

United Kingdom

Jurisdiction code: UK | Tier: A | Posture: Regulated | Direction: Tightening

Live page: <https://advennt.io/jurisdictions/united-kingdom/>

Overall status: Amber

Data current to 2026-10-25. Free jurisdiction — this report is available to everyone on advennt.io.

Expert review: Ramparts (law firm), Andrew Tait. Reviewed 26 Sep 2026.

Expert-reviewed wording is shown in place of the text it replaced. Each section's review history, including earlier wording, is on the live page.

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OVERVIEW

Executive Summary

Typical licensing timeline is 6-12 months.

Recommendation	Conditional
Time to revenue	12+ Months months
Capital requirement	See Assessment
Regulatory posture	Regulated
Confidence	Confirmed

Top risks

- Punitive UKGC enforcement
- 2023 White Paper tightening
- Post-Brexit Gibraltar dual licensing

Top opportunities

- English-speaking mature consumer base
- Qualifying gambling supplies exempt from VAT
- Established licensed supply chain

Analyst assessment

Verdict: conditional yes, for well-capitalised operators. Great Britain is open to licensed operators, but the cost of operating and of compliance has risen sharply.

Red flags

High — anti-money laundering and social responsibility enforcement. The Commission continues to impose substantial settlements for AML and social responsibility failures. The £19.2 million William Hill group settlement of 28 March 2023 was described by the Commission at the time as the largest in its history. In August 2026 QuinnBet (Gibraltar) Limited agreed to pay £609,104 for social responsibility and anti-money laundering failures.

High — Remote Gaming Duty at 40%. Since 1 April 2026 the rate has been 40%, up from 21%. Product lines that were marginal at 21% may now be loss-making.

Medium — B2B enforcement. Gambling software licensees are directly accountable for how their products reach consumers. On 23 July 2026 Evolution Malta Holding Limited agreed to pay £4.75 million after its games appeared on six unlicensed websites accessible in Great Britain. Its ML/TF risk assessment had not identified that two operators it dealt with were supplying its games in Great Britain without a licence.

Transition-state flags: Remote Gaming Duty 21% to 40% (1 April 2026); amended RTS 12B deposit-limit requirements (30 September 2026); licence fee changes under SI 2026/828 (1 October 2026); general betting duty of 25% on remote bets (1 April 2027).

Product mix. From 1 April 2027 remote bets are charged general betting duty at 25%. Bets made wholly on UK horse racing are not treated as remote bets, and bets on self-service betting terminals are excluded, so both stay at 15%.

Products outside gambling licensing. Free prize draws and prize competitions fall outside the Gambling Act 2005 only where they meet its conditions. A free draw must satisfy Schedule 2, including a genuine free entry route. A prize competition must require skill, judgement or knowledge sufficient to meet the test in section 14(5). Arrangements that fail those conditions are unlawful lotteries. Since 20 May 2026 prize draw operators have been expected to follow the government's voluntary code of good practice.

Opportunities: a large English-speaking consumer base, and an established licensed supply chain. Qualifying gambling supplies are exempt from VAT, which limits operators' recovery of input tax.

Regulatory pulse: tightening. The lead signals are the 40% Remote Gaming Duty rate, compounded by the fee changes in SI 2026/828.

Board Briefing

Headline

GB remains a large, open but heavily-regulated market with punitive enforcement and a live tightening cycle.

What has changed

The statutory levy (0.1%-1.1% GGY) commenced 6 April 2025 and online slot stake limits (£5 adult / £2 for 18-24) are now fully in force; UKGC introduced a turnover-linked penalty framework in 2025.

What to do now

Secure UKGC operating and/or B2B software licences, ensure GLI-19/RTS certification, implement slot stake caps and GAMSTOP, disable credit-card funding, and budget for the levy and high compliance burden.

What to watch

Gambling ombudsman/dispute redress scheme, affordability threshold tuning, and a possible single gambling tax rate following the 2025 Budget.

Product Coverage

Status for each product as published for this jurisdiction.

Expert reviewed: The expert returned this position.

Product / vertical	Status	How this answer was reached
Casino	Open	Expert reviewed
Poker	Open	Expert reviewed
Sports Betting	Open	Expert reviewed
Skill Games	Open	
Lottery	Restricted	Expert reviewed
Software / B2B	Open	Expert reviewed
Bingo	Open	Expert reviewed
Fantasy Sports	Open	Expert reviewed
eSports Betting	Open	
Sweepstakes	Outside the regulatory perimeter	Expert reviewed
Crypto Gambling	Restricted	Expert reviewed
Affiliate Marketing	Open	Expert reviewed
Payments for Gambling	Open	Expert reviewed
Horse Racing	Open	Expert reviewed
Exchange Betting	Open	Expert reviewed
Pool Betting	Open	Expert reviewed
Virtual Events Betting	Open	Expert reviewed
Other Event Betting	Open	Expert reviewed
Prediction Markets	Open	Expert reviewed
Free Play	Outside the regulatory perimeter	Expert reviewed
Betting Agent	Open	Expert reviewed

Service provider risk

Provider type	Risk level	Traffic light
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Payment Processor	Medium	Amber
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Regulatory Pulse

Direction	Tightening
Conviction	High
Lead signal	Gambling Commission settles with L&L Europe for £0.9m over AML, SR and unfair-terms failings (21 Oct 2026)
Category	Enforcement

Section-by-section cycle summary

Concise per-section summaries from the latest interpret cycle. These findings are folded additively into the persistent-state and are reflected in the baseline narratives throughout this report.

Overview: This cycle is dominated by a 25% Gambling Commission fee rise effective 1 October 2026, a £0.9m enforcement settlement against L&L Europe for AML and social-responsibility failings, and finalised technical standards for Category B gaming machines. No statutory change to the licensing regime itself occurred.

Licensing & Regulation: The MLRO personal-licensing requirement under LCCP 1.2.1 remains in force, requiring the head of a licensee's AML/CTF function to personally hold a Gambling Commission personal management licence. No change to licence categories was identified this cycle.

Enforcement: The Gambling Commission accepted a £0.9m settlement from L&L Europe over unfair and non-transparent terms, delayed withdrawals, inadequate AML policy and social-responsibility failings (21 October 2026). Three individuals were sentenced for General Election betting offences (23 October 2026), continuing a high-cadence enforcement run through autumn 2026.

Technical Compliance: Standing technical standards continue to prohibit autoplay on all online gaming (from 17 January 2025) and require a minimum 2.5-second slot game cycle. The Commission finalised new Category B gaming-machine standards on 30 September 2026 requiring player-set play limits with break-in-play prompts and display of elapsed session time and net position, phased from 2027.

Distribution & Platform Rules: No material development affecting distribution or platform rules was identified this cycle.

Commercial Activity: No discrete commercial transaction (M&A, investment, partnership, licensing deal) was identified in the research for this cycle.

Extraterritorial Reach: No material development affecting extraterritorial reach was identified this cycle.

Market Opportunity: No material market-opportunity development was identified this cycle.

Entry Pathways: No material development affecting entry pathways was identified this cycle.

Cost to Operate: DCMS confirmed a headline 25% rise in most Gambling Commission operating-licence, application, personal-licence, variation and change-of-control fees from 1 October 2026; society lottery licences are frozen and on-course bookmaker general betting licences move from a days-of-operation basis to a GGY market-share basis.

Operational Obligations: No new operational obligation was identified this cycle beyond the standing technical-standards and MLRO personal-licensing requirements already in force.

AML / CFT Regime: The LCCP 1.2.1 requirement that the head of a licensee's AML/CTF function personally hold a Gambling Commission personal management licence remains in force. No new AML instrument was identified this cycle; the L&L Europe settlement cited inadequate AML policy among its grounds.

Player Protection: The Gambling Commission's non-statutory guidance continues to state there is 'no valid reason to delay' a legitimate, verified withdrawal once AML, legal-hold and account-ownership checks are satisfied.

Payments & Money Flow: No material development affecting payments or money flow was identified this cycle.

Competitive Landscape: No material competitive-landscape development was identified this cycle.

Reform Horizon: The Northern Ireland Department for Communities minister ruled out a wider overhaul of gambling law while confirming a review of the 2022 reforms to the Betting, Gaming, Lotteries and Amusements (NI) Order.

Executive Summary: The cycle's dominant themes are a 25% Gambling Commission fee rise, continued high-cadence AML/SR enforcement (L&L Europe £0.9m), and new Category B gaming-machine technical standards. No statutory change to the core licensing regime occurred.

Regulated Activity Classes: New Category B land-based gaming-machine technical standards were finalised on 30 September 2026, requiring player-set play limits with break-in-play/safer-gambling prompts and display of elapsed session time and net win/loss, phased from 2027.

Consumer Protection: Schedule 2 of the Gambling Act 2005 continues to require a genuine, equally-publicised free-entry route for prize draws, with s.258/259 offences for promoting or facilitating a non-compliant lottery. The Digital Markets, Competition and Consumers Act 2024 ss.226-227 (in force since 6 April 2025) treats unclear or untimely material information as a misleading omission, with CMA fines up to 10% of global turnover.

Key Judgments

Analyst key judgments from the 2026-10-25 interpret cycle.

- The combination of a 25% licence-fee rise and continued six-figure AML/SR settlements is materially increasing the regulatory cost base for GB-licensed operators without any underlying statutory change.
- The Commission's enforcement cadence through autumn 2026 (QuinnBet, Targetlocal, L&L Europe) indicates sustained supervisory focus on AML controls and source-of-funds verification specifically.

This Cycle

What Changed This Cycle

- **[New]** L&L Europe £0.9m settlement

Reason: New enforcement settlement reported this cycle.

- **[Changed]** 25% fee rise effective 1 Oct 2026

Reason: DCMS confirmed fee rise this cycle.

Latest Update

2025-05-21 • Licensing • Impact: High

Online slot stake limits fully in force: £5 per spin for adults 25+ (9 April 2025) and £2 per spin for 18-24 (21 May 2025).

2025-04-06 • Taxes • Impact: High

Statutory levy of 0.1%-1.1% of GGY by sector commenced 6 April 2025 under the Gambling Levy Regulations 2025, replacing voluntary RET contributions.

Reform Horizon

Reform Horizon: Amber

The Category D gaming machines and bingo-premises licensing consultation, launched 15 October 2025, has now closed. The statement of principles for determining financial penalties has been in force since 10 October 2025, giving the Commission a settled framework for calibrating financial-penalty decisions. DCMS opened a further consultation on gambling regulation funding on 28 January 2026, adding a funding-model question to the active reform pipeline alongside the machine and bingo-premises consultation. These items collectively represent the continuing conversion of the 2023 White Paper's implementation programme into concrete rules through 2026, with multiple reform strands moving through consultation and in-force stages concurrently rather than sequentially.

