

The Gambling (Gaming and Betting) Control Commission

GUIDANCE NOTES FOR ETHICAL ADVERTISING AND MARKETING PRACTICES

1.0 PURPOSE:

This guidance note outlines the critical steps that licensed gambling and betting operators must take to advertise responsibly under the Gambling Control Commission of Trinidad and Tobago (GCC). It aims to ensure that all gaming and betting advertisements are fair, open, ethical and protect vulnerable persons from harm.

The GCC sets clear expectations for licensees and outlines the boundaries of lawful advertising. Following these guidance notes protect the public from misleading content, prohibits underage exposure, promotes responsible gambling, and helps maintain industry integrity. This, in turn, builds consumer trust and contributes to a safer gambling environment, a core objective of the Commission.

2.0 SCOPE:

These guidance notes apply to all forms of marketing and advertising including:

- TV, radio, digital and print ads
- Outdoor signage and billboards
- Event sponsorships and branded merchandise
- Social media, influencer promotions, mobile push notifications, and SMS campaigns

These apply to **licensed operators and any third-party marketers or affiliates** acting on their behalf.

3.0 DEFINITIONS:

Please see our document titled “Definitions” which can be found on our website <https://gcctt.org/> for terms mentioned in this document.

4.0 KEY PRINCIPLES:

Operators must ensure that all advertising and marketing:

- Is **truthful, accurate, not misleading** and does not target or appeal to minors, vulnerable persons, or individuals with known gambling problems.
- **Does not glamorize gambling** or portray it as a means to financial success or personal enhancement. Includes clear, visible responsible gambling messaging.
- **Receives prior approval** from the GCC before publication or broadcast. (Refer below to the Annex B: Submission and Approval Process for Advertisements.)

5.0 COMPLIANCE EXPECTATIONS FOR OPERATORS: ADVERTISING RULES AND STANDARDS

	Topics	Requirements
5.1	Targeting and Audience Restrictions <i>(Act, Section 80 (1))</i> <i>(Act, Section 4(a))</i> <i>Responsible Gambling Regs., s 4(3)(iii)</i>	Gambling advertisements must not be directed at children, prohibited persons , or vulnerable individuals, including those with known or suspected gambling problems. This includes: • Using imagery, language, or references that may appeal to minors (e.g., cartoons, youth slang, or celebrities popular with underage audiences).

		Positioning ads in media, platforms, or time slots where the primary audience is under 18 or vulnerable.
5.2	Content Integrity and Risk Disclosures <i>(Act, Section 4(b))</i> <i>(Act, Section 38(3)(c))</i>	Advertisements must present factual, truthful, and non-misleading information. Operators are prohibited from misrepresenting odds, exaggerating chances of winning, or presenting gambling as a solution to personal or financial problems. Ads must also: - Clearly state that minors are prohibited from gambling - Include the legal identity of the licensed operator - Avoid content that exploits individuals' aspirations, ignorance, or vulnerabilities Refrain from portraying gambling as an essential part of success, popularity, or social acceptance
5.3	Opt-Out Mechanisms for Digital Advertising	All advertising delivered via electronic communication (including email, SMS, and push notifications), must provide a clear, accessible mechanism for recipients to opt out or unsubscribe from further communications. Failure to provide this option will be deemed a compliance breach.
5.4	Prohibited Use on Child-Focused Products <i>(Act, Section 80(1))</i>	Gambling-related brands, logos, or advertising content must never be displayed on products, packaging, or merchandise primarily intended for children (e.g., toys, school supplies, children's clothing, etc.). This restriction applies to both promotional giveaways and commercial placements.
5.5	Advertising in Educational Institutions <i>(Act, Section 80(1))</i>	Gambling operators are strictly prohibited from targeting or placing advertisements on or near the premises of secondary schools, post-secondary institutions, colleges, or universities. Additionally, operators must not engage in any form of sponsorship, branded merchandise, or promotions that could reasonably be interpreted as marketing to students within these settings.
5.6	Promotion of Responsible Gambling <i>Responsible Gambling Regs, s. 4(2)(d-e)</i>	All advertisements must include a clear responsible gambling message and, where feasible, links to Commission-approved resources for help and education. Responsible gambling information should: - Be prominently displayed or clearly audible - Include the toll-free helpline and/or referral website approved by the Commission

