



Hellenic Republic  
**National Commission  
for Bioethics & Technoethics**

## RECOMMENDATION

**"On protecting adolescents from exposure to gambling"**



**February 2026**

**NATIONAL COMMISSION FOR BIOETHICS & TECHNOETHICS**  
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## Introduction

The widespread popularity of gambling in recent years, with the development of digital applications on the internet, constitutes an international phenomenon. This finding is linked to growing business interest in investing in such applications, as this is a highly profitable sector, which is also of interest to the state due to the significant tax revenues it generates. Alongside legal gambling applications, the possibilities offered by the internet have also encouraged an illegal gambling market, which operates with virtually no controls and is often linked to organized criminal practices.

In this environment, the pursuit of easy wealth by offering "opportunities" to those who feel the need for it, is remarkably facilitated. In particular, this ensures easy access to gambling for broader segments of the population, which are unable to satisfy this need in designated venues such as casinos or clubs, either due to limited financial resources or for other reasons (lack of time, family or professional obligations, etc.). In practice, anyone can now participate in any form of betting from anywhere, via their personal computer or mobile phone, regardless of where the relevant service provider is located, in their own country or elsewhere, on legal or illegal platforms. This applies not only to interested adults, but also to minors who have some relevant information from their own social circle.

It should be emphasized here that adolescents are currently the age group most familiar with digital communication, mainly due to the significant development of all kinds of online shared gaming platforms, but also because of the usual way they interact with their peers on a daily basis. Given this, attracting adolescents to betting activities or gambling in general is much easier than attracting adult internet users, since the participation of adolescents is no different in experience from participation in common digital games (gaming). At the same time, the high intensity and frequency of advertising for betting and gambling platforms during sports broadcasts on television and the internet, in sports venues (fields and stadiums), during athletes' appearances, but also in the form of sponsorship of athletes and teams or corporate social responsibility actions, leads to an association and correlation between professional sports and betting.

National Commission for Bioethics and Technoethics (NCBT) considers that this objective facilitation of adolescents' access to betting or gambling of any kind raises issues within its remit, both from a technoethical and a bioethical perspective.

On this issue, NCBT organized hearings of competent bodies, in which the following participated: From National Council for Radio and Television (NCRTV), Dr. Georgios Anagnostaras (Special Scientist, Lawyer). From Hellenic Gaming Commission (HGC), Mr. Dimitrios Papadopoulos (Head of the Directorate for Operational and Staff Support Functions) and Mr. Antonios Vourakis (Associate to the President). From

National Organization for Preventing and Combating Addiction (EOPAE), Ms. Stella Christidi (Psychiatrist, Director of Physical Detoxification and Addiction Treatment Programs), Mr. Dimitris Papadimitriou (Sociologist, Deputy Director of Adult Therapeutic Programs for Physical Detoxification and Addiction Treatment) and Ms. Efi Georgouloupoulou (Psychologist, Deputy Director of Prevention and Awareness).

### **A. The ethical dimension**

It should be noted from the outset that Greek legislation strictly prohibits access to gambling applications to minor users (and even to adults under 21 years of age). However, the legislative ban does not constitute a reliable deterrent, as there are technological methods to bypass user identity verification, which undoubtedly poses a techno-ethical problem.

From a bioethical point of view, NCBT highlights the problem of gambling addiction as a phenomenon that presents specific clinical symptoms and is already being addressed internationally (and in our country) as a public health problem (similar to an addiction to alcohol, tobacco, or drugs)<sup>1</sup>. This specific problem has already taken on significant proportions in our country, since according to official information from the National Organization for Preventing and Combating Addiction (EOPAE)<sup>2</sup>: *"Between 2022 and 2025, the number of young adults aged 18 to 25 who have sought help for gambling disorder has almost quadrupled. These young adults began gambling during childhood and adolescence."* In addition, EOPAE points out that *"Greece is among the countries in Europe with the highest rates of gambling and excessive gambling among 16-year-olds."*

From every side, therefore, a broader issue arises concerning restrictions not only on the use of specific applications, but also on information about them, even when they are legal applications. The issue of adolescent participation here concerns information that may lead to the manipulation of a will that is sensitive in terms of maturity. This information is disseminated through application advertising, especially on social networks popular with younger age groups, and regardless of whether the law prohibits access to gambling for those age groups.

Without a doubt, freedom of information is a prerequisite for the development of adolescents' maturity and, ultimately, their personal autonomy. In this light, an arbitrary restriction of information may conceal a paternalistic mindset. However, the

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<sup>1</sup> According to EOPAE: *"Underage gamblers often exhibit psychiatric comorbidity and difficulties in school performance, low socioeconomic status, high impulsivity, difficult family relationships, parallel risk behaviors such as substance use (smoking, alcohol, narcotics) and violence."*

<sup>2</sup> Additional information from the hearing of EOPAE representatives, submitted in writing to the NCBT.

principle of personal autonomy does not mean that the promotion by the provider of a product or service that carries proven risks of addiction or dependence can be equated with the promotion of products or services without similar risks. This is because, insofar as these risks are linked to public health, it is morally imperative to provide for preventive measures, as the protection of public health constitutes an imperative arising from respect for human dignity. This is especially true in cases where exposure to such risks cannot be prevented by consumer information mechanisms, when the maturity of the formation of free will on the part of the consumer is not a given.

