

Earlier this month, the UK government's Department for Culture, Media and Sport (DCMS) announced plans to launch a new consultation this coming spring into sports sponsorship by "unlicensed gambling operators" with a view to changing the law in this area.

With 11 out of the 20 Premier League clubs currently sporting betting sponsors on the front of their shirts for this current Premier League season, and with betting companies as title sponsors to the English Football League (EFL) as well as the Scottish Professional Football League (SPFL), the current significance of the betting sector in football sponsorship cannot be underestimated. Similarly, the betting sector offers significant UK sponsorship partnerships across a number of other sports too, including, in particular, horseracing, darts, rugby league, snooker and boxing.

As has been widely reported over the last few years since it was announced in April 2023, the Premier League's voluntary and collective [ban](#) on all forms of gambling sponsorship on the front of matchday shirts comes into effect from the end of this current 25/26 Premier League football season. As the incoming voluntary ban is limited to front-of-shirt sponsorship, it does not cover other forms of sponsorship or commercial partnerships (including sleeve, back-of-shirt, shorts, training kit or LED board) that could be contemplated. Furthermore, the Premier League's voluntary ban would not cover clubs in other UK football leagues, such as the EFL or SPFL, or, naturally, other UK sports clubs, participants and institutions.

By way of additional background and subsequent to the 2023 announcement of the Premier League's incoming front of shirt gambling sponsorship ban, as [commented](#) on previously in Sports Shorts, the Premier League, the EFL, the Women's Super League and the Football Association came together in the summer of 2024 to draft the Gambling Sponsorship Code for Football. Other UK sports organisations, including the England and Wales Cricket Board (ECB), the British Horseracing Authority (BHA) and the Rugby Football League (RFL) have also introduced codes of conduct that address sponsorship arrangements between stakeholders in their respective sports and betting companies. Such codes of conduct were prepared following the 2020 Gambling Act 2005 Review, and the subsequent release of the white paper "High Stakes: Gambling Reform for the Digital Age", which called on sports governing bodies to agree a set of guiding principles to help shape a gambling sponsorship code of conduct for sport.

These codes of conduct typically cover similar overarching principles: protecting children and young people; maintaining sporting integrity; reinvestment into sport; and ensuring the promotion of betting is undertaken in a socially responsible way. The codes do, however, diverge slightly with regard to the licensing requirements of gambling sponsors for their sports.

The Gambling Sponsorship Code for Football generally reflects the position under the current UK Gambling Act 2005 (Act), namely that where clubs, teams or leagues are to partner with gambling operators whose services are accessible to persons in the UK, such gambling operators must either obtain the relevant gambling licence from the GB Gambling Commission (GC) or enter into a white label arrangement with another gambling operator that was itself licensed by the GC. Indeed, the Act does not require gambling sponsors to obtain a licence from the GC where those sponsors appropriately implement the necessary measures to prevent their gambling sites from being accessible to UK customers. The gambling sponsorship code of conduct adopted by the RFL adopts a similar approach to that taken in the Gambling Sponsorship Code for Football. The codes of conduct on gambling sponsorship adopted by the ECB and BHA seemingly go a step further than the football and rugby league codes by requiring that their participants (including Professional County Teams and Hundred Teams under the ECB's code, and British racecourses under the BHA's code) must only enter into gambling sponsorship agreements with gambling companies that operate under licensing arrangements set by the GC. This would appear to include white label arrangements, though in the case of the BHA's code, this is not specified expressly.

It is not yet clear exactly what approach DCMS will take in its consultation with regard to sponsors operating under white label licensing arrangements. Similarly, it has not yet been made clear the full scope of sponsorship and/or commercial partnership arrangements that will become subject to the consultation or indeed when any legislative changes made pursuant to the consultation will come into force. The timing of the DCMS' proposed spring consultation appears to be particularly significant taking into account the Premier League's voluntary ban on all front-of-shirt gambling sponsorship, which will likely see a shake-up in the sponsorship portfolio of Premier League clubs as well as bringing about consequential changes to the broader UK sports sponsorship sector. The industry's attention will no doubt be drawn to how this develops, as commercial executives draw up their proposed sponsorship and commercial partnership plans for the seasons ahead.

For any queries, support or further discussion on these latest developments in this highly regulated area, please feel free to contact our gambling specialist, Mike Llewellyn.

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