



Education,
Prevention,
Support

Preventing Future Harms

BLACK MARKET EVALUATION REPORT

Prepared By

DEAL ME OUT

www.dealmeout.org

Evaluation By

SOCIAL INTENT

www.social-intent.com





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BLACK MARKET GAMBLING

Executive Summary





EXECUTIVE SUMMARY

Introduction

Deal Me Out is a lived-experience Research, Education, and Treatment organisation that delivers preventative measures to reduce gambling harm in the United Kingdom. Through our educational workshops in schools, colleges, and universities, it became evident that illegal gambling was common among children. In 2024, we designed and delivered a bespoke workshop to evaluate the impact of unregulated gambling on children (N=1254). To aid in gathering a deeper understanding of our concerns we also evaluated people who have used the Black Market and have lived experience of gambling addiction (N=100) and people who gamble and have used the Black Market (N=100). Deal Me Out took this to the next level by working with the public (N=184), and content creators and affiliates (N=10).

The gambling Black Market presents a vast and growing threat to gambling consumers, vulnerable people, the regulated industry, and the UK economy. **Whilst the UK Government and Gambling Commission are making important investments and inroads into combating the Black Market, it is clear that using disruptive methods alone against black market operators does not effectively address the problem.** Cease-and-desist letters to criminals and offshore payment providers have some benefit but create a game of whack-a-mole. We found evidence of black market operators having their websites taken down, only to be back up and running within 24 hours.

The Black Market operates in many forms, from "Not on GamStop" websites targeting gambling addicts—effectively turning the UK's national exclusion system into a keyword marketing golden goose of high-value customers—to poker dens and betting bookies operating through WhatsApp. **The problem of unscrupulous and predatory Black Market operators is not confined solely to online platforms, our report has evidenced the monumental growth of global blockchain gambling operators that compete for market share with UKGC-licensed operators while benefiting from a lack of regulation and absolute autonomy over their services, with little regard for consumer protection.**

Consumers are migrating to the Black Market, particularly global blockchain operators, at alarming rates, citing frustrations with regulation—especially the removal of bonus buys and turbo spins, the implementation of affordability checks, mandatory deposit limits, and general dissatisfaction with gambling restrictions in the United Kingdom. Content creators, celebrities, and affiliates play a key role in promoting crypto casinos, driving mass migration of consumers (see page 5).



EXECUTIVE SUMMARY

Gambling regulation is extremely difficult to execute effectively. When consumer experience and trust are compromised, migration into unregulated markets will inevitably follow. To protect UK consumers, regulators and the industry must implement sensible policies while balancing the prevention of black market growth. Slot regulation introduced by the UKGC in 2021 has unquestionably contributed to migration into the Black Market, and further regulation via the Gambling Act review could solidify the Black Market as a permanent fixture if not implemented with care.

We call on all stakeholders to review policies with particular attention to unintended consequences. Prohibition is unlikely to benefit consumers where a Black Market is simply a choice of URL in a search bar.



EXECUTIVE SUMMARY

Pathways to the Black Market

PATHWAYS

Lived Experience

- Targeted via marketing and advertising as a way of circumnavigating blocking software and tools
- People with addictions often watch streams as a way of trying to stop gambling themselves, those streams promote and affiliate consumers onto block chain Black Market websites
- Choosing Black Market in order to by pass enforced limits by licensed operators
- Increased marketing from block chain Black Market operators

Gamblers

- Choosing Black Market websites after having enforced limits by regulated operators to prevent harm
- Frustration at removal of bonus buys, turbo spins and reduced bet limits push consumers into block chain gambling where these regulations do not exist.
- Refusal to provide sensitive information to operators to conform with rules on affordability
- Affiliate links from content creators and influencers
- VIP schemes and rake back have higher return
- Confusion on what is legal, and what is not

Content Creators

- Creating content on Black Market is less time consuming due to bonus buys, turbo spins etc
- Increased affiliate monetary return
- Vastly increased VIP scheme returns, rake back and enticements
- Lower viewership on lower stake videos, whilst creators on the Black Market can utilise unlimited bet limits.
- Inability to compete with global creators whilst using the UK licensed market
- Ability to use bonus buys and turbo spins for personal enjoyment

Children

- Vastly increased advertising and marketing on social media for social casinos
- Peer pressure and word of mouth from friends who gamble using in game currency and via block chain gambling websites
- Variety streamers that provide gaming content gambling on Black Market websites on stream
- Children targeted by Black Market operators in gaming and via social media
- Children using discord becoming friends with adults that gamble through gaming, being introduced to blockchain gambling



EXECUTIVE SUMMARY

Conclusion

Our evaluation has evidenced that rules and regulation have resulted in a jaded and frustrated consumer base which has already caused mass migration of influencers, content creators and affiliates onto the Black Market. 100% of content creators that provided responses, and 84% of creators we researched externally of our respondents were using the Black Market which in turn generates consumer migration from the United Kingdom to Black Market websites through the use of affiliate codes and content on streaming and social media platforms like Kick, Twitch, Youtube, TikTok, Facebook, Instagram, Discord, Snapchat and X. **Just one UK based Youtube gambling content creator alone had 1.06 million views on videos between October 1st and October 31st 2024, This influencer was not only using a Black Market website, but actively promoting affiliate links and encouraging viewers to sign up in order to bypass regulation.** Ultimately, a clear picture is emerging; consumers are facing increased friction and detriment to consumer experience as industry and regulators combat problem gambling. Players are becoming increasingly aware that they can avoid changes to UK regulation with a simple URL choice and a VPN.

Respondents that gamble responsibly told us they used the Black Market as a way of preventing regulation, in particular to access blocked content like bonus buys, turbo spins and increased bet limits but also as a way to circumnavigate enforced deposit limits by licensed operators placed to prevent harm and as a result of regulation. Consumers are reporting concerns about giving personal information to gambling operators, either due to their views on 'Nanny Stating', or they are aware they may fail checks and be blocked from gambling in the UK at the levels they have historically used. Affordability checks and enforced deposit limits are designed to ascertain, and prevent harm when somebody is gambling beyond their means, **However the crux of the problem is that with the growth of global Black Market gambling, consumers have the option to gamble without friction and regulation on the Black Market.**



EXECUTIVE SUMMARY

Key findings

Prevalence Among Vulnerable Groups:

- Up to 420,000 school children may be engaging with black market gambling, in particular blockchain gambling and gambling within gaming or with in game currency.
- Individuals with gambling addictions report significant exposure to black market marketing, particularly after registering with self-exclusion tools like Gamstop.
- Whilst Gamstop report 34% of people registered use the Black Market, 67% of our lived experience respondents had used the Black Market to circumnavigate Gamstop.
- One service user provided evidence of £129,000 deposits in 14 days using Black Market websites whilst on Universal Credit.
- Gambling websites are targeting young gamers with websites accepting in game currency, FIAT and cryptocurrency to Gamble. These websites are also using games provided by UK regulated providers like Hacksaw and Evolution.

Influencers and Affiliates as Drivers:

- Social media influencers and content creators actively promote black market platforms, driving consumer migration.
- Frustration with regulated markets' restrictions, such as deposit limits, removal of bonus buys and slow gameplay mechanics, has led many consumers to seek alternatives.
- Children are being exposed to gambling by large variety streamers, whilst expecting to watch gaming content.
- 9 out of 10 content creators responding used BC GAME, and promoted it's global websites even whilst it was declared bankrupt, lost its Curacao license and removed its UK white label website.

Economic and Psychological Impact:

- Over £10 million in deposits were reported across all adult respondent groups, with significant losses attributed to withheld winnings or fraudulent Black Market operators.
- The population is inundated with Black Market advertising and marketing via sports, social media and through content created by influencers.
- People that gamble and those that don't are equally unable to tell what is regulated and what is not.



EXECUTIVE SUMMARY

What next

- **Affordability checks** - Affordability checks have the potential to deliver for player protection. However evidence from our respondents is clear that affordability checks, even the notion of them, is a driver to the Black Market.
- **Slot limits £2-5** - Consumer enjoyment of slots is already compromised when compared to use cases on the Black Market, as evidenced by our responses. Whilst the vast majority of consumers use slots at lower levels, those playing higher are likely to be driven into the Black Market.
- **Advertising** - It is imperative white label advertising in football be addressed. The ability to advertise in football must be undertaken by responsible operators that comply fully with regulation. Any advertising that promotes links and websites for Black Market gambling must be removed from football. Gambling advertising is a hot topic, we believe there is a risk that the removal of advertising entirely may contribute to reduced brand recognition of licensed operators and present opportunity for the Black Market.
- **VIP schemes and marketing** - Regulators and government must work with social media providers to remove marketing of Black Market operators, ideally through the online safety bill. Whilst regulation on VIP schemes is welcome, the Black Market can do as it pleases with regards incentives and VIP schemes, often offering all new customers some form of VIP. These policies must be considered when evaluating the Gambling Act.
- **Urgent review of blockchain gambling** - It is paramount the government develops a plan to prevent global blockchain gambling operators from accessing UK consumers, notably children through aggressive marketing and advertising.
- **Population based upskilling** - A preventative information campaign must be developed to ensure the population is equipped with the information to prevent Black Market usage. We must ensure consumers are aware the Black Market uses fake games, refuses to pay out winnings and often funds criminal activity.
- **Strong, Collaborative system** - A robust and collaborative Research, Treatment and Prevention sector must work alongside all stakeholders including Government, Enforcement, Industry, Health and Education to create an informed and supported population base



EXECUTIVE SUMMARY

Reason for study

Over the last five years we have become increasingly concerned about the surprising prevalence of Illegal gambling in the United Kingdom, in particular within children and vulnerable people. Since inception we have witnessed regulation intended to prevent harm at a population level, may in fact worsen harms for those most at risk.

Deal Me Out has been heartened to see a sizeable shift of rhetoric on the Black Market from all sides of the Black Market debate. Academics, Clinicians, Charities, Politicians, Industry and Regulators have started to show greater consideration of the Black Market as a real threat to people in the United Kingdom.

On September 8th 2023 Dr Henrietta Bowden-Jones, the national advisor on gambling harms and founder of the NHS gambling service, stated on the social media platform X “Worried by this week’s referrals to the children’s NHS gambling services. Two young children gambling pathologically using cryptocurrency with money stolen from parents’ bank cards. Sharing this in hope it is not something we will see more of, concerned what I am seeing”.

Prominent researchers like Dr Heather Wardle have also noted the Black Markets threat in emails to the GB Gambling Commission, citing **“We did have some people who reported gambling with unlicensed operators/crypto, which I was surprised about”**, and going further in emails stating **“Essentially people do not have a clue if things are UK licensed or not. Seems to me the GC should be doing clear kitemarking and running campaigns around this”**.

The UK Gambling Commission has committed to providing a report on the Black Market by spring 2025, Our report aims to support the Gambling Commission in order to prevent the impact of the Black Market on consumers within the United Kingdom.



EXECUTIVE SUMMARY

Reason for study

Our own CEO, Jordan Lea spoke to the BBC stating, **“More needs to be done during the consultation period’ (Gambling White Paper - RE Slot limits) to address the ‘unintended consequences’ of the restrictions. Problem gamblers have an addiction, and we can’t regulate ourselves out of that. We need enough support in place for people who need it because otherwise they will simply go down other avenues with their addictions.”**

The Gambling Commission has come out firing in the battle against the Black Market, with enforcement action taken against illegal gambling operators. The Great Britain Gambling Commission (GBGC) insists it has the ability, and will have further powers to combat the Black Market. This is extremely welcome, and our organisation will support the Gambling Commission in any and all work to prevent Illegal gambling. We have provided the Gambling Commission with evidence of Black Market Gambling operators both online and offline as a result of our evaluation, **The Gambling Commission has had some mixed success in deterring operators, taking down a Gambling website that targets children through the game ‘Roblox’, however the website was back up 36 hours after removal using a different provider.** Deal Me Out has reported 19 online Black Market operators and 3 land based Black Market operations to the Gambling Commission as result of our responses. Our hope is that by supporting the GBGC with grass roots evaluation, we can support policy makers and commissioners in order to prevent unintended consequences.

Anecdotally, we have heard the experiences of children over the last five years, from primary age to university students; these experiences are indicative of significant harm at a population level. Our primary concern is that Illegal gambling is sparsely understood. We take the view that Black Market gambling is formed in all gambling that is not regulated by the GBGC, however this view is not shared universally. We would like to see the GBGC and regulators take a firmer line on White Label operators accepting UK customers on their global websites, in particular children, and policy to deal with ‘Social Casinos’ and ‘Gambling within Gaming’ in particular.



EXECUTIVE SUMMARY

Data collection

Deal Me Out delivered educational workshops in 8 secondary schools in order to inform children and young people about the prevalence of gambling within Gaming and its Black Market potential. We surveyed young people pre and post workshop using Plickers. After gaining 1254 evaluations with children via workshops, Deal Me Out extended our project by evaluating 100 gamblers who have accessed the Black Market, 100 people who have been diagnosed with a gambling addiction, or self-identify as a gambling addicts and 10 content creators and affiliates to ascertain why players are moving to the Black Market and what we can do to prevent expansion and growth of unregulated gambling in the UK.

We delivered singular and collective sessions with respondents under recorded online meetings in order to obtain their testimony, and after our sessions we collected a 24-question research questionnaire to increase our understanding of their responses. To further our understanding of individual level consumer behaviour when related to the Black Market, Deal Me Out conducted a pre and post testing model at a community location with 194 individuals. Due to the nature of our work Deal Me Out have developed an extended safeguarding policy specifically for this project, designed to prevent impact or exposure to potential relapse for those impacted by gambling addiction.



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Lived experience of Addiction





LIVED EXPERIENCE SUMMARY

Those with addictions are accessing the Black Market through two channels; (i) referrals (including content creators/affiliates/influencers, friends and relatives) & (ii) through google searches and marketing aimed to circumnavigate Gamstop. 84% of respondents informed us they were accessing gambling streams and content in order to placate their urge to gamble, vastly increasing exposure to the Black Market via content creators choice, with the majority of all streamers hosting on the Black Market, this is an overwhelming concern for people with a gambling addiction. Those with lived experience of addiction are also exposing themselves to Black Market advertising and marketing by signing up to Gamstop in the first place. By searching and visiting websites related to Gamstop, footprints are left and Black Market operators are able to target all gamblers, but crucially also gambling addicts, using this data.

For those with addictions, you can't just sign up to block access like you can within the Regulated Market. You can't just sign up to Gamstop and remove the ability to access gambling, or gambling marketing. **At least £3.6 million has been deposited onto the Black Market from our 100 respondents and 61% of respondents have had money stolen after trying to withdraw. Over 70% of respondents said they were receiving marketing and VIP offers on a daily basis and could do nothing to stop them,** these came in the form of emails, texts, WhatsApp, phone calls, Discord messaging and push notifications. 66% of respondents reported to downloading a cryptocurrency wallet specifically to gamble on the Black Market.