Reform stage	Enacted In Force
Confidence	Confirmed

Reform horizon scenario

The GB reform horizon is genuinely bidirectional. Under the base scenario, the SI 2026/828 fee changes take effect on 1 October 2026, the burden-reduction invitation produces modest LCCP simplifications by early 2027, and the Financial Risk Assessment affordability rollout proceeds under new UKGC leadership with some delay. Under an adverse scenario, the payments consultation crystallises into a binding financial-institution blocking instrument, the unlicensed-sponsorship ban is enacted, and leadership turnover at the Commission produces a more aggressive enforcement posture during the transition — compounding cost and compliance pressure for operators. Under a favourable scenario, the burden-reduction invitation delivers meaningful LCCP simplification, the Remote Gaming Duty stabilises, and new UKGC leadership signals a more proportionate enforcement approach — improving the net cost-to-operate picture. The most consequential near-term watch items are the payments consultation outcome, the sponsorship-ban legislative progress, and the appointment of new UKGC senior leadership.

RISK ASSESSMENT

Enforcement

Status: Red

The Gambling Commission operates a proactive, risk-based enforcement regime. Licensees face regular compliance assessments and the GC will conduct formal audits, impose regulatory settlements (financial penalties), issue warnings, attach additional licence conditions, suspend licences, and in serious cases revoke licences. The Commission publishes enforcement outcomes, naming operators and detailing failings. The GC carries out regular compliance assessments as its form of supervision in conjunction with the quarterly regulatory returns and reacting to any complaints raised against licensees. The compliance assessment are a form of audit and should be taken very seriously, see: <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/compliance-assessments>

Enforcement intensity has increased markedly since 2018. Between 2022-2024, the GC concluded 26 enforcement cases with operators paying approximately £76m in regulatory

settlements. Record penalties include the £19.2m settlement with William Hill (2023) for social responsibility and AML failures — the largest penalty in UKGC history at that time.

The Commission has established a dedicated Illegal Gambling Taskforce with additional Treasury funding, signalling enhanced focus on unlicensed operators. Enforcement against unlicensed operators includes seeking removal of payment processing facilities, working with advertising platforms to remove unlicensed operator advertising, and collaboration with other regulators and law enforcement.

Software suppliers are subject to direct enforcement action for responsible product design failures, as demonstrated by the £122,835 fine against a gambling software supplier in 2025. B2B licensees must proactively monitor and police against use of their gambling software by B2C customers who operate them in the GB without a license, where Evolution Gaming's were subject to a £4.75M Regulatory Settlement UK B2B license as its games were accessible to UK residents via unlicensed, black-market gambling websites: <https://www.gamblingcommission.gov.uk/news/article/evolution-malta-holding-limited-to-pay-gbp4-75m>

Generally speaking, as part of a B2B license application, the GC will require information on how the B2B applicant ensures that their B2C customers are not transacting with customers who are resident in countries where gambling is not permissible and also the process in place should these customers be from countries on the watch list/high risk.

The GC also won the High Court litigation regarding the National Lottery licence award outright, demonstrating robust defence of regulatory decisions.

Enforcement powers

The Gambling Commission holds extensive enforcement powers under the Gambling Act 2005 including: (1) power to review and revoke operating and personal licences; (2) power to suspend licences pending investigation; (3) power to attach additional licence conditions; (4) power to impose financial penalties (regulatory settlements) — unlimited quantum; (5) power to issue formal warnings; (6) power to obtain injunctions; (7) powers of entry, inspection and seizure; (8) power to prosecute offences under the Act (though criminal prosecution is rare, regulatory settlement being preferred); (9) power to void bets in specified circumstances; (10) power to publicise enforcement outcomes; (11) under Licence Condition 18.1.1 (effective 29 July 2026), the ability to notify holders of the relevant non-remote operating licences in writing that a specified gaming machine is non-compliant, after which the licensee must not make that machine available for use. The Commission can also seek orders requiring ISPs to block access to unlicensed gambling websites, though this power is used sparingly.

The GC's enforcement powers and responsibilities are set out in its licence, compliance and enforcement policy <https://www.gamblingcommission.gov.uk/policy/licensing-compliance-and-enforcement-under-the-gambling-act-2005>

These powers including ability to conduct licence reviews are also set out in the regulatory section of its Policy on principals of licensing and regulation

<https://www.gamblingcommission.gov.uk/policy/statement-of-principles-for-licensing-and-regulation/statement-of-principles-for-licensing-principles-for-regulation>

The GC has published principals on when and how it imposes financial penalties, including regulatory settlement payments in lieu of penalties, see

<https://www.gamblingcommission.gov.uk/policy/statement-of-principles-for-determining->

financial-penalties

Licence-revocation risk drivers

Serious or repeated AML failures including inadequate customer due diligence, failure to file suspicious activity reports

Systemic social responsibility failures including inadequate affordability checks, failure to identify problem gambling indicators

Misleading the regulator or failure to disclose material information

Failure to comply with licence conditions or LCCP requirements

Criminal conduct by licensee or key personnel

Loss of suitability of key personnel

Financial instability threatening customer funds protection

Serious advertising code breaches

Technical failures compromising game fairness or integrity

Recent enforcement events against GB Licensees

Date | Target | Action / conduct | Amount | SRC

2023 | B2C Operator | Regulatory Settlement — AML/Social Responsibility | £10m+ | SRC-GB-004

2023 | B2C Operator | License Suspension - AML/ Unfair terms | |

<https://www.gamblingcommission.gov.uk/news/article/suspension-of-licence-in-touch-games-limited>

2025-07 | B2C Operator | Regulatory Settlement — Unfair Terms | £100k-£500k | SRC-GB-008

2025 | B2C Operator | Regulatory Settlement — Self-reported breach | £50k-£100k | SRC-GB-009

2025 | B2B Supplier | Regulatory Settlement — Responsible Product Design | £100k-£500k | SRC-GB-020

2022-2024 | Multiple B2C Operators | Aggregate Enforcement — Various | £10m+ | SRC-GB-004

2025 | B2B Operator | License Suspension - failure to hold host licence | |

<https://www.gamblingcommission.gov.uk/news/article/suspension-of-licence-spride-oue>

2026 | B2B Operator | Regulatory Settlement - illegal use of its games in GB | £4.75 |

<https://www.gamblingcommission.gov.uk/news/article/evolution-malta-holding-limited-to-pay-gbp4-75m>

2026 | B2B Operator | Self-suspended/ Regulatory Settlement - for running slots too fast | £123K | <https://www.gamblingcommission.gov.uk/news/article/stakelogic-bv-to-pay-gbp122-835-for-running-slots-too-fast>

► New — AI generated

Additional named settlements not in the synthesis event table: Entain (Ladbrokes/Coral) £17m (2022) for responsible gambling and AML failures; Kindred Group operators 32Red and Platinum Gaming combined £7.1m (2023) for AML and safer-gambling failures.

A GGY during period of breach -linked fine framework was introduced by the UKGC in 2025. High Court dismissed the TNLC / Northern & Shell challenge to the Fourth National Lottery Licence award, reinforcing regulatory discretion against litigation.

Resourcing: UKGC drawing on an additional £26m Treasury grant-in-aid over three years; DCMS Illegal Gambling Taskforce led by Gambling Minister Baroness Twycross now active.

A Greater Manchester Police raid on a suspected illegal gambling den resulted in two arrests.

Enforcement action taken against unlicensed operators

Payment blocking is an effective tool used by the GC to tackle illegal gambling websites. Illegal operators are also subject to criminal investigations and criminal prosecution processes.

The Gambling White Paper sets out new proposals to introduce legislation that will give the GC the power

to apply to the court for an order that requires ISPs, payment providers and other providers of “ancillary services” to implement measures aimed at disrupting the business of an illegal gambling operator.

The Industry’s voice: the Betting and Gaming Council conducted their own study into the black market, see: <https://bettingandgamingcouncil.com/news/shock-new-study> , where the headline was that “1.5m BRITS STAKE UP TO £4.3bn ON ILLEGAL GAMBLING BLACK MARKET EACH YEAR”

In his 10th November 2025 speech the GC’s CEO stated in relation to illegal gambling enforcement:

“But you can all see what it says behind me, you can see the scale of what we’ve been doing just in this financial year so far:

issued 480 Cease and Desists to advertisers and operators

reported 188,297 URLs to various search engines and seen 104,192 URLs removed as a result so far

referred 659 websites to the search engines for delisting

disrupted 504 websites so that they have either been taken down or geo-blocked.”

Expert-reviewed text · 2026-10-07

Licence Condition 18.1.1 took effect on 29 July 2026. It is a general licence condition attached under section 75 of the Gambling Act 2005, in line with section 86(2) of that Act, and it applies to holders of non-remote casino, bingo, betting, adult gaming centre and family entertainment centre operating licences. A licensee must not make a specified gaming machine available for use in reliance on its licence once the Commission has notified it in writing that the machine does not meet the requirements set out in the condition. Breach is a breach of a licence condition and may be dealt with through the Commission's ordinary regulatory powers. It is the first measure put into effect from the Commission's January 2025 consultation on gaming machine technical standards. No published enforcement outcome under LC 18.1.1 was identified as at 6 October 2026.

Holland Park Leisure Limited was fined £150,000 for failing to take part in the mandatory multi-operator self-exclusion scheme. The failure continued until the Commission suspended the operator's licence in October 2025. The Commission also found that the operator gave misleading information during the investigation, and it required an independent third-party audit as part of the outcome.

Expert-reviewed text · 2026-09-26

Licence condition 18.1.1 took effect on 29 July 2026. It applies to non-remote casino, bingo, general betting, adult gaming centre and family entertainment centre operating licences. A licensee must not make a specified gaming machine available for use once the Commission has notified it in writing that the machine's manufacture, supply, installation, adaptation, maintenance or repair was not carried out in reliance on a gaming machine technical operating licence, or did not comply with the Commission's technical standards. It is a licence condition, not a code provision. A breach can lead to a licence review under section 116 of the Gambling Act 2005 and a financial penalty under section 121. No

enforcement action under the condition has been published. Separately, the Commission has received £26 million of additional Exchequer funding over three years to tackle illegal gambling, with no published allocation to land-based supervision. Enforcement against licensees continued in this period. On 23 July 2026 Evolution Malta Holding Limited agreed to pay £4.75 million after its games appeared on unlicensed websites accessible in Great Britain. On 18 August 2026 Holland Park Leisure Limited was fined £150,000 for failing to take part in a multi-operator self-exclusion scheme at its adult gaming centres. On 20 August 2026 QuinnBet (Gibraltar) Limited agreed to pay £609,104 for social responsibility and anti-money laundering failures. The Commission suspended the licences of BresBet Ltd and Bet St George Ltd on 28 August 2026, pending review, over suspected social responsibility and anti-money laundering failings; both surrendered their licences on 4 September 2026. On 21 September 2026 it suspended the combined remote operating licence of Targetlocal Ltd after identifying anti-money laundering failings, pending a review of the licence.

