

Commentary on Gambling Commission Research Report *Illegal online gambling: Consumer awareness, drivers and motivations*

A report for the Campaign for Fairer Gambling by Howard Reed, Landman Economics

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Introduction

In September 2025 the Gambling Commission published *Illegal Gambling: Consumer awareness, drivers and motivations*, the first in a planned series of reports analysing the illegal gambling market in Great Britain (Gambling Commission 2025a; hereafter referred to as the Summary report). The analysis for the report was undertaken by Yonder Consulting, a business management consultancy which describes itself as “a strategic transformation company where insight and imagination come together to create lasting impact in a rapidly changing world”¹. The research consists of two quantitative surveys (Phase 1 and Phase 2) and a qualitative research component. The Summary report contains a write-up of the main results from the quantitative and qualitative research. The report contains links to detailed reports from Yonder Consulting on Phase 1 and Phase 2 of the research (Gambling Commission 2025a, 2025b); these are referred to hereafter as the Phase 1 report and the Phase 2 report respectively.

This report is a commentary on the GC Summary report and the Phase 1 and Phase 2 reports. It focuses in particular on areas where the analysis is flawed in some way, or the focus of the work is misplaced, or where additional analysis would have been beneficial.

¹ <https://yonderconsulting.com/>

1 Sample size for quantitative analysis

The sample size for the phase 1 quantitative component of the Yonder Consulting research is only just over 1,000 respondents, which is relatively small for a quantitative survey. For whole-group analysis (for example, looking at the proportion of respondents who engage in illegal gambling activity) the sample size is sufficient, but subgroup analyses (for example illegal gambling activity by age group) may be problematic. It is difficult to be sure whether the differences in (for example) use of social media by survey respondents who engage in illegal gambling by age group are statistically significant, as no confidence intervals or other analysis of statistical significance are included in either the Phase 1 or Phase 2 detailed reports. The sample size for the Phase 2 quantitative survey is significantly larger at just over 2,000 respondents, which means that the results from the Phase 2 quantitative analysis are more robust than Phase 1.

2 Characterisation of illegal online gamblers

Based on the phase 1 qualitative research for the project, Yonder Consulting classifies illegal online gamblers into four groups, as follows:

1. **Self-excluders** – individuals who gamble on illegal gambling websites but who have chosen to self-exclude from all licensed gambling websites by registering with GAMSTOP and/or using other gambling blocking schemes or software.
2. **Skilled advocates** – individuals who knowingly and systematically engage with illegal websites, motivated by the desire to acquire new skills and explore a variety of new game types.
3. **Social explorers** – individuals who discover these websites through social networks, social media, search engine advertising, affiliate websites and gambling forums.
4. **Accidental tourists** – individuals who stumble upon these websites completely by chance, and therefore unknowingly engage with the illegal online gambling market.

While this breakdown seems like a useful categorisation of online gamblers, the process by which Yonder Consulting arrived at this fourfold classification is not explained clearly in the Phase 1 technical report. Footnote 1 in the Phase 1 report states that “these audiences reflect attitudinal and behavioural leanings and have been drawn out of qualitative research. They have not been subject to any quantitative segmentation so remain directional”. This description of the classification process leaves the reader none the wiser.

Also, it is not clear that these categories are mutually exclusive. For example, there is a clear potential overlap between categories 1, 2 and 3. Someone might have self-excluded from licensed gambling websites but also could be a ‘social explorer’ and/or a ‘skilled advocate’. The Gambling Commission plans to collect data on the characteristics of illegal online gamblers in future waves of the Gambling Survey of Great Britain (GSGB) using this four-way classification. To allow the GSGB data to take account of overlaps between the four categories, it would be useful if the GSGB questionnaire could be structured to make it possible for respondents to classify into multiple categories rather than making the categories mutually exclusive.

3 Number of interviews for qualitative analysis

The main qualitative analysis for the report, conducted in June 2024, is based on 10 in-depth interviews with quantitative survey respondents identified as using illegal gambling websites. This is supplemented by two focus groups in July 2024 with 7 participants each, recruited from the GC’s wider lived experience network. There was also an initial 90-minute focus group with 11 participants in March 2024. In each case the number of participants is small. This is completely standard for qualitative research projects, and not a problem in itself. However, the small numbers of participants for the in-depth interviews does mean that there are likely to be only two, or at most three, individuals corresponding to each of the illegal online gambler types outlined in the previous section. This means that the specific gamblers interviewed for the qualitative research could be quite unrepresentative of the general population of illegal online gamblers in these categories.

