BEHAVIOURAL REALLOCATION AFTER THE ONLINE GAMING BAN

A Multi-State Survey-Based Analysis

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Behavioural Reallocation after the Online Gaming Ban: *A Multi-State Survey-Based Analysis*

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Executive Summary

This consolidated report examines behavioural responses following the nationwide prohibition of domestic online real-money gaming (RMG) under the Promotion and Regulation of Online Gaming (PROG) Act, 2025. The analysis draws on harmonised survey data from 3,000 respondents across three regions—Delhi NCR, Tamil Nadu, and Maharashtra—each of whom had participated in online money-based gaming prior to the implementation of the ban. Using a pre- and post-restriction analytical framework, the study explores how users adjusted their behaviour when regulated domestic platforms were withdrawn but offshore alternatives remained digitally accessible. The objective is not to evaluate the normative merits of the policy intervention but to document observable behavioural adjustments within the surveyed population and to examine whether money-based gaming participation declined, ceased, or reallocated following the ban.

The consolidated evidence suggests that the prohibition has been associated with a significant behavioural reallocation toward offshore platforms rather than a widespread cessation of participation in money-based gaming. Across the combined sample, offshore platform usage increased from 67.6 percent prior to the ban to 85.6 percent in the post-ban period, representing an increase of approximately 18 percentage points. In absolute terms, 539 additional respondents reported offshore usage after the ban compared with the pre-ban period. While this aggregated pattern masks regional variations, the directional trend is consistent across all three surveyed states. Delhi NCR recorded an increase from 68.3 percent to 82.0 percent offshore usage, Tamil Nadu from 67.8 percent to 83.0 percent, and Maharashtra from 66.7 percent to 91.7 percent. The magnitude of change varies across regions, with Maharashtra showing a sharper shift relative to the other two states, suggesting that regional demographic composition and user characteristics may influence the scale of behavioural migration.

Importantly, the evidence indicates substitution and consolidation rather than the emergence of entirely new behavioural patterns. Prior to the ban, offshore platforms were already present within the gaming ecosystem but typically played a secondary role relative to regulated domestic RMG platforms, which absorbed most higher-intensity participation in terms of financial expenditure and time commitment. Following the withdrawal of domestic options, both financial and temporal engagement appear to have been redirected toward offshore platforms. Indicators of engagement intensity—including daily participation, longer gaming sessions, and higher expenditure brackets—are now more visible within offshore usage patterns across states. These findings suggest that the underlying behavioural drivers of participation remained largely intact, while the jurisdictional location of activity shifted from

domestically regulated environments to offshore platforms operating beyond direct regulatory oversight.

The analysis also highlights that participation patterns in money-based gaming were already socio-economically structured prior to the ban. Higher spending tiers were predominantly concentrated among middle- and higher-income households, particularly those earning ₹1,00,000 or more per month, while lower-income households were generally concentrated in lower spending brackets. Age patterns also followed a structured gradient, with core working-age cohorts—especially those between 25 and 44 years—accounting for a large share of higher-value spending categories. Post-ban offshore engagement broadly reflects similar structural patterns, with higher spending tiers continuing to be dominated by respondents with greater financial capacity. However, the presence of younger users and some lower-income respondents across offshore participation brackets suggests that the migration toward offshore platforms is not confined to traditionally higher-spending segments. These patterns highlight the need for careful monitoring of potential risks among financially vulnerable or younger users who may have fewer safeguards when interacting with offshore platforms.

The findings carry important implications for consumer protection and regulatory policy. Offshore platforms operate outside India's domestic legal and regulatory framework, which means that users interacting with such platforms may have limited access to grievance redress mechanisms, consumer safeguards, or transparent financial monitoring. This raises concerns particularly for vulnerable users, including younger individuals or households with limited financial resilience, who may be exposed to greater risks in environments where safety features, dispute-resolution processes, and regulatory oversight are absent or weak. In addition, offshore ecosystems often rely on rapidly evolving digital infrastructure—including mirror domains, messaging networks, and alternative payment pathways—which can complicate enforcement and monitoring efforts. These dynamics underline the importance of considering not only regulatory compliance but also broader consumer protection, financial transparency, and harm-reduction mechanisms in policy design.

The evidence from this multi-state analysis suggests that regulatory interventions in digitally open markets can reshape where activities occur without necessarily eliminating the underlying demand. In such contexts, policy responses may benefit from a balanced and evidence-based approach that combines regulatory oversight, enforcement capacity, and consumer protection safeguards within a coherent domestic framework. Strengthening responsible gaming measures—including identity verification, transparent loss visibility, self-exclusion mechanisms, and support services such as counselling or de-addiction resources—can help mitigate potential harms. At the same time, regulatory strategies may need to consider how platforms serving Indian users can be brought within a clear domestic oversight framework so

that operators engaging with Indian consumers are subject to consistent accountability standards, data protection obligations, and consumer-protection requirements.