Enforcement powers

- —: Gambling Act 2005 s.86(2); LCCP LC 18.1.1

Enforcement events

- —
- —: Gambling Act 2005
- —: Gambling Act 2005 (Fourth National Lottery licence competition)
- —: Gambling Act 2005 s.116
- —: Licence Conditions and Codes of Practice (LCCP) AML and social responsibility provisions
- —: Social Responsibility Code Provision 3.5.6 (LCCP)
- —: WHG (International) / William Hill group agreed a record £19.2m regulatory settlement for widespread social responsibility and AML failures between May 2020 and October 2021; new licence conditions added.
- —: Entain (Ladbrokes/Coral) paid £17m for responsible gambling and AML failures — at the time the largest UKGC penalty.
- —: Kindred Group operators 32Red and Platinum Gaming fined a combined £7.1m for AML and safer gambling failures.
- —: Fafabet (Taichi Tech Limited) fined £170,000 for unfair terms and conditions allowing forfeiture of winnings; third-party audit ordered.
- —: WHG (International) Limited received a further £82,687 penalty for a self-reported breach of group account identification requirements (SRCP 3.9.1).
- —: Gambling software business fined £122,835 for breach of responsible product design standards
- —: High Court dismissed TNLC/N&S challenge to the Fourth National Lottery Licence award
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Extraterritorial Reach

Status: Green

Withheld pending counsel review. The assessment previously published here rested on a single uncorroborated source describing an unresolved matter. Counsel directed on 20 September 2026 that it be withheld or deleted; no substitute assessment has been made.

Reform Horizon

Status: Amber

The Category D gaming machines and bingo-premises licensing consultation, launched 15 October 2025, has now closed. The statement of principles for determining financial penalties has been in force since 10 October 2025, giving the Commission a settled framework for calibrating financial-penalty decisions. DCMS opened a further consultation on gambling regulation funding on 28 January 2026, adding a funding-model question to the active reform pipeline alongside the machine and bingo-premises consultation. These items collectively represent the continuing conversion of the 2023 White Paper's implementation programme into concrete rules through 2026, with multiple reform strands moving through consultation and in-force stages concurrently rather than sequentially.

Expert-reviewed text · 2026-10-07

On 29 January 2026 the Gambling Commission published its response to its January 2025 consultation on gaming machine technical standards and the LCCP. That response led to Licence Condition 18.1.1, which took effect on 29 July 2026. The Commission is still considering the consultation's other proposals. No timetable for a final outcome had been published as at 6 October 2026.

Outlook

Status: Amber

ID — Item — Date — Stage

HZN-GB-001 — Commission's invitation to industry to propose ways of reducing regulatory burden — Closed 25 September 2026 — Closed; outcome awaited. Not a consultation

HZN-GB-003 — UK holds the FATF Presidency — From 1 July 2026 (two-year term) — In effect

HZN-GB-005 — General betting duty of 25% on remote bets (Finance Act 2026 s.87) — 1 April 2027 — Enacted, forward-dated

HZN-GB-006 — Amended RTS 12B deposit-limit requirements — 30 September 2026 — Made; deadline extended from 30 June 2026

HZN-GB-007 — Staged Financial Risk Assessment rollout — Stage one timetable to be confirmed — Announced 7 July 2026

HZN-GB-008 — Licence fee changes (SI 2026/828) — 1 October 2026 — Made, forward-dated

HZN-GB-010 — Ban on sponsorship and advertising by unlicensed operators — None set — DCMS consultation published 15 July 2026, now closed; outcome awaited

HZN-GB-013 — Prohibition on third-party betting on the US Powerball draw — Consultation closes 4 November 2026 — DCMS consultation, published 23 September 2026

HZN-GB-014 — Revocation of the "Aim to Permit" premises-licensing principle — None set — Government statement of intent, 11 August 2026; no legislation published

Scenarios. Base: the fee changes take effect on 1 October 2026, and the burden-reduction invitation leads to modest LCCP simplification. Financial Risk Assessment stage one begins once the Commission confirms its timetable. Adverse: the sponsorship ban and the Powerball prohibition are both made, and Aim to Permit is revoked, tightening land-based entry. Favourable: the burden-reduction exercise produces meaningful LCCP simplification. The most consequential near-term items are the outcome of the burden-reduction invitation, the sponsorship consultation response and legislation on Aim to Permit.

Red Flags

[GB-RF-001] AML control gaps

Record multi-million penalties imposed for AML failures.

Evidence: [SRC-GB-004](#), [SRC-GB-023](#), [SRC-GB-024](#)

[GB-RF-002] Inadequate affordability/customer interaction

Drove the £19.2m William Hill settlement.

Evidence: [SRC-GB-004](#)

[GB-RF-014] High-velocity spend without checks

Cited in William Hill case (£23k in 20 mins).

Evidence: [SRC-GB-004](#)

[GB-RF-003] Statutory levy non-payment

Non-payment is a licence requirement breach risking revocation.

Evidence: [SRC-GB-005](#)

[GB-RF-004] Slot stake over £5/£2

Breach of mandatory licence condition.

Evidence: [SRC-GB-003](#)

[GB-RF-005] Contacting self-excluded customers

Prohibited under LCCP; benchmark penalties apply.

Evidence: [SRC-GB-001](#)

[GB-RF-008] Unlicensed software supply

B2B software must be UKGC-licensed.

Evidence: [SRC-GB-001](#)

[GB-RF-009] Credit-card gambling

Banned since April 2020.

Evidence: [SRC-GB-001](#)

[GB-RF-011] White-label arrangements

Under particular UKGC scrutiny.

Evidence: [SRC-GB-025](#)

[GB-RF-012] Gibraltar entity without GB licence

Dual licensing required post-Brexit.

Evidence: [SRC-GB-009](#)

[GB-RF-017] Uncertified RNG

GLI-19 / RTS certification required.

Evidence: [SRC-GB-003](#)

[GB-RF-020] Non-compliant affiliate conduct

Licensee liable for affiliate breaches under LCCP.

Evidence: [SRC-GB-001](#)

[GB-RF-021] Pre-verification gambling access

Age/identity verification required before play.

Evidence: [SRC-GB-001](#)

[GB-RF-022] No GAMSTOP integration

Mandatory for all remote licensees.

Evidence: [SRC-GB-001](#)

[GB-RF-006] Direct marketing without per-product opt-in

SRCP 5.1.12 in force from 1 May 2025.

Evidence: [SRC-GB-007](#)

[GB-RF-007] Unfair T&Cs / forfeiture clauses

Fafabet fined £170k July 2025.

Evidence: [SRC-GB-016](#)

[GB-RF-010] Open-loop voucher funding

Flagged high-risk by UKGC.

Evidence: [SRC-GB-001](#)

[GB-RF-013] Failure to identify group accounts

WHG fined £82,687 August 2025.

Evidence: [SRC-GB-009](#)

[GB-RF-015] Missing reality-check / session limits

Mandatory LCCP RG tools.

Evidence: [SRC-GB-001](#)

[GB-RF-016] Sub-2.5s slot spin

RTS 14D minimum spin time breach.

Evidence: [SRC-GB-003](#)

[GB-RF-018] Pre-watershed gambling TV ads

9pm watershed (except bingo).

Evidence: [SRC-GB-007](#)

[GB-RF-019] Premier League front-of-shirt gambling sponsorship

Banned from 2026/27.

Evidence: [SRC-GB-007](#)

[GB-RF-023] Inaccurate/late regulatory returns

Affects levy calculation and compliance standing.

Evidence: [SRC-GB-005](#)

[GB-RF-025] Non-compliant bonus/promotion design

Heavy LCCP restrictions on incentives.

Evidence: [SRC-GB-001](#)

[GB-RF-024] Single tax rate reform exposure

2025 Budget floated rationalising RGD/GBD.

Evidence: [SRC-GB-007](#)

Architecture Patterns

[GB-AP-001] UKGC point-of-consumption licensing

Typology: Licensing

Liability heads: Unlicensed Operation S.33

[GB-AP-002] B2B software licensing requirement

Typology: Supply Chain

Liability heads: Unlicensed Software Supply

[GB-AP-003] Statutory levy on GGY

Typology: Fiscal

Liability heads: Licence Revocation For Non Payment

[GB-AP-004] Slot stake limit licence condition

Typology: Product Control

Liability heads: Licence Condition Breach

[GB-AP-005] Punitive enforcement with turnover-linked penalties

Typology: Enforcement

Liability heads: Financial Penalty S.121, Licence Review S.116

[GB-AP-006] Credit-card gambling ban

Typology: Payments

Liability heads: Lccp Breach

[GB-AP-007] Post-Brexit Gibraltar dual licensing

Typology: Cross Border

Liability heads: Unlicensed Operation

Worked Examples

Maltese operator wishes to serve GB consumers

Entities: MT operator

Must obtain UKGC remote operating licence under POC regime; MT licence does not suffice.

Recommendation: Apply for UKGC licence; budget 6-12 months.

B2B slot supplier

Entities: software vendor

Remote Gambling Software licence required; games must meet GLI-19/RTS and slot stake caps.

Recommendation: Obtain B2B licence and certify content.

Operator with weak affordability checks

Entities: B2C operator

High-velocity unchecked spend triggered the £19.2m William Hill case.

Recommendation: Implement robust customer interaction and financial-risk thresholds.

Operator using forfeiture T&Cs

Entities: B2C casino

Fafabet fined £170k for unfair terms allowing winnings forfeiture.

Recommendation: Ensure terms are clear, fair and transparent.

Gibraltar group entity post-Brexit

Entities: GI operator

WHG (International) is Gibraltar-registered yet UKGC-licensed and enforced against.

Recommendation: Maintain GB dual licensing and group-level controls.

Decision Tree

Q: Do you target GB consumers?

Q: Are you a B2C operator or B2B supplier?

Q: Do you hold the relevant UKGC remote operating licence(s)?

Q: Do you hold a Remote Gambling Software licence?

Q: Is your software certified to GLI-19 / RTS?

Q: Are RG tools (GAMSTOP, limits, slot stake caps) implemented?

Q: Is AML/EDD framework in place and credit-card funding disabled?

Q: Are statutory levy and regulatory returns obligations met?

LEGAL BASIS

Overview

Status: Amber

The UK gambling regulatory environment is in an active tightening phase in 2026, with the 2023 White Paper continuing to convert into concrete LCCP and SRCP amendments across licensing, enforcement, cost and operational categories. The Gambling Commission is the primary regulator, operating under the durable statutory framework of the Gambling Act 2005, but is executing much of this cycle's change through Code-level instruments it can amend by consultation rather than through primary legislation. This cycle sees concurrent movement on the reporting threshold for operator-status changes, a new immediate-removal condition for non-compliant gaming machines, the abolition of Bingo Duty, a ban on mixed-product bonus promotions, and standardisation of deposit-limit terminology. A leadership transition at the Commission adds an element of uncertainty to how the current trajectory of tightening will be sustained going forward, though the reform pipeline itself continues to move through consultation and in-force stages without interruption.