For most people with gambling addictions, blocking tools and software like Gamstop SENSE, MOSES, deposit and time limits, Betblocker and Gamban are game changing. These products provide a safety blanket that prevents access and marketing, they also vastly reduce relapse potential. However blocking tools and software are limited within the Black Market and rely solely on personal responsibility. **Any unintended consequences of regulation may disproportionately affect those people that those policies are designed to protect.**

As a result of our work, we are increasingly concerned that people with Lived Experience of gambling addiction will be disproportionately thrust into the Black Market as a result of further regulation. In particular both slot limits and affordability checks, and whilst we are not arguing against the inclusion of these measures, we are urging policy makers to consider the impact of regulation and how this will unintentionally provide nudge economics for the Black Market.



LIVED EXPERIENCE STORIES

I started gambling when I was 14. People would pay me to boost their gaming accounts using cryptocurrency and, through my gaming connections and from watching my favourite streamers, I found crypto gambling. I was able to bet on Esports events, games that my favourite streamers were using.

It was social for me. My friends and I would come home from school, jump on Discord and watch each other gamble. We'd also be gambling with our gaming friends from the US, South America and Asia. There is something quite appealing, sitting next to your friends on a virtual table.

Over the past few years, I've tried to curb my gambling, I've blocked myself from various websites but still get marketing emails on a daily basis "100 Free spins if you come back". **If a person self excludes at Bet365 or Ladbrokes, they can't keep sending them marketing, they could lose their licence - but that isn't the case with the Black Market. They target the most vulnerable people with addictions to gambling.**

MT



LIVED EXPERIENCE STORIES

When I signed up to Gamstop, I started to get loads of marketing from casinos I'd never heard of.

I put £50 onto a website that I thought was legitimate, won and tried to withdraw - no response. I still can't withdraw that money one year later. They just don't respond. After this I researched good, not-on-Gamstop websites, and probably spent more of these websites than I ever did before signing up to Gamstop. They were sending me free spins every single day. I was getting texts every day. Phone calls from people that could barely speak English, offering me all sorts of bonuses. I had to change my email, I let Gamstop know and the emails started coming through again. How they know that I've signed up I don't know - maybe it's cookies?

Joe R

I tried to stop gambling as I was addicted. I watched streams which really helped me not gamble. Obviously I went into Cryptocurrency casinos because the streamers were using them and the bonuses were great. The fact you can bonus buy is a big plus for me.

The worst thing about Black Market is you can't self exclude. It's down to me. I'm gamble free for 15 months and no longer watch streams. Everything is better now I don't gamble on slots.

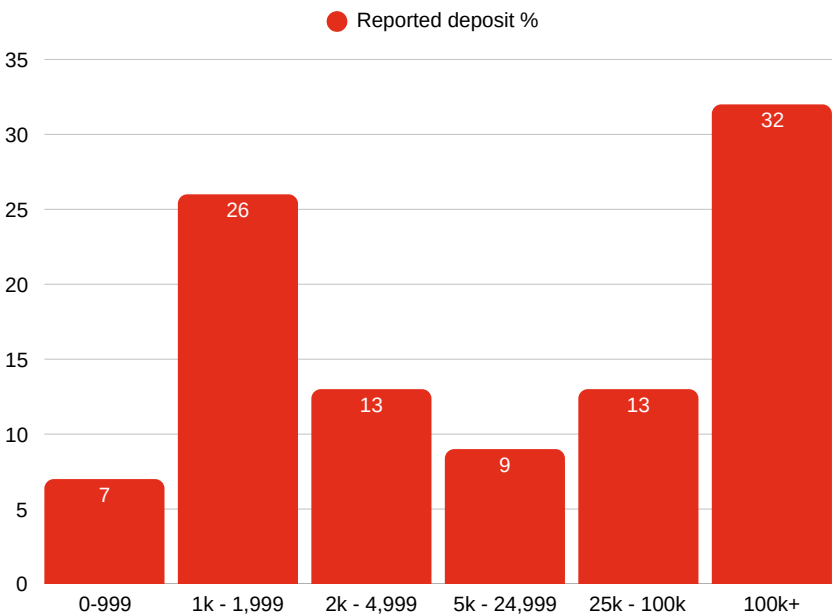
Donna T



LIVED EXPERIENCE SPEND

We asked participants to provide us with approximated deposits within the Black Market in order to better understand the scale of deposits from people with lived experience.

When taking the minimum amount of each choice (Example £0 - £999, we would use £0 for respondents), we can estimate that approximately **£3.6 Million** have been spent within the Black Market from our 100 respondents. During our focus groups in particular, we were able to gain extremely valuable information on spend.

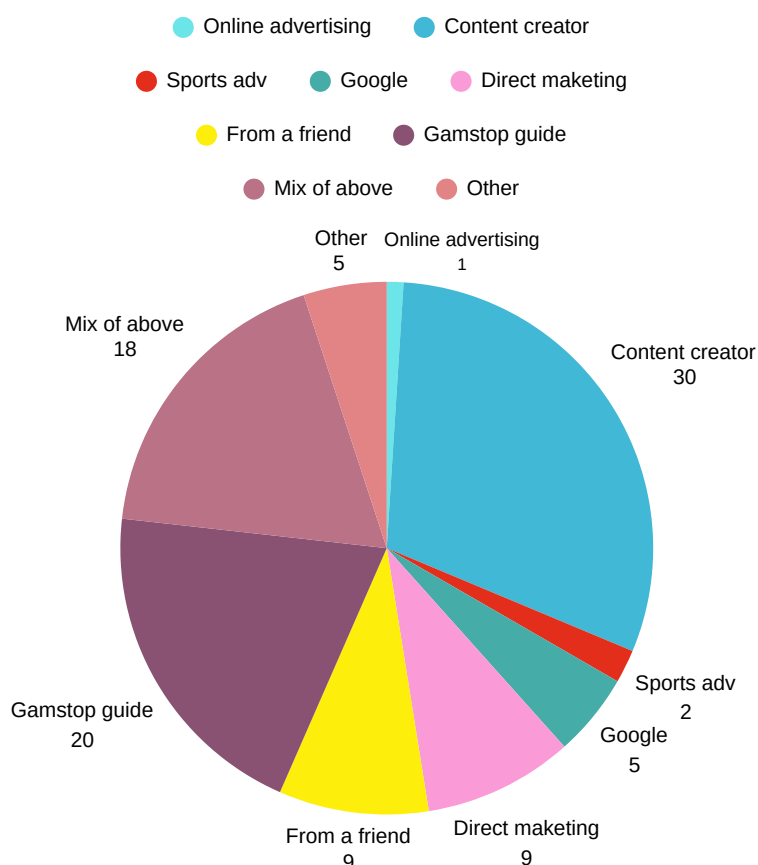


Answer Choices–	Responses–
–0 - £999	7.00%
–£1,000 - £1,999	26.00%
–£2,000 - £4,999	13.00%
–£5,000 - £24,999	9.00%
–£25,000 - £100,000	13.00%
–+ £100,000	32.00%
TOTAL	100



LIVED EXPERIENCE ACCESS

Respondents first gained awareness of the Black Market through two channels, 'environmental' and 'necessity through restriction'. The overwhelming response showed that people with gambling addictions are driven to the Black Market in attempting to circumnavigate Gamstop, and through following influencer-led affiliates and video content. Those responding with influencer led introduction cited significantly higher frustration with perceived regulatory friction, actions like removal of bonus buy's, turbo spins and reduced spin speed as well as reduced spin limit and deposit limits were of increased concern for those obtaining increased exposure to gambling through content creators.



I heard about the Black Market/Unregulated Market through Lived experience of Gambling addiction (N=99)

Answer Choices--	Responses--
--Online advertising	1
--Streamer/Content creator/Affiliates	30
--Advertising in Sport or Esports (sponsorships, marketing)	2
--Google search	5
--Direct email marketing from Black Market operators	9
--From a friend	9
--How to circumnavigate Gamstop guide	20
--Mix of the above	18
Other (please specify)	5
TOTAL	99



LIVED EXPERIENCE TARGETED

When people sign up to Gamstop, a product designed to prevent access to gambling products within the regulated market, people with addictions are disproportionately targeted by the Black Market.

When visiting a website, or searching google, people leave a footprint through 'Cookies'. Black Market operators utilise this information to target vulnerable consumers seeking support and preventative measures for their gambling addiction.

Whilst consumers registered to Gamstop can no longer gamble on the regulated market, the Black Market will accept addicts with open arms, highlighting NON GAMSTOP, or Not On Gamstop within their social media marketing.



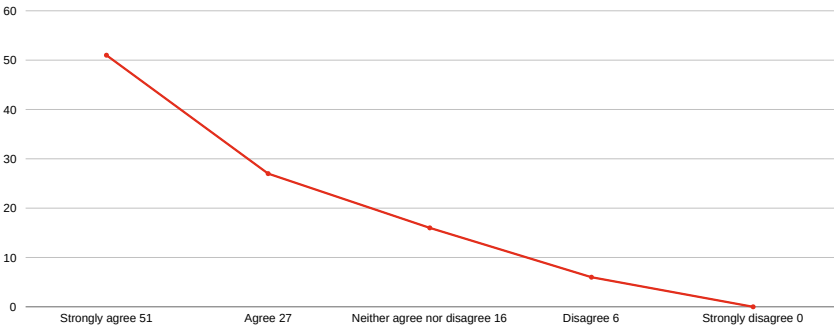


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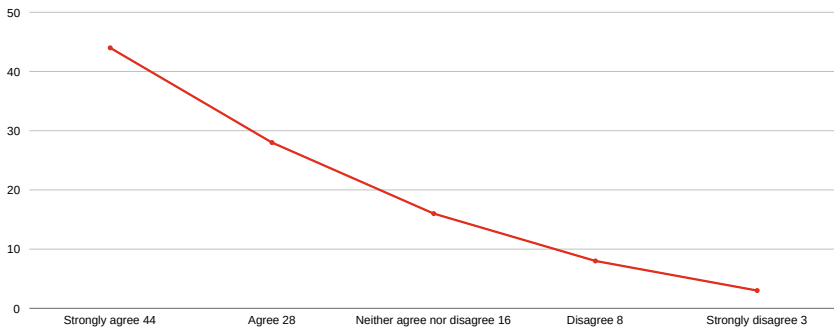
LIVED EXPERIENCE FRUSTRATION

The statistics support that respondents had clear concerns around perceived regulation. With nearly 78% of respondents either agreeing, or strongly agreeing, that changes to regulation directly influenced their decision to use the Black Market. 72% of respondents felt that enforced deposit limits placed by regulated operators influenced their decision to play on the Black Market.

Changes to regulation in the UK
(no turbo spins, no bonus buys,
lower limits, slower spins, deposit
limits) influenced my decision to
use the Black Market (N=100)



I used the Black
Market/Unregulated Market
because operator led deposit limits
limited my play within the regulated
market (N=100)

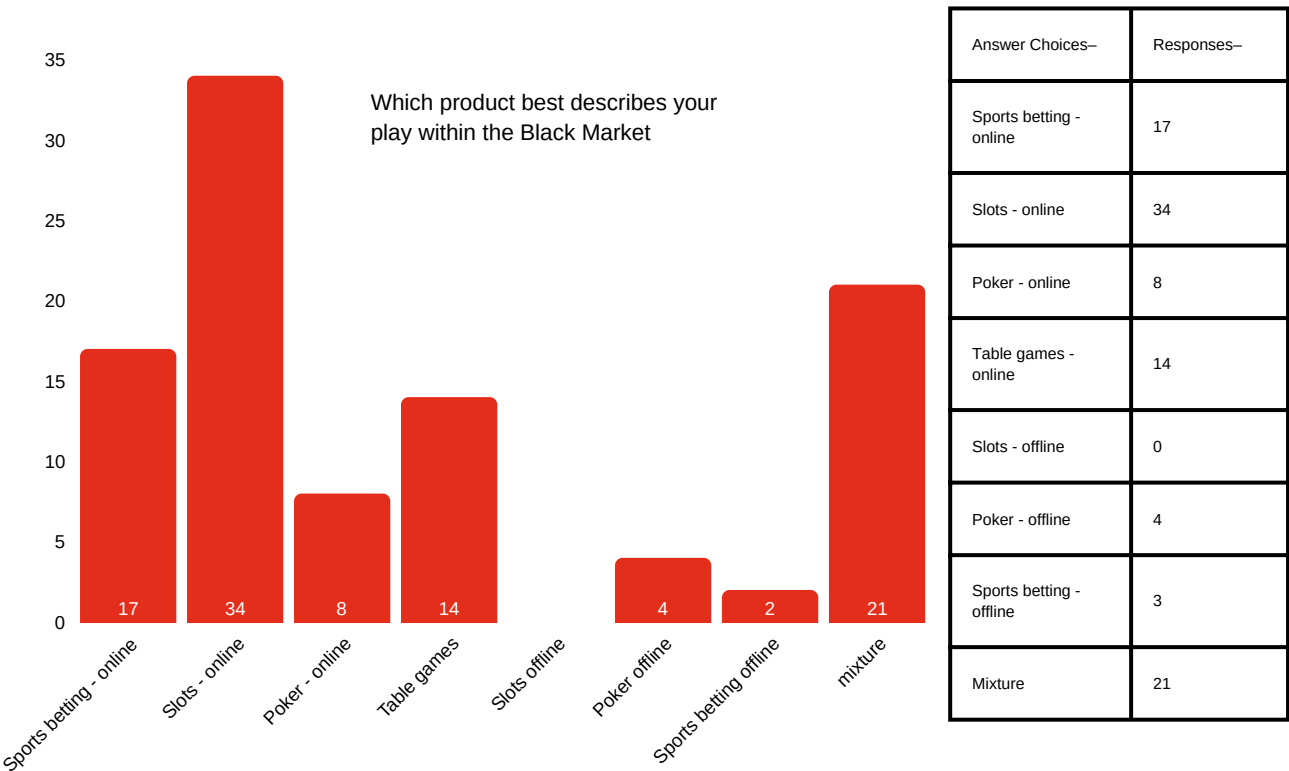




LIVED EXPERIENCE PRODUCTS

When it comes to product choice, we aimed to understand if respondents were gambling online or offline and what products were more likely to be accessed on the Black Market. For people with Lived Experience, gambling in land-based settings was almost non-existent. Respondents, including those answering ‘mixture of above’ were more likely to be gambling using online slots.

It is our harm prevention point of view that all products should only be accessible from the regulated industry, but particularly table games and slots. **Respondents reporting online slots as their best descriptor were also overwhelmingly from lower age range, higher spend and more likely to have been introduced to the Black Market through influencers affiliates.**



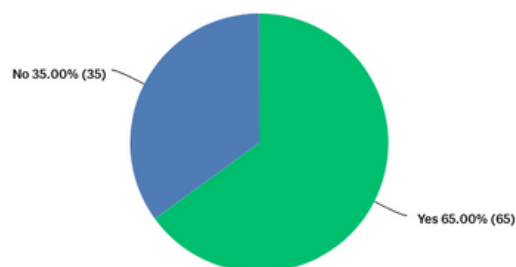


LIVED EXPERIENCE AGE VS TECH

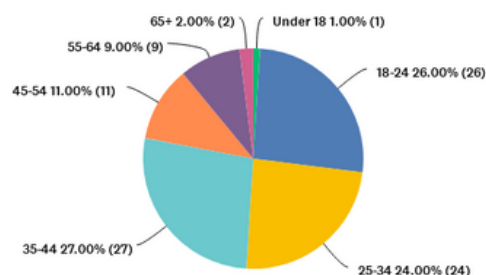
We found significantly divergent replies from the age profile of respondents, when compared to other question responses. For example, those reporting the higher categories of age had less dramatic deposit/spend and were significantly more likely to have accessed the market through circumnavigation of Gamstop rather than through social purposes. Those in the highest age categories used VPNs (Virtual private network) the least of all age groups.

