

## Collaboration for Impact: Safer Gambling in a Changing World

The Sustainable Gambling Conference 2025 underscored a shared imperative: in a landscape reshaped by rapid technological change, shifting consumer behaviour and the expansion of illegal gaming, safer play can only be secured through coordinated, evidence-led action.

The theme — "Collaboration for Impact: Safer Gambling in a Changing World" — reflects a sector navigating fading boundaries between regulated and unregulated environments, and one where regulators, operators and technology partners must work together to protect consumers and uphold market integrity.

#### THE DIGITAL ENVIRONMENT AND NEW BEHAVIOURAL RISKS

Safer gambling cannot be understood without examining broader online behaviour. Cyberspace introduces conditions that reshape decision-making: anonymity, online disinhibition, immersion and time distortion can heighten impulsivity, reduce self-regulation and amplify risk-taking. These effects may be particularly pronounced among young adults who have grown up in highly stimulating digital environments.

**Prof. Dr Mary Aiken** — a leading Cyber Security keynote speaker and Chair of the Department of Cyberpsychology at Capitol Technology University — delivered a powerful examination of how digital environments influence human behaviour and what this means for sustainable gambling.

Prof. Dr Mary Aiken described cyberspace as a behavioural environment with three layers: the physical network, the logical network, and the cyber-persona layer — the human interface. While cybersecurity has traditionally focused on protecting devices and data, she argued that the real frontier is understanding and safeguarding people.

Many young adults enter the gambling ecosystem already exhibiting increased anxiety, accelerated

risk-taking and diminished self-control; shaped by years of exposure to social media, influencers and interactive entertainment. Today's digital landscape merges communication, gaming and betting into a single attention ecosystem, normalising risk and creating behavioural vulnerabilities that require new forms of protection.

At the same time, the wider online threat landscape is evolving. Cyberfraud, dark Al and organised crime flourish in low-visibility environments where enforcement capacity is limited. Over-regulation on the surface web, if not matched by effective action against illegal channels, may inadvertently push vulnerable individuals toward unsafe environments. Protecting people, not only systems, must therefore become a central priority.

### TWO CONTRASTING AI MODELS SHAPING DIGITAL EXPERIENCES

Manipulative AI maximises play time and hides friction, while agentic AI enhances user agency through transparency, protective friction, and personalised self-control.

Responsible innovation offers important avenues forward. Safety Tech tools and emerging identity technologies can strengthen age assurance and reduce exposure to unsafe channels. Agentic Al, designed to enhance user agency, could help players set boundaries, respond to risk and maintain control, acting as a personalised, protective and importantly private digital companion.

Prof. Dr Mary Aiken's session reinforced a clear message: sustainable gambling in a changing world requires putting human behaviour at the centre — combining responsible innovation with a willingness to confront emerging risks across the wider digital ecosystem.





### A CHANGING MARKET: WHAT PLAYERS SEE AND HOW THEY BEHAVE

Across Europe, the distinction between legal and illegal operators is becoming increasingly difficult for players to discern. Illegal platforms actively reproduce the look, language and safety cues of legal brands; from accreditations to payment flows, making legitimacy harder to recognise. Data from a **FDJ UNITED** survey shows that more than half of players cannot reliably tell the difference, with many perceiving both categories as sharing characteristics associated with black-market operators.



**59% OF PLAYERS** can't tell the difference: More than half of those using unlicensed sites think they look just like legal operators.

**49% TRUST THE BADGE:** Nearly half of players say official regulatory approval is what makes them trust a gambling site.

+16% CHOOSE SPEED: Players are 16% more likely to pick black market sites for quick, disruption-free play.

This confusion is reinforced by the incentives that draw players toward illegal environments. The appeal of these illegal operators is rooted not in a preference for illegality but in the pursuit of convenience: smooth onboarding, fewer restrictions, attractive bonuses and interruption-free play. Although legal operators maintain advantages in payment security and user experience, the gap is narrowing as illegal actors become more sophisticated.