So, the central takeaway of the analysis is pragmatic. The PROG Act appears to have reshaped the location of money-based gaming activity rather than eliminating participation altogether. As a result, regulatory, social, and economic considerations must be addressed together through a human-centred policy approach that balances consumer protection, responsible gaming safeguards, and effective enforcement. Future policy development may therefore benefit from broader stakeholder consultations, continued empirical research on behavioural patterns, and the design of a holistic regulatory strategy that seeks to reduce real-world harms while maintaining enforceability within a technologically fluid environment.

1 Introduction

The Promotion and Regulation of Online Gaming Act, 2025 (PROG Act) introduced a nationwide prohibition on online real-money gaming (RMG) in India[1] with the stated objective of addressing concerns related to financial harm, addiction, fraud, and broader social risks[2]. While the regulatory intent was to curtail money-based gaming activity within the domestic ecosystem, an important policy question arises, how do users behaviourally respond when regulated domestic options are withdrawn but offshore alternatives remain digitally accessible?

Across digital markets globally, regulatory interventions that restrict or prohibit specific forms of online activity have often produced behavioural adjustments rather than complete cessation[3]. Users may discontinue participation, reduce intensity, or substitute toward alternative channels including platforms operating outside domestic regulatory jurisdiction. Experience from other policy domains also suggests that prohibitive regulatory approaches, when introduced without considering parallel regulatory alternatives or strengthened enforcement capacity, can generate unintended behavioural responses. Historical evidence from sectors such as alcohol prohibition, which has often coincided with the expansion of illicit or unregulated markets, provides a relevant parallel[4]. Early signals from the online gaming ecosystem suggest that similar dynamics may be unfolding following the nationwide ban on domestic real-money gaming. In particular, users appear to be engaging with offshore betting and gambling platforms, many of which were already accessible prior to the ban, with greater frequency and reliance in the post-ban environment. These platforms operate outside India's legal and regulatory framework[5], raising important questions around consumer protection, financial exposure, grievance-redress mechanisms, and the use of opaque or hard-to-monitor payment pathways associated with offshore gambling activity. In such contexts, understanding behavioural reallocation becomes central to assessing both regulatory effectiveness and downstream consumer-protection implications.

CUTS International[6] initiated a phased, survey-based assessment to examine post-ban gaming behaviour across Indian states. The first phase analysed responses from 1,000 former RMG

[1] https://www.meity.gov.in/static/uploads/2025/10/8a7f103cefc68ed8aaa2ebc9a2ed7c13.pdf
[2] https://static.pib.gov.in/WriteReadData/specificdocs/documents/2025/aug/doc2025821618101.pdf
[3] Ganesh, A. (2025). Effective remedies in digital market abuse of dominance cases. European Competition Journal, 21(2), 371–420. https://doi.org/10.1080/17441056.2024.2440222
[4] Luca, D.L., Owens, E. & Sharma, G. The effectiveness and effects of alcohol regulation: evidence from India. *IZA J Develop Migration* 9, 4 (2019). https://doi.org/10.1186/s40176-018-0139-1
[5] https://www.business-standard.com/industry/news/india-s-online-gaming-ban-may-fuel-offshore-betting-money-laundering-125082200197_1.html
[6] https://cuts-international.org/

users in Delhi NCR, with the survey conducted in November 2025[7]. The second phase extended the analysis to Tamil Nadu, a state with its own prior regulatory experience in online gaming, with data collected in December 2025[8]. The third phase examined Maharashtra, a digitally large and economically significant state without a pre-existing state-level prohibition before the PROG Act; the survey in this state was conducted in January 2026[9].

Each state report applied an identical survey instrument and methodological design, engaging 1,000 adult respondents (18+) who had participated in online money-based gaming prior to 1 September 2025. This consistent pre–post analytical framework enables systematic cross-state comparison of behavioural patterns following the implementation of the nationwide ban.

This consolidated report integrates findings from three state-level assessments conducted in Delhi NCR, Tamil Nadu, and Maharashtra to provide a comparative, multi-state analysis of post-ban behavioural reallocation. The individual state reports are available in the public domain, Delhi NCR[10], Tamil Nadu[11], and Maharashtra[12]. Building on these assessments, the present report synthesises the combined dataset of 3,000 respondents to examine broader behavioural patterns following the prohibition of domestic real-money gaming under the PROG Act. Rather than reiterating state-level findings, the analysis seeks to identify common trends as well as state-specific nuances in how users adjusted their gaming behaviour. Importantly, the objective of this analysis is not to attribute causality or evaluate normative policy choices. Instead, it aims to document observable behavioural adjustments within the surveyed population and assess whether money-based gaming activity appears to decline, discontinue, or reallocate following the prohibition of domestic real-money gaming.