We found that younger users were at higher risk of higher spend, and were more likely to be using a VPN. One respondent reported being under 18 at the time of review. We double checked with the respondent as this would have broken our safeguarding policy and governance policy for the project, the respondent had mistakenly responded in that box, however for response integrity, we chose to leave the original response intact.

Q6 I have used a VPN to gamble on the Black Market



Q4 What age best describes you now?





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DID
YOU
KNOW
?

The changes that happened very recently with Stake leaving the UK market have changed the below paragraph, but it is still worth highlighting that the most viewed tweet EVER is a partnership post between BC GAME and Leicester City FC.

BC GAME had a UK white label licence, but it promoted its Global cryptocurrency website in the links, which is an illegal Black Market website in the United Kingdom. The post has 1.8 Billion views on X.

21% of respondents that are addicted to Gambling told us they have used BC.GAME's unregulated Global website to Gamble, with one respondent having deposited £100,000+ on BC.GAME. All of our content creators have used, or currently use BC GAME as affiliates



BC.GAME
@BCGameOfficial

Follow

We're over the moon to announce that [BC.GAME](#) is now the Principal Partner of Leicester City FC [@LCFC](#)! This partnership is a dream come true, and we can't wait to reach new heights together. 🦊

🏆 Uniting the passion of football with the innovation of crypto!



141 · 08 · 24 · 1.8B Views

7,574 Reposts 441 Quotes 140K Likes

11.6K Bookmarks



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BLACK MARKET GAMBLING PEOPLE THAT GAMBLE





GENERAL CONSUMER SUMMARY

Within this group, the vast majority cited avoiding regulation to be their reason for accessing the Black Market, reasoning primarily enforced deposit limits by operators, stake limits, restrictions on the mechanics of the games and 'affordability checks (perceived affordability checks)'. **Consumers are extremely wary of having to hand any data to gambling operators, and are comforted by Black Market operators' lack of compliance. In contrast to our lived experience group, this group were far more wary the Black Market and conducted significantly more research into the websites,** rather than simply clicking an affiliate link from a website claiming to circumnavigate Gamstop.

We saw a much larger offline Black Market usage from our people that gamble, with 31% reporting gambling using illegal sports betting and Poker dens, WhatsApp groups and Unlicensed 'Bookies'. **We were given video and photo evidence of a Poker den in action from a respondent confirming a large group of individuals taking part in at least 5 tables of Poker at an unlicensed venue, with roulette wheels, valets, dealers and massages in action all present in the video.** A host of evidence has been made available to the GBGC under its reporting tool.

Overwhelmingly, the concern of our group was perceived over regulation. In focus groups, respondents told us time and again that they could not bet like they used to in regulated markets, so have opted to gamble elsewhere and that the level of checks or documents was overwhelming. Whilst some welcomed 'Frictionless checks', many were concerned their playing history would not be taken into account. **78% of respondents either agreed, or strongly agreed that changes to regulation on slots were the reason for playing within the Black Market and 80% of respondents cited limits and account restrictions as a key reason for migration.** Our group had a lower average deposit history than those with gambling addiction.

Our group of general consumers had a reported deposit of £1.9m (N=100), it became evident during oral workshops with respondents that withdrawals were more common amongst this group, with higher RTP when compared to those with addictions.

The more that Content Creators migrate to the Black Market, and the more that 'followers' follow them, then an increasingly large scale consumer base of gamblers, who generally already hold a deep mistrust of operators, regulators and government, is created. Encouraging these customers back from the Black Market, from our evaluation, would be difficult to achieve, with 91% of respondents stating they would never return to the regulated market.



CONSUMER EXPERIENCE STORIES

I'm a part of four WhatsApp home games for poker. We play at venues across Manchester. One of the groups is run by very clearly criminals, taking advantage of vulnerable people.

One of the group members was given credit for the watch he received after his Dad's death. The watch was left with the owners and they then refused to sell it back to him at the end of the night. They even overstated its value on a loan they offered him.

I've seen people beaten up for disagreeing with them, laying bets, hosting roulette sessions with tens of thousands on the table. The WhatsApp groups are just a Who's Who of extremely dangerous people.

Mark Jones
MCR



GENERAL CONSUMER STORIES

I've gambled since the age of 18, playing poker, betting on the football or races, and have always enjoyed myself responsibly. At some point in 2022, I found deposit limits start to creep into my gambling accounts, and the casinos I play in start to ask more and more questions.

Over the past few years, most of the poker 'regulars' now use a 'home game', held at a venue in the city we usually play. **At first, it felt a bit shady, with security doors and more cameras than Area 51, but you get used to it. I'd rather walk around a hell-hole with bags of cash at 3am after a good night than not be able to play properly at a licenced venue.** To put this into context, 100 people descend on a small gambling venue, we transfer money to a person we don't know - sometimes there might be £100,000+ worth of transfers a night between us all - and we have to trust this person to transfer the money back on withdrawal.

When it comes to online, I only use crypto casinos now for the same reasons. If i want to place a large bet occasionally, why should I have to be questioned and made to feel like a criminal for doing what I love to do, something that is entirely legal. On crypto casinos, there is none of this nonsense. I deposit, I bet - that's it.

Alex S

The biggest problem as I see it, if I want to play a Poker tournament and save all year, and the buy-in is £10,000, then I should be able to do that. But I can't on any regulated websites because I can't deposit that much. So I therefore have to play using unregulated websites where I can't get into that tournament anyway. I'm not interested in 20p bets; oh, thanks for the bonus, I'll enjoy my £3.30! That is the state of UK websites these days. **To enjoy gambling in 2024, I need to use unregulated Black Market.**

Louis H



INFLUENCERS & AFFILIATES REPORT

We delivered focus groups and survey responses from 10 gambling influencers/content creators in order to find out why content creators are migrating to the unregulated Black Market and what impact it is having on themselves and their followers.

Between July and August 2024, **The content creators we surveyed received viewership of 3.8 million views on YouTube alone, all providing exclusive content within the Black Market.** The content creators are open and transparent about their usage in public, with all 10 using the Black Market exclusively. **We estimate that across all platforms, there are 5 million views per month on content from UK based content creators, directly promoting affiliate links to Black Market websites.**

Our respondents informed us that at least 12,500 UK based consumers have signed up to Black Market websites as a result of their affiliate links, with many more people signed up through word of mouth. We have seen a significant amount of evidence from forums attached to our respondents to evidence a mass migration of engaged gamblers onto the Black Market



8/10 respondents are concerned their money is not safe within the Black Market



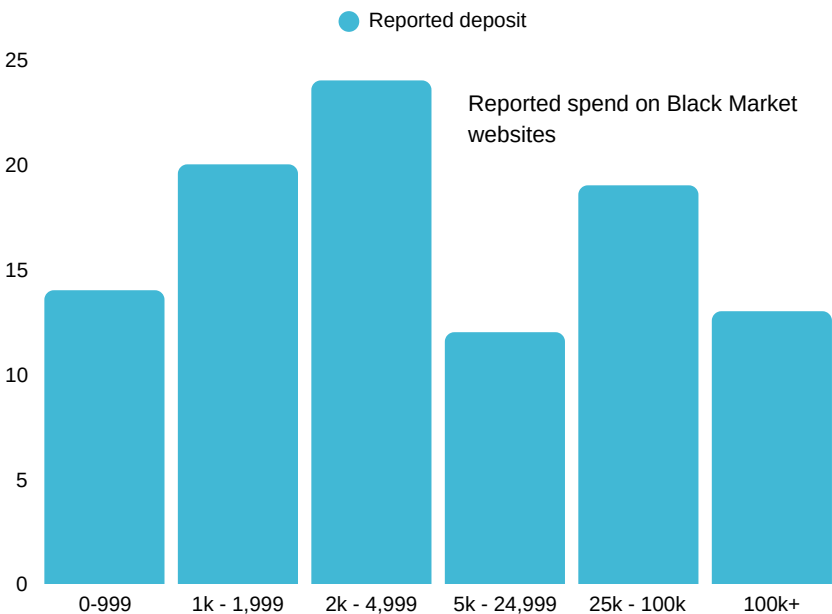
9/10 respondents would prefer to gamble within the regulated market, however do not feel able to do so in the current climate



GENERAL CONSUMER SPEND

We asked respondents to provide us with approximated deposits within the Black Market in order to better understand the scale of deposits from people with lived experience.

When taking the minimum amount of each choice (Example £0 - £999, we would use £0 for respondents), we can estimate that approximately **£1.9Million** have been spent within the Black Market from our 100 respondents. During our focus groups in particular, we were able to gain extremely valuable information on spend. Our group of general consumers reported more deposits, and more withdrawals when compared with our lived experience cohort of respondents.

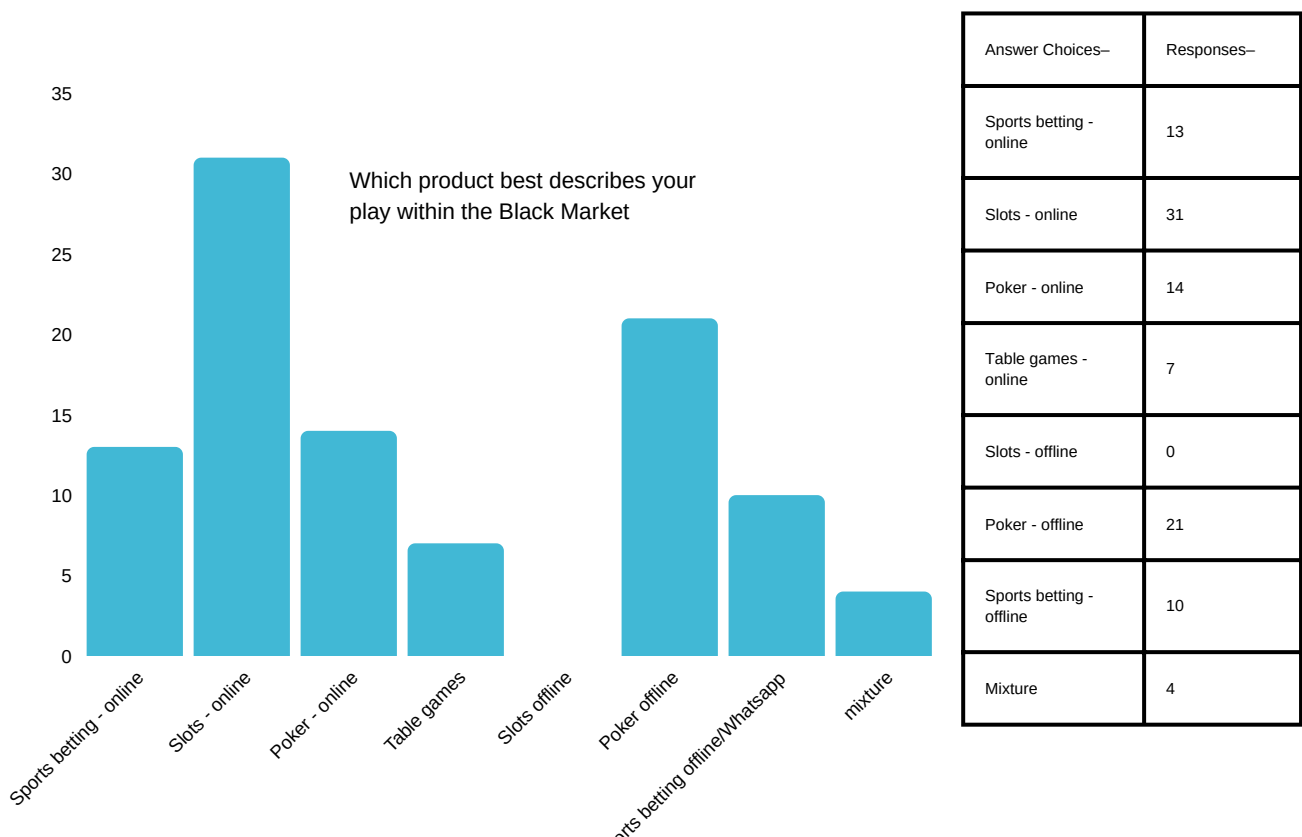


Answer Choices–	Responses–
–0 - £999	7.00%
–£1,000 - £1,999	26.00%
–£2,000 - £4,999	13.00%
–£5,000 - £24,999	9.00%
–£25,000 - £100,000	13.00%
–+ £100,000	32.00%
TOTAL	100



GENERAL CONSUMER PRODUCTS

Respondents from this category had a much higher prevalence of land based usage when compared to lived experience respondents.





GENERAL CONSUMER STORIES

Using Black Market websites is a no-brainer. If I use UK regulated websites then I can't use turbo spins, and I can't use auto spins. It's just a faff now. The enjoyment has completely evaporated from gambling using our regulated websites. I don't gamble that much money, so the deposit limits don't really affect me like it does some other people. But if I've got half an hour spare between working 12 hours shifts and then spending time with my family, I want to chill-out and get a bonus, not watch 200 spins at a slow pace. **Turbo spins is it for me, without it, I just can't enjoy slots at all.**

Using Black Market is a risk if you don't know what you're doing. I've had websites just not pay out. But once you find a good one with good reviews, then what's the harm? I get to enjoy gambling again.

Chris T

Gambling is global now, you can't just regulate it like you could. Everybody has a VPN or can access one easily. **I'm not saying the average person is using unregulated gambling, but at least there is now a choice. Limits and invasive checks will drive people onto the Black Market. It used to bother me, but now it's just normal.**

Gemma D

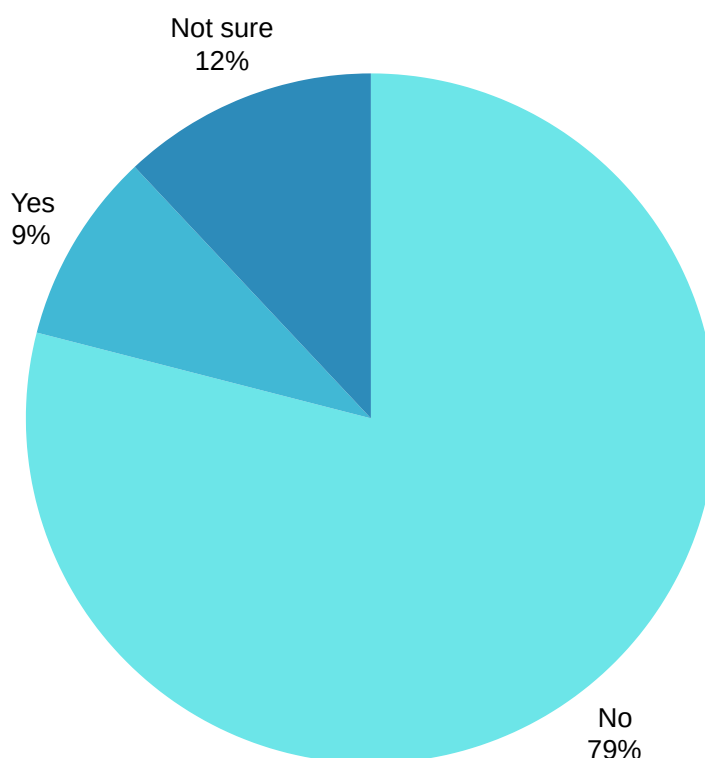


GENERAL CONSUMER FAKE GAMES

During our evaluation, we became aware of the issue of ‘fake games’ in the black market. Fake games are copies of legitimate slot products produced by criminals, and they make up a significant portion of the games provided on black market websites. Whilst consumers believe they are playing games that are licensed and regulated with a legitimate return to player (RTP), they are actually receiving RTPs set arbitrarily by the operator — with a 0% return being possible.