4 Lack of detail in the main report

There are several statements in the summary report that would benefit from more detail to make the results clearer for the general reader. For example, the “Overview” section states that “there does not appear to be a clear distinction between the demographics of consumers that gamble with legal websites compared with illegal gambling websites. As with legal gambling websites, reported engagement with illegal gambling websites also tends to be higher among men, younger individuals (aged 18-24 years), those who gamble more frequently, and those who score 8 or more on the PGSI (Problem Gambling Severity Index)”. It would be useful to have more detail on these findings in the main report as they are some of the most interesting findings from the report. There is some additional detail in the technical Phase 2 report, but not in the main report.

5 Under-18s excluded from the analysis

Yonder Consulting's quantitative analysis finds that the demographic profiles of legal and illegal online gamblers are very similar – primarily men, younger individuals aged 18-24, frequent gamblers and those scoring 8 or more on the Problem Gambling Severity Index (PGSI). However, recent research from the data analysis company Yield Sec for the Campaign for Fairer Gambling published in September 2025 – around the same time as the GC reports – finds that most of the growth in “black market” gambling in recent years is due to gamblers aged under 18 and self-excluded players – audiences with “no legal options and no other choice than illegal operators” (CFG, 2025). While self-excluded players are included in the Yonder Consulting quantitative analysis, under-18s are not – the quantitative (and qualitative) research used adults only. The Yield Sec results suggest that the Gambling Commission is ignoring illegal gambling from a key demographic – children – by focusing exclusively on players aged 18 and over.

6 Insufficient focus on the harms caused by illegal gambling

The quantitative survey aspect of the Yonder Consulting research is designed to look mainly at the interaction of legal and illegal online gambling rather than producing an incidence rate for illegal gambling across the British population – and in fact, the Phase 1 report specifically states that “landing on an incidence rate for illegal gambling was not within the scope of this research”. A problem with the research is that it does not consider the relative harms of gambling for each of the four groups classified in Section 2 above. Self-excluders may be significantly more engaged with illegal gambling than accidental tourists, for example, but this is not discussed in the report. There is no information on the average amount of illegal gambling harm within each group; it would have been useful for the quantitative survey to include questions on the amount of time spent on illegal online gambling in a typical week, and/or expenditure on illegal gambling, for instance. There is a danger that the research gives the impression of four groups that are equally engaged in illegal gambling, whereas the reality is very different.

7 Evidence of rushed publication

The GC Summary report was published only two weeks after the Yield Sec report for the Campaign for Fairer Gambling discussed in Section 5 was made public. For several days after the Summary report was published, the Phase 1 and Phase 2 technical reports were unavailable on the GC website; clicking on the links to each report brought up a “404 not found” error message. This was not fixed until at least a week after the original publication of the Summary report on 18 September 2025.

Furthermore, the main GC report, and the two technical reports published alongside it, have some presentational shortcomings compared with previous research from the Gambling Commission. The reports are primarily formatted for computer or tablet-based reading on a web browser. There is an option to “Print or Save” each report which opens a new tab with a printable PDF, but these are not well formatted for printing. Also, there are a number of typographical errors in the Phase 1 and Phase 2 reports. For example, the bottom row of Figure 1 in the Phase 1 report reads “I gamble using both licensed and unlicensed websites” when it should read “I only gamble on unlicensed websites.” Overall, the reports give the impression of having been published before they were properly copy edited, which is unfortunate. The overall impression is that the reports were rushed into publication as a response to the Yield Sec report.

8 Conclusion

This report identifies several issues with the GC’s Summary report and the Phase 1 and Phase 2 reports including the exclusion of a key illegal gambler group (children aged under 18) from the analysis, potential sample size and representativeness issues with Yonder Consulting’s quantitative and qualitative analysis, a lack of clarity in how the four-way classification of illegal gamblers was chosen, potential overlap between the four categories of illegal gambler, and a failure to consider the relative harms arising illegal gambling across each of the four groups. Also, the summary report suffers from a lack of detail in some key areas, and all three reports exhibit signs of a rushed publication schedule.

Notwithstanding these issues, The *Illegal Gambling: Consumer awareness, drivers and motivations* report is a useful contribution to current debates regarding the extent of illegal and unlicensed gambling in Great Britain, and the demographic profile of those undertaking it. In particular, it is very welcome that the results from the Phase 2 quantitative survey of illegal gambling behaviours are being used to develop a suite of questions on illegal gambling behaviour to be included in future waves of the Gambling Survey of Great Britain. It is crucial that the evidence on

illegal gambling in the GSGB enables researchers to quantify the extent of the harms caused by illegal gambling across each category of illegal gambling and demographic group.

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