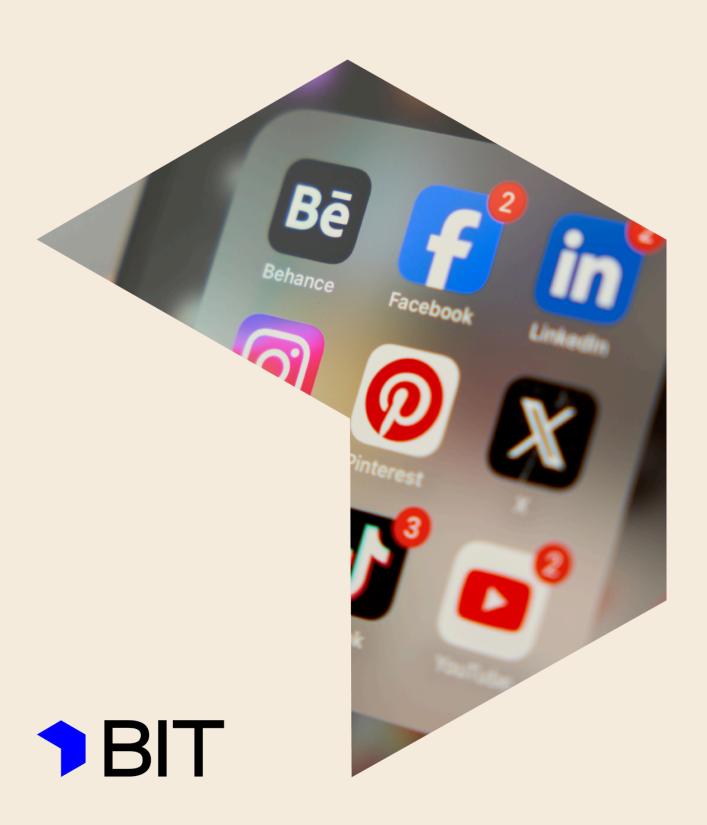# Understanding gambling through social media in Great Britain

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Acknowledgements

Contents

Glossary of terms

Bonus offer - A promotion offered by gambling operators where players receive a bonus or reward upon signup or as part of a promotion. This might include monetary rewards, increased chances of winning, or increased payouts in case of winning.

Crypto casino - An online casino where cryptocurrencies (see below), such as Bitcoin or Ethereum, are the primary form of payment, providing greater anonymity for the person gambling.

Cryptocurrency - A digital, encrypted currency, used for some online transactions. The value of cryptocurrencies, such as Bitcoin or Ethereum, tends to be highly volatile.

Depositing funds - Placing money into an account held with a gambling operator to fund future bets or wagers.

Free spins - A form of promotion where players receive a set number of free turns on a slot game.

Gambling - The act of betting money or wagering something valuable on an unknown outcome with the knowledge of risk and hope of gain. Some examples:
- Sports betting: betting on the outcome of sports events, such as a horse race or on who will score the first goal in a football match;
- Slot/fruit machine: inserting money into a digital of physical machine to bet that it will show special symbols that trigger a jackpot;
- Casino: playing games of chance typically found in casinos, such as betting that the ball on a roulette table will land on a certain number;
- Lottery: buying a physical or digital ticket of numbers, with the hope that your numbers are drawn to win a prize.

Gambling Commission - The regulator for gambling in Great Britain. With the government, they set and enforce the rules for gambling. They also decide who gets a licence to offer gambling products and services. This organisation covers gambling

activities on a national level, for example, licensing and regulating gambling operators such as SkyBet.

Gambling licence - A document that allows an individual, venue or operator to legally offer gambling products or services. In Great Britain, these are issued by the Gambling Commission (see above) or local authorities, who cover smaller-scale and local forms of gambling, such as slot machines in pubs or local horse racing.

Gambling-like products - In this report, we refer to games and competitions as gambling-like products if they share similarities with gambling products, such as the prospect of winning something by chance, but do not amount to gambling from a regulatory perspective, for example, because they do not require consumers to stake real money. Examples include free prize draws and free casino games.

Gambling operator - A company or entity that provides and manages gambling services and activities, such as casinos, online gaming sites, and betting shops.

GAMSTOP - A service allowing users to self-exclude from all online operators participating in the scheme. GAMSTOP is offered for people who would like to stop spending time or money on gambling. Licensed online operators in Great Britain all participate in this self-exclusion scheme.

Influencer - A person with a significant online following, who uses their platform to promote products, services, or ideas, often shaping opinions and purchasing decisions within their audience. In the world of gambling, influencers often provide betting tips and promote operator websites or specific gambling products to their audience.

Integrated games - In this report, we use the phrase "integrated games" to refer to games available on social media platforms that use gambling-like mechanisms, such as slot games on Facebook. Integrated games may or may not amount to gambling from a regulatory perspective. Note that social media platforms might have integrated games without gambling-like features, but these were not the focus of our research.

Odds - A number expressing how much people who bet on a certain event can win if that event happens. For example, if 5/1 odds are offered for a team winning a football match, those correctly betting on the winning team get back five times the amount they bet.

Regulated gambling (in Great Britain) - Gambling activities in Great Britain that are overseen and controlled by the Gambling Commission or local authorities to ensure fairness, protect consumers, and prevent criminal activity. Regulated gambling operators possess the necessary gambling licences.

Social media gambling - Engagement with gambling products available on social media platforms. Note that in this report, we use the broader phrase of "gambling through social media" to refer both to social media gambling and to accessing external gambling platforms through social media.

Tipsters - Tipsters provide gambling advice or predictions, particularly in sports betting, often for a fee.

Unregulated gambling - Gambling activities facilitated by companies and individuals not in possession of the required licences.

Virtual Private Network (VPN) - A VPN is a service that creates a secure, encrypted connection between a device and a remote server operated by the VPN provider. Some players use VPNs to mask their geographic location, and potentially access gambling websites that are restricted or unavailable in their country.

White labelling - Where a gambling operator licensed by the Gambling Commission partners with operators licensed elsewhere, enabling offshore operators to offer gambling products and advertise legally in Britain.

Withdrawing funds - Taking money out of a gambling account, usually to transfer it to a bank account or digital wallet. Withdrawal methods vary by operator and can include bank transfers, debit cards, or cryptocurrencies on the unregulated market.

Executive summary

Background

Social media has become a platform for novel gambling and gambling-like products to emerge, potentially posing risk to consumers. Many of these products and promotions are linked to unregulated gambling – gambling facilitated by an operator or person who would require a licence to legally operate within Great Britain (GB), but does not have one. Additionally, access to gambling-like products through social media – products that exhibit similar features, but are not considered gambling for the purpose of regulation – might be less restricted than to regulated gambling.

This report presents our research findings on gambling through social media. We interviewed 15 individuals who had gambled this way to understand their motivations and to explore their experiences. Our participants had engaged both with regulated and unregulated gambling products, as well as with products that mimic gambling, but do not amount to gambling from a regulatory perspective.

Findings

There are two main ways in which social media facilitates gambling: 1) gambling on social media platforms directly and 2) accessing external gambling platforms via social media. Both methods enable regulated or unregulated forms of gambling, although our research participants often struggled to differentiate between regulated and unregulated products.

Based on what we learned from participants, we developed three personas that demonstrate typical motivations and experiences:

The Idle Scroller gambles on social media to fill time. They click on gambling ads or try integrated games suggested by the social media platform they are scrolling through, rather than actively looking for gambling opportunities.

The Gamblepreneur views gambling as a way to make money and test their abilities. They gamble through social media to get better odds or to try innovative products, such as gambling using cryptocurrencies.

The Eyes on the Prize persona is motivated to gamble based on the type of prize at stake, not necessarily its value. They enter prize draws, raffles, and tombolas if the prize appeals to them.

All three user personas are motivated to explore gambling on social media by curiosity and seeking a sense of community.

We also mapped out what our research participants experienced and felt as they were accessing, paying for, and engaging with various gambling products through social media, as well as withdrawing funds:

- Participants found it easy to access integrated games and gambling groups through social media. They often stumbled upon these opportunities on their social media feed or were invited by friends and family members.
- Participants used payment methods that are inherently risky, such as transferring money to individuals' private accounts or using volatile cryptocurrencies. However, they were conscious of some of the risks involved with social media gambling, for example, financial fraud. Therefore, participants preferred using financial services and products perceived to be safer, such as PayPal, Monzo, Revolut, and credit cards.
- Participants' gameplay and betting experience on social media was determined by the type of gambling product they engaged in. Staking mechanisms and some product characteristics differed from what users would encounter on regulated gambling operator websites.
- Participants reported diverse experiences with withdrawing winnings, ranging from seamless transactions to instances of fraud.