Mark Johnson, Senior Principal at Frontier Economics, presented an in-depth analysis of the scale, characteristics, and risks of black market gambling in Great Britain. Johnson emphasised that regulators and licensed operators share the same long-term goal: keeping gambling safe, visible, and well-regulated. Yet unregulated markets continue to grow

across online and in-person channels, operating outside the Gambling Commission's oversight. Understanding how and why players engage with these operators is essential for reducing harm and protecting the integrity of the licensed market.

In Great Britain specifically, the impact of these confusing dynamics is measurable. The majority of players still use only regulated operators, yet estimated annual stakes in the black market exceed £4.3 billion. Younger adults and higher-spending customers are more likely to engage with illegal channels, motivated by anonymity, lighter documentation requirements or fewer friction points. Around £14.8 billion is staked in licensed markets by customers that already 'multi-home' across both licensed and black markets stakes that are potentially most "at risk."

Players cited several reasons for turning to unregulated operators, including better bonuses, easier account creation, the ability to play anonymously, and avoiding limits, documentation checks, or self-exclusion restrictions.

Awareness and usage were notably higher among younger cohorts, especially 18-24 year-olds, and higher-spending customers appeared more likely to engage with black market channels.

## £4.3 BILLION

Estimated annual spend on black market gambling in Great Britain — including

# £2,7 BILLION

online/messaging-based activity and

## £1.6 BILLION

in unlicensed premises.

Across markets, these behaviours reflect a consistent pattern: players respond directly to the balance between protection and friction in regulated environments, gravitating toward experiences that feel smoother, faster and less restrictive. As the gambling landscape evolves, empowering players with clear information and reinforcing the distinction between legal and illegal operators will be essential for building trust and ensuring safer gambling in a changing world.



#### MARKET INTEGRITY AND THE REGULATORY PARADOX

Illegal gambling remains a major threat to consumer safety and to the integrity of regulated markets. Even in jurisdictions with strong channelisation, a meaningful share of total spend continues to flow to illegal actors, exposing vulnerable players and undermining trust in regulated systems.

A central challenge is the regulatory paradox: tightening restrictions on licensed operators can unintentionally strengthen illegal markets. Legal businesses operate under strict rules, while illegal operators act anonymously, internationally and with minimal constraint, often assisted by mainstream digital platforms. This imbalance can make regulated environments feel comparatively less appealing and more burdensome for consumers.

Addressing this requires regulation that is evidence-led and outcome-focused. Policymakers need to understand how players respond to regulatory changes, assess whether measures genuinely reduce harm, and avoid blanket approaches that may displace users toward riskier channels. Structured consultation with legal operators is essential to ensure policy reflects real-world behaviour.

Effective action depends on collaboration beyond the sector itself. Banks, payment service providers and technology companies play a decisive role in disrupting illegal channels. Coordinated efforts across these actors can reduce the accessibility of unlicensed operators far more effectively than enforcement alone. Ensuring that customers understand the risks of illegal gambling, while maintaining competitive, responsible conditions for licensed operators, is vital for a strong and trusted regulated ecosystem.

## SHARED RESPONSIBILITY FOR A SUSTAINABLE FUTURE

Across all contributions, the message is clear and consistent: creating safer gambling in a changing world requires shared responsibility and sustained collaboration across the sector. Regulators, operators, policymakers, researchers and technology partners each have a role in strengthening protection, increasing visibility and countering illegal markets.

The sector must embrace transparency, acknowledge its impact and recognise its place within the broader digital environment. Collaboration is essential not only to address current challenges but also to anticipate emerging risks; from new behavioural patterns to advanced criminal strategies and the influence of Al-driven systems.



## CONCLUSION

The Sustainable Gambling Conference 2025 delivered a clear call to action: safer gambling demands coordinated, player-centred and future-focused approaches. By reinforcing the visibility and competitiveness of the licensed market, embracing responsible innovation, understanding digital-era behaviour and disrupting illegal channels, the industry can build a safer and more sustainable gaming future.