Fake games pose a threat not only to consumers, but also to the gambling industry and the Treasury. Any breakdown in trust in licensed operators undermines the regulated gambling market. Our respondents were not aware of fake games and were not informed about them by our researchers. Only 9% of respondents felt that products offered the same RTP as those in the regulated market.

Do you feel products on the
Black Market offer the same
legitimate odds and RTP as
the regulated market.
N=100






GENERAL CONSUMER FAKE GAMES

During the course of our evaluation, our researchers were contacted by multiple ‘fake game’ providers offering RTPs ranging from 0% to 100%, with the ability to increase or decrease RTP rates for each player at any time.

This means that, as a black market provider, we would be able to allow consumers to experience initial wins at higher-than-normal rates and then turn off wins at any point along the consumer journey. We spoke with two fake game providers as prospective customers and were given demonstrations and guidance on how to use the products. The providers claimed that the games were built using original code from legitimate game developers.

Increase Your Casino Revenue by 250%! External Inbox x ✕ 📄 🔗


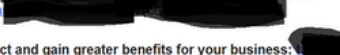
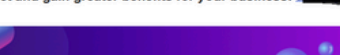
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 Thu, Mar 13, 9:19 AM ☆ ↶ ⋮


Integrate a slot game **API** with custom RTP (0-100%) from PragmaticPlay and other leading providers:

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⚠ Our solution is the only one on the market built on the **original source code**.
No need for a thousand words – see for yourself!

🎮 Demos:
PragmaticPlay: 
PG Soft: 
Amatic: 

💬 Contact and gain greater benefits for your business: 





GENERAL CONSUMER FAKE GAMES

We contacted four licensed game providers to verify the authenticity of games featured on several black market websites. All four providers confirmed that the games on the websites under investigation were fake and not their own.

One operator told us they had removed their intellectual property from one particular website on multiple occasions, but found it reappeared very quickly. To support the operator's findings, we used GameCheck — a website designed to investigate gambling sites using fake games. While this process takes time, one of four investigations has been completed and confirmed that the black market provider is indeed using fake games.

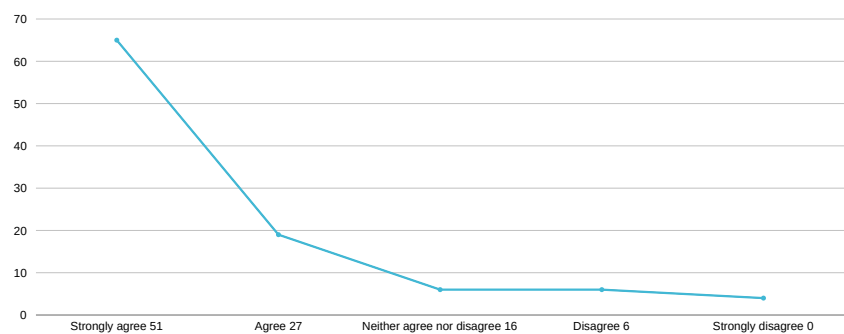
It is important to note that many black market websites do feature legitimate games. During the course of our evaluation, we observed a significant reduction in the presence of UK-licensed providers; however, some still routinely appear on black market sites. As a result, we have written to the licensed providers requesting the removal of their games, but have yet to receive a response.



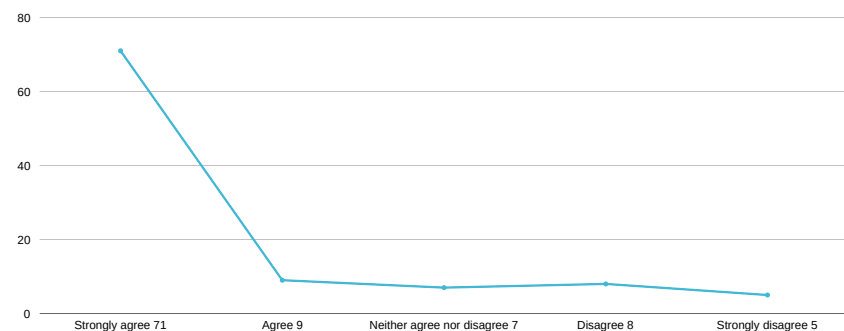
GENERAL CONSUMER FRUSTRATION

Respondents from this category, and the Lived Experience category, showed unified concern that regulation was pushing them into the Black Market. 84% of respondents agreed slot regulation influenced their decision to migrate to the Black Market and 80% of respondents felt deposit limits and affordability checks were the main reason for migration.

Changes to regulation in the UK
(no turbo spins, no bonus buy's,
lower limits, slower spins, deposit
limits) influence/d my decision to
use the Black Market (N=100)



I use/d the Black
Market/Unregulated Market
because deposit limits and
affordability checks limited my play
within the regulated market (N=100)





Preventing Future Harms

**DID
YOU
KNOW
?**

Many Black Market operators offer VIP schemes to all new customers, with dedicated VIP managers upon sign up. VIP schemes in licensed markets are heavily regulated, whilst the Black Market, in particular global blockchain gambling websites can offer VIP schemes with impunity.

Within advertising, licensed operators cannot utilise celebrities with strong appeal to children, whilst the Black Market consistently ignores rules and regulation designed to prevent harm

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CageCulture: Hows the training going Conor?
Freakinma: WHAT DATE ARE YOU COMING BACK IN THE OCTAGON BROTHER ?
Reconerypte: U MADE FUN OF ALDO FOR PULLING OUT FOR THE RIB BUT U PULLED OUT FOR A PINKY TOE BROTHER
pikacit: any good exercises for hip mobility?
agente420: Lookin' good with or without the glasses m8
Mtep_suy10: You are the best!
ToniKeld: mac daddy patak condisseur
PIZZA3654:
Kinbo_Undisputed: We are waiting for you in the Undisputed game, contact them!

REGISTER NOW & USE CODE **conor** **RECEIVE A DEDICATED VIP MANAGER**

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BLACK MARKET GAMBLING INFLUENCERS & AFFILIATES





INFLUENCER & AFFILIATE SUMMARY

After our focus groups and discussions with content creators, it became clear there is an overwhelming frustration with regulation in the United Kingdom. All ten content creators are fundamentally opposed to returning into the regulated market whilst restrictions are in place. Regulators must take notice; **where influencers' are playing, consumers follow**. This is true of all gaming and gambling related online content. With almost all content creators playing on the Black Market, it is only a matter of time before migration to the Black Market, in particular Crypto Casinos, is the new normality.

Put plainly, content creators have a decision to make; either to spend 20 hours making a video, and having less appealing content through lowered slot spin limits within the regulated market, or migrate to a global blockchain casino, where affiliate fees are better, no regulation and VIP schemes provide vastly increased opportunity. If any content creator is playing on the Black Market, they are monetarily significantly advantaged versus any creator operating within the regulated market.

Between July and August, **3.8 Million views were amassed on just our 10 respondents videos on YouTube, and hundreds of consumers signed up through affiliate links directly advertised through these videos**. Ultimately, consumers will follow their preferred content creators.

There is little concern for RTP when transacting through Cryptocurrency. All content creators were aware their overall RTP was reduced upon deposit through 'deposit and withdrawal fees', placing them at a disadvantage to regulated websites, however this is considered a cost of business. **One content creator informed us he had spent £20,000 in deposit/withdrawal fees during 2024 alone.**

There is an acceptance within the influencer/content creator community that the world wide, untouchable blockchain market is not only the future, but is here to stay. This is also consistent across all respondents to survey.

On the 9th March 2025, Youtube updated it's terms of use banning the advertising of Black Market casinos, In response to this - influencers have opted to advertise their own discord channels as a route to advertising.



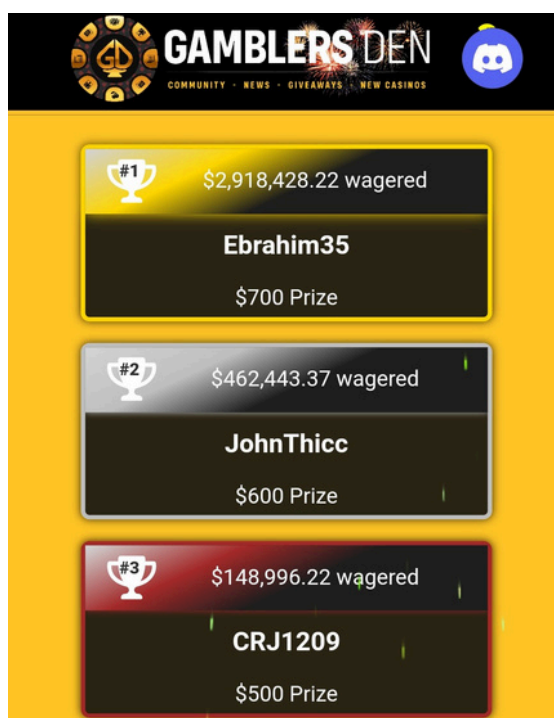
CONTENT CREATORS

As part of our research, we reviewed a variety of content creators and affiliates that did not take part in our evaluation to better understand what drives content creators to the Black Market, and to evidence migration of consumers through affiliates.

One content creator plays exclusively on BC GAME's global blockchain website and actively encourages UK-based players to sign up through affiliate links, which in turn generate revenue for the creator. Through use of their website Gamblersden and via Discord, we can evidence how much much consumers are wagering onto BC GAME per month through the creator's 'wager race'. A wager race is a legal incentive common place within the gambling industry and publication of figures can provide interested parties with evidence of play.

Between April and May 2024, over 4 million pounds was wagered on BC GAME's global blockchain website through this creator's members. Black Market operators offer increased revenue for affiliates when compared to the regulated market, which provides incentive for content providers to choose their platform.

<https://gamblersden.com/wagerrace>





CREATORS PROVIDING MIGRATION

Whilst reviewing the same content creator's videos, we were given insight into the frustration he and his followers were feeling, in particular around slot regulation. It is noteworthy this content creator is highlighting the use of VPN, play anywhere, and most notably, no ID checks and even the capacity to have no friction as long as you use the code.

“As always guys, if you want to play on BC Game and support me as a gambling content creator, **and if you want your quick spins, your auto plays, your bonus buys - NO ID checks, NO verification and full player protection, then make sure you sign up via gamblersden.com**, or use the link down below.”

“Yeah, so you can use a VPN if you want, you’re allowed to play anywhere in the world. **As long as you use our code you won’t be ID’d or anything like that, you’ll have full player protection.**”

“And we have contacts there that can deal with anything. You’ll find it here (Link) - just visit us at gamblers den, you need help? Just come on the Discord and we can help you out. **Get your gambling back to how it was before. Before everything got STAMPED out.** And you are able to set limits and self-exclude on BC game now, so there are player protection tools here, albeit they aren’t as thorough as some regulated countries, everything is a bit different, but there are tools on here that you can use.”

We encourage interested parties to view the evidenced video link below

https://www.youtube.com/watch?v=eVUjvJ_A-Xs&t=1664s

Time stamp 25 mins 26 seconds.



INFLUENCER'S & AFFILIATE'S RESPONSE

“Regulation has forced our hand; if we don't use crypto casinos we just can't compete. Our viewers want to watch Bonus Buys, Turbo Spins, High rolling content, something we just can't do in the UK anymore. I understand why the Gambling Commission has put these rules in place, we should do everything we can do protect people from addiction, but creating a poor consumer experience will only lead to the Black Market” - **YouTube Content Creator**

“Crypto websites are concerning. I wake up every morning not knowing if my balance will be there, has it crashed, have i been scammed, but will I change; absolutely not. Why would I make my own business harder and less profitable when I can just pop a VPN on and play like everybody else in the world. Gambling in the UK is dying because of Nanny State overlordship by the government.” - **Youtube & TikTok Creator**

“People often ask me, “you must be losing money due to the transaction fees using crypto”, and yeah, it is really frustrating - but it's a small price to pay for enjoyment” - **Kick content creator**

“I'll never go back to the regulated market, the future of gambling is within a global crypto market. That's what's growing, that's what people want. What gamblers don't want is to be told what you can or can't spend your money on, whilst the rest of the world is able to continue as it likes.” - **YouTube content creator**

“As content creators we have to be aware of where we are playing, that's why I use my forums to understanding what my viewers' experiences are. Yes, there are some horror stories about the sites I use, but that's the same everywhere. You can't even place a bet on the regulated market these days with all the restrictions, you have to use Unregulated websites - It's that simple. - **YouTube content creator**

“Just look at content creators in Germany, France, Belgium - they're all using crypto casinos. Americans, Canadians, Australians too. Show me a streamer that's using UK regulated websites to create content and I'll show you a fool - **TikTok creator**



INFLUENCERS & AFFILIATES REPORT

We delivered focus groups and survey responses from 10 gambling influencers/content creators in order to find out why content creators are migrating to the unregulated Black Market and what impact it is having on themselves and their followers.

