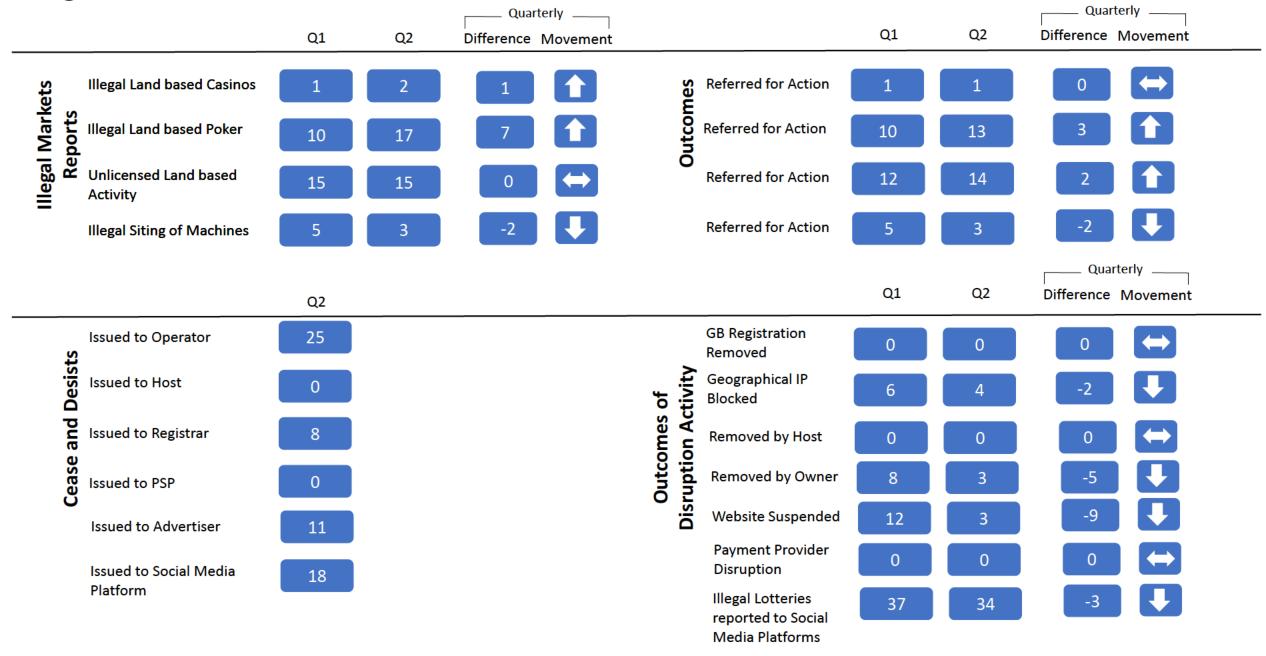
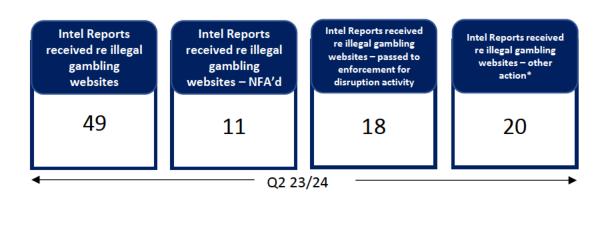
Illegal Markets



Illegal unlicensed gambling 2022/23

- The aim of our regulatory activity is to make it difficult to provide illegal gambling at scale to Great Britain (GB) customers.
- We receive reports and intelligence on potential illegal gambling activity. We may find, after initial assessment of a report, that unlicensed activity is not actually taking place or is not accessible by British customers. We prioritise action against those we consider pose the biggest risk.
- While we develop improved metrics in this area, we are demonstrating our impact by reporting on the activity we have taken to disrupt those priority cases. For 2022-23 we have made some improvements to the way we report our data, so not all data from previous years can be compared directly.



