would allow each side to identify and work with other Badge holders to increase business relationships and therefore profits. The costings model might need to be considered for by Community Care Gaming in the this case.

The Digital Badge

The Digital Badge would be an agreed image and wording designed to show official usage of this on websites, marketing material and other in-house documentation where appropriate. A brand guidance and adoption process should be created, along with a marketing strategy to promote the gambling business and influencers whom have attained it.



INTERNATIONAL PRECEDENTS

International precedents

The promotion of gambling by influencers has become a concern for regulators worldwide, leading to various enforcement actions. Here are some international examples where influencers have been found in contravention of local gambling and betting legislation in the last quarter alone in 2025:

Norway

During 2024-25, the Norwegian Gambling Authority (Lotteritilsynet) issued cease and desist orders to some of the Norwegian TikTok and Instagram influencers for advertising betting services.

The orders carried severe penalties, threatening copyright infringement fines of up to one million krona to any influencer or advertiser who could not remove the unlawful advertisements by the specified date ([Lotteritilsynet, 2025](#)). The judgement from the Court of Appeal in December 2024 reaffirmed the ability of the regulator to impose sanctions, which in turn created a form of deterrence.

As a result of the ruling, the regulator noted a 35% reduction in the impressions of unlicensed gambling content on Norwegian social media feeds.



Sweden

Sweden also took action in 2024-25. The Swedish Gambling Authority (Spelinspektionen) instituted targeted enforcement action which compelled Twitch and Instagram creators to verify an operator's license prior to accepting sponsorships at the rate of SEK 250 000 per post. Those who failed to comply were penalised with a hefty fine. [The 4H Agency \(2024\)](#) notes that early evaluations show a strong reduction in adolescent exposure to gambling promotions. These combined examples show that licensing influencer streams, reasonable monetary sanctions, and proactive monitoring of influencer streams can measurably diminish illegal marketing, and emphasise the importance of collaboration for cross border cooperation.



Netherlands

The Netherlands Gambling Authority (KSA) issued a penalty payment order to YouTube influencer "LeftlanePapi" for promoting illegal gambling in July 2025. The influencer's channel showed live streams of online gambling from unlicensed providers and actively encouraged viewers to play there. This action followed a warning that was not heeded.

The KSA imposed a penalty payment order of €25,000 per violation, with a maximum of €75,000, if the existing illegal content is not removed and no new advertising is made.

[KSA Imposes Penalty Payment Order on Influencer Leftlanepapi - European Gaming Industry News](#)



Norway

The Norwegian Gambling Authority (Lottstift) took action against Schpell.com in June 2025, a content platform where Norwegian influencers live-streamed and vlogged themselves playing online casino games from unlicensed providers. This was deemed illegal marketing of gambling under Norway's strict state monopoly.

Lottstift issued cease-and-desist warnings to the companies behind the platform and those with agreements with the influencers, demanding an immediate stop to all illegal marketing activities. Failure to comply would result in potential compulsory

fines and non-compliance violation fees. [Norway orders Schpell to withdraw Illegal gambling ads – 5 Star iGaming Media Regulation](#)



Sweden

Sweden's Gambling Authority (Spelinspektionen) investigated several Swedish influencers using Twitch to promote unlicensed gambling operators, including direct links and bonus offers in June 2025. This violated the Swedish Gambling Act which requires a valid license for marketing gambling services to Swedish consumers.

Following Spelinspektionen's intervention, all monitored influencers ceased their promotional activities. While no specific fines for influencers were publicly reported at this stage, the authority indicated continued monitoring and the possibility of stronger legal actions if violations recur. [Sweden clamps down on influencers promoting illegal gambling on Twitch](#)



Germany

A German higher administrative court ruled that rules barring gambling infomercials and pitches by social media influencers are legally permissible under the Joint Gaming Authority of the Federal States (GGL). This decision reinforces the GGL's ability to enforce bans on advertising by streamers and influencers for online slots and poker.



While this case isn't about specific individual fines, it establishes the legal basis for future enforcement. Violating these rules can lead to operators (and implicitly, their promoting influencers) facing significant penalties. The court emphasized that these regulations are "necessary to ensure compliance with the goals of the state treaty on gambling, which include averting the risk of addiction and protecting minors." [German Court Says Most Gambling Ad Restrictions Are Legal - VIXIO GamblingCompliance](#)

Spain

In 2020, Spain introduced strict restrictions on gambling advertising and marketing, including an outright ban on influencer marketing for gambling. While specific individual cases of influencers being fined under this ban are not often individually reported, the legislation itself makes such promotions illegal.