Policy Challenges and Recommendations

Our research demonstrates that social media has heightened exposure to both regulated and unregulated gambling, as well as gambling-like products. Compared to traditional gambling platforms and venues, social media often offers weaker consumer protections, increasing the risk of gambling-related harm, fraud, and data misuse for its users. Based on participant accounts, we identified the key challenges arising from gambling through social media as:

1. Unwarranted trust in third parties and risk of scams: Bets are placed with strangers who are trusted to return winnings. Unregulated sites advertised on social media are also accessed, as it is assumed the platforms have verified these sites.

2. Limited consumer control over both the content and volume of advertising and products displayed on platforms: Social media platforms expose users to a broad range of gambling opportunities, including unregulated products, which people click on "out of curiosity". This lack of control heightens the risk of harm and scams for users.

3. Lack of consistency with traditional gambling product regulations: Unregulated gambling and gambling-like products on social media are more accessible than those offered by regulated operators. There are often minimal checks on users, such as no ID verification, which presents a risk to children. High-risk features are also present, such as autoplay on slots, which is banned in the UK.

4. Participation in unregulated gambling to satisfy specific consumer needs: Some participants turned to the unregulated market to satisfy specific needs and looked for prizes or products not offered on the regulated market.

To address these policy challenges **we propose that**:

- **Social media platforms take action to reduce the exposure to gambling content and the risk of harm**: This includes removing unregulated products and advertising from platforms, enabling social media users to filter out gambling content, and introducing age verification mechanisms for all games and products involving gambling-like features.

- **Social media platforms raise awareness of risks associated with unregulated gambling products, as well as legal gambling-like products.** Social media platforms should also warn their users at key moments, for example, when they receive a message prompting them to make a payment.
- **Other stakeholders, such as banks, financial institutions, or the Gambling Commission, run coordinated public health-style campaigns** to educate a wide audience about the potential risks and harms associated with accessing gambling and gambling-like products through social media.

1. Introduction

1.1 Background

The gambling market is constantly evolving, especially in the online space. With this evolution come new products, new ways of accessing gambling and betting opportunities, and potentially greater risk to consumers. Social media has become a main platform for novel gambling products and opportunities to emerge. Many of these products and promotions are linked to unregulated gambling – gambling facilitated by an operator or person who would require a licence to legally operate within Great Britain, but does not have one.[1] Consumers are exposed to an increased level of risk on the unregulated market: unregulated products may not meet the consumer protection requirements set by British regulators, such as the Gambling Commission (GC). It is therefore a policy concern that the GC has received an increasing number of reports about novel gambling-like products on social media.[2] Meanwhile, industry representatives have expressed concerns that new regulations, such as financial vulnerability checks, drive their customers away from their products and towards alternative ways of gambling.[3]

This report presents our research findings on gambling through social media. We first carried out exploratory desk research and consulted with experts of the field to deepen our understanding of unregulated gambling in Britain. We identified gambling through social media as a particularly under-researched area of concern, potentially fuelling the unregulated market. While not all gambling advertised or available on social media is illegal, people find it difficult to make this distinction and to protect themselves even if they want to. To explore gambling through social media further, we conducted semi-structured interviews with people who had used these products. Our aim was to understand people's motivations for accessing

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[1] Licences are issued either by the Gambling Commission or by local authorities. Local authorities are responsible for licensing local and small-scale gambling activities, such as small society lotteries, gaming machines in pubs, as well as horse and dog tracks. Larger-scale or national-level gambling operations should be licensed by the Gambling Commission.

[2] *Blog - Facebook lotteries: A bit of fun or a potential risk?* (2021, May 25). Gambling Commission. https://www.gamblingcommission.gov.uk/blog/post/facebook-lotteries-a-bit-of-fun-or-a-potential-risk

[3] *Shock new study reveals 1.5m brits stake up to £4.3bn on illegal gambling black market each year.* (2024, 19 September). BGC. https://bettingandgamingcouncil.com/news/shock-new-study

gambling products and gambling-like games through social media, and to explore their experiences.

1.2 Gambling products on social media

Social media is used to advertise, organise, and facilitate gambling – in many cases, unregulated gambling. The GC has reported an increasing number of unlicensed lotteries and prize draws taking place on Facebook and other social media platforms[4], which have become a focus of their enforcement efforts.[5] These prize draws involve customers paying a small amount to enter a draw, in the hope of winning a large cash prize or valuable items, such as a house.[6] Investigative journalists have documented several cases when customers were scammed or won a prize much smaller than advertised.[7] Note, however, that some forms of prize draws and competitions, for example free prize draws used to promote a product, do not amount to a lottery from a regulatory perspective and can therefore be run legally without a licence.[8]

Experts also highlighted that gambling on social messaging applications is becoming more prevalent. These platforms host group chats offering community advice, such as betting tips, and link customers to operator agents.[9] Importantly, not all betting groups are illegal to operate. There are licensed operators accepting bets via chat services, and a licence issued by the GC is not needed to facilitate groups offering

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[4] *Blog - Facebook lotteries: A bit of fun or a potential risk?* (2021, May 25). Gambling Commission.
https://www.gamblingcommission.gov.uk/blog/post/facebook-lotteries-a-bit-of-fun-or-a-potential-risk

[5] *Unlicensed Gambling – Our approach to tackling unlicensed gambling.* (2024, October 21). Gambling Commission.
https://www.gamblingcommission.gov.uk/blog/post/unlicensed-gambling-our-approach-to-tackling-unlicensed-gambling/?utm_source=ebulletin&utm_medium=email&utm_campaign=ebulletin

[6] *Illegal raffles and lotteries in the United Kingdom.* (n.d.) PwC.
https://www.pwc.pl/en/articles/illegal-raffles-and-lotteries-in-the-united-kingdom.html

[7] *Housing raffles have taken the UK by storm - but how likely are you to win?* (n.d.). Sky News. Retrieved May 24, 2024, from
https://news.sky.com/story/housing-raffles-have-taken-the-uk-by-storm-but-how-likely-are-you-to-win-12960354

[8] *Blog - Facebook lotteries: A bit of fun or a potential risk?* (2021, May 25). Gambling Commission.
https://www.gamblingcommission.gov.uk/blog/post/facebook-lotteries-a-bit-of-fun-or-a-potential-risk

[9] *The Rise of Telegram Betting Channels.* (2024, January 30). BettingGods.com.
https://bettinggods.com/sports-betting/the-rise-of-telegram-betting-channels/

betting news and advice only. However, promoting or facilitating unlicensed gambling in group chats or social media channels is a criminal offence.[10]

The boxes below provide further insight into two novel forms of gambling that are related to social media platforms or mimic their mechanisms.

An insight into Telegram gambling

Telegram is a cloud-based messaging service, which hosts many betting groups, such as 22BET.[11] These groups provide betting-related news and advice, and also facilitate sports betting by advertising odds and accepting wagers from users. Users might be attracted to such groups because many view Telegram as a private and secure channel. The platform has a number of features that facilitate setting up large groups, such as the ability to host up to 200,000 group members. The Telegram app also has integrated casino and betting games, which can be played by chatting with pre-trained chatbots[12], and their users sometimes have the option to pay with cryptocurrencies to gamble.[13] Most of the available evidence on Telegram gambling is anecdotal, and therefore, more primary research is needed to better understand the features and risks of this gambling channel.

An insight into social betting apps

Social betting apps are an emerging form of online sports betting. They facilitate social interactions linked to betting, such as sharing betting outcomes on a social media-style feed, creating personalised tournaments with friends, and competing

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[10] *Guidance to licensing authorities - Illegal gambling*. (2023, September 14). Gambling Commission. https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities/part-36-illegal-gambling

[11] Ibid.

[12] *Should You Try Telegram Online Casinos?* (n.d.). Casino Guardian - Latest United Kingdom Casino News. Retrieved May 24, 2024, from https://www.casinoguardian.co.uk/articles/should-you-try-telegram-online-casinos/

[13] *9 Best Telegram Casinos in 2024 - Gambling Bots Ranked*. (2024, May 14). Cryptonews. https://cryptonews.com/cryptocurrency/best-telegram-casinos/

with others on leaderboards.[14] While social betting apps sometimes operate without a licence, there are regulated betting companies that offer social betting apps legally in GB. Understanding how social betting apps operate and which customer groups they attract requires further research, as most of the existing evidence is anecdotal.

