United Kingdom

Online casino launch roadmap

Gambling Commission (UKGC)

The most demanding remote licence in Europe, and the one where the compliance system you build matters more than the paperwork you file.

- Recommended path
- Optional, worth it
- Alternative route

LICENCE	TIME TO LAUNCH	GAMING TAX	LICENCE FEES	SETUP COST	LOCAL PRESENCE
Remote casino operating licence, plus personal…	9-14 months end to end; the Commission quotes 16 weeks…	40% Remote Gaming Duty on profits for accounting…	Application GBP 8,185 to GBP 165,069 and annual GBP…	Fees are small next to build cost; budget roughly…	No UK entity is required by the Act for a remote…

STAGE 1 · Weeks 0-6 — Market and legal feasibility

- 1.1 Model the 40% Remote Gaming Duty
- 1.2 Check you really need a GB licence
- 1.3 Read LCCP and RTS first
- 1.4 White label or own licence decision

STAGE 2 · Months 1-5 — Corporate structure and licence application

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- 4.1 Age and identity before play
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- 4.3 Financial vulnerability check
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- 5.1 AML risk assessment and MLRO
- 5.2 Source-of-funds triggers
- 5.3 Segregation of customer funds
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- 6.1 Independent testing of games and RNG
- 6.2 Annual assurance and internal audit
- 6.3 Pre-launch compliance testing
- 6.4 Disaster recovery rehearsal

STAGE 7 · Months 9-13 — Go-live and launch controls

- 7.1 Licence issue and first annual fee
- 7.2 Soft launch with limits
- 7.3 Advertising and marketing compliance
- 7.4 Incident and key-event runbooks

STAGE 8 · From launch — Ongoing obligations

- 8.1 Regulatory returns and data
- 8.2 Duty returns and statutory levy
- 8.3 Complaints and ADR
- 8.4 Watching rule changes

United Kingdom: launch roadmap in detail

Gambling Commission (UKGC) · as of 2026-11

Licence	Remote casino operating licence, plus personal management licences (PMLs) for key roles
Time to launch	9-14 months end to end; the Commission quotes 16 weeks for a complete application but warns it can take 6 months or more
Gaming tax	40% Remote Gaming Duty on profits for accounting periods starting on or after 1 April 2026 (was 21%); remote betting moves to 25% from April 2027
Licence fees	Application GBP 8,185 to GBP 165,069 and annual GBP 7,000 to GBP 1.45M+, set by GGY band (fees from 1 October 2026)
Setup cost	Fees are small next to build cost; budget roughly GBP 1.5M-4M for compliance tooling, testing and staff (estimate, not a regulator figure)
Local presence	No UK entity is required by the Act for a remote licence, but you must show effective control and have PML holders; most operators keep UK-facing compliance staff
Difficulty	High

1. Market and legal feasibility Weeks 0-6

1.1 Model the 40% Remote Gaming Duty RECOMMENDED

Remote Gaming Duty rose from 21% to 40% for accounting periods starting on or after 1 April 2026, and it applies to UK-customer profits wherever the operator is based. Bonuses and free spins are not a free deduction in the way many models assume, so rebuild your unit economics on net revenue after duty before you commit to the market. Duty is a HMRC matter, not a Commission one, and it sits on top of the Commission fees and the statutory levy.

In the book: Ch. 06 Licensing Guide, Ch. 07 Casino Implementation Planning and Timeline, Ch. 30 FinOps Deep Dive

1.2 Check you really need a GB licence RECOMMENDED

Anyone who offers gambling to people in Great Britain needs a licence, even if servers and staff are elsewhere. Marketing into GB without one is the fastest route to an enforcement case. If the plan is a small first launch elsewhere, a UK-facing block through geolocation is not a substitute for a licence.

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 06 Licensing Guide

1.3 Read LCCP and RTS first RECOMMENDED

The Licence Conditions and Codes of Practice (LCCP) and the Remote Gambling and Software Technical Standards (RTS) define what the platform must do. Map each social responsibility code and RTS requirement to a system owner now. Chapter 6 covers the LCCP traps that catch first-time applicants.

In the book: Ch. 06 Licensing Guide, Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security

1.4 White label or own licence decision ALTERNATIVE

A UK-licensed partner can host your brand under its operating licence, which avoids the application and the PML burden. You give up control of player protection decisions and share margin, and the host carries regulatory risk for your conduct. Check that the host's licence conditions allow third-party brands.