Expert-reviewed text · 2026-09-26

The period is defined by tighter technical compliance, enforcement and taxation rather than by structural market change. The LCCP was updated on 6 April 2026 to refer to the Digital Markets, Competition and Consumers Act 2024, and on 29 July 2026 a new licence condition, LC 18.1.1, took effect. It prevents non-remote licensees from making available any gaming machine that the Commission has notified as non-compliant. On 1 April 2026 bingo duty was abolished and Remote Gaming Duty rose from 21% to 40%. The statutory levy has applied since 6 April 2025, at 1.1% of the leviable amount for remote casino, bingo and betting licences, with lower rates for other licences. Great Britain remains a mature licensing market under the Gambling Act 2005.

Licensing & Regulation

Status: Amber

Great Britain has a fully regulated remote and non-remote gambling licensing regime for both B2C and B2B providers

Remote and non-remote gambling operations are licensed under the Gambling Act 2005.

The Gambling Commission (GC) holds powers as the gambling regulator in Great Britain (GB), they licence, regulate, advise, and provide guidance to individuals and businesses that offer gambling in GB. The National Lottery is also under their remit. The GC represents the government's Department for Digital, Culture, Media, and Sport (DCMS).

Northern Ireland has a separate gambling regime and is covered in a separate section. However the National Lottery regulation covers all of the UK (including Isle of Man)

The Gambling Act 2005 defines 'gambling' as 'gaming', 'betting' and 'participating in a lottery'. Gaming is defined as playing a game of chance for a prize. A 'game of chance' includes: (a) a game that involves both an element of chance and an element of skill; (b) a game that involves an element of chance that can be eliminated by superlative skill; (c) a game that is presented as involving an element of chance but does not include a sport.

The licensing regime distinguishes between Operating Licences (required to provide gambling facilities) and Personal Management Licences (PML) - required for individuals in specified management positions). Operating Licences are further subdivided by activity type: Casino, Bingo, General Betting (Standard and Limited), Pool Betting, Betting Intermediary, Gaming Machine General (for Adult Gaming Centres), Gaming Machine Technical (for suppliers), Gambling Software, Lottery (external lottery managers), and Remote Operating Licences for online activities.

Additionally, there are limited exceptions to PML requirements for small scale operators (SSO), but this excludes casino operators. SSO exemption is calculated based on the number of key personnel with overall responsibility for the management functions qualifying positions (finance, IT, compliance, overall strategy, and marketing).

An operator qualifies for SSO exemption if there are three key personnel with overall responsibility for the various management functions. However (as with the PML position) the person responsible for compliance cannot also hold the marketing or overall strategy function.

Gambling Licences continue until suspended, surrendered or revoke subject to payment of annual license fees.

The PML continues for 5 years and must be then renewed.

B2B suppliers require Gambling Software Operating Licences or Gaming Machine Technical Operating Licences depending on whether they supply remote or land-based products. B2C

operators require Operating Licences specific to their gambling activities.

The point of consumption regime means that any operator providing gambling services to GB consumers must hold a GB Operating Licence, regardless of where the operator is located. This applies to all remote gambling operators whose services are used in GB. This covers advertising to consumers in GB, which even includes a passive website accessible to GB based persons for the purposes of gambling - will trigger a requirement for a licence from the GC.

In addition and irrespective of where the end customers are based, a requirement for a gambling license will be triggered by relevant presence in the GB where there's deemed to be providing facilities for remote gambling (online or through other means) which includes gambling equipment and/or mind and management in the form of key personnel located in GB.

Application process involves: (1) submission of detailed application forms with supporting documentation; (2) suitability assessment of corporate entities and key personnel including management controls, business plan and source of funding; (3) submission of operating Policies and Procedures ; (4) payment of application fees; (5) determination by the GC typically within 16 weeks for straightforward applications. Key licence conditions include compliance with LCCP (Licence Conditions and Codes of Practice), AML obligations, responsible gambling requirements, and technical standards.

Other Application timeframes

The current application time scales are:

- Change of control application: 12 weeks
- Application to vary an operating licence: 8 weeks
- Personal licence application: 8 weeks
- Application to vary a personal licence: 2-4 weeks

For more information see: <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/what-you-need-to-send-us-when-you-apply-for-an-operating-licence>

Applications must all be made online by registering with the GC's portal and then uploading information and documents in accordance with the type of licence applied for.

This was recently updated and streamlined in December 2025 – as set out in this guide: https://mcusercontent.com/98b2fb542d2fef77a0dd47cc7/files/4c51e908-145e-4dee-62fc-27881901b165/Operator_Licence_Application_Changes_Information_Note.pdf

For application portal see: <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/operating-licences>

Regulator ecosystem

Regulator | Remit | Statutory basis

Gambling Commission | Primary gambling regulator — licensing, compliance monitoring, enforcement, policy guidance for all gambling activities except spread betting. Supervisory Authority for AML compliance in the sector with HMRC acting as the national supervisory authority | Gambling Act 2005

Financial Conduct Authority | Regulates spread betting as a financial product; authorises spread betting firms | Financial Services and Markets Act 2000

Advertising Standards Authority / CAP | Advertising content standards for gambling advertising — enforces CAP Code and BCAP Code | Self-regulatory codes endorsed by Ofcom (broadcast) and CMA (non-broadcast)

Information Commissioner's Office | Data protection compliance for gambling operators handling customer personal data | Data Protection Act 2018, UK GDPR

Competition and Markets Authority | Consumer protection enforcement, unfair terms, misleading practices | Consumer Rights Act 2015, Digital Markets, Competition and Consumers Act 2024

HM Revenue & Customs | Tax collection — Remote Gaming Duty, General Betting Duty, Pool Betting Duty, Lottery Duty | Finance Act (various), Gambling Taxes regulations

Licence classes

Licence type | Scope | B2C/B2B | Notes

Remote and Non-Remote Casino Operating Licence | Online and landbased casino games including slots, table games, live dealer | B2C | Covers poker, backgammon and other games of mixed skill and chance

Remote and non-remote Bingo Operating Licence | Online and landbased bingo games | B2C | Can be standalone or combined with other remote licences

Remote and non-remote General Betting (Standard) Real Events Operating Licence | Online and landbased Fixed-odds betting on all real event types | B2C | Covers sports betting, esports betting, in-play betting, betting on lotteries – except national lottery

Remote General Betting (Standard) Virtual Events Operating Licence | Online Fixed-odds betting on all virtual event types | B2C | Based on RNG generated results

Remote and non remote Pool Betting Operating Licence | On-line and landbased Pool/pari-mutuel betting operations | B2C | Required for tote-style betting products, also covers commercial fantasy sports offerings

Remote and non-remote Betting Intermediary Operating Licence | On-line and landbased Betting exchanges and intermediary platforms | B2C | Commission-based model rather than bookmaking risk

Remote and non-remote Gambling Software Operating Licence | Development, manufacture, supply of gambling software for On-line and landbased gambling | B2B | Required for platform providers, game developers, RNG suppliers serving GB-licensed operators. Remote Gambling Host licences (casino, bingo, virtual events betting) are required with gambling software licences if the B2B provider uses their own infrastructure (rather than their B2C customer)

Remote and Non-remote Gaming Machine Technical Operating Licence | Supply, installation, maintenance of gaming machines and associated software | B2B | For land-based gaming machine supply chain

Remote Lottery Operating Licence | Society lotteries, external lottery management | B2C/B2B | External lottery managers require licence; society lotteries may register with local authority or GC depending on size

Personal Management Licence | Individuals in specified management functions | Individual | Required for persons occupying qualifying positions in licensed operators

Presence Requirements No local entity requirement;

There are currently no server location or other infrastructure obligations in GB and there are also no data storage requirements under the current regulations.

No need to have any staff of key persons in GB, apart from a GB address for service of official documentation

Expert-reviewed text · 2026-10-07

With effect from 19 March 2026, the Gambling Commission raised the LCCP threshold for reporting changes in operator status or relevant persons from three percent to five percent. It also widened the definition of relevant persons to include entities without share capital, except for society lottery licensees. This is a licence condition made under the

Gambling Act 2005, so the Commission can amend it by consultation without primary legislation.

The Commission republished the LCCP twice in 2026: on 19 January 2026, amending Social Responsibility Code 5.1.1, and on 19 March 2026, amending Licence Condition 7.1.14 and Social Responsibility Code 6.1.1. These amend existing conditions. The basic route to an operating licence under the Gambling Act 2005 has not changed.

Vicky Foxcroft has been appointed Parliamentary Under-Secretary of State at the Department for Culture, Media and Sport, with responsibility for gambling policy, succeeding Baroness Twycross.

Expert-reviewed text · 2026-09-26

Licence condition 18.1.1 is a general licence condition attached under section 75 of the Gambling Act 2005 to the non-remote operating licences listed in its "Applies to" provision. Section 86(2) expressly allows an operating licence to be subject to a condition, whether imposed under section 75, 77 or 78, that a specified gaming machine may not be made available for use after written notification by the Commission. The Commission introduced LC 18.1.1 in line with section 86(2). It is a licence condition, not a code provision. A breach can lead to a licence review under section 116 and a financial penalty under section 121.

Expert-reviewed text · 2026-09-26

The LCCP was updated on 6 April 2026 to refer to the Digital Markets, Competition and Consumers Act 2024. The current version took effect on 29 July 2026, when licence condition 18.1.1 was added. The condition came out of the Commission's January 2025 gaming machine consultation, on which it published its response on 29 January 2026. It applies to non-remote casino, bingo, general betting, adult gaming centre and family entertainment centre operating licences. A licensee must not make a specified gaming machine available for use once the Commission has notified it in writing that the machine was not manufactured, supplied, installed, adapted, maintained or repaired in reliance on a gaming machine technical operating licence, or did not comply with the Commission's technical standards. Section 86(2) of the Gambling Act 2005 expressly allows an operating licence to carry a condition of this kind, and the Commission introduced LC 18.1.1 in line with that provision. The Commission can amend the condition through consultation. Further proposals on gaming machine technical standards remain under the Commission's consideration.

Licence types

- Remote Casino Operating Licence: Gambling Act 2005 (c.19) as amended
- Remote Betting Operating Licence: Gambling Act 2005 (c.19) as amended
- Remote Gambling Software Licence (B2B): Gambling Act 2005 (c.19) as amended

Product coverage

Product	Status
Casino	Open
Poker	Open
Betting	Open
Skill Games	Open
Lottery	Restricted
Software B2B	Open
Bingo	Open
Fantasy Sports	Open
Esports Betting	Open
Sweepstakes	Outside Perimeter

Crypto Gambling	Restricted
Affiliate Marketing	Open
Payments For Gambling	Open
Horse Racing	Open
Exchange Betting	Open
Pool Betting	Open
Virtual Events Betting	Open
Other Event Betting	Open
Prediction Markets	Open
Free Play	Outside Perimeter
Betting Agent	Open

Technical Compliance

Status: Amber

LC 18.1.1, in force from 29 July 2026, creates a new mandatory technical-compliance obligation requiring holders of non-remote casino, bingo, general betting (standard and limited), adult gaming centre and family entertainment centre operating licences to withdraw gaming machines that the Gambling Commission identifies as non-compliant upon written notification. The condition is attached as a general licence condition by virtue of section 75 of the Gambling Act 2005, in line with the provision at section 86(2). It is a licence condition, not a code provision: breach is directly enforceable, including by financial penalty and by regulatory action following a section 116 review. The condition text is amendable by Commission consultation, but non-compliance is actionable in a way that an ordinary code provision is not. This obligation was adopted directly out of the Commission's January 2025 gaming-machine consultation, feedback on which was published 29 January 2026, and it tightens the machine-standards regime by removing operator discretion once a withdrawal notice is issued.