1.3 Promoting unregulated operator websites on social media

Gambling operators and their products are advertised on social media both in paid advertisements and by tipsters and influencers. Some of these operators are licensed abroad or do not have a licence at all, meaning that social media users might be exposed to unregulated gambling products. For consumers, unregulated operator websites are often hard to distinguish from their regulated counterparts – unregulated operators sometimes even copy the design elements of well-known brands and falsely claim that they possess a GC-licence. However, accessing them from GB often requires the use of a Virtual Private Network (VPN).

There are streamers and celebrities who share live videos showing them gambling on such websites and reacting to large losses and wins, even though they frequently use funds provided by the operator for promotional purposes rather than their own funds.[15] This approach is often used to promote crypto casinos. These offer various casino-type games, slot games, or sports betting, but distinguish themselves from traditional gambling platforms by facilitating payments with cryptocurrencies. Although the GC accepts licensing applications from crypto casinos[16], none of them are currently licensed in the UK, as it is difficult to demonstrate how anti-money laundering and customer protection requirements are met when customers pay with cryptocurrencies.

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[14] *Best Social Betting Apps & Bookmakers in 2024* (n.d.). Retrieved May 24, 2024, from https://betat.net/social-betting-apps/

[15] *"I lost half-a-million dollars, but I kept playing": Inside the new online gambling craze.* (n.d.). Sky News. https://news.sky.com/story/from-drake-to-fake-money-inside-the-wild-world-of-crypto-casinos-12964330

[16] *Blockchain technology and crypto-assets.* (2023, 28 March). Gambling Commission. https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/page/blockchain-technology-and-crypto-assets

Promoting unregulated gambling products is a criminal offence. However, white labelling – where a gambling operator licensed by the GC partners with operators licensed elsewhere – enables offshore operators to advertise legally in Britain.[17] As a result, white labelling exposes British consumers to the adverts of offshore casinos, both on social media and other online platforms. White-labelling is particularly beneficial to operators targeting customers whose countries have banned gambling, but who use British online platforms or watch British television. The potential customers of white label operators often follow English football, and therefore, English football events, as well as teams' and players' pages provide a platform to reach this audience legally.[18] Offshore operators partner with football teams and venues who display the gambling companies' names and logos online, as well as on clothing and advertising boards.[19]

The rest of this report is structured as follows. In Chapter 2, we outline our research questions and methodology. Chapter 3 provides an overview of our research participants' gambling activities – both on social media and in general – and introduces the three user personas we constructed. Then, in Chapter 4, we outline what motivated our participants to gamble through social media, including both general and persona-specific sources of motivations. Chapter 5 follows a typical user journey to describe participants' experiences while gambling through social media. Finally, Chapter 6 summarises the main policy challenges we identified and suggests ways to address them.

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[17] *Raising Standards for consumers - Compliance and Enforcement report 2019 to 2020 - White Label Partnerships*. (n.d.). Gambling Commission. Retrieved May 24, 2024, from https://www.gamblingcommission.gov.uk/report/raising-standards-for-consumers-compliance-and-enforcement-report-2019-20/white-label-partnerships

[18] *Mapping the territory of football's lucrative pact with illegal sports gambling*. (n.d.). Play The Game. https://www.playthegame.org/news/mapping-the-territory-of-footballs-lucrative-pact-with-illegal-sports-gambling/

[19] *Meet the hydras: tracing the illegal gambling operators that sponsor football*. (n.d.). Play The Game. Retrieved May 24, 2024, from https://www.playthegame.org/news/meet-the-hydras-tracing-the-illegal-gambling-operators-that-sponsor-football/

2. Methodology

This chapter introduces the methodology we used to understand gambling through social media.

2.1 Research aims and questions

We conducted research between April and August 2024. Our research was split into two phases to allow us to reflect on and update our focus, research questions, and methodologies in light of the initial findings. In Phase 1, we investigated unregulated gambling products in general, but then pivoted our focus in Phase 2 to the overlapping area of gambling through social media.

2.1.1 Phase 1 research aims

Phase 1 aimed to deepen our understanding of unregulated gambling in GB, including the channels through which it is available and how they operate in comparison with regulated channels. We also sought to understand the pathways into and motivations for consumers engaging in unregulated gambling, as well as the risks associated with it. Our findings from this phase were used as a starting point for phase 2 research activities.

2.1.2 Phase 2 research aims

Our research in Phase 2 focused on understanding the motivations and experiences of individuals engaging in gambling through social media. We also sought a deeper understanding of how consumers find and access social media groups facilitating gambling, and the associated risks and consequences. We initially aimed to focus exclusively on unregulated gambling through social media; however, it was often unclear to participants what falls into this category, so we pivoted our research to gambling through social media more generally. This allowed us to look at the challenges from the perspective of a consumer who might not know whether they are interacting with regulated or unregulated gambling offers or gambling-like products.

We included the following gambling products and related activities in our research:

- Lotteries and raffles advertised and organised in social media groups and group chats, primarily on Facebook. This covers both free prize draws and competitions and those where participants have to pay an entry fee.
- Slot games integrated into Facebook or casino games facilitated by AI-powered chatbots on platforms such as Telegram.
- Betting groups on social media, where connections may bet privately between one another or place bets on behalf of other members.
- Channels on messaging platforms where customers of gambling operators can wager.
- Accessing external gambling platforms through social media, e.g. clicking on promoted links or advertisements.

These ways of engaging with gambling-related content on social media may give access to both regulated and unregulated gambling products, as well as gambling-like products that do not require a licence.

2.1.3 Research questions

Table 2.1 sets out the research questions for each phase of the research. Reflecting the focus of Phase 2 on gambling through social media, we developed a narrower set of research questions for Phase 2.

Table 2.1: Research questions

Phase	Research questions

1 (& 2)	1. What are the channels of unregulated gambling in GB?
	    a. How do these channels differ from those provided by regulated operators?
	    b. What are the main pathways into each unregulated gambling channel?

	2. What are the potential risks to those engaging in unregulated gambling?

	3.	What motivates people in GB who gamble to gamble with unregulated operators and what might discourage them? a. How does this vary by channel of unregulated gambling?
2	1.	How do people in GB who engage in gambling through social media learn about these forms of gambling?
	2.	Through which platforms do people who engage in gambling through social media access these forms of gambling?
	3.	What motivates people in GB to engage in gambling through social media?
	4.	What concerns, if any, do people in GB have about gambling through social media?
	5.	What negative experiences, if any, have people had who engage in gambling through social media?

2.2 Research methods

We report on the methodology used in Phase 1 of the research in the appendix.

Phase 2 used a qualitative approach to answer the research questions. We conducted semi-structured interviews with 15 individuals who had previously engaged in some form of gambling through social media. The interviews lasted up to 60 minutes and took place between July and August 2024. Interviewees received a £50 voucher for their participation.

2.2.1 Recruitment

We partnered with a recruitment agency to obtain the desired sample for our study. Given the initial focus on unregulated gambling, we aimed to interview people who had engaged in unregulated gambling on social media. To improve the accuracy of responses to screening questions, we used proxy questions. For example, we asked participants if they had ever used a credit card or a cryptocurrency to pay for gambling, instead of asking them if they had ever engaged in unregulated

gambling.[20] This technique was used to reduce social desirability bias, that is, participants responding in a way that they think would be viewed favourably by the researchers, and to minimise the impact of participants' unawareness of gambling regulation. The recruitment agency provided us with a pool of 22 participants. From this group, we employed purposive sampling to select 15 participants with a diverse set of backgrounds and experiences, and who, based on their responses, appeared most likely to have engaged in unregulated gambling through social media. The full list of proxy questions used can be found in the appendix.

2.2.2 Sample

Table 2.2 provides a breakdown of our sample based on the type of gambling participants engaged in through social media.

Table 2.2: Breakdown of achieved sample

Type of gambling through social media	Number of participants
Participating in raffles, prize draws, and lottery-type games in social media groups	5
Playing slots and casino games integrated into social media platforms (including both regulated and unregulated products)	5
Clicking on social media ads, directing users to external gambling platforms (including both regulated and unregulated operator websites)	4
Placing bets through messaging apps	3
Betting in social media groups	3

Note that one participant may have engaged in more than one type of social-media-related gambling. Therefore, the numbers in the second column do not add up to 15.

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[20] This was used as a proxy for unregulated gambling, because credit cards can no longer be used on GC-regulated platforms for payments. Similarly, gambling operators allowing crypto payments are not regulated in GB.

Note that, during the interviews, we found that our final sample included some individuals who had not engaged in unregulated gambling activities. These participants either played games on social media without risking real money or engaged in regulated gambling promoted through social media. However, we decided not to disregard these participants' responses and took this as an opportunity to broaden our focus on gambling through social media more generally.