In the book: Ch. 47d Casino as a Service: White-Label Provisioning at the Press of a Button, Ch. 09 Legal Framework and Contracts

2. Corporate structure and licence application Months 1-5

2.1 Operating licence application RECOMMENDED

Apply through the Commission's online service for a remote casino operating licence. Remote applicants must also supply an operational model map and an end-to-end system diagram. The Commission lists 16 weeks as its average for a complete application, not a guarantee, and warns complex files can take up to 6 months or more.

In the book: Ch. 06 Licensing Guide, Ch. 07 Casino Implementation Planning and Timeline

2.2 Fee band and budget RECOMMENDED

Fees from 1 October 2026 follow expected annual GGY. Examples for remote casino: band F1 (under GBP 250K) pays GBP 8,185 to apply and GBP 7,000 a year; G1 (GBP 3M to under GBP 10.5M) pays GBP 40,475 and GBP 27,337; H1 (GBP 36.75M to under GBP 130M) pays GBP 74,902 and GBP 112,556. The first annual fee is due 30 days after issue and is reduced by 25%. Your forecast GGY band is a statement to the regulator, so keep it consistent with your business plan.

In the book: Ch. 06 Licensing Guide, Ch. 07 Casino Implementation Planning and Timeline, Ch. 36 Financial Operations

2.3 Personal management licences RECOMMENDED

People in qualifying management positions apply for a PML at the same time as the operating licence. Holders of 10% or more of shares file an Annex A declaration instead. The Commission quotes 8 weeks for a personal licence, and the application fee rose from GBP 370 to GBP 463 on 1 October 2026.

In the book: Ch. 08 Team Structure and Operations, Ch. 06 Licensing Guide

2.4 Source of funds and ownership evidence RECOMMENDED

The Commission looks at who owns and funds the business, including complex ownership chains, which is also one of the listed causes of delay. Prepare audited accounts, funding evidence for the start-up period and a clear group chart before you file. Showing a credible three-year financial plan with the compliance headcount costed in is part of this.

In the book: Ch. 06 Licensing Guide, Ch. 09 Legal Framework and Contracts

2.5 Key event reporting process RECOMMENDED

Build the internal process for reporting key events and changes of control early. A change of control application is quoted at 12 weeks and a variation at 8 weeks. Investor rounds and group restructures during the first year are a common trigger operators forget.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 09 Legal Framework and Contracts

3. Platform and suppliers Months 2-8

3.1 Licensed supplier chain RECOMMENDED

Games, platform and payment components must come from suppliers that the operator can show it has assessed. Content must be tested and approved to RTS expectations, so pick studios that already carry UK-approved titles. Keep a supplier register and contracts that give you audit and data access.

In the book: Ch. 10b Supplier Integration Control Plane, Ch. 09 Legal Framework and Contracts

3.2 Game design rules for GB RECOMMENDED

GB has specific game design limits for online slots, including no autoplay and no features that speed up play beyond permitted limits. Check each title in the catalog against the current RTS before you whitelist it in the GB market. Studios sometimes ship a UK variant, so tie the game version to the jurisdiction in your gateway.

In the book: Ch. 10b Supplier Integration Control Plane, Ch. 27b The Jurisdiction Transfer Gateway and Cookie Consent

3.3 Stake limits on online slots RECOMMENDED

Maximum stake per game cycle is GBP 5 for players aged 25 and over (since 9 April 2025) and GBP 2 for ages 18 to 24 (since 21 May 2025). The limit covers reel-based online slots, not roulette or blackjack, and it counts total stake within a cycle including added stake mid-cycle. Enforce it in the wallet and game launch path, not just the front end, and test the age-band switch on a player's 25th birthday.

In the book: Ch. 10 Complete Platform Architecture, Ch. 15 Casino Mathematics and Game Economy

3.4 Data location and UK GDPR RECOMMENDED

The Commission expects you to be able to hand over records on request and to keep systems resilient. UK GDPR and the Data Protection Act 2018 apply to player data, and transfers need a lawful mechanism. Decide hosting region, backup region and retention before architecture freeze.

In the book: Ch. 27 Data Residency and Backup/Recovery, Ch. 34b Data Governance for iGaming Platforms

3.5 Platform security baseline RECOMMENDED

Expect questions on admin MFA, vulnerability scanning, logging and incident response. A SIEM with regulator-grade retention makes later evidence requests simple. Chapter 24 lists the controls most regulators ask for.

In the book: Ch. 24 Security and Compliance, Ch. 24b Wazuh SIEM for iGaming Compliance

4. Customer protection controls Months 3-9

4.1 Age and identity before play RECOMMENDED

Licensees must verify age and identity before a customer can gamble, with no play on a promise to upload documents later. Design KYC as a decision engine with stored evidence and retry paths, not a one-shot call to a vendor.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 19 Anti-Fraud System Deep Dive

4.2 GAMSTOP integration RECOMMENDED

GB licensees must take part in the national multi-operator self-exclusion scheme, GAMSTOP. Check the register at registration and on a recurring basis, close accounts that match, and stop marketing to them. Test that live casino and every brand skin use the same check; one operator failed a technical audit because live dealer games sat outside the exclusion flow.

