Consultation response

Field	Value
Responder	The National Online Self Exclusion Scheme Limited Trading as Gamstop Online
Responder Type	organisation
Org Role	Chief Marketing Officer

Volume 1: Context

3. Online advertising ecosystem

Q1: Is there any information or evidence you hold that could enhance our understanding of the online advertising ecosystem?

Gamstop is Great Britain's national online self-exclusion scheme, covering all operators licensed in Great Britain. We would like to provide information and evidence detailing how advertisers are deliberately targeting individuals who have self-excluded from gambling with adverts promoting illegal casinos that are not licensed in Great Britain and are therefore not part of the Gamstop scheme. This behaviour represents a targeted exploitation of people who have already identified themselves as potentially vulnerable or at risk of gambling harms.

Across search engines and social media platforms, we see frequent misuse of the Gamstop name, logo and wider branding. The most common way this is presented is through the phrase "Not on Gamstop", which is used as a deliberate marketing hook. These adverts are not generic illegal gambling promotions; they are intentionally designed to reach British consumers who have taken the step to self-exclude. We regularly observe modified versions of our logo, misspellings that retain recognisable branding, and landing pages built around search terms such as "bypass Gamstop", "Not linked to Gamstop" or "non Gamstop casinos". These tactics create a false sense of legitimacy and familiarity, encouraging vulnerable individuals to re-engage with gambling on an unlicensed website or app despite having actively chosen to self-exclude.

This activity is driven by operators who are not licensed in Great Britain and therefore not part of the self-exclusion scheme. This is a structural feature of the regulatory environment rather than a weakness of the scheme itself. However, illegal operators exploit this boundary by positioning themselves as an option "outside Gamstop". In doing so, they directly undermine the purpose of self-exclusion and intentionally target individuals who may be experiencing gambling harms, financial distress or crisis driven behaviour. The deliberate use of our branding and the framing of "non Gamstop" gambling as a desirable alternative is designed to circumvent the protections that self-excluded individuals have put in place.

We see evidence that these advertisers use different methods and graphic styles to avoid detection, including the use of AI generated imagery, flashing video elements and voiceovers. Illegal operators rapidly produce multiple variations of the same advert, enabling them to evade platform moderation and reappear quickly after takedowns. We also see the same creatives being used across multiple new accounts, with this being another way advertises navigate platform punishments.

Gamstop Online also run advertising on some of the same platforms. As a not for profit we have limited budgets, and the scale of illegal gambling advertising often reduces our ability to reach vulnerable people with our own safeguarding messages.

We have been reporting illegal "Not on Gamstop" advertising since we first noticed a significant increase in this activity at the end of 2024. We initially used the reporting tools available on advertising platforms to flag adverts that misused our branding or promoted illegal gambling. We were later advised that illegal gambling advertising should be reported directly through the Gambling Commission, and we have since reported all illegal adverts through the Gambling Commission.

4. Causes and impacts of fraudulent advertising

Q2: Do you have any comments on Ofcom's assessment of the causes and impacts of fraudulent advertising? Do you think we have missed anything important in our analysis? Please provide evidence to support your answer.

Ofcom's assessment sets out a broad picture of the causes and impacts of fraudulent advertising. One potential addition to this is that Illegal gambling advertisers specifically target people who have self-excluded from gambling, often using "Not on Gamstop" messaging and modified versions of our branding to reach individuals who have already identified themselves as vulnerable. This targeted activity directly undermines self-exclusion and exposes people to unlicensed operators at moments when they are actively seeking protection.

Q3: Do you agree with the examples of risky characteristics we have provided? Please provide any arguments and supporting evidence.

Ofcom's examples of risky characteristics are helpful, but we think one additional characteristic could be included. Illegal gambling advertisers frequently use "Not on Gamstop" messaging and modified versions of our branding to target people who have self-excluded from gambling. When an advert is designed to appeal specifically to individuals who have already identified themselves as vulnerable, and when it uses impersonation or altered branding to do so, this should be treated as a clear indicator of risk. This behaviour is a strong signal that the advertiser is unlicensed and attempting to circumvent consumer protections, and we believe it should be recognised alongside the other characteristics Ofcom has identified. Photographic examples can be provided to support this section.

5. Our approach to developing Codes measures

Q4: Do you agree with our proposed approach? Please provide any arguments and supporting evidence.

The only point we would like to add is that impersonation could also cover situations where illegal advertisers use branding or messaging to bypass consumer-protection tools such as Gamstop. Photographic examples can be provided to support this section.

6. Combined impact assessment

Q5: Do you consider the overall burden on the service providers in scope of our proposed measures to be proportionate? Please provide any arguments and supporting evidence.

One issue we see consistently is that illegal gambling advertisers using "Not on Gamstop" messaging frequently change their adverts, imagery and wording to avoid detection. They also create new accounts and begin advertising again very quickly after enforcement action. This repeat pattern shows why stronger checks and monitoring would help reduce the ability of illegal advertisers to continue promoting unlicensed gambling to self-excluded individuals.

We can provide photographic examples that illustrate how illegal advertisers reuse identical creatives across disposable accounts, allowing them to reappear quickly after enforcement action and making it harder for platforms to identify and prevent further illegal "Not on Gamstop" advertising.

Volume 2: Risk, governance and control

2. Advertising intermediaries

Q6: Do you agree with our proposal? Please provide any arguments and supporting evidence.