Expert-reviewed text · 2026-09-26

Licence condition 18.1.1 is attached under section 75 of the Gambling Act 2005, in line with section 86(2). It applies to holders of non-remote casino, bingo, general betting (standard and limited), adult gaming centre and family entertainment centre operating licences, not to all non-remote operators.

Distribution & Platform Rules

Status: Amber

Online/mobile: all remote gambling to GB consumers needs the relevant Remote Operating Licence (POC).

Retail: non-remote Operating Licence + premises licence; gaming-machine supply needs Gaming Machine Technical Licence.

Software/platform: B2B suppliers need a Gambling Software Operating Licence + RTS.

Affiliate: operators remain responsible for affiliate conduct under CAP/BCAP and LCCP standards.

► New — AI generated

iOS and Android app distribution permitted for UKGC licensees; white-label operators attract particular scrutiny.

Ad platforms (Google, Meta) restrict gambling ads to licensed, certified operators.

5. Technical

► New — AI generated (technical)

Software Certification

UKGC technical standards require RNG certification, game-fairness testing, geolocation, RG tools and mandatory GAMSTOP integration; software certified to GLI-19 and the Remote gambling and software Technical Standards (RTS); software must itself be licensed.

Remote Technical requirements are set out in the

<https://www.gamblingcommission.gov.uk/standards/remote-gambling-and-software-technical-standards> which should be read in conjunction with their implementation guide, namely the Testing Strategy for compliance with RTS:

<https://www.gamblingcommission.gov.uk/strategy/testing-strategy-for-compliance-with-remote-gambling-and-software-technical#changes>

The RTS can be categorised into two main areas:

The technical standards covering how remote gambling should be offered including the fairness of games, player account functionality and other information provision aspects. Security standards covering the licensee's Information Security Management System, as per: <https://www.gamblingcommission.gov.uk/standards/remote-gambling-and-software-technical-standards/4-remote-gambling-and-software-technical-standards-rts-security-requirements>

It's the latter that is the most relevant in terms of gambling equipment as it prescribes compliance to a data security environment in line with the international standards (ISO 27001 standards, see: <https://www.iso.org/standard/27001>

The RTS security requirements are aligned to ISO/IEC 27001. A current ISO 27001 certificate covering the relevant scope is ordinarily accepted as evidence toward compliance with the security standards; where it is not held, an annual third-party security audit is required under the testing strategy, with the first audit within six months of go-live. An ISO certificate is evidence toward compliance, not a substitute for the RTS. See link for further information on annual testing requirements:

<https://www.gamblingcommission.gov.uk/strategy/testing-strategy-for-compliance-with-remote-gambling-and-software-technical/7-third-party-annual-security-audit>

The latest implementation with an effective date of 30 September 2026 is the use and definition of Gross Deposit Limits. Where at a minimum, the gambling system must offer gross deposit limits - where the amount a customer deposits into their account is limited over a particular duration. Net deposit limits and Spend Limits can be used in addition subject to conforming to standardised terminology and definitions: see

<https://www.gamblingcommission.gov.uk/consultation-response/definition-of-deposit-limits-in-the-remote-gambling-and-software-technical/annex-2-rts-12-wording-in-full-from-30-september-2026>

Infrastructure and Integrations

GB has no general data-localisation requirement, but the position on hosting is not simply unrestricted: the LCCP remote gambling equipment condition governs the permitted location of key equipment used by GB licensees, and that position is not yet stated in this entry. Pending that, this entry should not be relied on when designing hosting architecture. Integration with GAMSTOP – safer gambling database

Expert-reviewed text · 2026-09-26

The security requirements in the Remote Gambling and Software Technical Standards are based on ISO/IEC 27001:2022. Holders of the remote licences listed by the Commission must have an independent security audit against those requirements every year. The first audit must take place within six months of the licence being granted. A licensee that is not yet trading can apply to have the six months run from the start of operations. An auditor

may take account of existing ISO/IEC 27001 work on a risk basis, but an ISO certificate is evidence towards compliance and does not replace the audit or the technical standards. From 30 September 2026, RTS 12B requires remote operators to offer gross deposit limits as a minimum and to use the term "deposit limit" only for gross limits.

AML / CFT Regime

Status: Amber

FATF status: largely compliant.

AML

The GB AML/CFT regime for gambling is robust and aligned with FATF standards. The UK is a FATF member and has been assessed as largely compliant with FATF Recommendations. The UK is subject to FATF standards and applies the Proceeds of Crime Act 2002 (POCA); The Terrorism Act 2000 ; The Money Laundering, Terrorist Financing & Transfer of Funds (Information on the Payer) Regulations 2017; and The Sanctions and Anti-Money Laundering Act 2018.

All B2C operators (including Gambling Software with hosting) under Licence Condition 12.1.1 are required to conduct an AML Risk Assessment to determine their businesses specific money laundering and terrorist financing risks. Where Casino B2C UKGC's operators will be required to comply with a higher standard as they are regulated entities under the AML legislation : see

<https://assets.ctfassets.net/j16ev64qyf6l/4bDXXXaD0rzzaglvvyqfbW/75988701e3ff13975ebc284b6583371d/>

[Prevention_of_money_laundering_and_combating_the_financing_of_terrorism_-_Fifth_edition__Revision_5_.pdf](#)

These risk assessments could factor in and reference relevant risk identified in the UKGC (as AML supervisory authority for the sector) risk assessments, the HMRC's (National supervisory authority) risk assessments, see:

<https://www.gamblingcommission.gov.uk/guidance/the-2023-money-laundering-and-terrorist-financing-risks-within-the-british>

For non-casino operators – the following guidance will need to be followed:

<https://www.gamblingcommission.gov.uk/guidance/duties-and-responsibilities-under-the-proceeds-of-crime-act-2002> Commission.

Also with reference to Licence Condition 12.1.1(3) of LCCP, the UKGC on 3 October 2025, published a very useful updated consolidation of AML/ CFT trends which highlight in both casino and non-casino sectors, topical issues, see:

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/anti-money-laundering-and-counter-terrorist-financing-casework-trends>. Though this is more targeted to B2C operators, there are some relevant learnings that have been considered and factored into this document

Generally Gambling operators must comply with AML obligations including:

- Customer Due Diligence (CDD): Operators must identify and verify customer identity. Enhanced Due Diligence (EDD) required for higher-risk customers including PEPs, customers from high-risk jurisdictions, and customers with complex ownership structures.

- Risk Assessment: Operators must conduct and document risk assessments covering customer, product, geographic and channel risks.

- Suspicious Activity Reporting: Obligation to file Suspicious Activity Reports (SARs) with the National Crime Agency (NCA) where there is knowledge or suspicion of money laundering.
- Record Keeping: Five-year retention requirement for CDD records and transaction data.
- Staff Training: Appropriate AML training for all relevant staff.
- Nominated Officer: Appointment of a nominated officer (MLRO) responsible for SAR submissions.

The Gambling Commission enforces AML compliance as the AML supervisory authority for gambling. Serious or systemic AML failures attract substantial penalties — the £19.2m William Hill settlement was partly for AML failings.

KYC

On registration:

customers' full names, home addresses, and dates of birth must be obtained during registration (ID)

On deposit:

ID and Age will be electronically checked (using electronic identity verification providers) against publicly available databases in the UK and matched against at least two primary data sources

Sanctions, PEP and bad media check (recommended on 1st deposit or at low level of deposit (not exceeding £100))

On Ongoing Monitoring

Enhanced Due diligence: source of wealth / source of funds checks as relevant

For PEPs

Those triggering high risk factors

Source of funds/source of wealth checks are required for higher-risk customers and those meeting financial thresholds. The enhanced affordability check requirements effectively overlay additional financial risk assessment on top of traditional AML CDD.

No change to the GB AML/CFT framework as at 6 October 2026. The Palfrey/Betfred settlement concerned social-responsibility failures, not AML.

Enforcement approach uses compliance assessments, quarterly return reviews and S.116 reviews focused on AML, social responsibility, customer interaction and technical compliance.

Expert-reviewed text · 2026-09-26

The money laundering and terrorist financing offences in Part 7 of the Proceeds of Crime Act 2002 and in the Terrorism Act 2000 apply to gambling businesses generally. The regulated-sector disclosure obligations apply to casinos as businesses in the regulated sector. Licence condition 12.1.1 requires operating licensees, other than gaming machine technical and gambling software licensees, to assess the risk of their business being used for money laundering and terrorist financing and to maintain appropriate policies, procedures and controls. Ordinary code provision 2.1.2 sets out anti-money laundering good practice for licensees other than casinos. Casino operators are relevant persons under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. The Regulations require them to keep a documented business-wide risk assessment, maintain policies, controls and procedures, apply customer due

diligence and, where required, enhanced due diligence, monitor ongoing relationships, keep records for five years and appoint a nominated officer. Under regulation 27(5) a casino must apply customer due diligence to any wagering or collection of winnings amounting to £2,000 or more, whether in one operation or linked operations. That threshold replaced 2,000 euros on 30 June 2026 under the Money Laundering and Terrorist Financing (Amendment) Regulations 2026. Under regulation 7(1)(d), the Gambling Commission is the supervisory authority for casinos.

Player Protection

Status: Amber

GB has one of the most extensive responsible gambling regimes globally, implemented through LCCP (Licence Conditions and Codes of Practice) and supplementary guidance.

