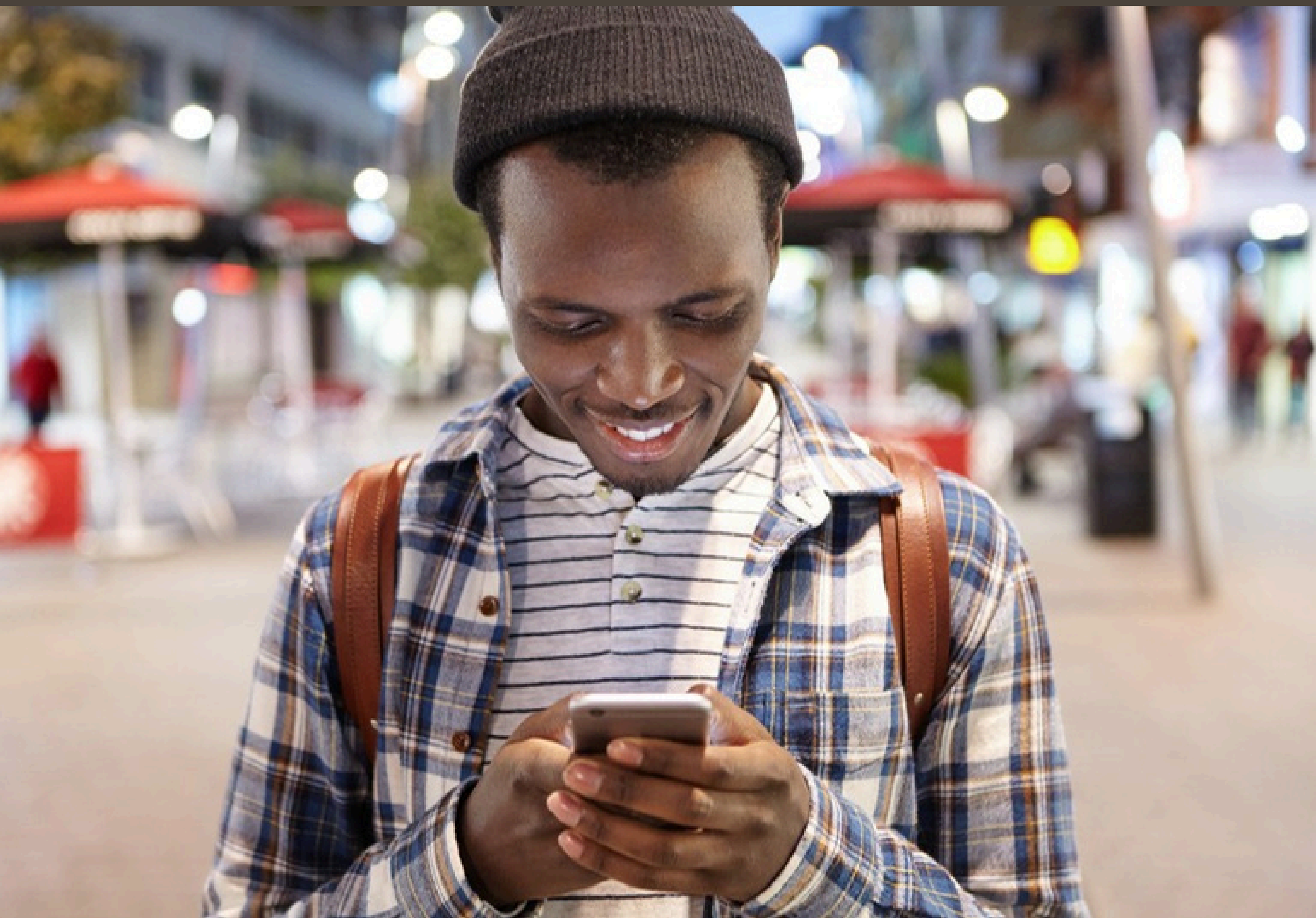
POLICY BRIEF

Closing the Gaps in Botswana's Gambling Regulation: Protecting Youth, Communities, and the Economy



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Closing the Gaps in Botswana’s Gambling Regulation: Protecting Youth, Communities, and the Economy

Executive Summary

Gambling in Botswana has transformed dramatically over the past decade. Once confined to casinos and urban betting shops, gambling is now a pervasive national phenomenon—driven by aggressive marketing, mobile technology, and economic hardship. However, Botswana’s legislative framework, primarily the Gambling Act of 2012, has not kept pace with these changes.