Between July and August 2024, **The content creators we surveyed received viewership of 3.8 million views on YouTube alone, all providing exclusive content within the Black Market.** The content creators are open and transparent about their usage in public, with all 10 using the Black Market exclusively. **We estimate that across all platforms, there are 5 million views per month on content from UK based content creators, directly promoting affiliate links to Black Market websites.**

Our respondents informed us that at least 12,500 UK based consumers have signed up to Black Market websites as a result of their affiliate links, with many more people signed up through word of mouth. We have seen a significant amount of evidence from forums attached to our respondents to evidence a mass migration of engaged gamblers onto the Black Market



8/10 respondents are concerned their money is not safe within the Black Market

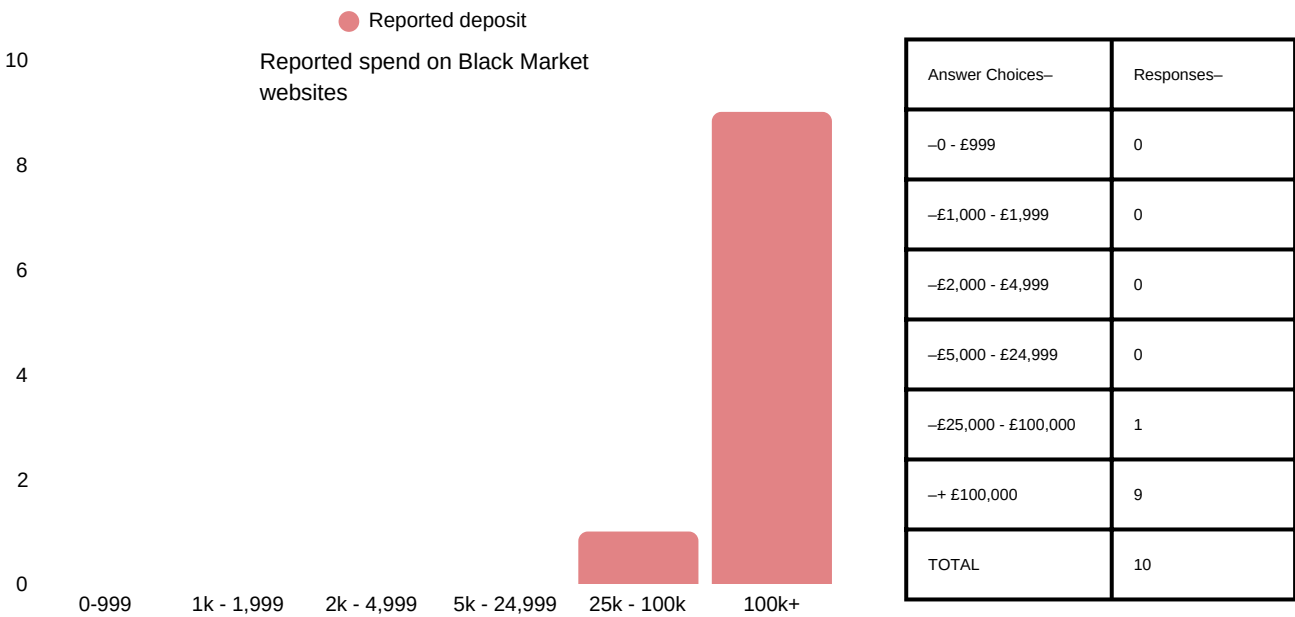


9/10 respondents would prefer to gamble within the regulated market, however do not feel able to do so in the current climate

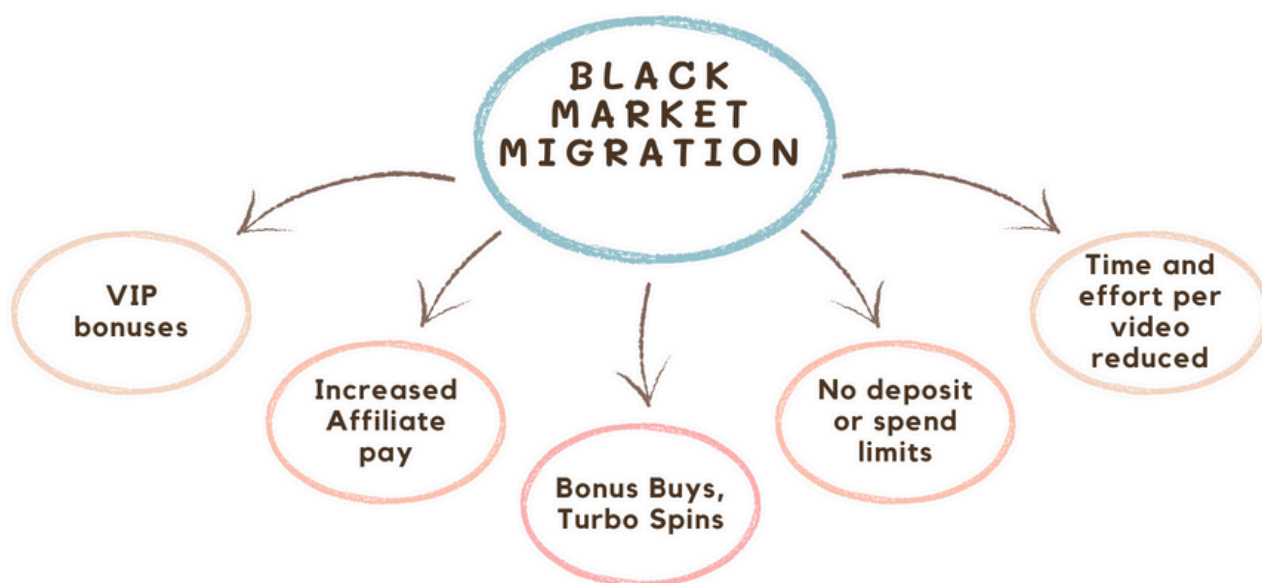


LIVED EXPERIENCE SPEND

When reviewing deposits within the Black Market from content creators, in particular during oral evidence, we are able to evidence reported spend of at least **£5.1 million into the Black Market from 10 content creators that provided response to evaluation**. We relied on oral evidence to ascertain deposit levels due to the reporting of deposits from all respondents.



INFLUENCERS & AFFILIATES BENEFITS

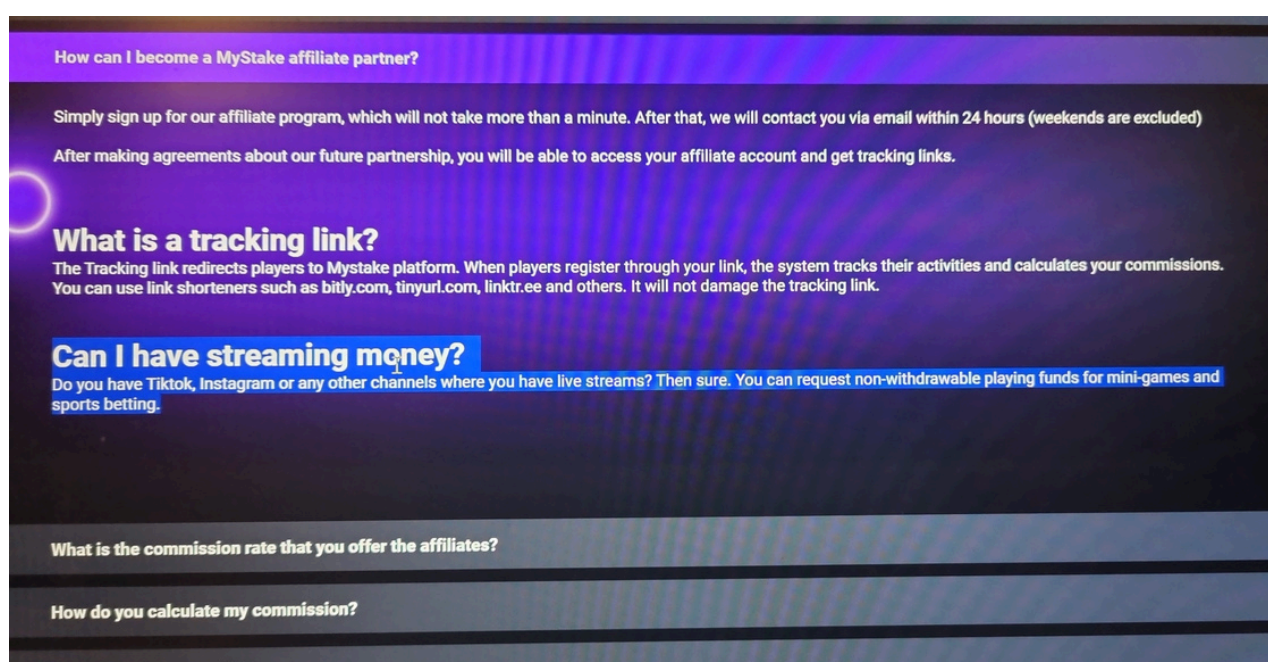


We asked our focus group to provide the 5 most prominent reasons for migration and continuation within the Black Market.

- VIP bonuses are no longer provided to the content creators within the regulated market. Three content creators had received a Rolex from Black Market operators
- Affiliate pay is up to 50% higher within the Black Market
- Videos take 1 hour to create, rather than 12 due to the ability to use bonus buys, turbo spins etc
- Viewers do not like watching low limit and low deposit play, detrimental impact on UK content creators using the regulated market
- Deposit limits / Affordability (perceived) checks mean content creators can no longer play high stakes



INFLUENCERS & AFFILIATES BENEFITS



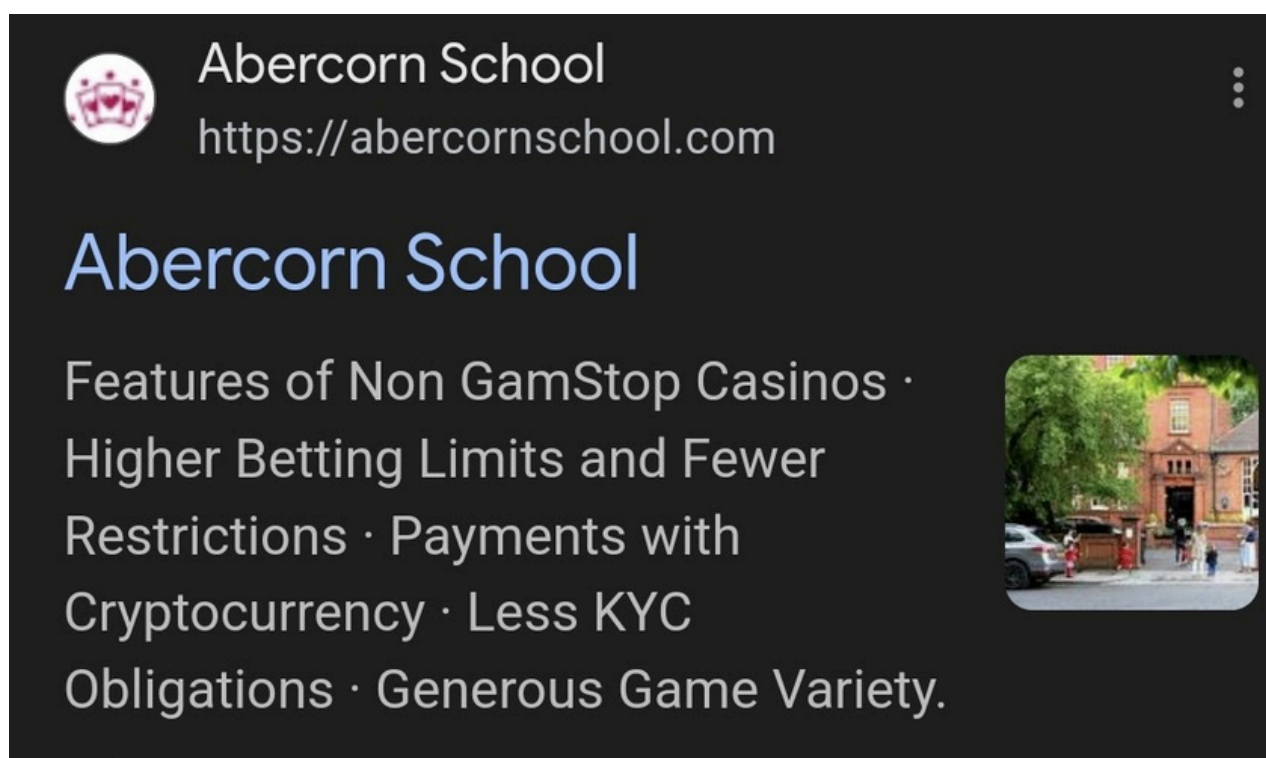
During our research, we investigated the affiliate platforms for 50 Black Market websites, and found all operators provided 'Non-withdrawable playing funds' for content creators. This enables content creators to give the illusion of wealth and care free Gambling.


Rumours have long persisted that many content creators are using 'Play money' - two members of our evaluation team contacted Mystake (website in the picture) to request information on affiliating and play money. During a call, the operator granted a request for 'Play Money' due to LinkedIn reach of one research team member.

3/10 respondents to our research confirmed they had utilised 'Play funds' in their video content.




INFLUENCERS & AFFILIATES OTHER

A screenshot of a website for 'Abercorn School'. The header shows a crown icon, the name 'Abercorn School', and the URL 'https://aberncornschool.com'. The main content area has the title 'Abercorn School' in blue, followed by a list of features: 'Features of Non GamStop Casinos · Higher Betting Limits and Fewer Restrictions · Payments with Cryptocurrency · Less KYC Obligations · Generous Game Variety.' On the right side of the content area is a small image of a red brick building with a large tree in front of it.

 Abercorn School
<https://aberncornschool.com>

Abercorn School

Features of Non GamStop Casinos ·
Higher Betting Limits and Fewer
Restrictions · Payments with
Cryptocurrency · Less KYC
Obligations · Generous Game Variety.

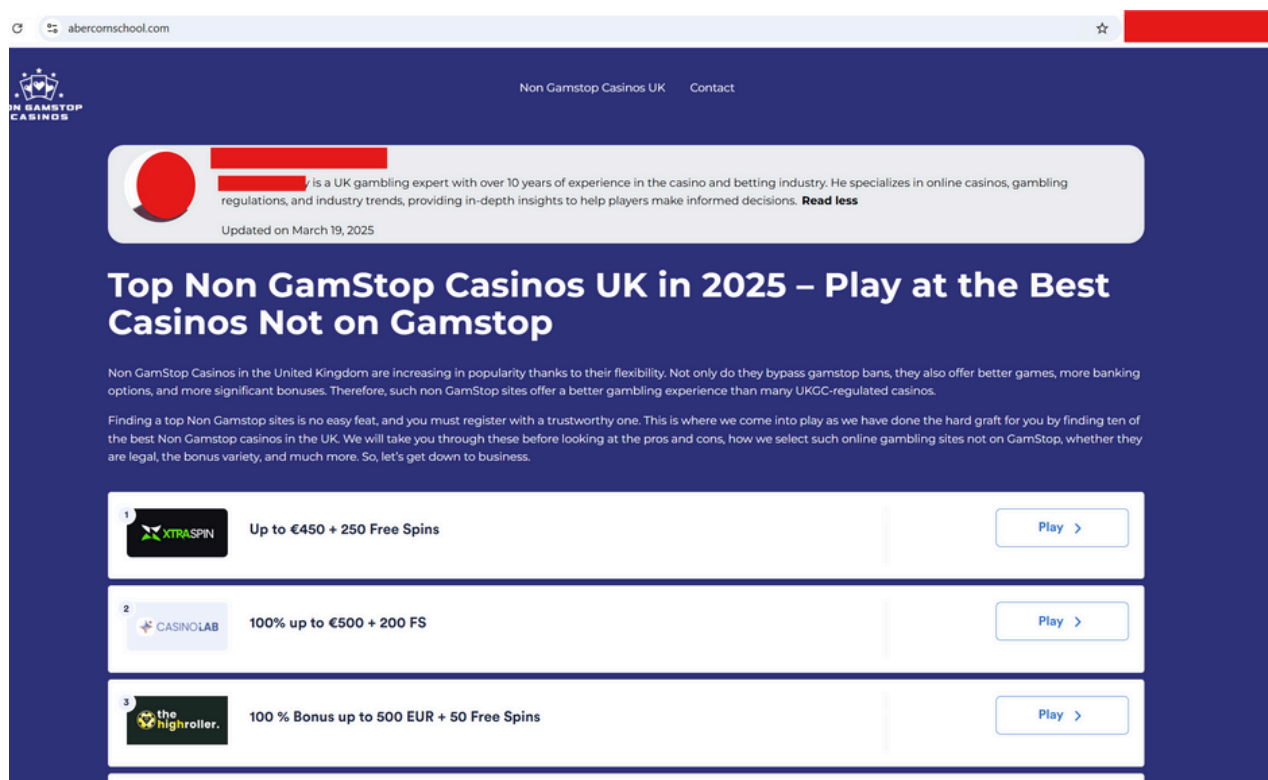


Affiliate marketing is a key problem in preventing the Black Market in the United Kingdom. SEO Marketing businesses play a game of whack a mole with regulators. As fast as they are removed, new replica sites are created.