		Avoid tokenism — messaging must be visible, legible, and proportionate to the ad's size and format
5.7	Self-Exclusion and Problem Gambling Support <i>Responsible Gambling Regs, s. 4, 5(1-3)</i>	Operators are required to promote access to self-exclusion tools and support services within their marketing and promotional efforts. This includes: - Clearly displaying links to self-exclusion registration portals or in-person support pathways - Including referral information to recognized problem gambling support organisations - Avoiding incentives or bonuses aimed at lapsed or excluded individuals.
5.8	Accuracy of Claims About Winnings <i>(Act, Section 4(c), 38(3)(c))</i>	Advertisements may only reference winnings, jackpots, or prize outcomes if such claims are: Factually accurate at the time of publication Not misleading to the average consumer Verifiable and auditable, with supporting documentation available upon request Exaggerating winning odds, using fine print to hide disclaimers, or falsely implying guaranteed returns is strictly prohibited.
5.9	Internal Advertising Compliance Frameworks	All licensed operators must establish and maintain internal compliance procedures to vet and approve advertising content prior to public release. This includes: - Internal checklists to review ads against the Commission's policy requirements - Designated compliance personnel (or teams) accountable for sign-off - Retention of ad approval records and marketing content for at least 12 months, or as otherwise required by the Commission
5.10	Oversight, Monitoring and Reporting	Operators must implement mechanisms to monitor all advertising and promotional activity, including activities by third-party affiliates or marketing agencies acting on their behalf. Operators should: - Conduct periodic reviews of ads across all platforms - Investigate any reports of non-compliance - Self-report breaches to the Commission where applicable - Take prompt corrective action where violations are identified

5.11	Authorisation and Display Regulations <i>Conduct of Betting Regs. s. 4(3)</i>	No advertisement may be displayed on hoardings, walls, trees, poles, fences, gates, or other structures unless: - It is done in accordance with the Advertisement Regulations Act, Chapter 35:53, and - It complies with Bye-laws or Regulations made under the Advertisement Regulations Act, Chapter 35:53. Hoardings may only be erected by or with the written permission of the relevant City, Borough, or County Council. Authorisation is typically granted for a maximum five years.
5.12	Business Premises Exemption	Gambling operators may display advertisements within or on their own premises , provided they do not violate other provision of the Advertisement Regulations Act, Chapter 35:53.
5.13	Removal of Unauthorised Ads	Local authorities have the power to remove any unauthorised hoardings or advertisements. Operators may be held financially responsible for the cost of the removal.
5.14	Use of Copyrighted Content	Section 5-8 of the Copyright Act Chapter 82:80: Ensure that all content used in advertisements (e.g., music, videos, graphics, slogans) is either: Original or Properly licensed from the copyright holder. Avoid using copyrighted material without permission, even in short clips or background music.
5.15	Derivative works	Section 6 of the Copyright Act Chapter 82:80 Modifying existing works (e.g., remixing music or altering images) creates a derivative work, which also requires the original creator's permission.
5.16	Public Performance	Publicly playing music or videos (e.g. in gambling venues or during promotional events) without authorisation may constitute an offence under the Copyright Act Chapter 82:80. Obtain a public performance license from the relevant rights management organisation.
5.17	Moral Rights	Respect the moral rights of author, including: - The right to be credited. - The right to object to derogatory treatment of their work
5.18	Permitted Uses (Fair Use Exceptions)	Limited exceptions exist for - Private use - Teaching - Quotations - Informative purposes - These do not typically apply to commercial advertising or gambling promotions.