This brief highlights critical policy and regulatory gaps in the current Act, particularly in the areas of youth protection, advertising, financial safeguards, rehabilitation, and social monitoring. It proposes evidence-based reforms to modernize Botswana’s gambling regulation to better protect vulnerable populations, address social harms, and ensure industry accountability.

The Challenges

Rising participation:
Gambling has expanded beyond urban casinos into rural communities through mobile betting platforms, normalizing gambling among youth and low-income populations.

Youth vulnerability:
In April 2025, the Gambling Authority announced plans to lower the legal gambling age from 21 to 18 (Motsu, 2025). While intended to align with regional norms, this shift risks exposing financially dependent and unemployed youth to gambling harms before they possess the financial literacy and emotional maturity to navigate associated risks.

Advertising boom:
Aggressive, celebrity-endorsed marketing portrays gambling as aspirational and solution-oriented, masking its documented links to addiction, financial strain, and mental health issues.

Household debt:
By the end of 2023, Botswana's household debt reached P61 billion, with 69% in unsecured loans (Bank of Botswana, 2024). Gambling is increasingly used as a perceived income supplement, entrenching households in debt cycles. As Downs and Woolrych (2010, p. 313) note, "unmanageable debt may be an outcome of problem gambling and is itself a social problem of significance," leading to deprivation at household and community levels.

Social harms:
Problem gambling correlates with rising cases of financial distress, domestic conflict, and emotional instability, particularly among working-age adults, amplifying existing social vulnerabilities.

Legislative lag:
The Gambling Act of 2012 predates the digital gambling surge and lacks provisions addressing online betting, targeted advertising, and community-based rehabilitation or prevention mechanisms.

Key Legislative Gaps in the Gambling Act, 2012

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Youth Protection and Legal Age

The Act clearly prohibits minors (under 18) from entering gambling areas, using machines, or participating in gambling activities, and sets penalties for both minors and licensees who allow violations (GAMBLING ACT, 7 OF 2012).
While the age of majority is now 18, under the amended citizenship act, at 18 years old, many young people in Botswana are still financially dependent, emotionally vulnerable, and navigating the pressures of unemployment and identity. Introducing them to gambling at such a formative stage would only accelerate cycles of debt, addiction, and despair. Instead of empowering youth, it would exploit their vulnerability (Diswai, 2025).

Without parallel investments in youth financial education, addiction awareness, and consumer protection, lowering the age limit risks widening exposure to gambling-related harms at a life stage characterized by economic vulnerability and high social pressure.

Gaps identified:

- Although no explicit justification for the age limit is provided, it appears to be aligned with the legal age of majority, which is 18 years, thereby leaving it vulnerable to policy changes (e.g., proposals to lower it to 18) without strong socio-economic safeguards.

- There is no requirement for mandatory youth-focused education, financial literacy, or preventive programmes in schools or communities.

- The Act does not address digital/mobile gambling by youth, which has grown rapidly since 2012, especially in rural areas through mobile apps and betting platforms. Section 105-106 is traditional gambling advertisement, it does not seem to provide for mechanisms to curb more digital forms of advertising/ use of social media personalities.

- There are no provisions for parental controls, ID verification technologies, or penalties specific to online operators targeting underage users.