In the book: Ch. 26b Self-Exclusion Registries: From API to Audit Trail, Ch. 26 Responsible Gaming and Player Protection Systems

4.3 Financial vulnerability check RECOMMENDED

Social Responsibility Code 3.4.4 requires a customer-specific public-record check (for example bankruptcy, county court judgments, IVAs, Debt Relief Orders) when net deposits exceed GBP 150 in a rolling 30 days. It is not required if you ran a check or financial risk assessment in the previous 12 months. Record the rationale for any action you take and keep this separate from source-of-funds enquiries, which depend on your own risk assessment.

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 24d KYC Evidence Lifecycle

4.4 Markers of harm and customer interaction RECOMMENDED

The Commission expects you to spot harm through behavior, such as deposit escalation, night play and chasing losses, and to interact before the customer complains. Build detection rules, case management and trained staff, and keep an audit trail of every interaction and outcome.

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 33b Workflow Engine and Case Management

4.5 Customer-led limits and deposit limits RECOMMENDED

From 30 September 2026 (extended from 30 June) operators must offer gross deposit limits, use the name deposit limits only for gross limits, and give them at least equal prominence with other financial limits. Only gross deposit limits may be offered over fixed time frames. Review the RTS 12 consultation response and annex before you design the limits UI.

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 14 Mobile-First Architecture for iGaming

4.6 Geolocation for GB OPTIONAL

GB has no state-by-state location rule like the US, but if you serve several markets you need reliable country detection to apply the right rules per player. Use it to stop GB players seeing non-GB product and the reverse.

In the book: Ch. 24e Geofencing and Location Verification, Ch. 27b The Jurisdiction Transfer Gateway and Cookie Consent

5. AML, fraud and payments Months 4-9

5.1 AML risk assessment and MLRO RECOMMENDED

Remote casinos are regulated entities under the Money Laundering Regulations and must hold a business-wide AML risk assessment, policies, a nominated officer and staff training. Suspicious activity reports go to the NCA. Gambling licences also carry their own conditions on preventing money laundering and terrorist financing.

In the book: Ch. 19 Anti-Fraud System Deep Dive, Ch. 24d KYC Evidence Lifecycle

5.2 Source-of-funds triggers RECOMMENDED

There is no universal GBP threshold for source-of-funds enquiries. Enhanced due diligence is triggered by your own risk assessment and the customer context, so define and document your triggers and apply them consistently. Do not copy a number from a competitor and call it policy.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 19 Anti-Fraud System Deep Dive

5.3 Segregation of customer funds RECOMMENDED

Customer funds must be protected at a level the operator discloses to players (basic, medium or high). Decide the level, set up a separate customer account and reconcile it daily. Disclosure wording in the terms must match what the ledger really does.

In the book: Ch. 36 Financial Operations, Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation

5.4 Payment methods and acquirers RECOMMENDED

Credit card gambling is banned in GB, which also affects how you handle bonus and refund flows. Many acquirers want to see your licence status and AML controls first. Keep chargeback and dispute handling aligned with player complaints rules.

In the book: Ch. 36 Financial Operations, Ch. 33d Disputes, Chargebacks, and Player Support

6. Testing and certification Months 6-11

6.1 Independent testing of games and RNG RECOMMENDED

Games and RNGs need testing by an independent test house against RTS expectations, and each release goes through change control. Allow for lab queues, which often run for weeks. Keep the RNG evidence and seed management documentation with your technical file.

In the book: Ch. 17 Random Number Generation (RNG), Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security

6.2 Annual assurance and internal audit RECOMMENDED

Licensees must complete a periodic security audit and keep their technical documentation current. Map controls to the GLI-19 or GSF-style frameworks to avoid redoing evidence per audit.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 24 Security and Compliance

6.3 Pre-launch compliance testing RECOMMENDED

Test self-exclusion, limits, age gates and affordability flows on every channel and game type, including live dealer. Capture evidence as you go so it can be exported on request.

In the book: Ch. 32 Testing and QA in Gambling, Ch. 25b Regulatory Reporting and Evidence Export

6.4 Disaster recovery rehearsal OPTIONAL

Documents for resilience are expected, and a rehearsal makes them credible. The book suggests an RTO under 4 hours and RPO under 1 hour as a design target, which is a book benchmark rather than a Commission rule.