5.19	Avoid Causing Confusion	Do not use names, logos, slogans or branding that could cause confusion with another gambling operator or business. Ensure your advertising and promotional materials are clearly distinguishable from competitors.
5.20	Respect Goodwill and Reputation	Avoid any act or campaign that could damage the reputation or goodwill of another gambling business, even if it doesn't cause confusion. This includes comparative advertising that unfairly discredits competitors.
5.21	Avoid Discrediting Competitors	Refrain from publicly discrediting another gambling operator's services or business practices. Focus on promoting your own offerings without undermining others .
5.22	Protection of Trade Dress and Business Identifiers	Do not imitate the appearance of a product, including packaging, colour schemes, or layout, that could dilute another brand's identity. Respect the use of business identifiers such as logos, emblems, and slogans.
5.23	Confidential Information	Do not use or disclose confidential business information obtained from competitors or former employees. Implement safeguards to protect your own trade secrets and proprietary data .
5.24	General Principle of Honest Practices	Any act that is contrary to honest commercial practices may be deemed unfair competition—even if not explicitly listed in the Act. Maintain ethical standards in all business dealings, especially in advertising and customer engagement.
5.25	Fair Trade Practices (Act, Section 4(b)(e))	Avoid any consumer trade practice that may adversely affect the economic interests of consumers. Ensure all promotions, odds, and terms are clear, accurate, and not misleading.
5.26	Transparency in Advertising (Act, Section 4(b)(e)) (Act, Section 38(3)(c))	Clearly disclose: • Terms and conditions of promotions or bonuses. • Eligibility criteria and restrictions. • Payout structures and odds.
5.27	Right to Information (Act, Section 4(e)) (Act, Section 13(1)(a)) (Act, Section 79(1))	Consumers must have access to: • Accurate and timely information about services. • Support channels for inquiries or complaints.
5.28	Redress and Complaints (Act, Section 13(1)(n))	• Establish a clear complaints procedure. • Respond to consumer complaints in a timely and fair manner. • Cooperate with the Consumer Affairs Division or other regulatory bodies in resolving disputes.
5.29	Prohibited Practices	Do not engage in: • False advertising • Bait-and-switch tactics

		Hidden fees or charges
5.30	Recordkeeping Documentation <i>Act. Section 52 (2) (c)</i>	and Maintain all approval materials for audit and compliance purposes for a period of 12 months or otherwise required by the Commission. - Retention of ad approval records and marketing content for at least 12 months, or as otherwise required by the Commission Maintain records of approval dates, reviewers and version history - Document any third-party data sources used in marketing claims.

Licensed operators are required to ensure that all advertising and marketing materials, regardless of their nature or format, fully comply with the Advertising Standards established by the Government of Trinidad and Tobago.

This compliance includes, but is not limited to, adherence to the following key legislation and standards:

- **Copyright Act** (Chapter 82:80, Act No. 8 of 1997, Amended by No. 18 of 2000 and No. 5 of 2008)
- **Protection Against Unfair Competition Act** (Chapter 82:36, Act No. 27 of 1996, Amended by No. 18 of 2000)
- **Advertisements Regulations Act** (Chapter 35:53, Act 16 of 1931, Amended by No. 39 of 1952 and No. 15 of 2000)
- **Consumer Protection and Safety Act, Chapter 82:34**
- **Trinidad and Tobago Bureau of Standards (TTBS)**
- **Any other applicable laws and regulations.**

Operators must regularly review their advertising practices to ensure ongoing alignment with these and any future legislative or policy changes.

6.0 VIOLATIONS AND NON-COMPLIANCE

These Guidance Notes form part of the Commission's regulatory expectations. Breaches of these requirements may trigger enforcement under the Gambling (Gaming and Betting) Control Act, 2021 and applicable Regulations, including administrative actions and penalties (see Schedule 6, as applicable). Operators must maintain evidence of compliance and produce same upon request by the Commission.

Please see our document titled "Offences and Penalties" which can be found on our website <https://gcctt.org/>.

7.0 REMINDER TO OPERATORS

The GCC expects all licensees to treat compliance with advertising and marketing requirements as a **core condition of their licence**. These standards are not optional or advisory — they are enforceable under the **Gambling (Gaming and Betting) Control Act, 2021**.

Operators are strongly encouraged to:



- Review all advertising material **before publication**
- Maintain a record of **internal approvals and campaign details**
- Seek **clarification from the Commission** where unsure of compliance

Failure to act in accordance with the policy and these guidance notes may result in sanctions, suspension, or revocation of your licence.

If in doubt, pause the promotion and contact the GCC.



Frequently Asked Questions (FAQs)

1. Is approval required for every advertisement, even if it's similar to ones previously ran?

Yes. Each advertisement must be **individually reviewed and approved** unless the Commission provides blanket approval for a specific series or format.

2. Can influencers or brand ambassadors be used to promote gambling services?

Yes, but only if the content **complies fully with the Advertising & Marketing Guidance Notes**, including the **prohibition on targeting minors** and the inclusion of **responsible gambling messaging**. Influencers must be over 18 and must not appeal to underage audiences.

3. What happens if an ad runs before approval is granted?

This is a **Compliance Breach**. The ad may be subject to immediate removal, and the operator may face **fines, suspension**, or other enforcement action.