Policy Implication
Any adjustment to the legal gambling age should be guided by developmental evidence, not administrative convenience, anchored in public health, education, and consumer protection frameworks that safeguard young people’s financial and emotional wellbeing.

Advertising and Promotion Regulations

The Act contains restrictions on advertising and promoting gambling (Section 114), but these provisions are limited in scope and enforcement mechanisms. It does not explicitly prohibit celebrity endorsements, aggressive social media targeting, or misleading messaging, tactics that are increasingly prevalent.

Gaps identified:

- Absence of advertising content and placement guidelines: There are no explicit regulations governing the tone, frequency, or placement of gambling advertisements. As a result, ads often appear on platforms with high youth viewership, such as sports broadcasts and social media, normalizing gambling as part of everyday life and blurring the line between entertainment and risk behaviour.

- Lack of restrictions on celebrity endorsements and glamorization: Current law does not prohibit the use of high-profile figures; musicians, athletes, and influencers in gambling campaigns. Many of these endorsers have no authentic association with gambling, yet their involvement glamorizes it as a lifestyle of success, wealth, and status. This practice exploits youth aspiration and undermines responsible gambling messaging.

- No mandatory health or risk warnings on advertisements: Unlike tobacco and alcohol, gambling adverts are not required to carry health disclaimers about addiction risks, mental health impacts, or available support services. This omission limits public awareness of potential harms and fails to position gambling as a regulated, high-risk activity requiring informed participation.

- Weak monitoring and absence of an advertising oversight mechanism: The Gambling Authority lacks a dedicated unit or independent watchdog to monitor, evaluate, and sanction non-compliant advertising. This regulatory gap allows aggressive and misleading marketing to persist unchecked, eroding public trust and complicating enforcement.

Policy Implication

Without explicit advertising standards and enforcement mechanisms, Botswana risks fostering a high-exposure, low-protection environment, where commercial interests outweigh social safeguards, particularly for youth and low-income communities.

Financial Protections and Household Debt

The Act treats gambling debts as legally enforceable (GAMBLING ACT, 7 OF 2012), but does not address the financial vulnerability of gamblers, particularly in an economy with rising unsecured household debt. The absence of affordability checks, spending limits, or self-exclusion mechanisms means that problem gamblers can accrue unsustainable losses without intervention. Moreover, treating gambling debt as enforceable—without corresponding social protection measures—can deepen poverty cycles, fuel household conflict, and increase reliance on high-interest informal lending.

Gaps identified:

- No caps on gambling expenditures or mechanisms to limit losses for individuals.
- No creditworthiness or income assessments are conducted prior to granting betting accounts or extending credit. This gap allows participation by financially vulnerable individuals, including many Batswana reliant on social welfare, thereby increasing exposure to gambling-related debt.
- While extending credit to gamblers is prohibited (s.107), enforcement and digital loopholes (e.g. e-wallet top-ups, third-party lending) are not addressed.
- No financial counselling or debt relief provisions linked to gambling addiction.

Policy Implication

A modernized framework should align gambling regulation with consumer protection principles—introducing affordability assessments, debt relief pathways, and financial counseling provisions to prevent gambling-related over-indebtedness.

Rehabilitation and Support Systems

The Gambling Act (No. 7 of 2012) mandates the establishment of an Excessive Gambling Prevention and Rehabilitation Committee, the development of a Code of Practice, and the outsourcing of counselling and education services. It also requires that the Gambling Authority put in place mechanisms to prevent and address gambling-related harm.

Gaps Identified

- No clear funding obligations are imposed on gambling companies to sustainably finance prevention, counselling, or rehabilitation services.
- The Committee's role is primarily advisory and monitoring, not operational, meaning that real service provision depends on external NGOs and the availability of local service providers.
- There are no national rehabilitation centres or guaranteed access to support services for low-income or rural communities, leaving vulnerable groups without assistance.
- Although annual reporting to Parliament is required, there are no measurable social impact targets, sanctions for non-compliance, or public transparency mechanisms to evaluate outcomes or accountability.