2.2.3 Analysis approach

Interview recordings were transcribed and analysed using the Framework approach, which allows for themes to be identified in a transparent and structured way. This involved creating an analytical framework to categorise participants and analysing their characteristics, their attitudes toward social media gambling and their activity on these sites. The interview data was then summarised in the appropriate cell. Thematic analysis was undertaken to identify the range of concepts and themes from across the sample and between different subgroups or personas (segments of the sample). These were analysed to understand how each participant's characteristics, views and experiences interrelate.

2.3 Limitations

Our findings have been drawn from self-reported, retrospective accounts of individuals' experiences while gambling through social media. These accounts may be subject to inaccuracies due to a variety of reasons. First, participants might have misremembered some details of their past experiences. Second, participants' answers might also have been subject to social desirability bias. Independently verifying participants' claims about various gambling products was out of scope for this research.

We had also intended to interview people who had self-excluded from gambling and turned to unregulated products to circumvent self-exclusion schemes. These participants would have formed an important part of our sample: the Gambling Commission has identified avoiding self-exclusion schemes – both the cross-operator scheme provided by GAMSTOP and operator-level exclusion – as a core motivation

for accessing unlicensed operator websites.[21] Unfortunately, we were not able to recruit participants from this group. Therefore, our report does not include these consumers.

2.4 How to read this report

We use direct quotes, case examples and personas to capture the voices of participants from Phase 2 and provide a deeper understanding of their experiences and views. To protect their anonymity, quotes and case examples are labelled with key sampling and persona background information, such as gender, age bracket and which persona identity the participant fell into. We use pseudonyms when presenting case examples.

When presenting qualitative findings, we avoid the use of statistics or quantitative descriptions like "most" or "many" that denote prevalence. This is because, unlike quantitative research, which aims for statistical representation, qualitative sampling prioritises diversity within the sample and focuses on exploring a range of experiences and behaviours in depth. Qualitative samples are not designed to scale up to the wider population, and therefore reporting participant numbers would not reflect broader trends. Instead, this approach provides rich, detailed insights into behaviours, views, and experiences, offering explanations about what people think and do.

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[21] *Unlicensed Gambling – Using data to identify unlicensed operators and estimate the scale of this market.* (2024, October 21). Gambling Commission. https://www.gamblingcommission.gov.uk/statistics-and-research/publication/unlicensed-gambling-using-data-to-identify-unlicensed-operators-and-estimate

3. Overview of participants' social media and gambling activities

This chapter introduces the participants who took part in the Phase 2 interviews about their experiences with gambling through social media. We first outline their general use of social media and their general gambling behaviour before taking a closer look at the ways in which they accessed gambling-related content on social media. We conclude this chapter by introducing three distinct personas. We refer to these personas where relevant in the rest of this report.

Key findings

Our sample included both frequent and occasional social media users, but frequent social media use was more widespread across the sample. The participants of this research were not new to gambling: each participant had engaged in one or more traditional forms of gambling before gambling through social media.

- There are two main ways in which social media facilitates gambling: 1) gambling on social media platforms directly and 2) accessing external gambling platforms via social media. Both methods enable regulated and unregulated forms of gambling, although participants often struggled to differentiate between regulated and unregulated products.

- Examples of gambling on social media directly include playing online slots, raffles and tombolas; casino games; scratchcards and sports betting. While Facebook is the main platform used by participants to gamble on social media directly, platforms such as X, WhatsApp and Telegram were also mentioned.

- Participants followed ads or links on social media to access external gambling platforms. A wide range of social media platforms were mentioned in relation to this.

- The sample fell into three main groups in terms of how and why they accessed gambling-related content on social media. We call them "The Idle Scroller"; "The Gamblepreneur"; and "The Eyes on the Prize".

3.1 General social media use

A wide range of social media platforms were used by participants, including social networking platforms (Facebook, X, LinkedIn); content-sharing platforms (Tiktok, Instragram, Youtube, Pinterest); and messaging and communication platforms (WhatsApp, Telegram, Snapchat, Viber, Skype).

Two main groups emerged in terms of their social media use; those who we deemed to use social media frequently and those who were occasional users. The former group was characterised by daily use of social media, use of multiple platforms and the use of social media for a range and combination of reasons, including for social contact and networking; information and news; work (e.g. to generate business); entertainment, and games. In contrast, lighter social media users tended to limit their use to social messaging on just one platform or with a small group of connections across multiple platforms. Alternatively, they used multiple platforms for information purposes only.

Frequent social media use was more widespread across the sample than occasional use. This is perhaps unsurprising given our sampling criteria – frequent social media use may increase exposure to gambling ads and content, make users more familiar with platform features that enable social media gambling, and widen access to influencers who advocate gambling in this way. In turn, as gambling activity on social media increases, the total amount of time spent on the platform might also increase.

3.2 Gambling behaviour

3.2.1 Prior experience of gambling

The participants of this research were not new to gambling: each participant had engaged in one or more traditional forms of in-person or online gambling before accessing gambling-related content on social media. This involved gambling individually, with some participants also gambling as part of a group. Note, however, that our participants voluntarily applied to participate in this research, and those with more experience using various gambling products might have been more likely to do so. The types of gambling our participants had engaged in included:

- Sports betting

- Betting on world events
- Lotteries
- Scratchcards
- In-person casino games
- In-person card games
- Bingo
- Slot machines

3.2.2 Accessing gambling-related content through social media

There are two distinct ways in which social media facilitates gambling. The first involves gambling on social media directly, for example, through social media lotteries and raffles taking place in designated groups. The second entailes accessing a separate gambling platform, such as an operator website, through adverts or links circulated on social media.

While the first category is the main focus of this research, the second emerged as the interviews progressed. It should be noted that participants engaged both in regulated and unregulated gambling using social media. This was true both for those participants who directly gambled on social media platforms and those who accessed operator websites indirectly through social media. Note that some participants reported initial engagement with gambling products on social media, but not spending money to gamble. For example, a participant used free tokens to play an integrated slot game and stopped when prompted to deposit real money.

Gambling on social media directly

While Facebook is the main platform used by participants to gamble on social media directly, platforms such as X, WhatsApp, and Telegram were also mentioned. Participants engaged in a range of different forms of gambling on social media:

- **Lotteries, raffles, and tombolas** are a key form of direct gambling on social media platforms like Facebook and X. They involve promotions or giveaways, where users can win products, services and other prizes. They are commonly used by individuals, brands, or online businesses to make money, engage followers, increase visibility or boost sales.
- **Sports betting** is carried out by joining specific groups or channels on platforms like Facebook and Telegram to place bets, as well as to discuss

odds and tips as part of a community. Another method is opening accounts with companies on WhatsApp and placing bets by texting the company through the account. These companies are thought to offer better odds than high street gambling operators, or to identify bets with better odds on users' behalf. It is unclear whether regulated or unregulated operators are used for these purposes; indeed, participants themselves were not clear on the distinction.

- **Integrated casino games and slots** were also mentioned and accessed via Facebook. These games are digital versions of land-based casino games, such as slots, poker, blackjack, roulette, and bingo. Playing these games may or may not involve staking real money.
- **Scratchcards** on Facebook were also cited. Facebook scratchcards are online versions of physical scratchcards, where players virtually "scratch" off panels to reveal symbols, numbers, or other icons in the hopes of winning digital prizes.

Accessing gambling through social media

The main way in which participants access gambling through social media is by following ads or links that take them to regulated or unregulated gambling platforms. A wide range of social media platforms were mentioned in relation to this. For example, participants described being directed to betting websites through operators' ads on X, Telegram, and Instagram. In one case, an online crypto casino was reached via an ad on Instagram. In another example, a participant reported clicking on a link shared alongside a TikTok video, in which an influencer was promoting betting.

Some participants described gambling more indirectly using social media, by asking friends to place bets on their behalf. In one instance, a participant asked a connection on X to place a bet for them when they could not access an operator directly themself.

3.2.3 Social media gambling personas

Based on the participant accounts, we identified three main groups in our sample with distinct behaviours in relation to accessing gambling-related products through social media, which we have named "The Idle Scroller", "The Gamblepreneur" and

"The Eyes on the Prize". While participants in each group had diverse socio-demographic characteristics, their motivations and the products they favoured (discussed further in Section 4.2) were unique.

- **The Idle Scroller** gambles on social media to fill time. They click on gambling ads or try integrated games suggested by the social media platform they were scrolling through.