4. Does this policy apply to third-party advertisers or affiliates acting on our behalf?

Yes. Licensees are **fully responsible** for the actions of their third-party vendors or affiliates. Operators must ensure that they comply with all requirements and that proper oversight mechanisms are in place.

5. What if the same ad runs on multiple platforms (e.g., Facebook, email, print)?

Operators must **declare all intended channels** at the time of submission. If the content is the same across platforms, it may be approved as a single campaign, but the Commission may request platform-specific adjustments (e.g., sizing, disclaimer visibility).

6. Can any reference to the GCCTT be placed in advertisements (e.g., “Licensed by the GCCTT”)?

Operators may state that they are **licensed by the GCC**, but it **must not imply endorsement**. There **must be explicit written permission** to use the GCC’s logo or branding.

7. How are ads submitted for review/approval and how long does it take?



Ads are Submit to: advertisingapprovals@gcctt.org (replace with actual email when ready). Allow **five (5) working days** for processing. Incomplete forms will delay review.

8. Can promotions like “risk-free bets” or “guaranteed wins” be advertised?

No. These terms are considered misleading unless the promotion is structured in a way that truly eliminates risk and this is clearly explained. All promotional language must be accurate and not exaggerated the chances of winning.

9. Are there any restrictions on the time-of-day gambling ads can be shown?

Yes. Advertising must not be shown during programming or on platforms primarily targeting minors. The GCCTT may also issue specific time-based restrictions to protect vulnerable audience.

10. Can humor or satire be used in gambling ads?

Yes, but with caution. Humor must not trivialize gambling risks or appeal to underage audiences. It must also comply with all other content and tone requirements.

11. is it necessary to include responsible gambling messages in digital ads like banners or social media posts?

Yes. All forms of advertising, regardless of format or platform, must include a clear and visible responsible gambling message and support contact information.

12. What if a third-party platform modifies the ad content?

Operators are responsible for the advertisements and must ensure that any platform or affiliate does not alter the content in a way that violates compliance. Regular audits and contractual safeguards are recommended.

13. Is advertising to users outside of Trinidad and Tobago permitted?

Only if it is a condition of the license. Sections of the licence permits international operations and this complies with the advertising laws of the target jurisdiction. However, all local advertising standards must still be met.



14. What happens if advertising rules are repeatedly breached?

Repeated violations may result in escalating enforcement actions, including higher fines, suspension of advertising privileges, or revocation of your gambling license.

The official version of this form must be used, as published on the GCC website. This annex is included for operator visibility.

Annex A: Glossary of Key Terms

This glossary provides clear definitions of key terms used in the Advertising & Marketing Guidance Notes to support consistent interpretation by licensed operators.

Term	Definition
Advertisement	Any notice, bill, placard, poster and similar publication
Minor	Any person under the age of 18 , regardless of the legal gambling age in other jurisdictions.
Vulnerable Person	An individual who, due to personal circumstances (e.g., financial hardship, mental health condition, gambling addiction), is at a higher risk of harm from gambling activities.
Responsible Gambling Message	A clear, visible or audible message that promotes safe and informed gambling practices , such as “Gamble Responsibly,” or a helpline link.
Misleading Advertisement	An advertisement that distorts, omits, or exaggerates information in a way that a reasonable person could be misled, particularly about odds, winnings, or risk.
Advertising Material	Any content designed to promote gambling services , including but not limited to print ads, social media posts, influencer content, radio/TV spots, SMS messages, branded merchandise, or sponsored events.
Pre-Approval	The process by which operators must submit proposed advertising content to the GCC and receive written permission before it is published or aired.
Prohibited Person	Any individual legally disqualified from gambling participation, including minors, self-excluded persons, and those restricted by law or court order.
Endorsement	Any statement, imagery, or implication that suggests the GCC officially supports or promotes a specific gambling operator or product. Use of GCC branding in this context is prohibited unless authorised .
Hoarding	Any structure used as an advertisement or used for exhibiting any advertisement

Annex B: Submission and Approval Process for Advertisements

This Annex outlines the mandatory process for submitting gambling-related advertising and marketing material to the Gambling Control Commission of Trinidad and Tobago (GCC) for approval.

All licensed operators are required to comply with this process prior to publishing or distributing any advertisement, in accordance with the GCC's Advertising & Marketing Policy. Failure to do so may result in sanctions, including withdrawal of the advertisement, fines, or suspension of the licence.