Policy Implication

The absence of sustainable funding, institutional infrastructure, and measurable targets weakens Botswana's capacity to prevent and treat gambling-related harm. A modern rehabilitation framework—anchored in public health, community access, and corporate responsibility—is essential for a balanced and socially protective gambling sector.

Monitoring Social Effects vs. Modern Realities

The Gambling Act (2012) mandates monitoring of the social effects of gambling. However, its design reflects an era of brick-and-mortar casinos and limited participation, not today's highly digitalized and decentralized gambling environment. As betting rapidly migrates to mobile and online platforms, the Act's monitoring provisions have become outdated, failing to capture the full social, geographic, and gendered dimensions of harm.

Gaps Identified

- Absence of real-time reporting and data integration: Operators, especially digital and mobile betting platforms, are not required to provide real-time data on user activity, spending, or demographic profiles. This limits the Gambling Authority's capacity to detect risk trends, track problem gambling, or identify underage participation.

- Neglect of rural and remote community impacts: Monitoring frameworks remain urban-centric, overlooking how mobile betting has penetrated rural villages and informal settlements. Without community-level data, the full extent of gambling's reach and its economic or social implications in low-income areas remain invisible.

- Lack of gender-sensitive and psychosocial indicators: Despite growing evidence linking gambling-related financial stress to domestic violence, emotional distress, and relationship breakdowns, the monitoring system does not include gender-disaggregated or wellbeing-based indicators. This obscures the differentiated impact on men and women, and the compounding effects of financial and emotional harm.

- No inter-ministerial coordination mechanisms: There is no structured collaboration between the Gambling Authority and key ministries such as Education, Health, Gender, or Finance. This siloed approach prevents a holistic response, from prevention and mental health support to community rehabilitation and financial literacy interventions.

Policy Implication

Botswana needs a modern social monitoring framework—digitally integrated, gender-responsive, and coordinated across ministries—to generate real-time insights and guide early intervention before gambling harms escalate into broader social crises.

Policy Recommendations

To align Botswana's gambling regulation with the objectives of the Gaming and Gambling Policy (2000) and to address emerging digital-era challenges, this section proposes reforms grounded in the Policy's guiding principles, institutional framework, and enforcement mechanisms. These recommendations reinforce the Policy's dual commitment to economic growth and social protection by embedding harm-prevention, accountability, and evidence-based governance within the national regulatory system.

1. Youth Protection and Digital Safeguards

Botswana's Gaming and Gambling Policy underscores the importance of social responsibility and prevention of excessive gambling (Clauses 6.1(d) and 7.1(g–h)). However, it lacks concrete mechanisms for protecting youth in the modern, digital environment. To safeguard young people, who remain financially and emotionally vulnerable, the legal gambling age should remain at 21. This threshold must be supported by digital age-verification systems, parental control tools, and penalties for online operators who target underage users. These measures should be embedded within operational standards and surveillance powers (Clauses 9.16–9.18, 9.26–9.28). Additionally, youth financial literacy and addiction awareness programs should be institutionalized through the training and localisation Committee (Clauses 9.34–9.35) to ensure prevention and education are delivered nationwide, particularly through schools and community centers.

2. Responsible Advertising and Public Awareness

The Policy prohibits gambling advertisements near schools and places of worship and mandates public warnings about gambling harms (Clauses 9.37–9.38). However, the rise of celebrity endorsements, influencer campaigns, and social media advertising has outpaced these provisions. To address this, the Gambling Authority should establish explicit advertising content and placement standards covering digital media and sports sponsorships. All advertisements must carry health warnings, and celebrity or influencer endorsements targeting audiences under 21 should be prohibited. A dedicated Advertising Oversight Unit within the Authority should monitor compliance, while public education campaigns promote awareness of gambling risks.