In the book: Ch. 27 Data Residency and Backup/Recovery, Ch. 35 Incident Management

7. Go-live and launch controls Months 9-13

7.1 Licence issue and first annual fee RECOMMENDED

Once the licence is issued, the first annual fee is due within 30 days. Check that conditions on the licence match your plan before the first real-money bet.

In the book: Ch. 07 Casino Implementation Planning and Timeline, Ch. 36 Financial Operations

7.2 Soft launch with limits RECOMMENDED

Start with a small player cohort and tighter limits so detection rules see real data before volume arrives. Watch for gaps between your test design and real behavior.

In the book: Ch. 07 Casino Implementation Planning and Timeline, Ch. 33 Operational Playbooks

7.3 Advertising and marketing compliance RECOMMENDED

The ASA and CAP codes and Commission conditions govern ads, affiliates and bonus terms. From recent LCCP changes, mixed-product promotions are banned and wagering requirements are capped at 10x. Sources disagree on the exact start date (December 2025 or January 2026), so check the current LCCP text.

In the book: Ch. 37 Marketing Technology and CRM Systems, Ch. 06 Licensing Guide

7.4 Incident and key-event runbooks RECOMMENDED

Prepare runbooks for outages, data breaches and cash flow incidents that also name who reports to the Commission and when. Practice them once before launch.

In the book: Ch. 35 Incident Management, Ch. 35b Cash-Flow Integrity Incident Response

8. Ongoing obligations From launch

8.1 Regulatory returns and data RECOMMENDED

Licensees submit regulatory returns and respond to information requests. Build exports from the ledger and player-protection systems once and reuse them, rather than preparing each return by hand.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 34 Data and Analytics

8.2 Duty returns and statutory levy RECOMMENDED

Remote Gaming Duty is returned to HMRC under the Remote Gaming Duty rules, and operators also pay the Commission annual fee each year before the licence anniversary. The statutory levy is a separate cost; check current GOV.UK levy guidance for rates. Remote betting duty changes to 25% from 1 April 2027 if you add sports.

In the book: Ch. 36 Financial Operations, Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation

8.3 Complaints and ADR RECOMMENDED

Players must be able to complain, and unresolved disputes go to an approved alternative dispute resolution provider. Track timelines and root causes.

In the book: Ch. 33d Disputes, Chargebacks, and Player Support, Ch. 26 Responsible Gaming and Player Protection Systems

8.4 Watching rule changes RECOMMENDED

The Commission changes LCCP and RTS several times a year. Keep a change log mapped to owners, and subscribe to the Commission bulletins.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model

Common pitfalls

- Treating 16 weeks as the plan. The Commission says operating licence applications can take 6 months or more when ownership or funding is complex.
- Modeling the market on the old 21% Remote Gaming Duty. The rate has been 40% since April 2026 and it applies wherever you are based.
- Enforcing the GBP 5 and GBP 2 slot stake limits only in the front end. They must hold in the wallet and launch path, and the age band changes at 25.
- Copying a competitor's source-of-funds threshold. The UKGC sets no universal GBP trigger; yours must come from your own documented risk assessment.
- Leaving live dealer or a secondary brand outside the GAMSTOP and limits flows.
- Mixing up the financial vulnerability check (net deposits over GBP 150 in 30 days, public records) with source-of-funds enquiries.
- Missing the 30 September 2026 deposit limit changes: only gross limits may carry the name deposit limit or use fixed time frames, and they need equal prominence.
- Filing a GGY band that does not match the business plan, then discovering the fee and expectations that come with the band.

Sources

1. Gambling Commission: remote casino operating licence and fees (from 1 October 2026) https://www.gamblingcommission.gov.uk/licensees-and-businesses/licences-and-fees/remote-casino-operating-licence
2. Gambling Commission: information for licence applicants (processing times) https://www.gamblingcommission.gov.uk/contact-us/print/information-for-licence-applicants
3. Gambling Commission: online slots stake limit guidance https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/online-slots-stake-limit-guidance
4. Gambling Commission: LCCP 3.4.4 financial vulnerability check https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/condition/3-4-4-financial-vulnerability-check
5. Gambling Commission: implementation extension for new deposit limit requirements https://gamblingcommission.gov.uk/news/article/implementation-extension-for-new-deposit-limit-requirements
6. GOV.UK: gambling duty changes (Remote Gaming Duty 40%) https://www.gov.uk/government/publications/changes-to-gambling-duties/gambling-duty-changes
7. GOV.UK: government response on Gambling Commission fees from 1 October 2026 https://www.gov.uk/government/consultations/proposed-changes-to-gambling-commission-fees/outcome/government-response-to-the-propsals-for-changes-to-gambling-commission-fees-from-1-october-2026

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