ADVERTISING SUBMISSION & APPROVAL PROCESS

All gambling-related advertisements must be **submitted to the Gambling Control Commission (GCC) for review and written approval** before publication or broadcast.

This requirement applies to all advertising mediums, including but not limited to:

- TV and radio commercials
- Digital ads (social media, web banners, sponsored content)
- Print media (newspapers, magazines, flyers)
- Outdoor signage (billboards, posters)
- SMS, email, and mobile app notifications
- Event sponsorships, branded merchandise, or influencer partnerships

What to Submit

Operators must submit the following to the Commission:

- **Final version** of the proposed advertisement (including scripts, artwork, or recordings)
- A brief **description of the intended distribution** (media type, platform, location)
- **Target audience profile** (if applicable)
- **Planned run dates** for the campaign

Submissions must be made via [insert submission portal/email] and allow a minimum of **five (5) working days** for review.

Commission Review Criteria

Advertisements will be assessed for compliance with the following:

- Alignment with the **Advertising & Marketing Guidance Notes**
- Accuracy and **non-deceptive content**
- Inclusion of **responsible gambling messaging**
- Exclusion of content that targets or appeals to **vulnerable persons or minors**
- Proper use (or **non-use**) of GCC branding or any misleading affiliations

Approval and Recordkeeping

- The Commission will issue **written approval** or feedback within the review period.
- Operators are **prohibited from publishing or airing** the ad until written approval is granted.



- Approved ads and correspondence should be **retained on file for at least 12 months** for audit or investigation purposes.
- Marketing staff must be trained on legal requirements and ethical standards.

Advertising Standards

- Licensed operators must ensure that their marketing communications comply with all relevant laws and regulations in relations to Advertising Standards within Trinidad and Tobago. These laws and regulations include but not limited to:
 - **Copyright Act** (Chapter 82:80, Act No. 8 of 1997, Amended by No. 18 of 2000 and No. 5 of 2008)
 - **Protection Against Unfair Competition Act** (Chapter 82:36, Act No. 27 of 1996, Amended by No. 18 of 2000)
 - **Advertisements Regulations Act** (Chapter 35:53, Act 16 of 1931, Amended by No. 39 of 1952 and No. 15 of 2000) and its Bye-laws
 - **Consumer Protection and Safety Act, Chapter 82:34**
 - **Trinidad and Tobago Bureau of Standards (TTBS)**
 - **Any other applicable laws and regulations.**

Annex C: GCC Advertising & Marketing Approval Request Form



GCC ADVERTISING & MARKETING APPROVAL REQUEST FORM

For use by Gambling Operators and Gambling Related Vendors when submitting Advertising & Marketing Approval Request to the Gambling Control Commission (GCC). This form must be completed and submitted by licensed operators prior to the distribution of any gambling-related advertisement.

SECTION 1: OPERATOR DETAILS

Field	Details
Name of Operator	
Trading Name (if different)	
Licence Number	
Primary Contact Person	
Contact Email	
Phone Number	

SECTION 2: ADVERTISEMENT DETAILS

Field	Details
Type of Advertisement	☐ TV ☐ Radio ☐ Print ☐ Digital (incl. social media) ☐ Outdoor ☐ SMS/Email ☐ Sponsorship ☐ Other: _____
Title/Name of Campaign	
Brief Description of Advertisement	
Target Audience	
Proposed Distribution Channels	
Planned Campaign Dates	From: _____ To: _____

SECTION 3: ATTACHMENTS

Please confirm that the following are attached to this request:

- | | |
|--------------------------|---|
| ☐ | Final artwork / creative / script |
| ☐ | Media plan or summary of distribution |
| ☐ | Responsible gambling messaging included, include any QR codes or links if applicable. |
| ☐ | Any disclaimers or terms and conditions |
| ☐ | Verification of prize/winning claims (if applicable) |
| ☐ | Proof of internal compliance approval |

SECTION 4: DECLARATION

I confirm that the submitted advertisement complies with the **GCC Advertising & Marketing Guidelines**, and that all claims made are accurate and verifiable. I understand that the advertisement **must not be published or distributed until written approval is received** from the GCC.

Signature	
Name (Block Letters)	
Position	
Date	

Submit via email to: advertisingapprovals@gcctt.org

Allow five (5) working days for processing. Incomplete forms or missing attachments may delay review.