Stage 1 C&D notice/letter issued

Q1 23/24: 92 **Q2 23/24:** 71

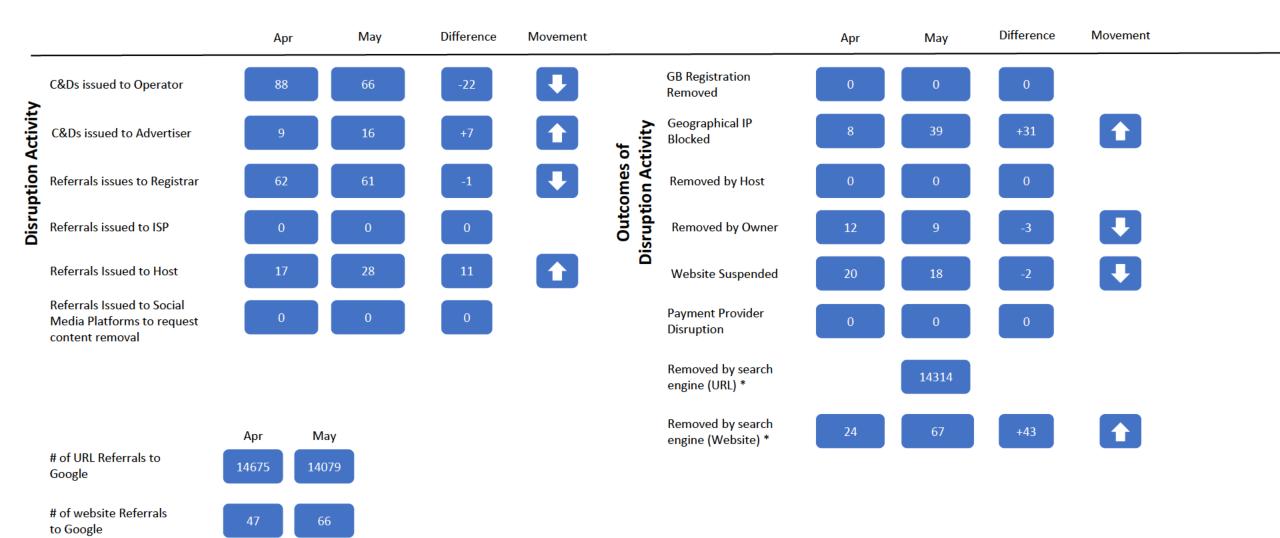
disruption cases closed positive outcome (site/payment/other)

Q1 23/24: 26 **Q2 23/24**: 22

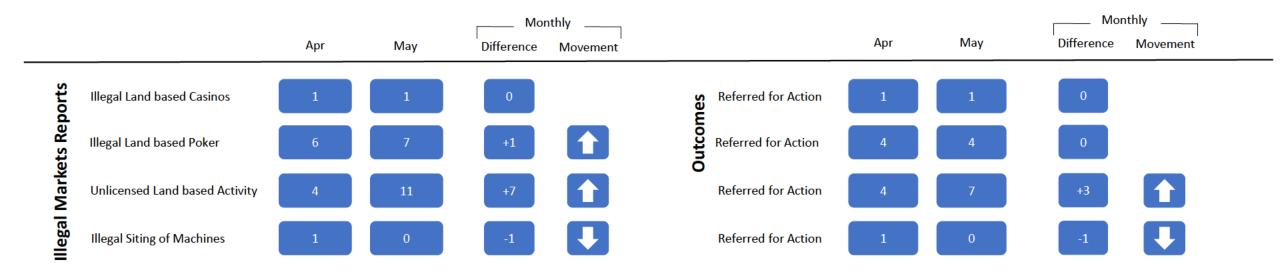
% Stage 1 disruption completed in $$\operatorname{KPI}$$

Q1 23/24: 100% Q2 23/24: 100%

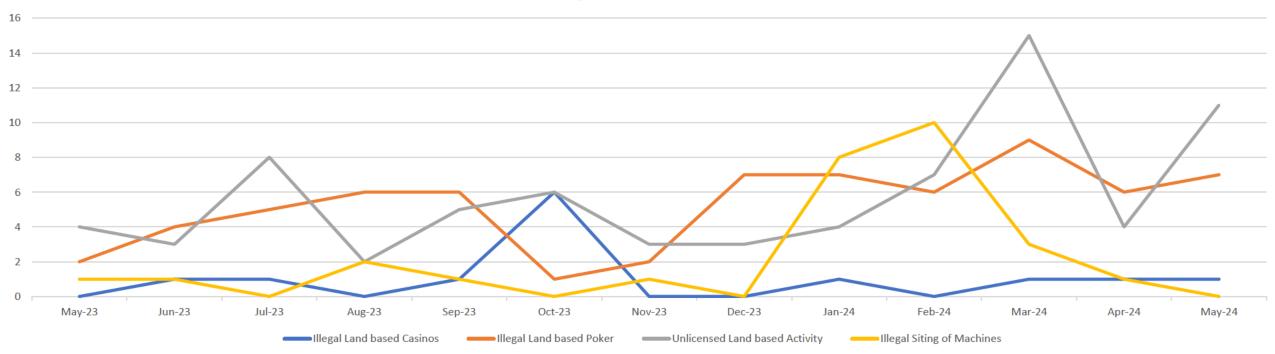
Enforcement - Illegal Markets



Intelligence - Illegal Markets



Illegal Markets Reports



Extracts from Documents relating to the 28 September 2023 Board meeting

References to unlicensed, unregulated and 'black market' betting

Agenda item: Corporate Strategy draft overview, assurance and Earned Recognition

Recruit Head of Illegal markets and agreed FTE to implement strategy to tackle illegal gambling. b. reportable KPIs/metrics on activities and impact.

Agenda item: Operations Transformation Approach & Plan

Designers will take in to account different channels of feedback; from industry as well as colleagues but crucially will remain close to the strategy development process and factor in emerging ideas and early thinking, particularly regarding the strategic approach to Assurance, Account Management, the Data Strategy, Illegal markets and a focus on objective 'fair and open'.