The state, as the guarantor of public health, is responsible for regulating the public promotion of digital gambling services in this specific context through appropriate measures. Without assuming the paternalistic role of a "health inspector," it must ensure a balance between legitimate business activity (including advertising) and the need to protect those who are vulnerable in terms of maturity.

It should also be emphasized that, from an ethical point of view, it is improper for the state to treat the "market" for digital gambling services as an investment sector that promises increased tax revenues, like any other investment. For, however much the revenue from the taxation of all kinds of economic activities contributes to serving the public interest, they should not serve as a pretext for circumventing regulatory standards based on fundamental principles, such as respect for human dignity and the protection of public health.

## **B. The legal dimension**

The above guidelines are framed by a set of legal rules that must be taken into account here.

The EU has not established a single regulatory framework for gambling. The regulation of the matter (licensing, taxation, consumer protection rules, and advertising restrictions) is primarily the responsibility of each member state, taking into account, of course, the rules of EU primary law (free movement of services, freedom of establishment, consumer protection) and the case law of the Court of Justice of the European Union. However, a European Commission Recommendation (2014) has set out guidelines for member states on the protection of minors, which include, in particular, guidelines prohibiting the use of applications, as well as restrictions on advertising, related to physical or digital areas frequently accessed by minors. This Recommendation does not constitute binding law for the member states, but it expresses fundamental ethical and political choices that cannot be ignored by the national legislator. In the same spirit, the more general Commission Communication (2025) on the implementation of measures to protect minors on the

internet (which specifies Regulation 2022/2065) includes specific references to the verification of a minor's age, as well as to unfair advertising, in order to prevent exposure to risks associated with access to gambling.

In terms of fundamental rights, both the economic freedom of gambling service providers and the protection of public health (in particular in combination with child protection) are constitutionally guaranteed, supported by international binding texts such as the European Convention on Human Rights and the Charter of Fundamental Rights of the EU. However, economic freedom is subject to compliance with the Constitution (Article 5(1) of the Constitution), that is, it is satisfied to the extent that it does not threaten the application of other constitutional provisions. On the contrary, the protection of public health and the protection of childhood are unconditional (Article 21 of the Constitution). This means that these two constitutional values take precedence over economic freedom or, in other words, that economic freedom is overridden when it comes to public health issues in childhood, such as the risk of addiction among adolescents.

From the point of view of consumer information, the provision of Article 15 of the Constitution, which regulates the conditions for the operation of radio and television, is crucial, designating National Council for Radio and Television (NCRTV) as the competent body for its control. "Quality" is a constitutional criterion for the control of radio and television, and in this sense, the state - through NCRTV - is required to regulate the advertising of specific activities, but also to provide objective information to the public with a view to protecting values such as public health and childhood. The aim of the necessary measures to be adopted in this regard is to prevent the constant exposure of adolescents as a category of viewers or listeners to advertising for these activities.

Similarly, the control of the promotion of online gambling applications is, by law, the responsibility of both National Council for Radio and Television (NCRTV) and Hellenic Gaming Commission (HGC), while the law enforcement authorities of Hellenic Police also have jurisdiction for illegal applications.

### **C. Proposals**

Based on the above, NCBT considers that the state must take targeted measures to protect adolescents from exposure to gambling in general, beyond the control of the illegal gambling market, for which a legislative initiative has already been announced.

The aim should be to halt the alarming increase in addiction cases observed in recent years due to the rapid growth of this particular "market." Specifically, the following measures should be taken:

- Regulate by law the advertising permitted on radio and television stations, especially during periods of high audience viewership or listenership (e.g., during the broadcast of sports events or programs). The responsibility for establishing relevant provisions lies with General Secretariat for Communication and Information, and the responsibility for their implementation lies with National Council for Radio and Television (NCRTV).
- On the initiative of Hellenic Gaming Commission (HGC) and in cooperation with companies in the sector, a corresponding provision should be added to the Advertising and Communication Code within the framework of self-regulation of the specific market.
- Conditions should be set regarding the frequency and content of online advertising. In this case, too, responsibility for establishing the relevant provisions lies with General Secretariat for Communication and Information, and responsibility for their implementation lies with National Council for Radio and Television (NCRTV).
- The Ministry of Education, Religious Affairs and Sports should take the initiative to inform adolescents, within the framework of education, about the dangers of addiction. This initiative should be combined with the already planned collaboration between Hellenic Gaming Commission and National Organization for Preventing and Combating Addiction for the prevention of addiction.
- User authentication should make use of the Gov Wallet infrastructure, in which citizens' identities are stored in a secure and interoperable manner (as is already planned for the connection of minors to social media platforms). This prevents minors from accessing betting platforms in cases where they attempt to bypass the current verification procedures and gain access using anonymous prepaid cards. The proposal is in line with the recent NCBT Declaration *"on protecting children from the adverse impact social media of algorithms"*. A relevant initiative should be undertaken by the Ministry of Digital Governance in cooperation with Hellenic Gaming Commission.

In the same context, the Ministry of Economy and Finance should introduce measures to restrict the use of prepaid debit cards, which are currently the most widely used means of transactions among younger people.

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