By situating three large and socio-economically distinct regions North (Delhi NCR), South (Tamil Nadu), and West (Maharashtra) within a unified analytical framework, this report contributes to evidence-based policy discussions on online gaming regulation, enforcement design, and consumer-protection considerations in digitally open markets.

[7] https://cuts-ccier.org/pdf/research-report-access-to-offshore-betting-websites-after-the-online-gaming-ban.pdf
[8] https://cuts-ccier.org/pdf/research-report-access-to-offshore-betting-websites-after-the-online-gaming-ban-tamil-nadu.pdf
[9] https://cuts-ccier.org/pdf/research-report-access-to-offshore-betting-websites-after-the-online-gaming-ban-maharashtra.pdf
[10] https://cuts-ccier.org/pdf/research-report-access-to-offshore-betting-websites-after-the-online-gaming-ban.pdf
[11] https://cuts-ccier.org/pdf/research-report-access-to-offshore-betting-websites-after-the-online-gaming-ban-tamil-nadu.pdf
[12] https://cuts-ccier.org/pdf/research-report-access-to-offshore-betting-websites-after-the-online-gaming-ban-maharashtra.pdf

2 Evolving Regulatory and Market Landscape in the Post-Ban Environment

The behavioural shifts documented in this consolidated report are unfolding alongside a rapidly evolving regulatory and market environment. Since the enactment of the PROG Act, developments across enforcement actions, judicial proceedings, and industry responses indicate that the post-ban ecosystem remains in flux[13]. This contextual backdrop is important for interpreting state-level behavioural evidence, particularly where domestic restrictions coexist with continued digital access to offshore platforms.

2.1 Enforcement Actions and the Limits of Digital Blocking

Recent months have seen intensified enforcement measures aimed at restricting access to illegal betting and gambling websites. Public reporting indicates that the Government has blocked hundreds of such sites in additional rounds of action, taking the cumulative number of blocked links to over 7,800[14] [15] [16]. Enforcement actions have also extended beyond website blocking. For instance, investigative authorities have uncovered large offshore betting syndicates operating through complex financial and digital networks. A recent case reported the arrest of an alleged mastermind associated with an online gaming and betting network involving transactions estimated at over ₹13,000 crore[17], highlighting the scale and sophistication of offshore betting operations in the country.

At the same time, these developments also underscore a structural enforcement challenge typical of digitally distributed offshore services, where mirror domains, rapidly changing URLs, and alternative access channels can limit the effectiveness of blocking as a standalone mechanism. In parallel with central enforcement efforts, several states have also introduced regulatory and institutional interventions to address online gaming-related concerns. For example, Tamil Nadu established the Tamil Nadu Online Gaming Authority to regulate online gaming activities and frame rules governing the sector[18]. Such state-level initiatives reflect growing policy attention to the governance of online gaming, although enforcement

[13] https://sigma.world/news/india-hears-challenge-to-rmg-ban-industry-in-flux
[14] https://www.medianama.com/2026/01/223-india-blocks-242-gambling-sites-total-above-7800
[15] https://economictimes.indiatimes.com/news/india/govt-blocks-access-for-242-betting-gambling-sites/articleshow/126587799.cms
[16] https://www.ndtv.com/india-news/centre-blocks-242-illegal-betting-gambling-website-links-10765598
[17] https://www.ibtimes.co.in/online-gaming-syndicate-busted-hyderabad-gst-sleuths-arrest-alleged-mastermind-rs-13000-crore-898420
[18] https://www.tnonlinegamingauthority.tn.gov.in/Acts_rules.aspx

complexities remain significant in digitally open markets where offshore platforms can rapidly adapt to regulatory restrictions.

2.2 Judicial Scrutiny and Regulatory Uncertainty

Parallel to enforcement actions, the PROG Act has also been subject to constitutional and legal challenge. Reports indicate that the Supreme Court is hearing petitions filed by online gaming operators and industry bodies, with commentary suggesting that the matter may require consideration by a larger bench, reflecting the complexity and significance of the issues involved[19] [20]. At the same time, the regulatory framework continues to evolve. The Ministry of Electronics and Information Technology (MeitY) issued draft rules under the online gaming law for public consultation, inviting stakeholder feedback on the proposed regulatory framework[21]. These developments indicate that the institutional and regulatory architecture surrounding online gaming remains in a transitional phase. Related reporting has also pointed to continuing uncertainty in the broader regulatory environment, including issues around implementation timelines and the status of associated rules, contributing to an unsettled operating context for stakeholders.