Key requirements include:

- strict age verification (as well as ID verification) at point of registration
- Self-exclusion: Operators must offer self-exclusion and participate in multi-operator self-exclusion schemes (GAMSTOP for online gambling).
- Affordability checks: Enhanced financial risk assessment requirements. Operators must conduct affordability checks at specified thresholds and where indicators of financial vulnerability are present. The regime has progressively tightened with lower thresholds and more prescriptive requirements. Specifically:
 - Light touch (automated and based on open-source information) checks on financial vulnerability (checks against bankruptcy, county court judgements and other publicly available data but will not require gambling businesses to consider an individual's personal details such as postcode or job title) are triggered at £150 net deposit
 - Financial risk assessments start date to be announced- FSAs will need to be carried out by the largest remote operators where there is spend of £5,000 net deposit over a rolling 24-hour period for over 25s (£2500 for under 25s) . Once fully implemented in due course, Financial Risk Assessments will be applied to customers aged 25 years or older with net deposits exceeding £1,000 in a rolling 24-hour period or £3,000 over a rolling 90-day period; for those under 25 these thresholds will be reduced to £750 in a rolling 24 hours or £2,000 in a rolling 90 days. See:
<https://www.gamblingcommission.gov.uk/blog/post/financial-risk-assessments-pilot-update-on-stage-two>
- Customer interaction: Mandatory customer interaction requirements when problem gambling indicators or vulnerable customers (age, mental state, other vulnerabilities) are identified. Operators must have systems to identify customers exhibiting indicators of harm and must take appropriate action. In addition they will need to measure and evaluate the effectiveness of their interactions and where necessary take steps to make improvements.
The guidance to assist operators can be found here:
<https://www.gamblingcommission.gov.uk/consultation-response/customer-interaction-guidance-for-remote-gambling-operators-consultation/executive-summary-customer-interaction-guidance-for-remote-gambling>
- Deposit limits: Customers must be able to set deposit limits. From 30 September 2026, RTS 12B requires remote operators to offer gross deposit limits as a minimum, to reserve the term 'deposit limit' for gross limits, to offer gross limits with at least equal prominence

to other limit types, and to apply the most restrictive of simultaneous limits. The Commission extended the original 30 June 2026 date on 26 May 2026.

- Reality checks / session time limits: Required for certain products.
- Stake limits: Online slots now subject to statutory stake limits — £5 per spin for customers aged 25+, £2 per spin for customers aged 18-24.
- Product design: Game design must be socially responsible. Auto-play restrictions, spin speed limits, and other product features mandated.
- Advertising: Responsible gambling messaging required in all advertising. Social media marketing needs to be age gated to prevent enticing under 18's
- Statutory levy: The Gambling Levy Regulations 2025 fund research, education and treatment of gambling-related harms.

Failure to comply with social responsibility requirements is a major enforcement trigger — the largest penalties have been imposed for social responsibility failures combined with AML breaches.

► New — AI generated

Petfre (Gibraltar) Limited (Betfred) — £900,000 settlement (30 June 2026) for failures in automated harm identification, no immediate action on strong harm indicators, and a seven-day delay in re-flagging accounts for safer-gambling review (breaches of SRCP 3.4.3 and LCCP). Prior regulatory history cited as aggravating.

Staged Financial Risk Assessment regime: Stage 1 targets customers aged 25+ with net deposits exceeding £5,000 in a rolling 24-hour window (UKGC estimates <0.5% of accounts); no enforcement attaches to Stage 1 non-action — a calibrated rollout.

Continuity risk: probable departure of Executive Director of Policy and Research (Tim Miller) in September 2026 may affect near-term rollout.

Expert-reviewed text · 2026-10-07

The Gambling Commission fined Holland Park Leisure Limited for failing to take part in the mandatory multi-operator self-exclusion scheme. The failure continued until the Commission suspended the operator's licence in October 2025. The Commission also found that the operator gave misleading information during its investigation, and it required an independent third-party audit as part of the outcome. The case shows that failing to take part in the required self-exclusion scheme can lead to a financial penalty, suspension of the licence and remedial requirements.

Expert-reviewed text · 2026-09-26

The first phase of the Commission's changes to deposit limits took effect on 31 October 2025. From 30 September 2026, the Remote Gambling and Software Technical Standards (RTS 12B) require remote operators to:

- offer gross deposit limits as a minimum, meaning limits on the amount a customer deposits over a period;
- use the term "deposit limit" only for limits that meet the gross definition;
- offer gross limits with at least equal prominence to any other limit type;

stop further deposits once a limit is reached, until the period restarts or the customer increases the limit, subject to a 24-hour cooling-off period;

apply the most restrictive limit where a customer sets several.

The Commission originally set 30 June 2026 for these changes and extended the date on 26 May 2026. The technical standards are given effect through licence conditions, and the Commission can amend them by consultation.

Consumer Protection

Enforced by the CMA and the Gambling Commission under the Consumer Rights Act 2015 and Part 4 of the Digital Markets, Competition and Consumers Act 2024, which replaced the Consumer Protection from Unfair Trading Regulations 2008 for commercial practices from 6 April 2025 and gave the CMA direct enforcement powers, alongside the LCCP.

Unfair terms actionable — Fafabet £170k (Jul 2025).

Approved ADR access required under LCCP.

Bonus/free-bet advertising must include material terms.

Transparent and Fair Terms & Conditions

The Competition and Markets Authority (CMA) standards, which operates in conjunction with the GC, requires that all significant conditions relating to an offer or promotion are provided in a clear, timely and intelligible manner (e.g., if bonus winnings cannot be withdrawn until certain wager requirements have been met) in the advert itself (such as banner ads).

Further to this requirement, all other terms and conditions relating to a promotion need to be accessible within a single click from any other form of advertising where it is not possible to include the full terms and conditions within the advert due to restrictions on space or time (this applies, for example, to small banners).

The GC have also issued updated guidance on fair terms and practices following findings of licensees using terms that per potentially under fair and in some cases give the licensees undue discretion to decide if and how they are applied. As a result, licensees should review their terms and conditions to make sure they are compliant. The guidance can be found here:

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/fair-and-transparent-terms-and-practices>

Useful CMA guidance for the remote gambling industry in relation to use of unclear, unfair, and restrictive terms and conditions used in adverts can be found here:

https://assets.publishing.service.gov.uk/media/5b87cd2a40f0b63c9ca2b51d/Further_information_for_online_gambling_companies.pdf

► New — AI generated

Reporting obligations: Regulatory Returns (Gambling Act 2005 / LCCP); Statutory Levy Payment (Gambling Levy Regulations 2025).

Expert-reviewed text · 2026-09-26

The Consumer Rights Act 2015 applies to gambling operators' consumer contracts, including the fairness and transparency of their terms. From 6 April 2025, Chapter 1 of Part 4 of the Digital Markets, Competition and Consumers Act 2024 replaced the Consumer Protection from Unfair Trading Regulations 2008 for unfair commercial practices. That Act also gave the Competition and Markets Authority powers to enforce consumer law directly. Public enforcement of those provisions lies with the CMA and the other designated enforcers, including local weights and measures authorities (Trading Standards). The

Gambling Commission is not a designated enforcer under that Act. It addresses unfair terms and practices through the Licence Conditions and Codes of Practice, including licence condition 7.1.1 on fair and transparent terms, which was updated on 6 April 2026 to refer to the 2024 Act. A breach of that condition can lead to regulatory action by the Commission.

Operational Obligations

Status: Amber

SRCP 5.1.1 amendments, effective 19 January 2026, ban mixed-product bonus promotions and cap bonus-fund wagering requirements at ten times the bonus value, following the Autumn 2023 consultation response published 26 March 2025. This is a fragile, Code Provision-level instrument rather than statute, meaning it is amendable by future regulatory consultation, but it is binding on operators now. The restriction reshapes promotional design for online operators specifically, removing the ability to combine multiple product types within a single bonus offer and imposing a hard ceiling on how much wagering can be required before bonus funds convert to withdrawable balance. No other operational-obligations material was surfaced this cycle beyond this bonus-promotion restriction.

Northern Ireland (separate regime — BGLA 1985). The principal post-licence operational obligation identified this cycle derives from Article 180A of the 1985 Order, inserted by section 16 of the Betting, Gaming, Lotteries and Amusements (Amendment) Act (Northern Ireland) 2022 — durable primary legislation. This provision requires the Department for Communities to issue codes of practice, and licensees to follow those codes, on fair and open conduct and on the protection of under-18s and vulnerable persons. The 2022 Act also created a new criminal offence of inviting under-18s to play gaming machines, establishing a statutory floor for age-protection obligations. Beyond these instruments, no NI-specific technical certification, data-localisation, or game-approval standards were identified this cycle, consistent with the absence of an independent regulator capable of publishing such requirements. Reporting obligations to a dedicated gambling authority do not exist in NI; compliance mapping must instead account for the dispersed oversight architecture of courts, district councils, PSNI and the Department for Communities.

Reporting obligations

- Regulatory Returns: Gambling Act 2005 / LCCP
- Statutory Levy Payment: Gambling Levy Regulations 2025

Advertising & Marketing

Status: Red

Gambling advertising in GB is subject to a multi-layered regulatory framework. The primary advertising codes are the CAP Code (non-broadcast) and BCAP Code (broadcast), enforced by the Advertising Standards Authority. The Gambling Commission also imposes marketing requirements through LCCP, and the industry operates under the IGRG (Industry Group for Responsible Gambling) Code.

Key restrictions under CAP 16.3 include:

- All advertising must be socially responsible and not target minors or vulnerable persons
- Mandatory responsible gambling messaging and age verification statements

- Prohibition on celebrities or sports personalities with particular appeal to under-18s
 - Restrictions on advertising during certain broadcast watersheds. Any lottery or bingo carve-out arises from specific BCAP scheduling rules and is not stated here pending identification of the rule relied on.
 - Prohibition on advertising that suggests gambling can be a solution to financial problems or that emphasises the social status associated with gambling
 - Customers should be given the option to opt-in to bonuses and promotional offers separately from other marketing, and to set controls regarding which products they receive offers on. Specifically, there should be no 'cross-selling' without user opt-in.
 - Free bet and bonus advertising must include material terms
 - Affiliate marketing must comply with same standards as operator advertising — operators responsible for affiliate conduct
- voluntary action taken by the English Premier League to ban shirt sponsorships by end of 2026/27 season

An overview guidance provided by the GC can be found here which maps all the LCCP regulations, IGRG codes, ASA and Competition and Markets Authority (CMA) guidance: <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/advertising-marketing-rules-and-regulations>

Operators need to ensure their digital adverts (including those of their third-party marketing affiliates) are not placed on websites providing unauthorised access to copyrighted content, see: <https://www.gamblingcommission.gov.uk/news/article/infringing-website-list-iwl-for-gambling-operators>

Under the industry's voluntary IGRG code, signatory operators do not advertise during live sport from five minutes before to five minutes after an event, before 9pm, with a limited exception for horse and greyhound racing. This is an industry commitment, not a licence condition or statutory prohibition, and it binds signatories rather than all licensees.

Social media advertising faces particular scrutiny — age-gating requirements, prohibition on influencer marketing that appeals to under-18s, and requirements for clear identification of paid promotional content. In October 2023, the ASA published guidance on links between footballer social media posts and gambling advertising, in light of recent enforcement cases and the strong appeal of such marketing to minors, see: <https://www.asa.org.uk/news/stay-strong-on-strong-appeal-learnings-from-the-new-rule-one-year-on.html>

Recent enforcement has focused on misleading bonus terms, inadequate responsible gambling messaging, and targeting of vulnerable consumers. The ASA regularly upholds complaints and can require advertising withdrawal, though the Commission can take direct licensing action for serious marketing failures.

