

communitycaregaming.org

PRINCIPLES FOR REGULATED GAMBLING OPERATORS IN ORDER TO MINIMISE THE ILLEGAL BLACK GAMBLING MARKET



**Community
Care
Gaming**

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.





**COMMUNITY CARE
GAMING**

Community Care Gaming, 124 City Road, London, EC1V 2NX
E: hello@communitycaregaming.org | T: 0203 488 5227 | www.communitycaregaming.org

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.