Policy Recommendations

3. Financial Integrity and Consumer Protection

Clauses 9.26 and 9.28 of the Policy mandate surveillance and transaction reporting but do not include proactive consumer safeguards. To prevent debt-driven harm, the Gambling Act should incorporate affordability checks, spending caps, and self-exclusion mechanisms as licence conditions under Clauses 9.16–9.18. Licensed operators must verify that gambling funds come from disposable income, not loans or social benefits. Additionally, financial counselling and debt-relief referrals should form part of responsible gambling requirements. These measures operationalize the Policy’s intent (Clause 7.1(g)) while linking enforcement with data intelligence (Clause 8.1(f)).

4. Rehabilitation and Community Support Systems

Although the Policy creates a General Fund (Clause 9.32) and a Rehabilitation Committee (Clauses 9.39–9.41), funding mechanisms remain inadequate. A ring-fenced Social Impact Levy; a fixed percentage of operators’ gross profits, should be paid into the General Fund to support rehabilitation centers, counselling services, and financial education. The Rehabilitation Committee should oversee allocation and track outcomes using indicators such as relapse rates and service accessibility. Annual reports to Parliament will strengthen transparency and accountability.

5. Technological and Data Governance

The Policy currently regulates physical gaming machines (Clauses 9.22–9.25) but does not address digital platforms or online betting systems. The definition of 'machines and equipment' should be expanded to include software, digital applications, and algorithms. All platforms should undergo certification through the Botswana Bureau of Standards to ensure compliance with data privacy, transaction integrity, and fairness. Operators should also provide real-time data reporting to the Gambling Authority to detect risks and underage participation.

Policy Recommendations

6. Institutional Coordination and Social Monitoring

Effective regulation requires coordination between the Gambling Authority and ministries such as Health, Education, Gender, and Finance. Inter-ministerial collaboration under Clause 9.42 should institutionalize a holistic response to gambling's social impacts. Monitoring systems must include real-time data from operators, rural and gender-sensitive indicators, and psychosocial metrics. This modernized framework will enable early interventions and ensure that gambling's broader economic and social effects are continuously tracked.

7. Transparency, Policy Review, and Accountability

Clauses 8.1(c–g) call for regular monitoring and evaluation of the Policy.
To strengthen transparency, all licensed operators should submit quarterly data feeds to the Gambling Authority, and annual public reports should summarize social and gender impacts. These reports must feed into the five-year policy review cycle (Clause 8.1(g)), ensuring adaptive governance. A National Consumer Redress Framework, based on Clause 9.33, should also standardize complaints handling and public reporting.

Conclusion

Modernizing Botswana's gambling regulation is not merely a fiscal reform but a social and developmental necessity. Integrating digital safeguards, responsible marketing, and sustainable funding will align the industry with public welfare priorities. Anchored in the Gaming and Gambling Policy (2000) and supported by evidence-based governance, these reforms can position Botswana as a regional model for responsible, inclusive, and transparent gambling regulation (Republic of Botswana, 2000; Diswai, 2025).

References

References:

Diswai, K. L. (2025, October 3). Gambling: a growing crisis disguised as entertainment . Botswana Guardian. Retrieved October 28, 2025, from https://www.pressreader.com/botswana/botswana-guardian/20251003/281565181946279?srsltid=AfmBOopy8d2K_ojz0mo3jNMJv0mojZn7YBnqMN_tTmYPbLWY0DKpJZqG.

Downs, C., & Woolrychb, R. (2010). Gambling and debt: the hidden impacts on family and work life. Community, Work & Family, 13(3). https://doi.org/ DOI: 10.1080/13668803.2010.488096

Motsu, D. (2025, April 25). Botswana to lower legal gambling age from 21 to 18. Gabz Fm. https://www.gabzfm.com/post/botswana-to-lower-legal-gambling-age-from-21-to-18

Republic of Botswana. (2000). Gaming and Gambling Policy. Ministry of Trade, Industry, Wildlife and Tourism.

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