2.3 Industry Realignment and Governance Initiatives

In response to the evolving policy environment, industry actors appear to be reorganising governance and policy engagement strategies. For instance, recent reporting notes that the Game Developers Association of India (GDAI) has constituted a governing council with a stated focus on operational governance and policy advocacy[22] [23]. Separately, industry representatives have also continued to flag offshore betting as a growing concern in the post-ban environment, particularly in the context of regulatory asymmetries and consumer-protection risks associated with platforms operating outside domestic oversight[24].

At the same time, industry stakeholders have raised concerns about potential unintended consequences of the prohibition, including the possibility that restrictions on domestic platforms may inadvertently push users toward offshore betting operators that operate beyond Indian regulatory jurisdiction. Commentators and industry bodies have also pointed to potential economic implications, including loss of investment, employment, and tax revenues within the

[19] https://sigma.world/news/india-hears-challenge-to-rmg-ban-industry-in-flux
[20] https://www.exchange4media.com/digital-news/sc-moves-online-gaming-sector-case-to-three-judge-bench-150149.html
[21] https://www.moneycontrol.com/news/business/meity-releases-draft-rules-for-online-gaming-law-seeks-feedback-till-october-31-13594517.html
[22] https://www.business-standard.com/industry/news/https-www-business-standard-com-industry-news-industry-gaming-body-sets-up-council-for-operational-governance-policy-advocacy-126020900512-126020901378_1.html
[23] https://cxotoday.com/media-coverage/gdai-formalizes-industry-governance-announces-its-21-member-governing-council
[24] https://www.financialexpress.com/business/news/gaming-industry-flags-offshore-betting-threatnbsp/4108688

regulated domestic gaming ecosystem. These developments indicate that the industry landscape is undergoing a period of adjustment, with actors simultaneously responding to regulatory changes, attempting to strengthen governance mechanisms, and engaging in policy discussions on the future structure of India's online gaming regulation.

2.4 Market Adaptation and Shifts in Product Strategy

Alongside enforcement and institutional responses, parts of the broader gaming ecosystem appear to be adapting by repositioning products toward non-monetary or entertainment-led engagement models. Recent reporting in the cricket gaming segment, for example, points to a shift toward "thrill" and experience-driven formats rather than money-based participation, suggesting that at least some segments are experimenting with alternative pathways to retain user engagement under a restricted real-money environment[25].

2.5 Implications for Interpreting Behavioural Evidence

These developments suggest that the post-ban environment is characterised by simultaneous enforcement escalation, judicial scrutiny, industry governance responses, and evolving market strategies. The behavioural reallocation patterns documented in subsequent sections of this report should be interpreted within this broader landscape, user-level shifts toward offshore platforms are occurring in a context where domestic options remain constrained, enforcement tools are being actively deployed, and legal and market structures continue to adjust[26].

In this context, some commentators and industry stakeholders have raised concerns about potential unintended consequences of prohibition-led approaches, including the possibility that restrictions on regulated domestic platforms may inadvertently redirect users toward offshore operators that fall outside India's regulatory and consumer protection frameworks. These debates have also prompted calls for a more holistic and balanced regulatory strategy that combines consumer protection, responsible gaming safeguards, and effective enforcement mechanisms within a coherent domestic regulatory architecture[27].

[25] https://economictimes.indiatimes.com/industry/media/entertainment/cricket-gaming-finds-its-new-groove-as-fans-now-chase-thrills-not-money/articleshow/128221704.cms
[26] https://sigma.world/news/india-hears-challenge-to-rmg-ban-industry-in-flux
[27] https://usindiataxforum.org/wp-content/uploads/2020/11/Global-Regulation-Report_Web-View.pdf

3 Analytical Framework and Study Design

3.1 Regulatory and Behavioural Context

This consolidated report builds on a phased, state-wise assessment of post-ban behavioural responses following the implementation of the PROG Act. The Act, which came into force on 1 October 2025, introduced a nationwide prohibition on online real-money gaming (RMG) in India.

The analytical framework is structured around a pre–post comparison design to assess how former RMG users adjusted their gaming behaviour after domestic monetary gaming platforms ceased operations. While the formal enforcement date of the PROG Act was 1 October 2025, pilot testing across states indicated that most major platforms began disabling monetary transactions from 1 September 2025 in anticipation of enforcement. Accordingly, 1 September 2025 was adopted as the operational cut-off date to distinguish between pre-ban transactional behaviour and the post-restriction environment.

The framework focuses on identifying whether post-ban participation declined, discontinued, or reallocated toward offshore and unregulated platforms operating outside India's legal jurisdiction.

3.2Quantitative Survey Design and Sampling Strategy

The consolidated dataset draws upon three independent but methodologically identical state-level surveys conducted in Delhi NCR, Tamil Nadu and Maharashtra. Each state survey engaged 1,000 adult respondents (18+) who had participated in online money-based gaming prior to 1 September 2025, resulting in a total consolidated sample of 3,000 respondents.