- **The Gamblepreneur** views gambling as a way to make money and test their abilities. They gamble through social media to get better odds or to try innovative products, such as gambling using cryptocurrencies.

- **The Eyes on the Prize** persona is motivated to gamble based on the type of the prize, not necessarily its value. They enter prize draws, raffles and tombolas if the prize appeals to them.

These personas are discussed where relevant in the rest of the report.

4. Motivations for gambling through social media

This chapter outlines the range of motivations displayed by our research participants to gamble through social media. We present general motivations shared by a range of participants, alongside the three distinct personas, each exemplifying specific motivations. We also present a case example for each persona, providing background information and a detailed description of the participant's motivations, using a pseudonym.

Key findings

- All three user personas are motivated to explore gambling on social media by curiosity and seeking a sense of community.
- The Idle Scroller persona gambles through social media to pass time or whilst on the move, where less concentration is required.
- The Gamblepreneur persona is motivated to use innovative products, which provide new ways of making money and better perceived odds.
- The Eyes on the Prize persona is motivated and excited by the reward which could be won in a social media raffle, and is more likely to enter a draw when feeling lucky.
- There is no clear pattern in how or why the frequency of gambling through social media might have changed since participants' first engagement.

4.1 General motivations for gambling through social media

Curiosity is a key motivator for gambling through social media for each persona. Participants reported being algorithmically targeted by adverts or hearing about social media gambling through friends and family (see *Section 5.1.1* for more details). Following this, they were driven by curiosity to explore this new channel which they thought offered the possibility of a more enjoyable and rewarding gambling experience.

The social element of gambling using social media is another strong attraction, fostering a sense of belonging and community. For example, betting and raffle groups on Facebook offer their members the opportunity to discuss raffle outcomes and bets with others. This was reported to create a 'buzz' around the gambling experience, with users feeling as though they were part of a community of like-minded people with whom they could share experiences. One participant explained:

> *"It feels more social, it's got a community feel to it. It feels more personal as well, as opposed to just interacting with an app."* [The Gamblepreneur, male, aged 18-34]

4.2 Key motivators for the three personas

The Idle Scroller, The Gamblepreneur and The Eyes on the Prize personas introduced in the previous chapter each share some general motivations outlined in Section 4.1. However, they are also motivated to gamble through social media in their own unique ways. The motivations for each persona are described below.

The Idle Scroller

The Idle Scroller engages in gambling through social media to fill time, particularly when 'out and about' or 'bored at work'. This is the core motivation for this user group. A participant noted they view gambling through social media as:

> *"Something to pass the time and out of curiosity."* [The Idle Scroller, male, aged 56+]

These users mainly gamble small amounts and engage with free spins and slot games, which require less concentration. One participant noted that they used an autoplay feature on slots, which is currently banned in the UK[22], to quickly use up free credits when their commute was coming to an end.

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[22] *Summer 2023 consultation - Proposed changes to LCCP and RTS: Consultation Response (2024, August 27). Gambling Commission. Retrieved 08 October, 2024, from https://www.gamblingcommission.gov.uk/consultation-response/summer-2023-consultation-proposed-changes-to-lccp-and-rts-consultation/proposal-3-autoplay.*

The Idle Scroller also views social media companies as more trustworthy and secure than gambling operators, motivating them to gamble through social media (see *Section 5.2.2* for more detail).

Case example 4.1 - An Idle Scroller [female, aged 35-55]

Jennifer uses social media regularly in her free time. In the past, she played online poker and bingo regularly, whilst raising her son alone and experiencing financial difficulties. She enjoys gambling, as it is an independent activity that makes her happy.

Jennifer has never sought to gamble while on social media but when she sees adverts while scrolling her Facebook newsfeed, she becomes motivated to do so. Colourful slot game ads offering free spins on her feed particularly grab her attention. She thinks the games always seem to "choose" her:

"The Facebook ones, honestly, I've never gone looking for them".

The Gamblepreneur

The Gamblepreneur is motivated to gamble for its money-making potential and the opportunity to profit from mastering an innovative product or platform. The Gamblepreneur's confidence in their ability to profit from strategic play increases over time, as they gain more experience. The Gamblepreneur is more likely to use novel channels to gamble, such as crypto casinos.

This persona is also motivated to use social media for gambling because they think it offers special betting tips or better odds than regulated operators. This is consistent with a study that analysed self-reported data and found that odds were a primary platform selection criteria, giving unregulated operators a competitive edge.[23]

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[23] *Review of unlicensed online gambling in the UK*. (2021). PwC.
https://bettingandgamingcouncil.com/uploads/Downloads/PwC-Review-of-Unlicensed-Online-Gambling-in-the-UK_vFinal.pdf

Case example 4.2 - A Gamblepreneur [male, aged 18-34]

Sebastian's hobbies include investing and staying fit. He describes himself as a light user of social media and has gambled regularly from a young age, often betting on football with established bookmakers. He is interested in the notion of using money to make money, and frequently invested in cryptocurrencies during the 2017-2020 boom.

He is now motivated to use crypto casinos, seeking large payouts. Sebastian follows tipsters on Telegram and enters crypto-based raffles on X. He proudly uses a variety of channels, stating:

"My repertoire has increased over time as I become more of a seasoned gambler".

Sebastian also places bets in Facebook groups, stating that these provide better odds than licensed bookmakers. To place a bet, he transfers money to the facilitator's personal account, trusting them to return any winnings.

The Eyes on the Prize

The Eyes on the Prize persona is motivated by the reward at stake. This is not necessarily a large financial prize, as with The Gamblepreneur, but something specific, like baby clothes. This persona prefers lottery-style games such as raffles and bingo, tending to avoid online slot machines or sports betting. This is because they prefer not to risk losing money quickly, but are excited by gambling for a prize that interests them and want to do so sparingly. The Eyes on the Prize persona is also motivated to enter prize draws when they "felt lucky" (see *Case example 4.3)*.

> **Case example 4.3 - A participant with her eyes on the prize [female, aged 35-55]**
>
> Kayleigh uses a variety of social media platforms to keep in touch with friends and family, as well as to attract clients for her business. She has previously engaged in horse betting and lotteries, but does not trust virtual gambling products where the outcomes are determined by an algorithm.
>
> On Facebook, Kayleigh participates in raffles, whenever she finds the prize desirable. She is first prompted to gamble this way when she sees a group organising baby clothes raffles – something she needs for her kids. As soon as she shows interest in this group, Facebook starts showing her many more. Kayleigh is motivated to keep participating in raffles because she feels lucky having won several times in the past. She comments:
>
> *"I always feel like I'm going to win*."

4.3 Changes in frequency of gambling through social media

There is no clear pattern in how or why the frequency of gambling through social media might have changed since participants' first engagement.

Participants who decreased their gambling on social media attributed this to a range of factors:

- **The addictive nature of these platforms:** a participant made a conscious decision to stop gambling through social media as they felt they had started to get addicted.
- **Uncertainty over how apps worked**: a participant felt it was foolish to be using an app to gamble without knowing how it worked.
- **Notification overload:** some participants reported being discouraged by the volume of notifications from the social media platforms they used, which increased as they gambled more:

  "The WhatsApp one was just horrendous. [...] It was continually [sic] enough to drive you crazy, so yes, I pulled out of it - and that was the main reason." [The Gamblepreneur, male, aged 56+]

- **Changes in the value of stakes:** when the value of cryptocurrency fell, using crypto casinos became less attractive than traditional platforms (see *Section 5.2.1* for more details).

Others reported that their gambling on social media became more frequent with time. Some got familiar with betting groups and their members, leading to greater confidence that they could bet safely through these groups. Increased usage was also due to a perceived opportunity to make money in new ways, as more gambling products had become available through social media.

5. The user journey of gambling through social media

This chapter follows the typical user journey of gambling through social media. We present our findings on what users experienced and felt like as they were accessing, paying for, and engaging with various gambling products, as well as withdrawing funds.

Key findings

- Participants found it easy to access integrated games and gambling groups through social media. They often stumbled upon these opportunities on their social media feed or were invited by friends and family members.
- Participants used payment methods that are inherently risky, such as transferring money to individuals' private accounts, or using volatile cryptocurrencies. However, they were conscious of some of the risks involved with social media gambling, for example, financial fraud. Therefore, participants preferred using financial services and products perceived to be safer, such as PayPal, Monzo, Revolut, and credit cards.
- Participants' gameplay and betting experience on social media was determined by the type of gambling product they engaged in. Staking mechanisms and some product characteristics differed from what users would encounter on regulated gambling operator websites.
- Participants reported diverse experiences with withdrawing winnings, ranging from seamless transactions to instances of fraud.