Australia

Amendments to Australia's Interactive Gambling Act bar any social media influencer, streamer, or content creator from promoting illegal gambling services through any paid video, unless such promotion is through pre-approval by ACMA and comes with rotating harm reduction warning outlines ([ACMA, 2025](#)).



Marketers from unlicensed casinos or in-play sports books face civil penalties of up to AUD 231,000 per post, and repeat corporate offenders risk facing blocking orders, along with additional multimillion dollar fines. ACMA's first year compliance report showed a 70% drop in influencer-generated content prompts with illegal gambling referrals. This illustrates how mandatory pre-approval registers, personal fines, and severe repercussions can change conduct swiftly.

Argentina

In July 2025 sixteen Argentinian influencers and celebrities were sanctioned for promoting illegal gambling platforms on their social media. This is part of an ongoing investigation into over 100 public figures.

The initial group entered a “symbolic reparation agreement,” requiring them to produce and share awareness videos warning about illegal gambling and attend training. Future or repeat offenders could face asset seizures, fines, or property embargoes.

[Argentinian influencers sanctioned for promoting illegal gambling – but have they got off lightly? - Gaming America](#)

United States

The Federal Trade Commission (FTC) settled charges against two social media gaming influencers for deceptively endorsing CSGO Lotto, an online gambling service. They failed to disclose their ownership of the company and also paid other influencers to promote the site without requiring disclosure of payments.

The settlement did not include monetary fines for Martin or Cassell but imposed strict, 20-year requirements for clear and conspicuous disclosure of any material connections with endorsed products or services. [CSGO Lotto Owners Settle FTC’s First-Ever Complaint Against Individual Social Media Influencers | Federal Trade Commission](#)

Brazil - Influencers Promoting Unlicensed Casinos (Ongoing Investigations)

Numerous Brazilian influencers and celebrities, including high-profile names, have been investigated for promoting illegal online casinos (like “Jogo do Tigre” and “Jogo do Aviãozinho”) which are expressly forbidden in Brazil. These promotions often used social media (especially Instagram) with links to the sites.

While a new law (Law 14.790) was sanctioned in December, and the Ministry of Finance is preparing an ordinance to make influencers directly responsible for non-compliant advertising, specific fines for individuals are pending clearer regulation. However, courts have already taken the position that influencers can be held civilly liable for damages caused by misleading advertisements, and assets of some associated companies have been blocked. [Influencers involved with Blaze could face legal action for harming fans - BTLAW](#) and [Brazil To Curb Social Media Influencers’ Endorsement Of Online Gambling - VIXIO GamblingCompliance](#)

Philippines

Meta (parent company of Facebook) removed at least 20 pages belonging to high-profile Filipino influencers for promoting illegal gambling platforms. This action followed a joint request from the Philippine government’s Cybercrime Investigation and Coordinating Center (CICC) and civic group Digital Pinoy. The influencers had ignored prior warnings.

The immediate penalty was the removal of their social media pages, some with millions of followers.

The CICC has also issued “show cause orders” requiring creators to justify why they should not face criminal charges, indicating potential future legal and criminal consequences, especially for repeat offenders or those who received payment for promotion. [Meta removes Filipino influencers for promoting illegal gambling - Mundo Video Entertainment](#)

India

India’s Enforcement Directorate (ED) launched an inquiry against 29 public personalities, including actors, TV presenters, and digital influencers, for allegedly endorsing online betting applications suspected of violating Indian law. These apps were often promoted as “skill-based gaming” to mislead users, with substantial payments made to the influencers.

The investigation falls under the Prevention of Money Laundering Act (PMLA) and other gambling acts. The ED is expected to summon the individuals for questioning. While specific fines or convictions aren’t yet reported as the probe is ongoing, the severity of the acts indicates significant legal repercussions. [ED Probes 29 Celebrities for Alleged Promotion of Illegal Betting Apps: Money Laundering Suspected - The CSR Journal](#)





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Community Care Gaming is a trading name of ESG Corporate Community Interest Company.
Registered Trade Mark: UK00004157469

Regulated by the Community Interest Company Regulator

Company Registration number 13566221 | VAT registration number: 391 4171 96.