Our evaluation found evidence of School website domains being purchased after lapse and used as affiliate marketing pages. As of the release date of our report, this website is still online having been reported.



INFLUENCERS & AFFILIATES OTHER



The picture above shows the website for Abercorn school, which is now illegally acting as an affiliate gambling website linking into Black Market websites.

Illegal affiliate marketing businesses steal the identity of reputable operators and people to add authenticity to their product, whilst having no affiliation to the person at all.

Whilst affiliate marketing may have gained a bad name within the Gambling sector amongst some, they play a vital part in the eco system. We found affiliate schemes within the Black Market were paying an average of 10 times more per customer than the regulated market, thus ensuring illegal casinos are preferred. Black Market casinos are able to pay more as they have little incentive to pay a winning customer.



Education,
Prevention,
Support

Preventing Future Harms

BLACK MARKET GAMBLING

Children & Young people





YOUNG PEOPLE'S CONCLUSION

At Deal Me Out, we are extremely concerned at the prevalence of gambling within children, and the abundance of opportunity to gamble, in particular within the Black Market. Children are spending significant amounts of money and time gambling and are consuming marketing and advertising via influencers and content creators at alarming rates. **We see a clear pathway and introduction to gambling within the Black Market, and a young persons consumer base that does not understand the nuance of what unregulated gambling is. From a young person's point of view, gambling is gambling, no matter where it is done.**

Children consume marketing and advertising differently to older generations, as is always the case as society moves. The world is becoming increasingly small, with children conversing globally, and becoming increasingly more ingrained in global markets through the internet, communication tools like Discord and through gaming. Our evaluation found an unsurprising prevalence of VPN usage, with a wide range of potential uses. Respondents told us that VPNs were used for variety of reasons.

Our children are unsurprisingly advanced when it comes to technology and spending more and more time individually isolated, whilst at the same time increasingly Internet social. Children today are not TV watchers to same extent as their parents are. This has in part been exacerbated through the pandemic. As part of our evaluation, we encouraged children to review their screen time, and share totals with our facilitators and each other.

We have significant concern at the exposure and prevalence of gambling within children, and the concerning usage of illegal gambling. It is little wonder the National Advisor on Gambling Harms, and Head of the NHS southern Gambling service, Henrietta Bowden Jones, is seeing referrals to their service from Illegal Gambling



YOUNG PEOPLE'S REPORT

Our evaluation found **67% of Children had Gambled within the last 12 months**. We found a large number of young people were gambling in the traditional way we expected to see, at arcades or bets with friends for money or things of value, however due to our unique workshop delivery and pre- and post- methodology, we found **a significant increase in respondent's admitting to gambling with unregulated methods, in particular within gaming and via the gambling Black Market, and increasingly with Cryptocurrency**. Our evaluation evidenced clearly that young people are being introduced to gambling, and engaging with gambling content, through online streaming platforms and through social media.

Children and young people are being introduced to gambling via social media and content creators, with **62% of children admitting to regularly watching gambling content** through websites and apps like Youtube, Kick, Twitch, TikTok, Instagram and Snapchat. Whilst most gambling specific content creators have limited appeal to children, popular variety streamers and celebrities with strong appeal to children are using Black Market gambling websites, particularly Crypto casinos that provide introduction and promote gambling to children. Within the UK regulated market, operators cannot utilise celebrities with significant appeal to children as marketing affiliates, this restriction is not a problem for Black Market operators, even ones with white label UK licenses.

Our evaluation found **3 out of 10 ten children surveyed had used VPNs to access gambling products such as Black Market Gambling websites that use in game currency, cryptocurrency casinos, and social casinos**. VPN usage within children and young people is a common occurrence with **7 out of 10 children admitting to VPN usage specifically to circumnavigate regulation or rules in gaming**, many respondents highlighted cheaper games on platforms like Steam when purchased from countries in South America. Respondents also highlighted the ability to circumnavigate gaming rules on platforms like Pokemon GO (Spoofing)

Within children and young people deregulation and freedom of choice is of significant importance. The ability to access the global internet without friction presents the primary concern for the prevention of gambling harm in the future. Cryptocurrency, by its very definition and desirability, is largely unregulatable. Marketing and influencers are introducing and directing children to Black Market gambling in ways that regulated operators could not due to rules and regulations placed upon the industry.



GAMBLING IN GAMING CASE STUDY - ROBLOX

58% of Roblox players are under the age of 17 according to statista.com, with 42% of players under the age of 13.

When looking at the terms and conditions for the Game 'Roblox' we see their rules state - **'Except where prohibited by local law or regulation, we allow the portrayal of gambling in experiences. However, no real money, Robux, or in experience items of value may be exchanged in connection with any gambling activities. We also require that the odds of winning to be fair and clearly disclosed to the user prior to playing'**

Whilst this would appear an eminently sensible policy, Roblox is a largely peer to peer game, with content creators developing games within a game. It is entirely possible to create a casino with BlackJack, Roulette, Slots - any game you wish, and have other players come to your casino.

This means, any person can create their own casino, and manipulate in-game mechanics, and whilst against terms and conditions of the game, in practice this is impossible to regulate due to the 'cat and mouse game' of Black Market operators - one door closes, another two open. This is one form of 'gambling in gaming', where Ecurrency (Robux) is purchased either legally, or from a Black Market trader and used to buy a VIP PASS within the casino, the Pass is converted for chips and the reverse for any winnings. A player can sell the Robux back to Black Market sellers for FIAT.



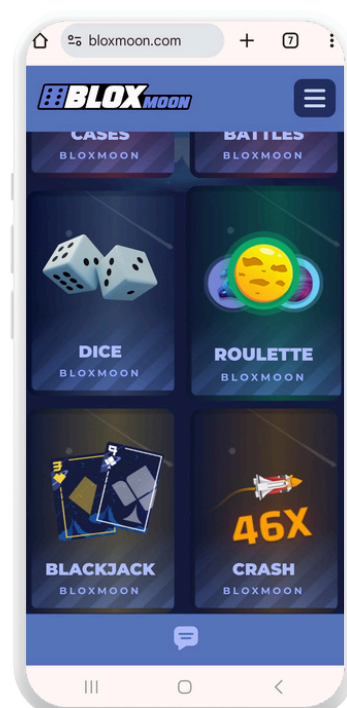
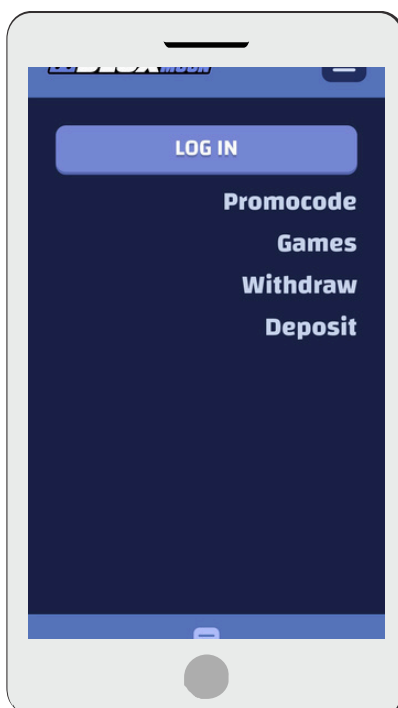
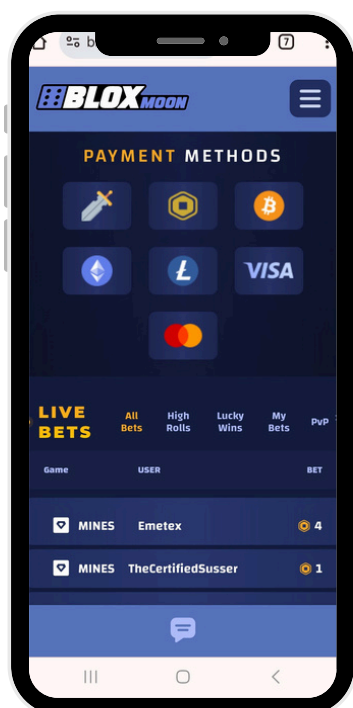


GAMBLING IN GAMING CASE STUDY - ROBLOX

Another form of gambling on Roblox is more traditional, but uses few in-game mechanics. A player can purchase the in-game currency, ROBUX, and deposit onto a traditional Black Market gambling website. The player is able to play a range of traditional gambling games, deposit, withdraw, transfer and everything in between. We reviewed the website Bloxmoon, and watched over 3,000 transactions take place over ten minutes on their live bet watcher.

This is a more common form of gambling within respondents to our survey, informed through work testimony. The problem is not limited to Roblox, it is systemic of most games, including CS:GO. Runescape and VALORANT to name a few reported during our survey. It is not necessarily the fault of the gaming industry, or any gaming operator. Players will invariably find ways to circumnavigate policy, regulation and above all, profiteer from children and vulnerable people. This is precisely the problem that awaits regulators and policymakers in gambling.

On 17th November, Sky News revealed a report into Bloxmoon, finding the website had been removed by the Gambling Commission. The website had been re-uploaded within 36 hours.





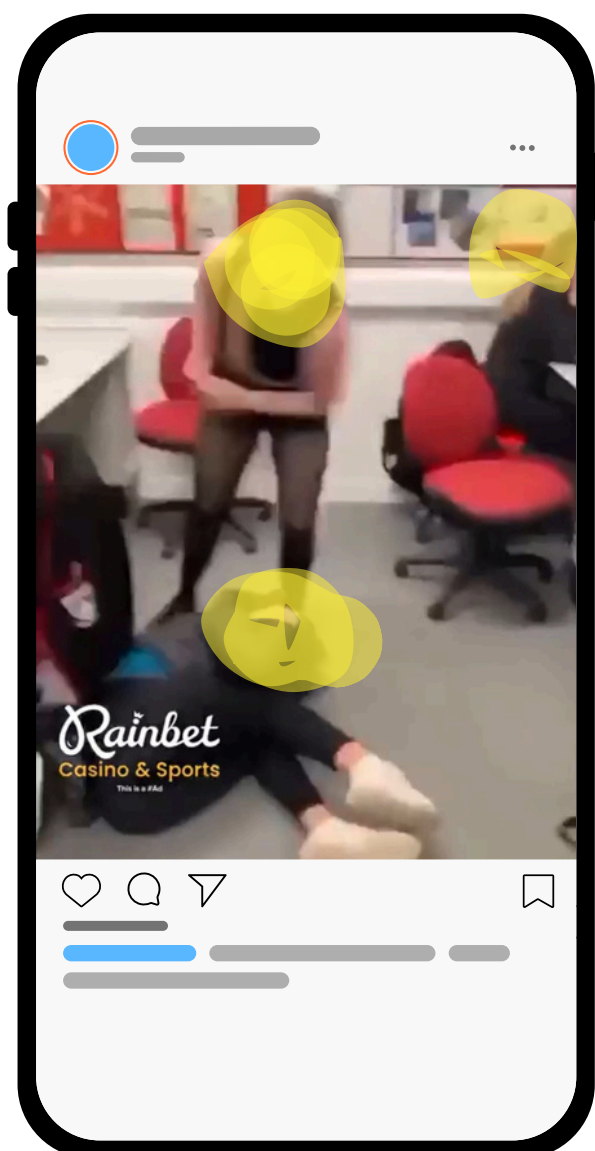
YOUNG PEOPLE & SOCIAL MEDIA

Black Market operators sponsor and advertise on viral online content. Usually in reel format on platforms like Instagram, TikTok, Snapchat, X and Facebook.

The viral content usually shows graphic content that has no place on social media, often videos of assaults in schools, sexual content and abuse. **The picture included is a screenshot from a reel sponsored by a Black Market operator, showing a graphic assault of a child at a college and has been viewed over 7 million times, we found 24 other videos with similar content featuring the branding of a Black Market operator, 17 videos featuring fights involving children.** We also found evidence of hundreds of videos involving other Black Market operators.

Deal Me Out was not aware of this marketing technique before our evaluation in schools, with a plethora of young people reporting the marketing to our teams. The screenshot shown, was reported and sent to us by a 14 year old respondent.

Throughout our education and awareness sessions, we have encouraged young people to report all similar content to prevent the Black Market, and sharing of abusive and dangerous content online, monetized by global cryptocurrency Black Market gambling websites. In early 2025 Stake withdrew from the UK market after the Gambling Commission withdrew their licence due to the promotion of adult content.



