



The Association of Directors of Public Health Consultation Response

Banning unlicensed gambling sponsorship

Objectives and Scope

Under current legislation, businesses are able to enter into advertising and sponsorship arrangements with gambling operators which are not licensed by the Gambling Commission, so long as those operators' services cannot be accessed by consumers in Great Britain. Unlicensed operators prevent access to their services by geo-blocking their websites. However, this can be circumvented by consumers using a virtual private network (VPN). This has become a particular issue over the past year in the sporting sector, particularly football, as the result of changes in the advertising landscape.

The [Department for Culture, Media, and Sport](#) want to change this and has released a [consultation](#). Their rationale for change is driven by three core objectives:

- To protect consumers, especially young people and those who are vulnerable, from unregulated platforms that may not offer adequate player protections or fraud recourse.
- To defend the integrity of our domestic market by ensuring advertising footprints are exclusive to operators who are required to adhere to the Gambling Commission's Licence Conditions and Codes of Practice (LCCP).
- In the sport sector, to eliminate money laundering vulnerabilities within football clubs and agents that have been flagged within our National Risk Assessment.

They are therefore consulting on legislative changes to ban unlicensed gambling sponsorships and advertising in Great Britain across all sectors, including sport, and are proposing using secondary legislation to do so.

About ADPH

ADPH is the representative body for Directors of Public Health (DsPH), and is a collaborative organisation, working in partnership with others to strengthen the voice for public health, with a heritage which dates back over 160 years. We also work closely with a range of Government departments, including [DHSC](#) and [UKHSA](#), as well as the four CMOs, NHS, devolved administrations, local authorities, and national [organisations](#) across all sectors to minimise the use of resources as well as maximise our voice.

ADPH aims to improve and protect the health of the population by:

- Representing the views of DsPH on public health policy.
- Advising on public health policy and legislation at a local, regional, national, and international level.
- Providing a support network for DsPH to share ideas and good practice.
- Identifying and providing professional development opportunities for DsPH.

Impact on consumer harm

4) What impact, if any, do you estimate this proposal would have on the prevalence of gambling-related harm in Great Britain? (Significant Increase / Slight Increase / No Change / Slight Decrease / Significant Decrease / I do not know)

ADPH responses:

- I do not know.

4a) Please explain your answer

ADPH response:

- People's lives are becoming increasingly saturated with gambling advertisements both online and offline, with the industry taking a pervasive approach that targets vulnerable groups including children and young people, with four in five young people recalling seeing or hearing gambling adverts or promotions through either online or offline resources.ⁱ
- Increased exposure to gambling advertising is associated with higher levels of gambling activity and a greater risk of harm,ⁱⁱ including increased frequency of gambling, higher expenditure, more intensive gambling behaviours, and triggering gambling relapse.ⁱⁱⁱ
- Gambling advertising also exacerbates existing gambling harms, with those experiencing so-called 'problem gambling' receiving daily incentives to gamble.^{iv}
- Given the role that the promotion of gambling has in influencing behaviour and driving harm, the Government should address this.
- However, the proposed ban focusing on unlicensed advertising risks the industry redirecting resources into less regulated areas of the policy environment, known as the 'balloon effect'. It is therefore possible that the gambling industry may seek to increase its licensed sponsorship in response to a ban on unlicensed markets.
- The Government should therefore introduce a gambling advertising, promotion, and sponsorship (GAPS) ban, based on the tobacco advertising, promotion, and sponsorship (TAPS) bans, which are a cornerstone of tobacco control.
- This ban should include tactics used to retain at-risk gamblers, such as loyalty schemes, VIP reward programmes, gamification, and the use of personal account managers, and be extended to include both licensed and unlicensed gambling sponsorship and advertisement.

5) What impact, if any, do you estimate this proposal would have on the severity of gambling-related harm in Great Britain? (Significant Increase / Slight Increase / No Change / Slight Decrease / Significant Decrease / I do not know)

ADPH response:

- I do not know.

5a) Please explain your answer

ADPH response:

- As stated above, proposals to ban unlicensed operator marketing should be extended to also include licensed operators, given the clear link between advertising exposure and gambling-related harm.

9) In your view, should the scope of this ban be extended beyond physical, in-stadium advertising assets to include online and digital advertising platforms (Yes, it should be extended immediately / Yes, it should be considered in future primary legislation / No, it should remain limited to physical assets / I do not know)

ADPH response:

- Yes, it should be extended immediately.

9a) Please explain your answer

ADPH response:

- A significant proportion of gambling industry revenue is spent on advertising, marketing, sponsorship, and promotion to retain and supplement the gambling industry's user base, with estimated expenditure increasing from around £1bn in 2014 to over £1.5bn in 2017.^v
- A proportion of this is spent on online advertising, which includes unregulated subliminal marketing on social media to socialise gambling companies and products, creating brand familiarity through indirect exposure from an early age. This normalises the activity and reinforces harmful behaviours.^{vi}
- Whilst the ban on unlicensed advertising for physical assets is a welcome and necessary step to tackling the harms caused to people's health by the gambling industry, legislation should phase out all gambling advertising, including online and digital assets.

ⁱ [Young People and Gambling 2025: Official statistics - Recall of gambling advertising or promotions](#)

ⁱⁱ McGrane, E., Wardle, H., Clowes, M., Blank, L., Pryce, R., Field, M., Sharpe, C. and Goyder, E. (2023). What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature. *Public Health*, [online] 215. doi: <https://doi.org/10.1016/j.puhe.2022.11.019>.

ⁱⁱⁱ Wyllie, C. and Kallman, A. (2024). Gambling advertising, marketing and sponsorship: the need for action Prepared for the Coalition Against Gambling Ads. [online] Available at: <https://cega.org.uk/wp-content/uploads/2024/08/3-Gambling-Advertising-Marketing-and-Sponsorship-The-Need-for-Action.pdf>.

^{iv} Gambling With Lives. (2025). Key gambling stats. [online] Available at: <https://www.gamblingwithlives.org/key-gambling-stats/>

^v Regulus Partners (2014-17). Gambling advertising and marketing spent in Britain. Available at: <https://www.gambleaware.org/media/ym5dba3l/2018-11-24-rp-ga-gb-marketing-spend-infographic-final.pdf>

^{vi} Torrance, J., John, B., Greville, J., O'Hanrahan, M., Davies, N. and Roderique-Davies, G. (2021). Emergent gambling advertising; a rapid review of marketing content, delivery and structural features. *BMC Public Health*, 21(1). doi: <https://doi.org/10.1186/s12889-021-10805-w>