5.1. Access and signup

Participants reported accessing gambling products through social media platforms in three ways. First, by joining groups and channels facilitating betting and lottery-type games; second, by playing casino and slot games integrated into social media platforms; and finally, by clicking on links and advertisements, which brought

them to external websites (see *Section 3.2.2* for details). Either way, their experiences indicated that accessing gambling products was an easy and simple process.

5.1.1 Exposure to gambling products on social media

Gambling advertisements

Some of the gambling-related content participants came across on social media consisted of paid promotions and advertisements, including both advertisements for integrated games and for external gambling platforms. Therefore, clicking on these advertisements either opened up games within the given social media platform or directed users to an external website. Due to the high number of such sponsored content, participants felt like they were being targeted by the platform's algorithm.

> *"These algorithms nowadays are so astute. You only need to click two or three betting links on Twitter, or whatever, and all you're going to see is sponsored adverts from betting sites."* [The Gamblepreneur, male, aged 18-34]

Our findings indicate that users in GB are also targeted with advertising by unregulated gambling operators: one participant reported seeing a paid advertisement for a crypto-casino.

Gambling advertisements and algorithmically recommended gambling content appeared on participants' social media feeds even when they were not looking to gamble. These passive encounters prompted The Idle Scroller persona to access integrated games and to visit external gambling websites.

> *"I can say hand on heart, I haven't gone looking for it. It's always found me."* [The Idle Scroller, female, aged 35-55]

Organic exposure to gambling content

Encountering gambling-related content also happened organically, i.e. without seeing paid promotions. Participants saw tipsters and influencers promoting gambling with specific operators, for example, by providing sports betting tips or by sharing videos of themselves placing bets. This aligns with our Phase 1 findings showing that tipsters and influencers often stream videos of themselves playing casino games and placing sports bets, often using money provided by the operator

for promotional purposes. Our interview participants reported that tipsters and influencers also shared links to the operator websites they were promoting, including unlicensed ones, such as crypto casinos.

> *"There's a lot of gimmick betting pages where people are videoing themselves placing bets or recording their screen to talk about better betting websites. I think it can become quite overwhelming, especially if you're a new bettor as well."* [The Idle Scroller, female, aged 18-34]

Social media feeds also recommended groups designated to organising and discussing various forms of gambling, such as raffle groups and sports betting communities. For example, a Facebook group organising baby clothes raffles showed up on a participant's feed, although they had not engaged with gambling-related content before. They assumed that this recommendation was linked to her general interest in kids' clothing. Participants were curious to find out more about gambling groups and products recommended on their feed, which led them to try social media gambling for the first time.

> *"Every now and then a new group or page will be suggested in my wall [sic] while scrolling down, and then I may check that out. So that was how it first started"* [The Gamblepreneur, male, aged 18-34]

Finally, friends and family members also encouraged participants to try gambling on social media. While this often took the form of generic recommendations and encouragement, some friends and family members sent links, which participants could use to join specific groups facilitating gambling.

5.1.2 Lack of friction

Overall, the journey from logging into the user's social media account to starting to gamble on the platform appears to be frictionless, that is, a smooth and quick process. This is mainly due to easy account creation, a lack of ID checks, and the opportunity to start playing without providing payment details.

When participants engaged with products offered by gambling operators, they typically needed to create an account, which was seen as an easy process. Although participants' did not make explicit comparisons between the account

creation process on regulated and unregulated platforms, we suspect that the lack of ID checks was a key reason why some highlighted how easy the sign-up process on unregulated platforms was. This lack of friction had a particularly large impact on The Idle Scroller persona's engagement with gambling products, who reported trying out games without having a strong determination to do so:

> *"I do feel like it's too easy to sign up"* [The Idle Scroller, female, aged 35-55]

Integrated games reduced friction further by offering a limited number of free spins or free trials, which did not require participants to provide payment details to start playing a game.

Participants expressed concerns about the risks associated with the lack of friction and checks: some were worried that children might be tempted to try gambling on social media if they can access products without an ID check, while others highlighted that those participating in self-exclusion schemes would still be able to gamble this way.

The only friction point mentioned by participants was the need to use a VPN to access the website of a crypto casino advertised on social media. This experience indicates that the participant accessed a website blocked in GB.

5.2 Depositing and payment

5.2.1 Payment methods and associated risks

Participants used payment methods that are inherently riskier than payment methods used on regulated operator websites.

Those joining gambling groups, such as community raffles and sports betting communities, transferred payments directly to an individual's bank account, who did not issue a receipt or other formal confirmation of payment. Participants recognised that this requires trust between two individuals, and that by doing so, they share some of their personal data with a stranger.

"It can be a bit risky, usually you place the bet and then you have to pay the organiser usually via PayPal, that's how they do it. So you basically provide your personal information in a way. I make a payment and they know my name, my

surname, they know my email address. So I'm a bit concerned about that." [The Gamblepreneur, male, aged 18-34]

Some participants had been victims of online fraud before, which made them more aware of risks associated with sharing payment details with individuals, but did not discourage them from social media gambling entirely.

Participants accessing crypto casinos through social media used cryptocurrencies to fund their gambling. They were worried that customers were not protected by regulation while using these casinos and payment methods.

> *"Quite an uncertain realm because you don't know any of the rules, the regulations, if you're protected, if something goes wrong. [...] Should I really be doing this?"* [The Gamblepreneur, male, aged 18-34]

> *"It's the Wild West with crypto, so there's no rule. There's no guarantee of you getting any money, even if you win.*" [The Gamblepreneur, male, aged 18-34]

Participants also recognised that the volatility in the value of the underlying cryptocurrency makes the outcome of their gambling even more unpredictable. However, participants thought that doing their own research could help mitigate this risk.

> *"It's risky in the sense that you're using crypto, and crypto can crash on the broader scheme at any time. [...] Because I would do quite a lot of research, I felt comfortable with the risk, and actually I'm a more pro-risk-taker than probably most people in life in various aspects, which has, like I said at the beginning, both been manageable and unmanageable at times."* [The Gamblepreneur, male, aged 18-34]

5.2.2 Feeling of safety and mitigating risks

A wide range of explanations were provided for why participants felt safe to provide payment and personal data while gambling on social media or on an unregulated platform, despite the concerns detailed in section 5.2.1.

First, those who had never been victims of fraud or had not had negative experience gambling through social media felt little concern when providing

payment and personal details. Similarly, participants felt safe using products that a friend or family member had used before. Participants also checked gambling groups and platforms for perceived signs of legitimacy, such as the sentiment of previous comments and reviews, as well as the quality of spelling and grammar used. A padlock being shown on screen during payment was also mentioned as a reassuring sign of safety.

Furthermore, participants assumed that social media companies verified and even approved gambling companies and products available or advertised on their platforms. This introduced a false sense of security.

> *"I think because I saw, 'commission paid', I thought, okay, it must be trusted by TikTok."* [The Idle Scroller, female, aged 18-34]

> *"I assume that someone like Facebook or Meta would be analysing these companies before they go on their sites in the first place, so I would take their word for it."* [The Idle Scroller, male, aged 56+]

To mitigate the potential consequences of fraud, participants used financial services and products they perceived to be safer. PayPal, Monzo, and Revolut payments were preferred, because participants' accounts with these companies were used as secondary accounts and did not have large amounts of money in them. Some participants viewed paying with credit cards as another way to mitigate risks, because they saw the transferred funds as the bank's money and not their own. In some cases, it was unclear whether a participant used a credit or debit card to pay for gambling, as these terms were often used interchangeably during the interviews.

5.2.3 Offers

Gambling operators accessed through social media have unique offers that delayed the need for payments in some cases. Some of the offers that participants encountered are rare or non-existent on the regulated market. For example, users of integrated casino games on Facebook receive credits for inviting friends to play the same games. These credits can then be used to play a variety of games, and when they run out, participants are required to purchase additional credits to continue playing. Those who navigated from social media to crypto casino websites reported

that the casinos refunded some of their losses in the form of a cryptocurrency, thereby encouraging further play.

> *"It almost feels like a double bet, and almost like a less risky way, because it's like, even if my bet loses, I still have some value in this crypto, because I'm going to get some of my stake back, and I guess that fuels more play."* [The Gamblepreneur, male, aged 18-34]

5.3 Gameplay and betting experience

Gambling through social media differs from other forms of gambling in many ways, for example, consumers first interact with a social media platform's user interface and not with a gambling operator's website. Participants also highlighted a number of differences in game structures, payouts, and staking mechanisms. However, some struggled to differentiate between regulated and unregulated gambling, or between games integrated into social media platforms and games offered on gambling operator websites.