The GC have also issued updated guidance on fair terms and practices following findings of licensees using terms that per potentially under fair and in some cases give the licensees undue discretion to decide if and how they are applied. As a result, licensees should review their terms and conditions to make sure they are compliant. The guidance can be found here: <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/fair-and-transparent-terms-and-practices>

Useful CMA guidance for the remote gambling industry in relation to use of unclear, unfair, and restrictive terms and conditions used in adverts can be found here:

<https://assets.publishing.service.gov.uk/media/5b87cd2a40f0b63c9ca2b51d/>

[Further_information_for_online_gambling_companies.pdf](#)

Operators must provide customers with options to opt-in to direct marketing on a per product and per channel basis. The options must cover all products and channels provided by them and be set to opt-out by default. These options must be offered as part of the registration process and be updateable should customers change their preference. This requirement applies to all new and existing customers. Channel options must include phone call, email and text messages (SMS) as applicable. Product options must include betting, casino, bingo, as applicable. Operators must make clear to customers which products they offer are covered under relevant categories. For more detail see here: <https://www.gamblingcommission.gov.uk/consultation-response/summer-2023-consultation-proposed-changes-to-lccp-and-rtts-consultation/summary-of-responses-and-our-position-improving-customer-choice-on-direct>

Operators will also be limited on the number of times bonus funds must be re-staked before the consumer can withdraw winnings from the bonus. These changes come into force on 19 January 2026. See:

<https://www.gamblingcommission.gov.uk/news/article/gambling-promotions-to-be-safer-and-simpler>

Enforcement

There are frequent rulings by the ASA against gambling adverts, which if upheld lead to those adverts having to be taken down. See: https://www.asa.org.uk/search.html?q=gambling&sort_order=recent&topic=7509B48E-504B-4E08-9C053A2BF9DA5021

► New — AI generated

From 1 May 2025, new direct-marketing requirements (SRCP 5.1.12) require per-product, per-channel opt-in consent.

VIP / high-value-customer schemes attract high scrutiny. Premier League clubs agreed collectively to withdraw front-of-shirt gambling sponsorship from the end of the 2025/26 season; this is a collective club agreement, not a regulatory prohibition.

Expert-reviewed text · 2026-09-26

Gambling advertising in Great Britain is regulated in layers. The Advertising Standards Authority enforces the CAP Code (non-broadcast) and the BCAP Code (broadcast), whose gambling sections require advertising to be socially responsible. Among other things, they prohibit advertising that is likely to be of strong appeal to under-18s, including through sports or celebrity figures with such appeal, that suggests gambling can solve financial problems, or that links gambling to social status. The Gambling Commission requires licensees to comply with those codes and imposes its own marketing requirements through the LCCP. Signatory operators also follow the industry's IGRG code.

LCCP. From 1 May 2025, remote operators must let customers opt in to direct marketing separately for each product type and each channel they use. The options must default to opt-out, be offered at registration and be changeable later. From 19 January 2026, social responsibility code provision 5.1.1 caps bonus wagering requirements at ten times the bonus. It also bans promotions that require customers to take part in two or more types of gambling. Licensees remain responsible for marketing carried out by affiliates and other third parties. They must not place advertising, directly or through affiliates, on websites that provide unauthorised access to copyrighted content, including those on the Infringing Website List.

IGRG code. New gambling products may not be advertised on television before 9pm. The exceptions are bingo and lotteries, which could be advertised before September 2007, and sports betting around televised sporting events. Signatories do not advertise betting

during live televised sport from five minutes before to five minutes after the event, with an exception for horse and greyhound racing. Pre-watershed television advertising may not include sign-up offers aimed only at new customers.

Sponsorship. Premier League clubs agreed to remove gambling sponsorship from the front of shirts by the end of the 2025–26 season, so none is carried from 2026–27. Sleeve and other sponsorship remains possible. DCMS consulted from 15 July 2026 on banning operators not licensed by the Commission from sponsorship and advertising arrangements in Great Britain.

Terms and consumer law. The Commission has issued guidance on fair and transparent terms and practices, after finding terms that were potentially unfair or gave licensees undue discretion. The CMA has published guidance for online gambling businesses on unfair terms and promotions.

Enforcement. The ASA regularly upholds complaints against gambling advertisements and can require their withdrawal. The Commission can take licensing action for serious marketing failures.

Expert-reviewed text · 2026-09-26

Under the industry's voluntary IGRG code, signatory operators do not advertise betting on television during live sport from five minutes before an event to five minutes after it, before 9pm, with an exception for horse and greyhound racing. This is an industry commitment, not a licence condition or statutory prohibition, and it binds signatories rather than all licensees. Free prize draws and prize competitions fall outside Gambling Act 2005 licensing only where they meet its conditions: for free draws, the payment-to-enter rules in Schedule 2, including a genuine free entry route; for prize competitions, a skill, judgement or knowledge requirement that meets section 14(5). Promotions that fail those conditions are unlawful lotteries. The government published a voluntary code of good practice for prize draw operators on 20 November 2025, and operators were expected to implement it by 20 May 2026. "Unregulated" should not be used to describe these promotions.

CONTEXT & EVIDENCE

Cost to Operate

Status: Amber

Bingo Duty is confirmed abolished from 1 April 2026, having previously stood at ten percent, a durable fiscal change with statutory backing behind it. Remote Gaming Duty is charged at 40% of a gaming provider's profits from remote gaming with UK persons for accounting periods beginning on or after 1 April 2026, confirmed in HMRC's primary guidance at Excise Notice 455a, and Bingo Duty was abolished with effect from 1 April 2026 with no registration or returns required for periods starting on or after that date. The statutory basis is the gambling duties provisions of the Finance Act 2026. Beyond the duty picture, the compliance lift for operators this year includes re-engineering deposit-limit UX and restructuring bonus-fund wagering terms to comply with the SRCP amendments, both landing within the same operating year as the duty change, concentrating cost exposure into a single compliance cycle rather than spreading it across multiple years.

Northern Ireland (separate regime — BGLA 1985). The dominant cost development for any operator with remote-gaming exposure reaching NI consumers is the UK Budget 2025

confirmation that Remote Gaming Duty rises from 21% to 40% effective 1 April 2026, applicable UK-wide including NI under the Betting and Gaming Duties Act 1981 and Finance Act 1997. This near-doubling of the headline rate materially raises the cost-to-operate baseline and has prompted an escalation of the headline rate band from average to high. A new 25% Remote Betting Rate for remote sports betting takes effect from 1 April 2027, while remote horserace betting remains at 15%; the UK Government confirmed it will not proceed with a single unified Remote Betting and Gaming Duty. Gaming Duty gross gaming yield bandings are frozen from 1 April 2026 to 31 March 2027. The AML/CFT, responsible-gambling and technical-compliance operational-lift assessments remain unpopulated this cycle pending a dedicated NI-specific evidence pass; operators should not infer low burden from their absence.

Expert-reviewed text · 2026-09-26

Section 88 of the Finance Act 2026 abolished bingo duty from 1 April 2026. From the same date, section 86 raised Remote Gaming Duty from 21% to 40% of a provider's profits from remote gaming with UK persons, for accounting periods beginning on or after 1 April 2026. HMRC's Excise Notice 455a reflects the new rate. The statutory levy under the Gambling Levy Regulations 2025 has been in force since 6 April 2025. It is charged at rates from 1.1% down to 0.1% of the leviable amount, depending on the licence held. The 1.1% rate applies to gambling software, remote betting intermediary (other than trading-room), remote bingo, remote casino and remote general betting licences. For all operating licences other than lottery licences, regulation 2(3) measures the leviable amount as stakes and other amounts accruing to the licensee in connection with the licensed activities, less prizes and winnings. The regulation does not confine that amount to activity with customers in Great Britain, which matters for gambling software and gaming machine technical licensees with non-GB revenue. Together, the duty changes move the relative cost of operating away from land-based bingo and towards remote gaming.

Fee schedule

- Remote Gaming Duty: 40%
- General Betting Duty (Remote): 15%
- Bingo Duty: 0%
- Statutory Levy: 0.1%–1.1%

Taxes

Status: Amber

Application fees. From 1 October 2026, SI 2026/828 sets remote operating licence application fees by licence type and gross gambling yield category. They range from £4,901 at the lowest category (remote betting host, real events) to £165,069 at the highest category for remote casino, bingo and virtual betting licences. The lowest category for remote casino and bingo is £8,185.

Annual fees. The first annual fee is payable within 30 days of the licence being issued, and later fees on each anniversary. An operating licence continues until it is surrendered, revoked or lapses. From 1 October 2026, remote casino annual fees range from £7,000 in the lowest category to £1,453,949 in the highest (£1.6 billion or more of gross gambling yield), plus £272,324 for each additional £200 million above £1.6 billion. Operating licence fee income rises about 25% overall, but individual fees change by different amounts, and the categories are rebased.

Personal licences. From 1 October 2026, the personal management licence application and maintenance fees each rise from £370 to £463. Personal functional licence fees rise from £185 to £231 for applications, and from £145 to £181 for maintenance. Maintenance fees are payable every five years, not annually.

Customer funds. Licensees must tell customers how their funds are protected in an insolvency. Licence condition 4.1.1 requires remote licensees that hold customer funds, other than the excepted licence types, to keep them in a separate client bank account. Remote operators report customer funds information in their regulatory returns.

Gambling duties (2026–27 rates):

Remote Gaming Duty: 40% of remote gaming profits, charged under Part 3 of the Finance Act 2014 as amended by section 86 of the Finance Act 2026, for accounting periods beginning on or after 1 April 2026. A straddling period is apportioned on a time basis.

General Betting Duty: 15% on fixed-odds and totalisator bets (3% on financial spread bets and 10% on other spread bets). From 1 April 2027 a 25% rate applies to remote bets. Bets made wholly on UK horse racing are not treated as remote bets. On-course, pool and self-service betting terminal bets are excluded.

Pool Betting Duty: 15%.

Lottery Duty: 12% of the price paid for a ticket or chance.

Bingo duty: abolished from 1 April 2026.

Machine Games Duty: 5% lower rate (stake of 20p or less and prize of £10 or less), 20% standard rate (stake of £5 or less), 25% higher rate (stake above £5).

Gaming Duty, for accounting periods beginning on or after 1 April 2026: 15% on the first £2,686,000 of gross gaming yield, 20% on the next £1,852,000, 30% on the next £3,243,000, 40% on the next £6,845,000, and 50% on the remainder.

Remote gambling duties are charged by reference to UK persons, wherever the operator is located. Gambling duties are reserved and apply across the United Kingdom, including Northern Ireland. Returns and payments are generally made for three-month accounting periods, within 30 days after the end of each period. In November 2025 the government decided not to introduce a single tax on remote betting and gaming.

VAT. Qualifying gambling supplies are exempt from VAT, which limits operators' recovery of input tax.

Statutory levy. The Gambling Levy Regulations 2025 charge a levy of 0.1% to 1.1% of the leviable amount, depending on the licence held, to fund research, prevention and treatment of gambling harms.