To reach this niche cohort of pre-ban RMG users, a non-probability sampling strategy was employed, combining purposive sampling, snowball referrals and a pre-existing verified respondent database developed through earlier research on online gamers[28].

Respondents were eligible if they had played online money-based games at least once prior to the operational cut-off date. The survey instrument remained identical across states to enable cross-state comparison. The questionnaire captured information across offshore platform usage (pre- and post-ban); spending patterns and expenditure distribution; frequency of play and session intensity; average duration of gaming sessions; payment pathways and perceived

[28] https://cuts-ccier.org/pdf/policy-report-fixing-the-odds-a-policy-blueprint-for-curbing-illegal-online-gambling-in-india.pdf

transactional ease; access routes to offshore platforms and reported drivers of continued offshore engagement. The pre–post paired design allowed for behavioural transition mapping and statistical testing (including McNemar tests[29]) to assess directional shifts in offshore participation.

3.3 Consolidation and Comparative Analytical Approach

The three state datasets were consolidated using a harmonised analytical structure to enable cross-state comparison of net behavioural shifts, relative increases in offshore participation, changes in spending distribution and shifts in intensity indicators (frequency, duration, sessions per day).

The consolidated analysis does not pool the data to produce a national estimate. Rather, it compares state-level patterns side-by-side to assess consistency, divergence, and structural similarities in behavioural reallocation across regions.

This approach preserves the contextual distinctiveness of each state while enabling broader policy-relevant inference regarding post-ban behavioural trends.

3.4 Qualitative Component and Thematic Analysis

In addition to the quantitative survey, a qualitative component was incorporated to deepen understanding of behavioural motivations and user-level experiences in the post-ban environment. A total of 30 semi-structured qualitative interviews were conducted, comprising 10 respondents from Delhi NCR, 10 respondents from Tamil Nadu, and 10 respondents from Maharashtra. Participants were selected from among survey respondents who indicated continued offshore engagement in the post-ban period and consented to follow-up interaction. Participation in the interviews was voluntary, and respondents were informed about the purpose of the study. All responses were anonymised, and personally identifiable information was not collected or retained. The data were used solely for research purposes and analysed in aggregated form to ensure confidentiality and privacy of the participants.

Interviews were transcribed and analysed using thematic analysis. An inductive coding approach[30] was applied to identify recurring behavioural patterns, decision-making rationales, and perceived structural drivers of offshore engagement.

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[29] *McNemar's test is a non-parametric statistical test used on paired, nominal (categorical) data to determine if there are significant differences between row and column marginal frequencies in a contingency table. It is commonly used for pre-test/post-test studies (before-and-after) or matched-pair designs, testing whether the proportions of discordant pairs are equal (null hypothesis).* https://www.statisticssolutions.com/free-resources/directory-of-statistical-analyses/mcnemars-test/

[30] Interviews were transcribed and analysed using thematic analysis to identify recurring patterns in respondents' experiences and motivations regarding offshore platform usage after the ban. An inductive coding approach was

The qualitative insights are not intended to be statistically generalisable but serve to contextualise and interpret the quantitative findings, offering explanatory depth to observed behavioural transitions.

3.5 Limitations of the Study

The findings presented in this consolidated report are based on both quantitative survey responses and qualitative interview insights, which rely on self-reported information and may therefore be subject to recall bias or response inaccuracies, particularly in areas involving financial transactions or compliance-sensitive behaviour such as offshore betting. The quantitative sampling approach was non-probabilistic and targeted pre-ban RMG users; therefore, the results should not be interpreted as nationally representative of the broader population.

Offshore usage patterns could not be independently verified, as these platforms operate outside domestic regulatory oversight and do not provide official user-level data. Additionally, the qualitative component is exploratory in nature and based on a limited number of interviews, and is intended to provide contextual insights into behavioural motivations rather than statistically generalisable conclusions. Consequently, both the quantitative and qualitative findings should be interpreted with these methodological limitations in mind.