Illegal Markets 35. A new 'Illegal Gambling working group' has been set up in 2023. The initial aim of the group has been to identify, link and accelerate activity against unlicensed illegal gambling across the Commission. The cross functional working group looks to identify and undertake high impact interventions to disrupt unlicensed operators targeting consumers in Great Britain. The immediate aim is to be proactive with a tactical plan taking co-ordinated action in respect of illegal gambling activities.

Illegal Markets scoping

Agenda item: Board Academy – Operations Transformation

Head of Illegal Markets being recruited

Agenda item: Q1 2023/24 Performance Report

The closure of several larger cases, the focus on **illegal activity** and PML reviews, has resulted in a decrease in the percentage of cases involving AML and SR from 61% to 38%.

A review of the Not on Gamstop work informing the **Illegal Markets** working Group needs to be conducted, in order to identify priorities & resourcing requirements for the next quarters activity. Senior Managers in E&I to finalise as a priority.

Enforcement – illegal markets slide

Agenda Item: 28 September Board minutes

The last Chairs' roundtable was held yesterday and attendees were impressed with the work the Commission is doing around illegal markets, and took on board the need for operators to work with us on this topic.

Has allowed for increasing levels of collaboration as we have recently seen when tackling illegal gambling with Ontario.

Extracts from documents relating to the December 2023 Board meeting

Agenda item: CEO report - update for Board December 2023

I had a good meeting with REDACTED who is the Chair of the CMS Select Committee. We discussed the Statutory Levy. We also touched upon 4NL, the illegal market and the Young Persons Report 2024

IAGR in Rome

I gave a keynote speech, REDACTED led a presentation on our work on illegal online gambling, that was received very positively. We held 11 meetings with other regulators and signed MOUs with regulators from Malta and Lagos, Nigeria. Once again, the Commission was able to strengthen key international relationships and advance the international agenda on key topics including illegal online gambling.

CEO roundtable

The meeting covered the Commission's aim for greater transparency, tackling illegal markets, financial risk checks pilot, the upcoming Gaming Machine Technical Standards (GMTS) consultation and questions about GSGB.

In my other meetings with illegal online gambling has been a key point of discussion.

Agenda item: Q2 23/24 Performance Report

Illegal Markets: the impact of this work in this area means we are seeing a a positive disruption in websites offering illegal gambling.

71 Cease and Desist letters were issued in Q2 resulting in 22 instances where GB access to illegal websites was disrupted.

The focus on illegal website advertisers has resulted in disruption of eight online publications.

Q2 Intelligence assessment has identified changes in top ten illegal sites/affiliates – in websites present within the top 10, a move to overseas based online advertising and a decrease in overall traffic circa 46%.

Intelligence:

Intelligence continues to analyse web traffic to the top 10 online illegal Not on Gamstop domains to focus Enforcement disruption tactics.

Work is ongoing, but reductions in web traffic to some of these sites were noted in a comparison of Q1 & Q2 data. Available data for July shows a downward trend snapshot of the data at that time, which, corresponded with an increase in engagement with websites, hosting providers & other online facilitators of online illegal gambling. The remaining Q3 data will now be analysed to compare the most recent GB traffic share to these sites.

There has been an increase in reports of illegal land-based poker in the last quarter, with 17 reports received as opposed to 10 in the previous quarter. Research continues to establish whether this represents an emerging threat or trend.

Legal

Legal is seeing an increase in queries/ support for FOIs, inquests, criminal investigations, illegal gambling and policy related matters. They have also noticed a decrease in the number of cases being referred to the Regulatory Panel by Licensing and Enforcement.

Extracts from documents relating to the July 2024 Board meeting

Agenda item: Chairs Report to July Board 2024

Hosted the latest Operator Chairs' roundtable which covered the following agenda items: GAR update, compliance assessments – risk-based approach - and an update from GC enforcement on illegal gambling

Operator Chairs commended the work the GC is carrying out in making good the commitment that the GC Chair made at the start of his tenure regarding enhanced work on the illegal gambling market. They suggested that the GC's efforts would dovetail with the upcoming BGC study of the size of the illegal gambling market. The GC Chair highlighted the GC's recent international work such as Andrew Rhodes having attended the G7 summit and other examples of increased coordination and connection with other regulators. He also commented that the GC's new Corporate Strategy includes this as an area for proactive action around illegal markets and international cooperation.

Agenda items discussed were reflections and priorities from REDACTED since becoming BGC Chair, affordability/AML, egregious cases, illegal gambling, industry Chairs' roundtable and areas of concern for the BGC.

Agenda item: Board performance cover paper July 2024

What is the impact of the illegal market work?

The Commission's working relationship with Google is making a positive impact on the illegal market.

Illegal markets work continues at pace with a further 14,000 URLs referred to Google again this month. It is anticipated that it will be possible to maintain this level of reporting across the year. We continue to receive data from Google confirming the total number of URL removals; however, there is usually a delay of 2-3 weeks before we receive a response.