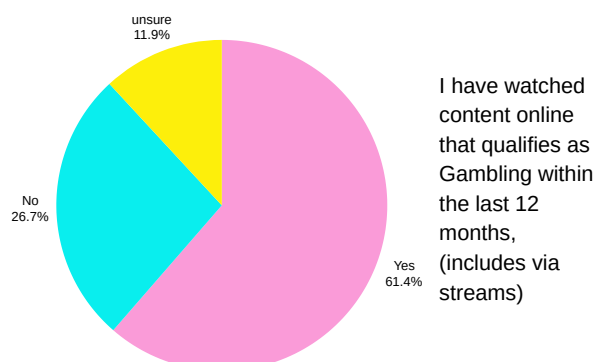
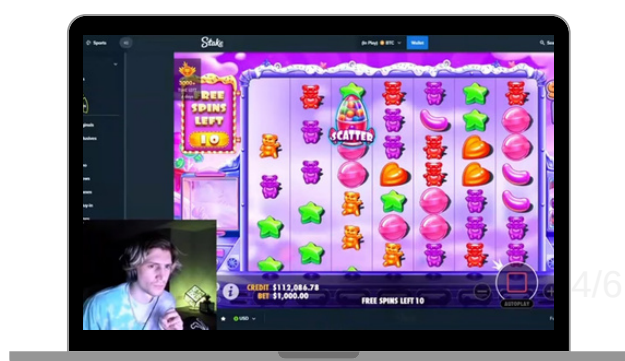


YOUNG PEOPLE & INFLUENCERS

Upon evaluation, we have found that children's relationships with gambling are extremely complex. **Whilst it is extremely unlikely children will access licensed gambling operators, the activity is prevalent amongst young people through accessing the Black Market in some form or another. 62% of young people responding to our survey acknowledged engaging with gambling content in the past year.** This is primarily influenced by content creators. Although a limited number of content creators solely focus on gambling content, the surge in variety streaming has significantly propelled the growth of prominent streamers and content creators, increasing the exposure to children and young people. Most respondents exposure to gambling content derived from occasional gambling content via variety streamers

Gambling streams are predominantly showing access to Black Market websites in the United Kingdom or operators. Stake and BC Game formerly held white label licences within the United Kingdom, but surrendered their licence after investigation from the Gambling Commission for Black Market activity. Brand familiarity, especially amongst children, revolves around cryptocurrency websites that extensively leverage endorsements from popular streamers and celebrities. Among young gamblers, Stake.com stands out as the most recognized gambling website. This recognition may be partly attributed to geographical considerations and Stake.com's sponsorship ventures in sports, particularly its association with Everton Football Club. **Respondents reported watching Gambling content with celebrities such as Neymar, Connor McGregor, Drake, Sergio Aguero, XQC and more.**

Whilst Crypto casinos like Rollbit, Stake and BC game hold a white-label license in the UK, young individuals are acquainted with its global brand presence. A minority of respondents demonstrated awareness of the licensing, by mentioning their purchase of player accounts and gambling using cryptocurrency wallets. Some respondents could name account purchasing websites like 'Playerup'

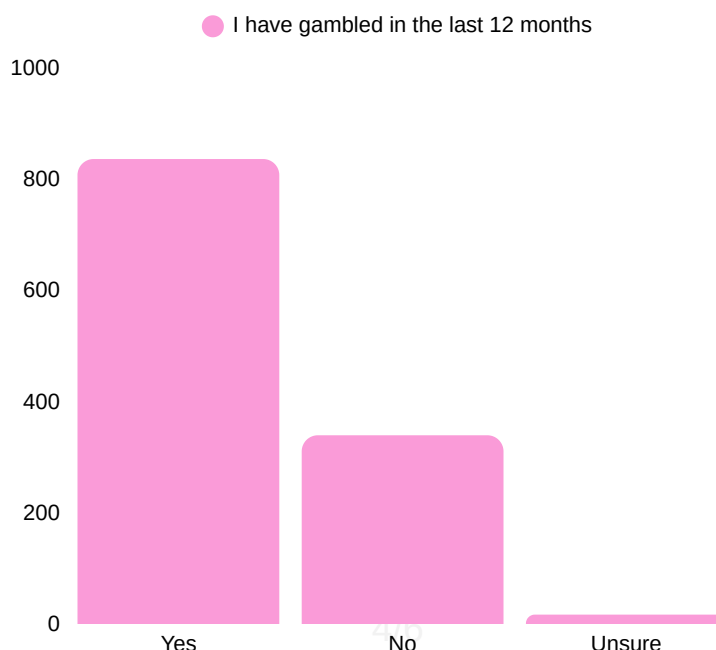




YOUNG PEOPLE'S GAMBLING

Deal Me Out delivered a program of bespoke workshops to 1,254 children in secondary school settings, aimed at better informing children and young people of the dangers of unregulated gambling, and what unregulated gambling is. We saw significant increase between pre and post representation of prevalence after undertaking our workshop.

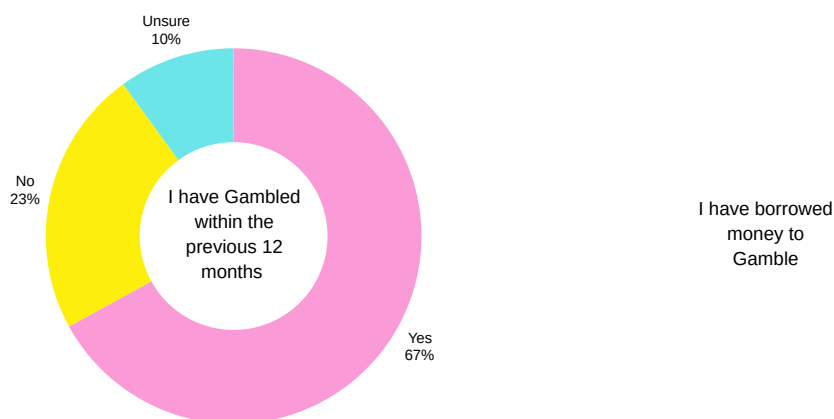
834, or 67%, of participants reported to have gambled within the last year, a large increase on any previous study or evaluation on children of the same age. A similar figure is reported in Students by YGAM in their Annual Student Gambling Survey with 59% of respondents reporting gambling in the previous 12 months - a more specific comparison is not possible due to the difference in age categories between secondary school children and university students. It is important to note geography of data collection, two secondary schools were located in seaside towns with numerous arcades.





YOUNG PEOPLE'S GAMBLING

Children have reported engaging in gambling activities at an alarming rate, **with 67% of respondents reporting participating in at least one form of gambling in the past year, and 46% of those same respondents reported borrowing from friends and family in order to Gamble.** The most prevalent forms of gambling among youth include gambling in gaming environments, social casinos, betting with friends and arcades. Notably, we have seen a significant amount of reporting of gambling with cryptocurrency in children.



331, or over 3/10 children admitted to using VPN's to access illegal Gambling products.



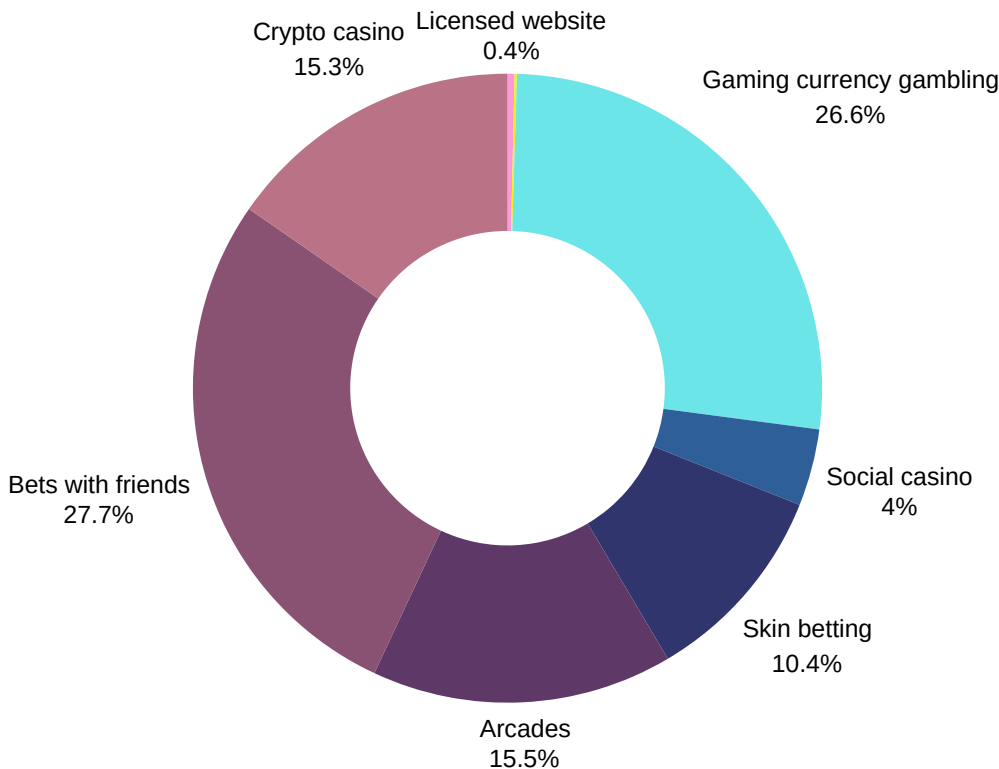
7/10 children admitted to used a VPN for any reason

The usage of VPN's by children is expected, VPN's are heavily marketed on Youtube, Spotify, Twitch, and social media. We know children use VPN's to change location in order to watch different Netflix content, Purchase games on Steam from different locations where the game is cheaper and for a variety of internet safety reasons. gambling is just one of many use cases for VPN usage of children.



YOUNG PEOPLES GAMBLING

After delivery of workshop, 834 children reported having gambled using one or more products within the last 12 months, a significant increase from a pre workshop survey. After informing children what social casinos, gaming currency gambling and skin betting are, we saw significant increases in prevalence. Whilst we understand children do gamble on more than one product, we asked them to tell us which gambling products they had used most in the last 12 months.



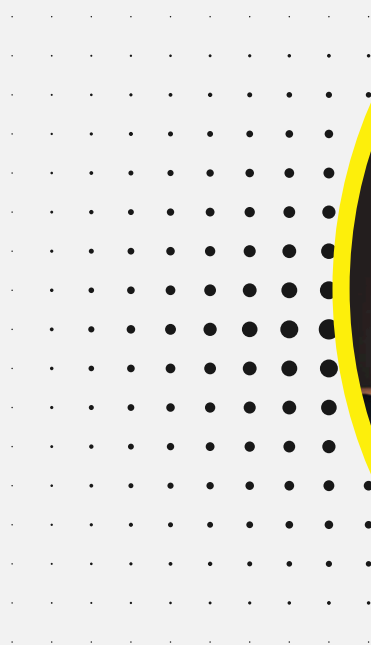
Answer Choices--	Responses--
Licensed website	3
Licensed land based - Betting shops, Casinos (not including arcades)	1
Gaming currency gambling	222
Social casino	33
Skin betting	87
Arcades	129
Bets with friends	231
Crypto casinos	128



Education,
Prevention,
Support

Preventing Future Harms

BLACK MARKET GAMBLING POPULATION UNDERSTANDING





POPULATION LEVEL CONCLUSION

Post surveys, it has become abundantly clear that the population has extremely limited understanding of what is and isn't unregulated gambling. Whilst there is a small level of understanding of Black Market operators, most respondents felt unregulated crypto casinos were entirely legal and legitimate.

It is of paramount importance that **the GBGC proactively takes action against providers that deliver gambling products that are unlicensed in Great Britain**, such as Facebook raffles, WhatsApp gambling sites and entirely Black Market operators that present a danger to the population of the United Kingdom, but particularly to gambling addicts and young people. **The general population must be able to gamble with confidence and assurance that they are using regulated and appropriate operators. Any blurred lines and confusion creates a lack of trust in gambling, something Regulators and Governmental departments must take seriously.**

The Black Market has often been seen as a dangerous topic, with little appetite to discuss or prevent. Whilst the key to prevention is sensible regulation, our research shows a clear lack of understanding and education. Stakeholders must act like the adults in the room when discussing the Black Market. At times the Black Market threat has been ridiculed and belittled but to combat the growth of the Black Market all stakeholders must work collaboratively and effectively to ensure consumers in the United Kingdom are kept within our world leading, regulated market.

The GBGC must ensure better visibility through Kitemarking, and differentiating between GBGC regulated websites, and that of Curacao/other regulatory bodies. Our respondents found it difficult to differentiate between different licensing bodies, which adds to their confusion about which sites are regulated and which are not.



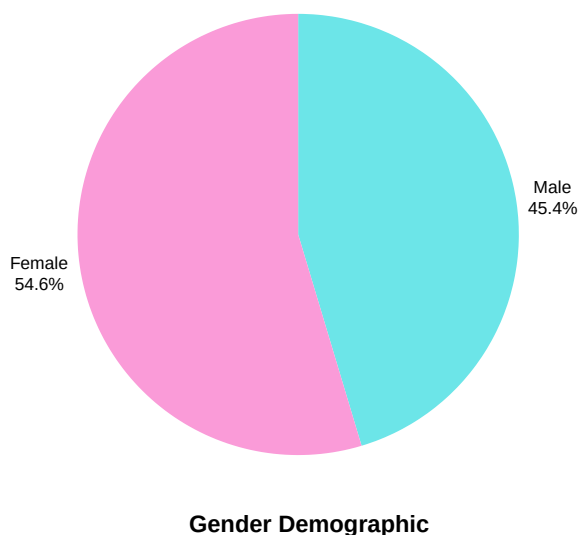
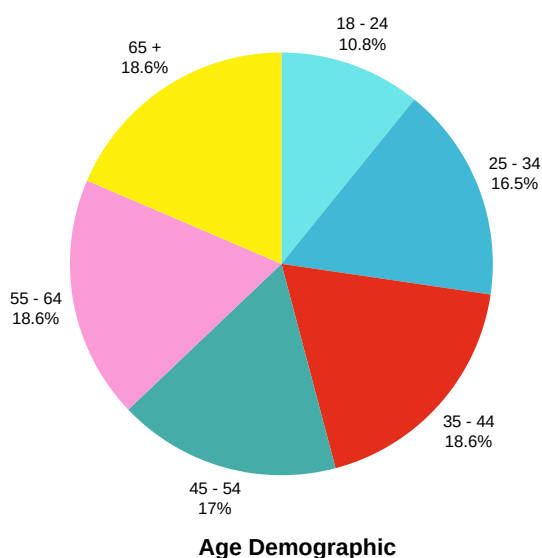
POPULATION REPORT

We held pop-up workshops in shopping centres and events throughout July and August 2024, giving the public an opportunity to take part in our survey. We aimed to find out if the general population could tell the difference between a Black Market website and a regulated website, and marketing from a licensed operator and marketing from a Black Market operator.

- We set up a laptop with 12 gambling websites pre-loaded, 6 GBGC regulated websites, 2 crypto unregulated casinos with VPN login, 2 unregulated websites with Curacao licensing and 2 without any licensing at all.
- We pre-loaded real examples of marketing from 6 GBGC regulated, and 6 unregulated websites

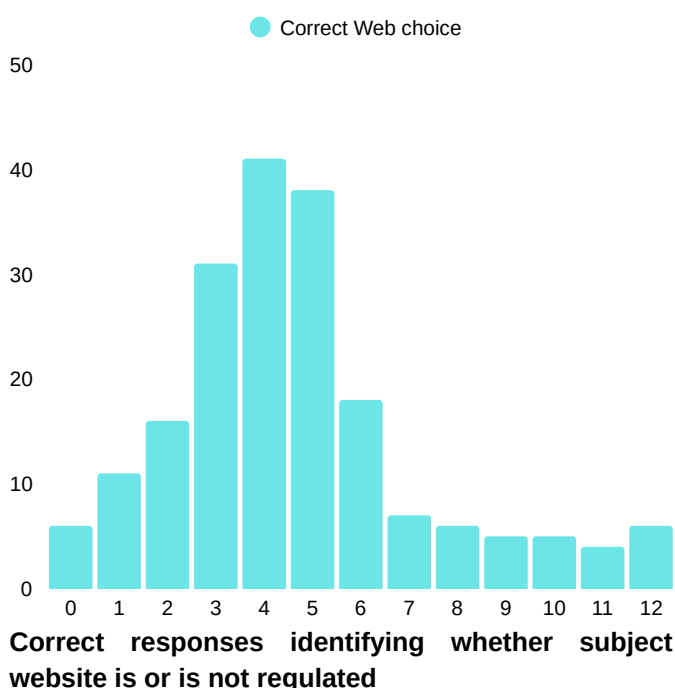
Each respondent provided scored responses for each website and marketing example in order to ascertain their understanding of what is, and isn't regulated.

83% of respondents scored 50% or less and only a small minority could accurately tell the difference between marketing from regulated and unregulated operators





POPULATION UNDERSTANDING WEBSITE Q1



83% of respondents scored 50% or less when attempting to identify a Black Market website.