In our experience, illegal gambling advertisers using "Not on Gamstop" messaging frequently switch intermediaries, alter their creative content and set up new accounts quickly after enforcement action. This behaviour is designed to avoid detection and makes it harder for platforms to rely solely on direct advertiser checks. Ensuring that intermediaries apply equivalent standards and controls is therefore important, particularly where impersonation or attempts to bypass consumer-protection tools are involved.

Q7: We have included two illustrative examples of when and how this measure may be applied, and what 'all reasonable endeavours' might look like. Do you have any comments on these examples, and do you have any additional examples of how providers could work with or require intermediaries to implement safety measures in circumstances where they have insufficient control? Please provide any arguments and supporting evidence.

No response

3. Fraud indicator assessment

Q8: Do you agree with our proposal? Please provide any arguments and supporting evidence.

No response

Q9: Do you think there are other information sources providers should consider in order to understand how fraudulent advertising manifests on their service? If so, what information and why would they need to consider it?

No response

4. Governance and accountability

Q10: Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

No response

5. Testing advertisement generation tools

Q11: Do you agree with our proposal? Please provide any arguments and supporting evidence.

In our experience, illegal gambling advertisers using "Not on Gamstop" messaging frequently generate multiple variants of creative content, including altered branding and repeated formats designed to avoid detection. Testing automated ad-generation tools is therefore important to ensure they are not inadvertently being used to produce creatives being used to promote illegal casinos. Photographic examples can be provided to support this section.

Volume 3: Ensuring account integrity

2. Account checks and actions

Q12: Do you agree with our proposal? Please provide any arguments and supporting evidence. Where your feedback relates to a specific check we are proposing providers should carry out, please make this clear. These are :

In our experience, illegal gambling advertisers using "Not on Gamstop" messaging frequently create new accounts quickly after enforcement action, switch intermediaries and alter their creative content to avoid detection. We also see the same creative assets appearing across multiple newly created accounts that have very few or no followers, which is a strong indicator of coordinated activity designed to bypass platform checks.

Q12.A: verification that advertising account holders work for, or on behalf of, the individual or organisation they are advertising

In our experience, illegal gambling advertisers promoting "Not on Gamstop" casinos frequently create new accounts quickly after enforcement action, switch intermediaries and alter their creative content to avoid detection. We also see identical creative assets appearing across multiple newly created accounts with very few or no followers, which is a strong indicator of coordinated activity designed to avoid platform detection. Requiring a verified identity beside an advertising account would be a significant deterrent to this behaviour and would slow down the rapid creation of new accounts. It would also make it harder for banned advertisers to re-enter platforms, strengthening overall account integrity.

Q12.B: checks and actions to prevent banned advertising account holders returning

Similarly to section a, strengthening checks against previously banned advertisers would be a positive step in preventing attempts to bypass consumer-protection tools by using multiple accounts.

Q12.C: checks for accounts with indicators that there is a material risk they will post fraudulent advertising so that restrictions can be applied to them

No response

Q12.D: repeat checks where there are relevant changes identified on an account.

No response

Q13: Are you aware of any other account checks and actions providers could do to protect users from fraudulent advertising? Please provide any arguments and supporting evidence.

No response

3. Preventing fraudulent financial services advertising

Q14: Do you agree with our proposal? Please provide any arguments and supporting evidence.

No response

4. Countering account takeover

Q15: Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

No response

Q16: Do you have any evidence about account takeover that could inform our assessment, including how frequently it occurs or its impact?

No response

5. Advertising bans

Q17: Do you agree with our proposal? Please provide any arguments and supporting evidence.

We have seen identical "Not on Gamstop" creative assets being used across multiple accounts, including newly created or low-follower accounts. Please see question: Combined impact assessment - Do you consider the overall burden on the service providers in scope of our proposed measures to be proportionate? For more information.

Q18: Are you aware of any additional exceptional circumstances in which it may be proportionate for providers to reverse advertising bans?

No response

6. Account appeals

Q19: Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

No response

Volume 4: Moderation

2. Advertising moderation

Q20: Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

No response

3. Terms of service and publicly available statements

Q21: Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

No response

4. Advertising complaints (including DRC for trusted flaggers)

Q22: Do you agree with our proposals? Please confirm which proposed measure your views relate to and provide any arguments and supporting evidence.

No response

5. Ad libraries

Q23: Do you agree with our proposal? Please provide any arguments and supporting evidence.

We currently use ad libraries where platforms make them available, and we find them to be an effective way to identify illegal gambling adverts, particularly those promoting "Not on Gamstop" casinos. These adverts frequently reuse similar or identical creatives across multiple accounts, and ad-library transparency helps us detect trends and report this more easily.

Q24: Do you agree with the principles, functionalities and information categories which we have included in the proposed measure? Please explain your reasoning and, if possible, provide supporting evidence.

No response

Q25: Do you have any evidence or insights on the process of building an ad library from scratch or adjusting an ad library to align with the proposed measure, and how long that process would take?

We have no experience of this.

Additional questions

Q26: Do you agree with our Equality Impact Assessment? Please provide any arguments and supporting evidence.

No response

Q27: Do you agree with our Welsh language assessment? Please provide any arguments and supporting evidence.

No response

Q28: Do you agree with our proposals? Please provide any arguments and supporting evidence.

No response