Payments & Banking

Status: Amber

Licensed operators in Great Britain can use a full range of payment methods, including debit cards, bank transfers, open banking, e-wallets, and prepaid cards and vouchers. Payment service providers may need FCA authorisation or registration. Since 14 April 2020, licence condition 6.1.2 has prohibited accepting credit cards for remote gambling and non-remote betting, including funding an e-wallet with a credit card to gamble. In October 2025 the Commission said it views prepaid cards, prepaid vouchers and all other prepaid payment methods as high-risk for money laundering and terrorist financing, because of cash or cryptoasset loading, anonymity and their open-loop nature. Card schemes classify gambling merchants under merchant category code 7995. The code identifies a transaction as gambling, but it does not by itself determine which cards may be used. In June 2026 the Commission said that, following FCA progress, it is looking at a possible path for cryptoassets to be used as a consumer payment option, and that this will take time. That is a policy direction, not a new permission. Operators remain responsible for risk assessment, customer due diligence and monitoring across all deposit and withdrawal methods. From 30 September 2026, RTS 12B requires remote operators to offer gross deposit limits as a minimum. Licence condition 4.1.1 requires remote licensees that hold customer funds, other than gaming machine technical, gambling software, host and ancillary licensees, to keep those funds in a separate client bank account. Licensees must also tell customers how far their funds are protected in an insolvency. The Commission uses payment blocking against unlicensed operators.

Market Opportunity

Status: Amber

Great Britain is one of the largest regulated gambling markets globally, with an established and competitive licensed sector operating under the Gambling Act 2005. No fresh market-size or gross gambling yield quantum was published as a structured claim this cycle; however, DCMS commentary in its Gambling Commission Fees Review response noted that licence fees remain a small proportion of annual GGY, implying a market of sufficient scale that even the SI 2026/828 fee changes, which raise operating licence fee income by about 25% overall, do not materially alter the fee-to-revenue ratio for established operators. The competitive landscape is mature, with multiple licensed operators across remote casino, betting, and bingo verticals. The SI 2026/828 fee changes effective 1 October 2026 and the enacted Remote Gaming Duty rise to 40% incrementally raise cost pressure across all participants, which may modestly reduce the attractiveness of marginal market positions but does not alter the fundamental scale or accessibility of the opportunity for well-capitalised entrants. Market opportunity is assessed as unchanged this cycle.

Northern Ireland (separate regime — BGLA 1985). Northern Ireland's gambling market size cannot be quantified with confidence at the sub-jurisdiction level. No NI-specific gross gambling yield or market-size figure is published separately from UK aggregate statistics; NI data is folded into UK non-GB aggregate figures, a structural feature of how the Office for National Statistics and parliamentary committee evidence handle devolved sub-jurisdictions without their own regulatory reporting body. This absence of disaggregated data means any market-size estimate for NI should be treated as illustrative rather than evidenced. The market is small relative to GB by population and economic weight, and the

absence of an online licensing pathway structurally limits the addressable market for remote operators to whatever NI consumers access via GB-licensed channels. Competitive intensity in the land-based segment is unquantified this cycle, as no aggregate licensed-operator count was located. The structural data gap is flagged in the gaps register and would require a direct query of NI Statistics and Research Agency or DfC licence registers to resolve.

Entry Pathways

Entry into the GB market requires an operating licence issued by the UK Gambling Commission under the durable primary authority of the Gambling Act 2005. The UKGC issues operating licences across remote and non-remote gambling activities, and personal licences are required for key individuals in qualifying roles. The statutory basis for all licence classes is confirmed and durable. This cycle brought no change to licence categories, activity-class status, or the fundamental architecture of the licensing regime — the pathways themselves are unchanged. The material development for entry modelling is the confirmed 25% uplift to annual operating licence fees, extending to personal licences, supplementary operating licences, and single machine permits, effective 1 October 2026, set by delegated instrument under the Gambling Act 2005 and therefore a fragile instrument. General betting operating licence fees move to a GGY market-share basis rather than days of operation, a structural methodology change that alters the cost profile of the general betting pathway for operators of different scale. Society lottery fees are frozen and on-course general betting limited licences are excluded from the headline uplift.

Northern Ireland (separate regime — BGLA 1985). Northern Ireland offers a narrow set of land-based entry pathways under the Betting, Gaming, Lotteries and Amusements (Northern Ireland) Order 1985, a durable primary statute. Bookmaker and track-betting licences are issued by the Courts of Northern Ireland — specifically Magistrates' and County Courts — making the judiciary the primary licensing authority rather than a dedicated commission. Bingo-club and amusement-arcade permissions are administered by district councils. Private members' clubs may operate up to two gaming machines per club subject to court registration under the Registration of Clubs Act (Northern Ireland) 1967. No casino licence class has ever existed under the 1985 Order, and no casino has operated in NI since the legislation came into force. Lottery activity is restricted to narrow carve-outs — small lotteries at exempt entertainments, private lotteries, and registered society public lotteries for charitable, sports or cultural purposes — with the National Lottery holding a UK-wide statutory monopoly under the National Lottery etc Act 1993. The online and remote pathway is formally absent: no NI-specific remote licence category exists, and online gambling falls entirely outside the 1985 Order's scope. B2B software supply has no statutory pathway. The land-based route is open and durable; the online route is structurally closed.

Licence types

- Remote Casino Operating Licence: Gambling Act 2005 (c.19)
- Remote Betting Operating Licence: Gambling Act 2005 (c.19)

Product coverage

Product	Status
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Casino	Open
Poker	Open
Betting	Open
Skill Games	Open
Lottery	Restricted
Software B2B	Open
Bingo	Open
Fantasy Sports	Open
Esports Betting	Open
Sweepstakes	Outside Perimeter
Crypto Gambling	Restricted
Affiliate Marketing	Open
Payments For Gambling	Open
Horse Racing	Open
Exchange Betting	Open
Pool Betting	Open
Virtual Events Betting	Open
Other Event Betting	Open
Prediction Markets	Open
Free Play	Outside Perimeter
Betting Agent	Open

Competitive Landscape

Status: Amber

The GB licensed market is mature and competitive, with an established base of licensed operators across remote casino, betting, and bingo verticals operating under the Gambling Act 2005. No new licensed-operator-count or market-share data was published as a structured claim this cycle. The confirmed 25% licence-fee uplift effective 1 October 2026, stacking on the enacted April 2026 Remote Gaming Duty rise to 40%, incrementally raises cost pressure across all participants and may modestly favour larger incumbents with greater GGY scale relative to their fee burden. The structural shift of general betting operating licence fees to a GGY market-share basis will alter the relative cost distribution across operators of different scale. The unregulated sector faces intensifying enforcement pressure from the DCMS Illegal Gambling Taskforce and the probable £26 million enforcement funding build-out, which may modestly reduce unlicensed competition over the medium term.

Gaps Register

Evidence gaps identified by the pipeline — areas where confirmation from primary sources is outstanding.

- **[adv-int-20261025-UK-G001]** DfC Northern Ireland Code of Practice full adopted text not opened this cycle; only secondary reporting of the minister's October 2026 statement was available.
- **[adv-int-20261025-UK-G002]** Full LCCP/fee-schedule annexes for the 1 October 2026 fee rise were not read line-by-line; relied on DCMS response summaries.
- **[adv-int-20261025-UK-G003]** The withdrawal-delay supervisory expectation was carried from an intake lead without independent re-opening of the Commission's blog this cycle.

Sources & Provenance

20 sources. T1 = primary instrument/regulator; lower tiers = secondary. Inline [SRC-XX] markers link to this table.

ID	Tier	Source / instrument	URL
SRC-GB-001	T1	UK-GAMBLING-ACT-2005	https://www.legislation.gov.uk/ukpga/2005/19
SRC-GB-002	T1	UKGC-INDUSTRY-STATS	https://www.gamblingcommission.gov.uk/about-us/statistics-and-research
SRC-GB-003	T1	UK-SLOT-STAKE-SI-2025	https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/online-slots-stake-limit-guidance
SRC-GB-004	T1	UKGC-WILLIAM-HILL-2023	https://www.gamblingcommission.gov.uk/news/article/william-hill-group-businesses-to-pay-record-gbp19-2m-for-failures
SRC-GB-005	T1	UK-GC-LEVY-CALCULATION	https://www.gamblingcommission.gov.uk/guidance/statutory-gambling-levy/statutory-levy-how-the-statutory-levy-is-calculated
SRC-GB-006	T1	UK-LEVY-SI-2025	https://www.legislation.gov.uk/uksi/2025/213/made
SRC-GB-007	T1	UK-WHITE-PAPER-2023	https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age
SRC-GB-009	T1	UKGC-WHG-2025	https://www.gamblingcommission.gov.uk/public-register/regulatory-action/detail/271
SRC-GB-010	T1	UK-DCMS-SLOT-RESPONSE-2024	https://www.gov.uk/government/consultations/a-maximum-stake-limit-for-online-slots-games-in-great-britain
SRC-GB-011	T1	UK-GC-FEES-RESPONSE-2026	https://www.gov.uk/government/consultations/proposed-changes-to-gambling-commission-fees
SRC-GB-012	T1	UK-GC-AML-RESPONSIBILITIES	https://www.gamblingcommission.gov.uk/licensees-and-businesses/page/remote-and-non-remote-casinos-aml-responsibilities
SRC-GB-013	T1	UK-CMA-ONLINE-GAMBLING	https://www.gov.uk/cma-cases/online-gambling
SRC-GB-016	T1	UK-GC-TAICHI-TECH-2025	https://www.gamblingcommission.gov.uk/news/article/taichi-tech-limited-fined-gbp170-000-for-unfair-terms-and-conditions
SRC-GB-020	T1	UK-GC-EVOLUTION-MALTA-2026	https://www.gamblingcommission.gov.uk/news/article/evolution-malta-holding-limited-to-pay-gbp4-75m
SRC-GB-021	T1	UK-GC-LCCP	https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp
SRC-GB-022	T1	UK-GC-RTS-12-2026	https://www.gamblingcommission.gov.uk/consultation-response/definition-of-deposit-limits-in-the-remote-gambling-and-software-technical/annex-2-rt-12-wording-in-full-from-30-september-2026
SRC-GB-TAX-001	T1	UK-HMRC-GAMBLING-DUTY-CHANGES	https://www.gov.uk/government/publications/changes-to-gambling-duties/gambling-duty-changes
SRC-GB-023	T1	UKGC-ENTAIN-2022	https://www.gamblingcommission.gov.uk/news/article/entain-to-pay-gbp17-million-for-regulatory-

			failures
SRC-GB-024	T1	UKGC-32RED-PLATINUM-2023	https://www.gamblingcommission.gov.uk/news/article/gambling-commission-fines-32red-and-platinum-gaming-gbp7-1m
SRC-GB-025	T1	UK-GC-THIRD-PARTY-RESPONSIBILITY	https://www.gamblingcommission.gov.uk/licensees-and-businesses/page/licensees-responsibilities-for-third-parties

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