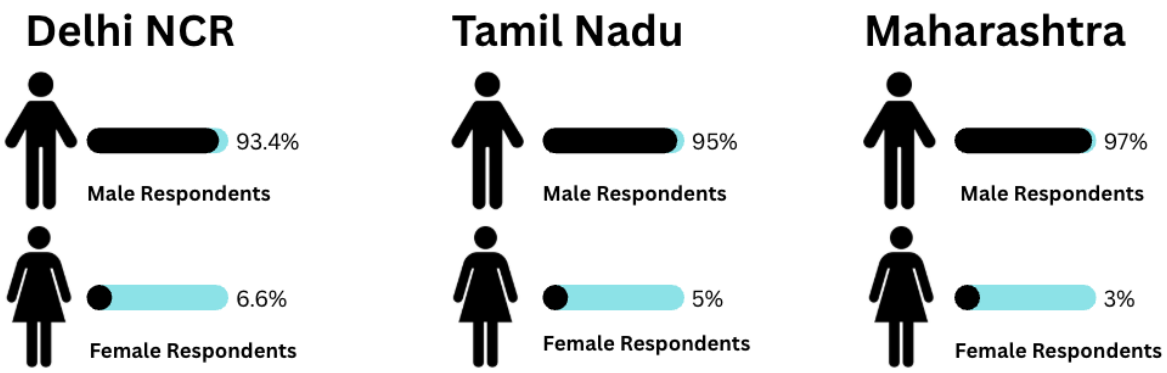
employed, meaning that themes were derived directly from the data rather than being imposed based on pre-existing theoretical categories. During the coding process, interview transcripts were systematically reviewed to identify recurring ideas, behavioural explanations, and decision-making factors mentioned by respondents. These codes were then grouped into broader thematic categories that helped interpret the behavioural dynamics underlying the quantitative findings.

4 Demographic Profile of the Respondents

This section provides a brief overview of the demographic characteristics of respondents across the three surveyed regions: Delhi NCR, Tamil Nadu, and Maharashtra. The consolidated dataset comprises 3,000 respondents (1,000 from each state) who had participated in online real-money gaming prior to the ban. A detailed demographic breakdown of respondents, including gender, age, occupation, and income distribution, is presented in Annexure 1.

Across the three states, the respondent pool is overwhelmingly male, with male participation exceeding 90 percent in each region. Female participation remains comparatively limited, though present across all three states. This pattern broadly aligns with participation trends observed in online real-money gaming ecosystems, where engagement tends to be disproportionately concentrated among male users.

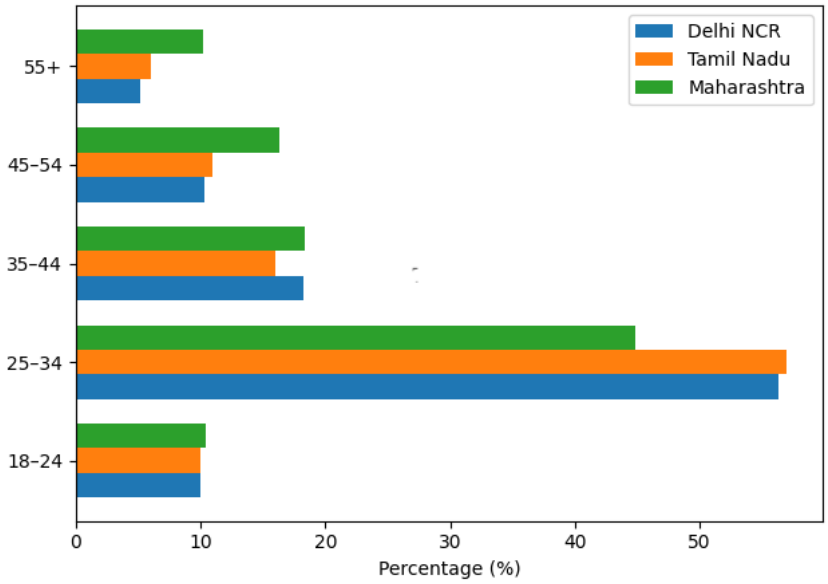
Figure 1: Gender



Source: Authors' analysis

In terms of age distribution, respondents are largely concentrated within economically active age groups. The 25–34 cohort represents the largest share of respondents across states, followed by the 35–44 age group. At the same time, the Maharashtra sample shows a relatively higher representation of older respondents (45 years and above) compared to Delhi NCR and Tamil Nadu. This demographic variation may have implications for behavioural patterns observed later in the analysis.

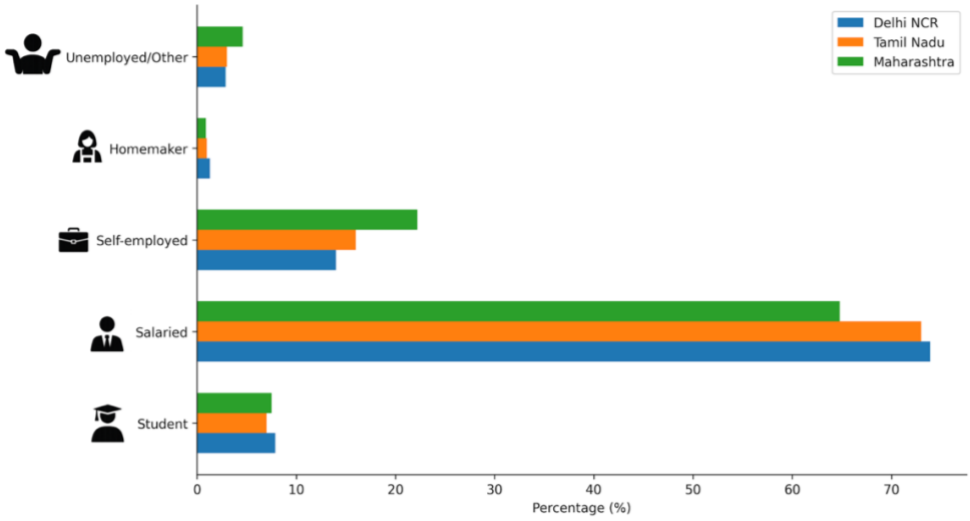
Figure 2: Age-wise Distribution of Respondents