5.3.1. Differences in the user experience across types of gambling

Participants highlighted that more social interactions take place while gambling on social media compared to traditional gambling forms. Some enjoyed the opportunity that gambling groups offer to discuss bets and prize draws with others – something that gambling operator platforms lack (see *Chapter 4* for details on how these differences impacted motivations to gamble on various platforms).

There were different views on how privacy, advertising, and cross-selling compare across social media gambling and traditional gambling and how important these aspects of the user experience are. Privacy is an important factor for some: a participant noted that she liked to hide her gambling activity on Facebook from her friends, because she perceived gambling as an activity that is frowned upon, similar to smoking. Some assumed that social media and unregulated websites offer more privacy overall and that users encounter fewer advertisements there. In contrast, others were annoyed by the cross-selling and advertising activity while gambling through social media. For example, a participant stopped betting through

WhatsApp, because they received too many messages prompting them to gamble again.

Participants viewed social media gambling as more suitable for small bets and casual gaming, and turned to external operator platforms – both licensed and unlicensed – to place large bets and try to win substantial amounts of money. This perception might have been linked to the low-value prizes offered in social media raffles, such as gift baskets. However, it is unclear why participants saw slot games and betting groups available on social media as a more casual form of gambling than using similar products on a gambling operator's platform.

Finally, participants noticed characteristics of gambling products on social media that do not comply with current regulations. First, participants saw no or very few safer gambling tools and messages while gambling on social media. In contrast, GC-licensed operators are required to communicate how their customers can access information and tools that help them manage their gambling.[24] Second, participants reported using an autoplay feature on slot games, despite GC-licensed operators not being allowed to provide auto-play features on slots.[25] Other participants' reports, however, were in line with the regulations around responsible gambling and related technical standards. We therefore hypothesise that these participants accessed gambling products which were licensed by the GC.

5.3.2 Differences in prizes and staking mechanisms across types of gambling

Unregulated forms of gambling, especially betting groups and crypto casinos, are thought to offer better odds and unique prizes, such as meat hampers. These characteristics make social media gambling particularly attractive to The Gamblepreneur and The Eyes on the Prize personas. This insight on perceived odds

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[24] *LCCP Condition 3.3.1 - Responsible gambling information*. (n.d.). Gambling Commission. https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/condition/3-3-1-responsible-gambling-information

[25] *Remote gambling and software technical standards (RTS) - RTS 8 – Auto-play functionality*. (2021). Gambling Commission. https://www.gamblingcommission.gov.uk/standards/remote-gambling-and-software-technical-standards/rts-8-autoplay-functionality

aligns with industry stakeholders' worry that they cannot compete with the odds offered on the unregulated market.

Three unique staking mechanisms described by participants differentiated gambling on social media and traditional forms of gambling. First, to participate in prize draws in gambling groups, participants often needed to comment under the posts announcing a draw before transferring any entry fees to the administrator. For example, group members commented a number between 1 and 99, the facilitator confirmed entries, and proceeded to draw out one of the entry numbers as the winner. Secondly, groups organising sports betting asked their members to send private messages to the facilitator to receive information about odds and to confirm bets. Finally, on Telegram, participants could chat with AI-powered bots to place sport bets or stake money in casino games.

5.4 Outcomes of bets and draws and withdrawing funds

The type of gambling participants engaged in determined how outcomes were announced and influenced how they used winnings. Participants playing slots and casino games integrated into social media platforms preferred to spend any winnings on the same product instead of withdrawing funds. Those who did withdraw winnings from integrated games reported a seamless experience similar to what they experienced on regulated gambling operator websites. In contrast, a participant gambling on a crypto casino website reported not being able to withdraw winnings at times.

Entrants of raffles and prize draws in social media groups learnt about the outcome of draws in unconventional ways: facilitators uploaded videos or live streams showing themselves drawing winning numbers, or simply announced winners by writing a post in the group. Participants expressed concerns that these informal and unsupervised draws might be manipulated. Some reported having been subject to fraud, when the facilitator did not announce any winners or the winner did not receive the prize. However, other participants had positive experiences with social media raffles and prize draws, claiming that they had not witnessed or been victims of scams. Those winning material prizes, such as clothing items, had these delivered to their home address.

6. Policy challenges and recommendations

Based on our findings, we have identified four key policy challenges, which need addressing in order to protect individuals gambling through social media. We outline how changes to social media platforms, gambling and advertising regulations, alongside raising consumer awareness could make it safer for social media users to engage with regulated gambling products and also reduce any engagement with the unregulated market. Note that our recommendations are inspired by the accounts of 15 individuals, which might not be representative of what the wider population experiences while gambling through social media.

Challenges

Challenge 1: Unwarranted trust in third parties and risk of scams

Participants trusted what they saw on social media platforms, assuming that the content they saw would be safe. Some participants placed bets with strangers, trusting them to return any winnings and protect their data, and others thought that social media companies verified gambling operators before allowing them to promote on their platforms.

Participants assumed that protective behaviours, such as checking for misspelt words and using Monzo, PayPal or credit cards for payments, would prevent them from falling victim to fraud. They also reported a higher level of trust towards gambling products and platforms that friends and family had used previously. These findings indicate that consumers may use unregulated gambling products or gambling-like products without being aware of the full range of risks, making them more vulnerable to scams and misuse of data.

Challenge 2: Limited consumer control over both the content and volume of advertising and products displayed on platforms

Social media platforms expose users to a broad range of gambling or gambling-like content, with limited oversight of the design and types of products advertised or embedded within these sites. This lack of monitoring has led to the promotion of unregulated products, such as crypto casinos, raffles, and access to betting and gambling groups, which heightens the risk of gambling-related harm and scams for users. Participants shared experiences of unintentionally encountering unregulated gambling opportunities, which often sparked their curiosity despite not actively seeking to gamble.

Additionally, participants reported having little control over their exposure to gambling-related content online. Many felt overwhelmed by the sheer volume of advertisements, promoted posts, and algorithmic recommendations for gambling that appear on their feeds. This lack of control was particularly concerning to participants, as such content is easily accessible to children and individuals who had self-excluded from gambling activities.

Challenge 3: Lack of consistency with traditional gambling product regulations

Our findings highlighted that gambling-like games and unregulated gambling products on social media lack the protections seen in regulated operator sites, making them easier to access and potentially riskier. Key issues include:

- *Minimal Checks:* Users can participate in these games without ID verification and are often allowed to play with free coins before depositing real money. This ease of access increases the likelihood of young people, including those under 18, engaging with gambling-like content.

- *High-Risk Features:* Autoplay functions on slot games, banned by the GC, are still available on advertised unregulated gambling platforms. These features expose players to greater risks, such as losing control over payments.

- *Gambling-like products* may present additional risk to consumers, as they can serve as a gateway, leading individuals who might not have otherwise considered gambling to transition into using actual gambling products.

Challenge 4: Participation in unregulated gambling to satisfy specific consumer needs

Some participants turned to the unregulated market to satisfy specific needs and looked for prizes or products not offered on the regulated market. For example, The Gamblepreneur persona is motivated to use innovative products, which provide new ways of making money and better perceived odds. The Eyes on the Prize persona is excited by the reward which could be won in social media raffles and would not normally be available on regulated platforms. However, these attractive offers and incentives often come with additional risks that users may not be aware of. These risks include being scammed, having their personal information shared without their consent, and engaging with harmful products.

Recommendations

To address the above challenges, social media companies should take action to enforce existing legislation (e.g. around unregulated gambling) on their platforms and to empower users to take informed decisions around engagement with gambling. This will complement actions by other stakeholders, such as enforcement activities by the GC.

Actions social media platforms should take to lower exposure to gambling-related content

To address challenges like the promotion of unregulated gambling, lack of content control, and risk of scams, social media platforms should take the following actions:

Prevention of unregulated products and advertising on sites: Social media platforms should take greater responsibility for identifying and removing advertisements and products promoting unregulated gambling. This should include products ranging from crypto casinos through to illegal gambling groups. Platforms should be required to implement robust systems for identifying and removing unregulated gambling

advertising and products, which should be supported by proactive monitoring measures to ensure compliance.

Content filtering and reporting tools: Platforms should provide users with tools to filter out gambling-related content and advertisements, allowing them to customise their exposure based on personal preferences. Users should also be able to easily report unregulated gambling content directly to the platforms. This could help users who do not want to or have stopped gambling, protect children from gambling exposure, and increase reporting of illegal activities.