Respondents overwhelmingly informed us that brand recognition played a significant part in response rate.

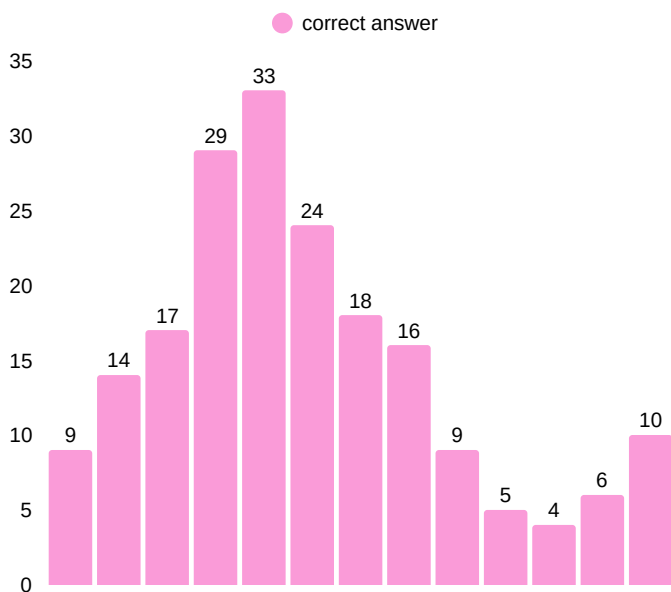
Bet365 and Ladbrokes had the highest correct response rates, Whilst the lowest correct response rates were Kwiff (licensed) and one Black Market operator.

Generally, the public could not tell the difference between regulated and unregulated, relying heavily on brand recognition for correct answers.

Respondents were given 30 seconds on each website in order to make a decision. Each respondent was given the opportunity to answer “Regulated”, “Unregulated” or “I don’t know”. “I don’t know” responses were scored as incorrect answers. We felt this was important in order to prevent data skew through a 50/50 guess.



POPULATION UNDERSTANDING MARKETING Q2



Correct responses identifying whether subject website marketing seen is or is not regulated

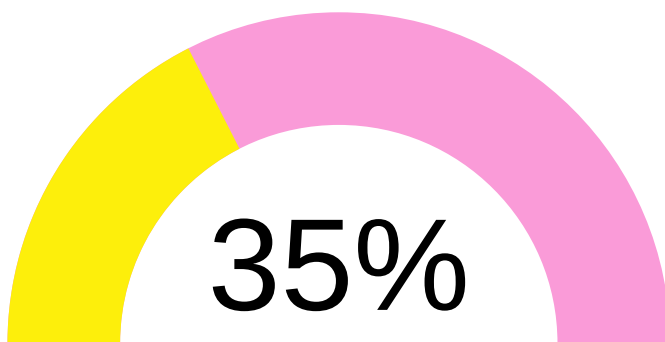
We asked respondents to review marketing materials from regulated and unregulated operators. **Only 10/194 people could correctly identify what was, and what was not, regulated.**

Brand recognition again was prevalent in decision making, with most respondents correctly identifying recognised brands as regulated (for example, Bet365), but having a hard time discerning between unregulated websites and lesser known regulated websites.

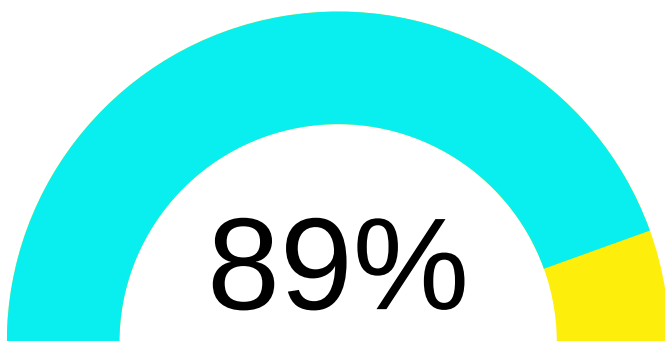
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POPULATION UNDERSTANDING MARKETING



We asked all respondents to use the search feature within their emails to search for marketing from unregulated gambling operators. **35% of respondents had received marketing offering various gambling products.** Spam filters had intercepted the majority of marketing.



89% of respondents felt they are more capable of identifying a Black Market operator after taking part in our survey, and subsequent informational content delivery.



POPULATION UNDERSTANDING RESPONSE

"This was a real eye opener; it's almost impossible to know what is, and isn't legal gambling in our country, these websites should be banned immediately. How do we know they are not scammers? You just assume all gambling companies are legit" - **Iwan, Llangefni**

"I thought I was being clever by noticing the watermark at the bottom of some of the websites stating regulated by whoever, I only realised at the end my answers were wrong! It was licenced by an island somewhere. It makes no sense. Surely people just think that is OK to use, It's just fraud isn't it?" - **Rachel, Chester**

"Been there, got the T-shirt! I was on Gamstop and had use some of these websites like mystake.com, had no choice. I tried to withdraw my money and they didn't respond. Ended up just deliberately losing after about a month." - **Jack, Llandudno**

"Once you know what you are looking for it's quite easy to tell the difference, but what if you don't know what a gambling Black Market is? I didn't. I could have very easily fallen foul of these websites. The government needs to stop it" - **Rihad, Manchester**

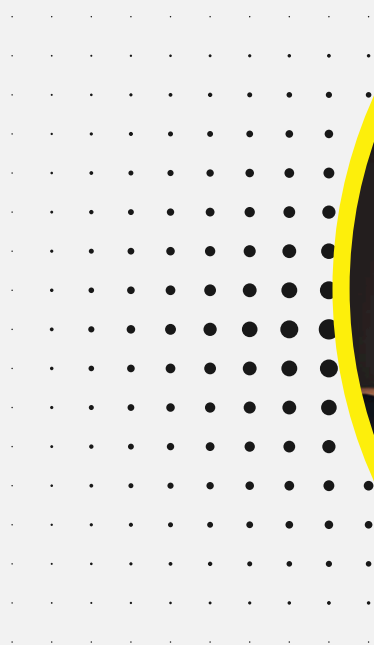
"How do we know these websites aren't just saying you lose every time if you play roulette or something? They could easily just build a code to make you lose every bet. You'd never know. This is the problem with the internet and cryptocurrencies. Who is going to stop them? You can't".- **Lewis, Stockport**



Education,
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Preventing Future Harms

BLACK MARKET GAMBLING EVALUATION & GOVERNANCE





EXTERNAL EVALUATION

Background to Social Intent

With over five years of direct experience in delivering services to individuals grappling with severe gambling-related harm, we have effectively addressed critical issues such as suicidal tendencies, the devastating impacts of loss, and the complex psychological and mental health challenges faced by addicts. Additionally, our expertise extends beyond gambling; we have over 15 years of experience working in mental health, addressing other addictions, including substance abuse, and providing comprehensive social care. Throughout our work, we have maintained one fundamental truth: a one-size-fits-all approach is inadequate. A multi-layered strategy is essential for effectively supporting those in need.

The Black Market Gambling Evaluation Report, prepared by Deal Me Out, provides an in-depth analysis of the prevalence, drivers, and consequences of unregulated gambling markets in the UK. The evaluation of this study was conducted by Social Intent, a consultancy specializing in corporate social responsibility and harm prevention strategies. This evaluation critically assesses the methodology, data integrity, and key findings to determine the study's reliability and implications for policy and regulatory reform.

Our approach: Methodology and Evaluation Process

Social Intent played a pivotal role in monitoring and evaluating all respondent surveys, interviews, and methodologies used in this study. The evaluation process included:

- **Survey Analysis:** Social Intent ensured the robustness of survey responses from multiple demographic groups, including general consumers, individuals with lived experience of gambling addiction, and content creators who promote gambling platforms.
- **Recorded Calls and Testimonies:** Respondents participated in recorded online meetings to provide qualitative insights into black market gambling behaviours, motivations, and experiences.
- **Methodological Testing:** Social Intent assessed the reliability and validity of the research methods, ensuring that biases were minimized and findings were representative of the population studied.
- **Focus Groups and Observational Data:** Focus groups were conducted to assess key trends, including the impact of regulatory changes on gambling migration and the role of influencers in promoting unregulated gambling.



EXTERNAL EVALUATION

Key Findings and Analysis

The report highlights several critical findings regarding the dynamics of Black Market gambling, including:

- Migration to the Black Market:
 - Consumers are increasingly turning to unregulated gambling platforms due to affordability checks, deposit limits, and gameplay restrictions in the UK.
 - Influencers and affiliates play a key role in redirecting users to unregulated platforms.
- Prevalence Among Vulnerable Populations:
 - Up to 420,000 children may be engaged in Black Market gambling, particularly through blockchain-based platforms.
 - Individuals registered with self-exclusion tools (e.g., Gamstop) report being actively targeted by black market operators.
- Economic and Psychological Impact:
 - The estimated total deposits into Black Market gambling sites exceeded £1.9 million among surveyed respondents.
 - Fraudulent operators often withhold winnings, leading to financial losses and increased risks of harm.
- Regulatory Gaps and Unintended Consequences:
 - The study provides evidence that current regulatory policies may inadvertently push consumers into the Black Market.
 - The lack of global enforcement mechanisms enables blockchain-based gambling platforms to operate with minimal oversight.



EXTERNAL EVALUATION

Based on our observations, individuals affected by gambling-related harms, specifically those identified as problem gamblers and gambling addicts, represent a distinct demographic. We have meticulously delineated three separate groups, primarily due to the fact that as the severity of the gambling behaviour increases, the complexity of the individuals involved also escalates. Our findings indicate that gamblers embody a particularly complicated profile; they are frequently highly intelligent and function effectively within society, yet they also exhibit manipulative tendencies and possess exceptional deception skills. Many of these individuals grapple with enduring mental health challenges and are often burdened by past traumas, such as childhood abuse, unresolved issues related to sexual identity, and difficulties in processing the conclusion of personal relationships. Those who become problem gamblers typically do so as a means of circumventing their underlying issues, utilizing gambling as a mechanism to escape the demands of everyday life and social interactions.

Individuals who experience problems with gambling, particularly those identified as gambling addicts, will often go to great lengths to fulfill their desires. Frequently, gamblers tend to pursue the most straightforward option when placing bets. Testimonials from gamblers indicate that it is not solely the outcome of winning or losing that satisfies their needs; rather, it is the thrill of identifying and placing a bet that provides their sense of gratification. While this may vary among individuals, it is noteworthy that for the average person, the emotional highs and lows associated with the outcome of a wager are significant motivators for engaging in gambling behaviour. Some gamblers may attempt to recover their losses; however, this mentality of 'one last bet' typically proves to be short-lived. Gamblers often exhibit a relentless pursuit of their fix, akin to the behaviour exhibited by drug addicts seeking their next dose of a dangerous substance such as heroin.



EXTERNAL EVALUATION

Due to the absence of overt physical indicators of gambling-related harm or addiction, a gambler is typically recognised only upon reaching a critical juncture, being discovered, or seeking assistance. Problem gamblers often possess multiple accounts with various operators, frequently managing several bank accounts, which complicates the accurate assessment of their addiction. The individuals we have collaborated with have commonly utilised methods such as self-exclusion programs, Gamstop, or similar services. They may traverse from one area of town to another to access a gambling venue on the high street, and they frequently diversify their gambling activities to evade detection, whether by an operator or by family and friends.

Gamblers, particularly problem gamblers, will go to great lengths to engage in the gambling activities they crave, regardless of the circumstances.

They will take the line of least resistance and don't care which operator they engage with. There is limited brand affinity. From what we have seen and understood, anything that puts a block, difficulty, or level of interrogation in place will stop a problem gambler from using that operator.

The Black Market offers a path of least resistance for those who seek it. Often, gamblers do not mind that it is unregulated; they simply want to bet at the level they desire (often unaffordable). They are indifferent to the possibility of not being able to access their winnings; they crave the simplest and easiest way to engage in gambling. As the research shows from Deal Me Out its simple and easy to access the Black Market, as easy as it is to access the regulated market.



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EXTERNAL EVALUATION

Limitations and Areas for Further Research

Despite the robustness of the study, Social Intent identifies areas requiring further exploration

- Longitudinal Impact:
 - A longer-term study is needed to assess how changes in UK gambling regulations continue to influence black market growth.
- Cross-Border Gambling Trends:
 - More research is required to evaluate the role of international jurisdictions in facilitating unregulated gambling.
- Technological Safeguards:
 - Evaluating the effectiveness of blockchain monitoring tools and AI-driven interventions could enhance consumer protection.
- Conclusion and Policy Implications
- The findings of this evaluation emphasize the urgent need for regulatory adaptation to address the growing prevalence of Black Market gambling. The independent evaluation by Social Intent confirms that regulatory measures must strike a balance between consumer protection and preventing migration to unregulated markets. Further collaboration between industry stakeholders, regulatory bodies, and harm prevention organizations is essential to mitigate risks, enhance enforcement, and promote safer gambling environments.
- This study provides critical evidence to inform future UK gambling policies and underscores the importance of continuous monitoring and adaptation in an evolving digital gambling landscape.



EXTERNAL EVALUATION

To prevent the Black Market from taking over, we require a system that performs several functions.

- We ought to guide the rest of the world and create the best system that everyone wishes to implement.
- We need to ensure that the most appealing, straightforward, and least resistant way to access gambling is through regulated operators, so that all gamblers are part of a system overseen by the Gambling Commission.
- We need to ensure that if there are affordability checks, these are simple and do not create a barrier.
- We must support all gamblers at every stage to ensure they gamble safely, within their means, and receive assistance through early intervention and prevention.
- We need to build strong links between operators, prevention/education providers, and treatment providers through a triage and referral system that can ensure that people can be supported and receive what they need when they need it, whether that be the most intensive residential support or a simple one-off conversation with someone with lived experience.



GOVERNANCE & CONFLICT OF INTEREST

Governance & Conflict of interest

Deal Me Out worked with a panel of Lived Experience experts to design the project and met continuously with the panel to inform and receive feedback.

Due to the sensitive nature of our work, we designed a bespoke safeguarding policy for our project, specifically aimed to prevent harm or relapse to people with lived experience and children.

Deal Me Out is a member of the GBGC's RET list and is funded primarily through this source. Gambling operators are required to make a donation to a member of the RET list annually. This project was funded through RET funding. Deal Me Out has a strict funding governance policy and ensures no Gambling operator is able to influence our work in any way. We have never had influence placed upon us, nor would we allow this to happen. All work, including the funding of work is reviewed by our head of governance prior and post completion. Deal Me Out produce a governance report for publication at the end of each financial year which includes all work review. We are committed to transparency and openness of all funding.

All staff working on the project have produced conflict of interest reports in line with our funding governance policy.

Jordan Lea - 17/04/2023 - 16/10/2023 supported Kindred group on their Journey to Zero panel. 2x online meeting, non financial

21/10/2024 - EGR London summit Black Market panel - Non financial

Wil Lovelock - No conflict reported

Chris Birkett - No conflict reported

Ciaran Henry - Employment within the Gambling Industry (safer gambling manager) Ceased May 2023, financial

Paul Lea - No Conflict reported