Source: Authors' analysis

Occupationally, the respondent base is largely composed of economically active individuals, with salaried employment forming the largest occupational category across all three states. Maharashtra also records a relatively higher share of self-employed respondents compared to the other two regions.

Figure 3: Occupational Profile of Respondents

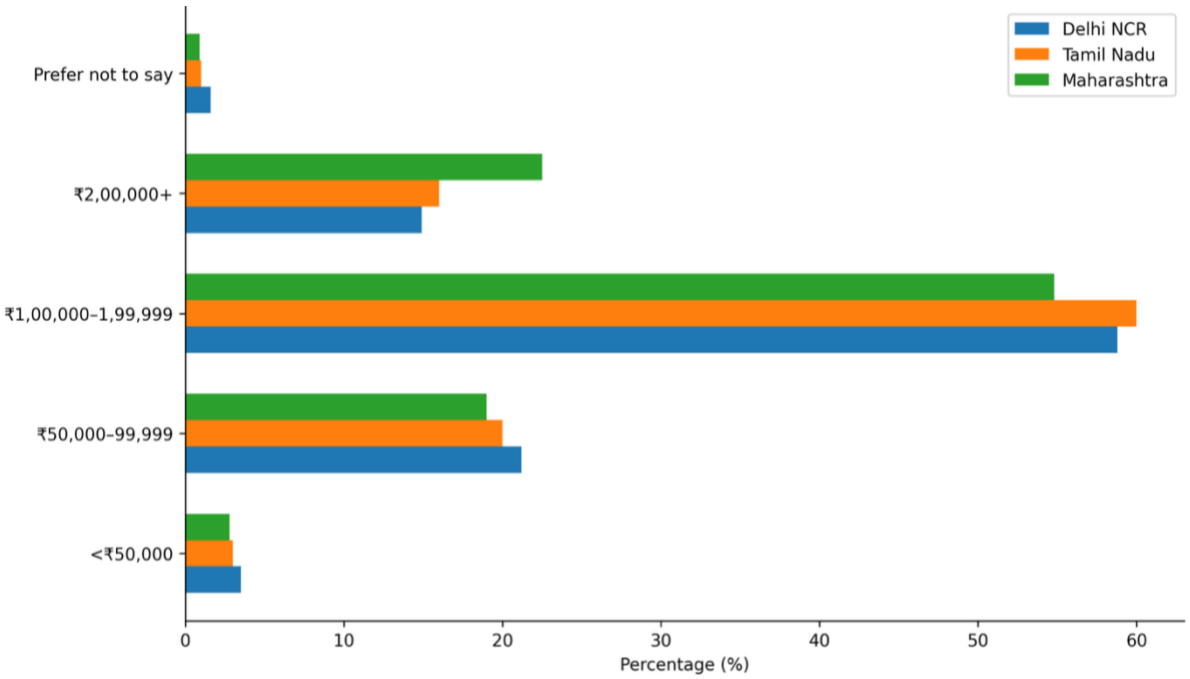


Source: Authors' analysis

In terms of income distribution, respondents are primarily drawn from middle- and upper-middle-income households, with the ₹1,00,000–₹1,99,999 monthly income bracket

representing the largest segment across states. Maharashtra additionally shows a relatively higher representation of respondents in the ₹2,00,000+ income category.

Figure 4: Monthly Household Income Distribution of Respondents



Source: Authors' analysis

These demographic patterns provide important context for interpreting behavioural adjustments in gaming activity following the ban.

5 Key Findings

5.1 The Shift to the Offshore Platforms Across States

The state-level comparison presented in Table 1 indicates a clear and statistically significant increase in offshore platform usage following the implementation of the PROG Act across all three regions. Offshore participation rose from 68.3% to 82.0% in Delhi NCR, from 67.8% to 83.0% in Tamil Nadu, and from 66.7% to 91.7% in Maharashtra. The corresponding net behavioural shifts, calculated as the difference between new offshore adopters and those discontinuing offshore usage stand at 13.7%, 15.2%, and 25% respectively. McNemar tests conducted for each state confirm that transitions into offshore usage significantly exceeded transitions out of offshore usage ($p < 0.001$), indicating a directional behavioural shift rather than random fluctuation.