Age verification mechanisms: Platforms should integrate robust age-verification processes to prevent underage users from accessing gambling or gambling-like content. Social media companies already restrict certain content (e.g., hate speech, harmful misinformation) and should extend this capability to gambling-related content where required.[26] This should stop under 18 users from accessing unregulated content or being exposed to other types of gambling content.

Where social media companies do not take more action to protect consumers, the recommendations should be baked into relevant regulatory frameworks with subsequent penalties for non-compliance.

Actions social media platforms should do to raise awareness

In addition to regulating content, platforms have a role in educating users about gambling risks and ensuring safety. Awareness efforts should address both unregulated gambling products and advertisements, as well as legal gambling-like products that may carry additional risks.

Platforms should also highlight broader online safety issues, such as the risks of scams and the importance of taking extra precautions when spending money online. This might take the form of warnings, for example, a pop-up message warning the user of potential scams if they receive a payment request message. Any content

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[26] The Advertising Standards Authority's (ASA) Advertising Guidance on gambling and lottery advertising states that marketing must not appeal to children and young people under the age of 18. More generally, advertising standards state that marketing that is targeted directly at this group should not contain anything that might lead to harm. Our proposal goes further in that it would ensure that children and young people are not exposed to gambling-related content, even where this is non-targeted.

highlighting safety issues should be prominently displayed to counter the false perception that all content on social media is trustworthy. By educating users, platforms can inform them of the dangers of online scams, such as personal details being sold on the black market, funding criminal activities, and losing money without receiving promised returns.

To maximise effectiveness, social media platforms could experiment with different formats and content styles to identify the most impactful ways to raise awareness across diverse user demographics.

Actions for other stakeholders

Addressing the risks of gambling through social media requires a coordinated effort involving multiple stakeholders, such as banks, financial institutions, or the Gambling Commission. Given the diverse user base engaging with gambling-related content, awareness campaigns may need to adopt varied approaches to resonate with different demographic groups. One approach could involve innovative and attention-grabbing campaigns, like those developed by the French Autorité Nationale des Jeux (ANJ), which use fake ads to highlight the dangers of illegal online casinos.

Conclusion

Our research provides deep insights into consumers' motivations to turn to gambling through social media and how they access unregulated products through this channel. Our findings complement existing quantitative studies measuring the size of the unregulated market.[27] However, further research is needed to build a comprehensive understanding of how social media shapes the gambling market, consumer behaviours, and potentially harmful outcomes.

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[27] See, for example, The size and economic costs of black market gambling in Great Britain (2024). Frontier Economics. https://bettingandgamingcouncil.com/uploads/Measuring-the-economic-impacts-of-black-market-gambling-A-report-for-the-BGC-September-2024-FINAL.pdf and *Unlicensed Gambling – Using data to identify unlicensed operators and estimate the scale of this market.* (2024, October 21). Gambling Commission. https://www.gamblingcommission.gov.uk/statistics-and-research/publication/unlicensed-gambling-using-data-to-identify-unlicensed-operators-and-estimate

Gambling through social media takes many forms, crosses jurisdictions, and evolves rapidly. Therefore, we believe that stakeholders ranging from social media companies to support organisations and regulators should seek opportunities for collaboration to take effective measures.

Appendix:

Phase 1 methodology

In the first Phase of our project, we used an evidence review and experts consultation to develop our understanding of the range and characteristics of gambling products on the unregulated market, and to get an overview of the research landscape and policy priorities. We used the findings from Phase 1 to refine and narrow down the focus of Phase 2 and to update our research questions accordingly.

Evidence review

Due to the scarcity of high-quality research on unregulated gambling, we included a mix of sources in our evidence review, ranging from academic articles to unverified online sources. We first reviewed publications by the Gambling Commission and other governmental bodies, peer-reviewed academic research, as well as studies funded by the gambling industry. We also included investigative journalism reports in our review to understand how the unregulated market operates and what the users of unregulated platforms are exposed to. Finally, we gathered information from websites aimed at potential customers of unregulated operators and betting groups, describing their features and available offers. We acknowledge that the information we gathered on these websites might be unreliable, as they are not reputable sources and their claims have not been independently verified.

Expert consultation

We interviewed experts from academia, the industry, and the Gambling Commission, who specialise in or have experience with unregulated gambling. We analysed these interviews and integrated expert opinions with findings from the evidence review to form our narrative about unregulated gambling.

The methodology used in Phase 2 of the research is outlined in Chapter 2 of the report.

Ethics and safeguarding procedures

BIT is committed to conducting research ethically and to the highest standard. This project was subject to our research ethics process, which meets the criteria set out by the UK Government's Social Research (GSR) Unit[28] and the Economic and Social Research Council's guidance on governance arrangements for research ethics committees.[29] Our ethics policies are regularly updated ensuring alignment with GSR. We have a research ethics panel consisting of trained staff who conduct project reviews. To ensure the independence of the ethics panel, only panel members who are not involved in the project in question can review.

We recognise the increased level of risk associated with running this research due to the nature of the overall topic (unregulated gambling) and the potential inclusion of participants at risk of experiencing gambling-related harms. Therefore, we put a range of additional safeguarding measures in place. For example, we signposted participants to organisations offering gambling support both before and after the interviews. Researchers could opt out of working on any or all of the research activities. Both researchers and participants had the option to talk to BIT's designated safeguarding lead if they had concerns or experienced distress.

Interview topic guides

We conducted semi-structured interviews, where researchers used a topic guide to structure the discussion and ensure that key themes were discussed. Below we provide a summary of our topic guide for reference. Please note, however, that the interviews were also shaped by each participant's unique experience and background. Therefore, researchers often deviated from our pre-specified list of themes or their sequence.

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[28] *Ethical Assurance Guidance for Social Research in government.* (2011). GOV.UK. https://www.gov.uk/government/publications/ethical-assurance-guidance-for-social-research-in-government

[29] *Governance arrangements for research ethics committees.* (n.d.). UK Research and Innovation. https://www.ukri.org/councils/esrc/guidance-for-applicants/research-ethics-guidance/research-organisations-and-research-ethics-committees-our-principles-research-ethics-committees/governance-arrangements-for-research-ethics-committees/

Section	Purpose
Introduction	Researcher to introduce themselves and explain the aim of this interview
Contextual information and rapport building	To 'warm up' the participant(s) and gather contextual information relevant to the topic.
Experience accessing unregulated gambling	To understand the participant's experience accessing unregulated gambling, i.e. the channels / forms of unregulated gambling they engaged in, learning about and accessing them, frequency
Motivations for accessing unregulated gambling	To understand what motivates the participants to engage in unregulated gambling
Customer experience using unregulated gambling	To understand the characteristics and risks of unregulated gambling
Concluding thoughts	To wrap up the discussion and capture final thoughts
Signposting, end, and close	To direct participant to support if needed, check for questions, reassure about anonymity

Proxy questions used for recruitment

Our recruitment partner used the questions below to identify a pool of potential participants for this research. These questions asked about proxy behaviours for engagement with unregulated gambling through social media. We used proxies to reduce social desirability bias and to mitigate the fact that consumers are often unaware whether they have engaged with a regulated or unregulated gambling product. We also asked potential participants to provide details about their experience in free text form if possible.

We only considered participants who said yes to question 1. We then used responses to other questions as well as demographic data to arrive at a diverse and relevant sample.

1. Have you ever placed bets on social media?
(E.g. lotteries and raffles organised in Facebook groups, or gambling/betting on Telegram with operators such as 22BET, TG. Casino, Mega Dice, Lucky Block, and Wall Street Memes)

Yes
No

2. Was your social media betting subject to GamStop rules?
Yes
No
Unsure

3. Which social media platforms have you used to place bets?
Facebook
X
Whatsapp
Telegram
Instagram
Other (specify: _____)

4. Have you ever used Cryptocurrencies, such as Bitcoin, to pay to place bets on social

media?

Yes

No

5. Have you used a credit card to pay for a bet on social media in the last four

years?

Yes

No

6. Has someone on social media ever asked you to transfer money to their bank

account to pay for a bet?

Yes

No

7. Have you ever placed a bet on social media while self-excluded from gambling?

Yes

No

8. Have you used an auto-play slot machine feature on social media in the last two

years?

Yes

No

9. Have you ever been restricted in your ability to withdraw money after placing a

bet

on social media?

Yes

No

10. Have you ever been scammed while placing a bet on social media?

Yes

No

11. Have you ever gambled on social media and not been issued a receipt?

Yes

No

12. Have you ever gambled on social media and found the experience to be very glitchy,

for example, the page kept on crashing?

Yes

No

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