Table 1: Net Behavioural Shift

		Frequency	Percentage
Delhi NCR	Total pre ban usage	683	68.3
	Total post ban usage	820	82
	Absolute percentage-point increase		13.7
	Net behavioural shift (New shifters - Quitters)		**13.7**
Tamil Nadu	Total pre ban usage	678	67.8
	Total post ban usage	830	83
	Absolute percentage-point increase		15.2
	Net behavioural shift (New shifters - Quitters)		**15.2**
Maharashtra	Total pre ban usage	667	66.7
	Total post ban usage	917	91.7
	Absolute percentage-point increase		25
	Net behavioural shift (New shifters - Quitters)		**25**

When the three state-level datasets are consolidated, the analysis covers a total of 3,000 respondents who had participated in online real-money gaming prior to the ban. Table 2 presents the aggregated pattern of offshore platform usage before and after the implementation of the PROG Act. Across the combined sample, 2,028 respondents (67.6%) reported using offshore platforms prior to the ban, while 2,567 respondents (85.6%) reported offshore usage in the post-ban period. This represents an increase of 539 respondents, translating into an overall rise of approximately 18 percentage points in offshore platform usage.

Table 2: Consolidated Behavioural Shift Towards Offshore Platforms

Category	Frequency	Percentage
Total respondents	3000	100
Total pre-ban offshore usage	2028	67.6
Total post-ban offshore usage	2567	85.6
Absolute increase in offshore users	539	18
Net behavioural shift (New shifters – Quitters)		**18**

The consolidated pattern indicates that the prohibition of domestic real-money gaming has been associated with a substantial behavioural reallocation toward offshore platforms rather than a widespread cessation of monetary gaming activity. A considerable number of respondents who had not previously engaged with offshore platforms appear to have adopted them in the post-ban environment, while comparatively fewer respondents discontinued offshore usage. This directional shift is consistent with the state-level evidence presented earlier and suggests that offshore platforms have increasingly become the primary channel for continued participation in money-based gaming following the withdrawal of regulated domestic options.

At the same time, the aggregated shift masks important cross-state differences in the magnitude of behavioural adjustment. While Delhi NCR and Tamil Nadu show relatively similar increases in offshore participation (approximately 14–15 percentage points), Maharashtra exhibits a much larger increase of 25 percentage points, indicating a stronger consolidation of offshore usage in that state. These variations highlight the value of the consolidated dataset: it allows both the identification of a clear overall behavioural trend across the sample and the exploration of regional differences in the scale and dynamics of the shift toward offshore platforms.

The consolidated evidence suggests that the regulatory intervention altered the location of gaming participation rather than its underlying behavioural drivers. Monetary gaming engagement appears to have been redirected from domestically regulated platforms toward offshore operators that remain digitally accessible, raising important questions for policy discussions related to enforcement capacity, consumer protection, and regulatory design in digitally distributed markets.

The larger behavioural shift observed in Maharashtra may partly reflect differences in the demographic composition of the respondent sample. As discussed in the demographic profile section, the Maharashtra dataset contains a relatively higher share of older respondents (45 years and above), self-employed individuals, and households in higher income brackets, particularly those earning ₹2,00,000 or more per month. These groups may possess greater disposable income, accumulated savings, or financial flexibility compared to younger or lower-income respondents. Consequently, they may be better positioned to continue participating in

money-based gaming through offshore platforms after the withdrawal of domestic options. While this interpretation remains exploratory, it suggests that the magnitude of offshore migration may vary depending on the socio-economic characteristics of the user base across regions.

Taken together, the findings suggest that while Delhi NCR and Tamil Nadu display broadly similar behavioural responses to the ban, Maharashtra stands out for the substantially larger scale of offshore migration. This indicates that the behavioural consequences of the regulatory intervention may not be uniform across regions or user groups. The Maharashtra case suggests that respondents with higher income levels, greater financial flexibility, and a higher share of self-employed or older individuals may be more likely to sustain gaming participation by shifting to offshore platforms. At the same time, the evidence from the other two states indicates more moderate behavioural adjustments. These differences underscore the need for further empirical investigation across additional regions and demographic segments to better understand how regulatory interventions affect different categories of users. In particular, future surveys could examine whether younger or lower-income users respond differently to such policy changes, or whether offshore migration is more strongly driven by users with greater disposable income and financial capacity.

5.2 Financial and Time Reallocation in Money-Based Gaming Before and After the Ban:

Before the implementation of the PROG Act, money-based gaming engagement was distributed across both domestic real-money gaming (RMG) platforms and offshore platforms. However, the structure of that engagement, both financially and temporally, was asymmetrical. Domestic platforms generally functioned as the primary locus of higher-intensity participation, while offshore platforms operated as a supplementary channel within the broader ecosystem.

This asymmetry is visible in the pre-ban offshore intensity indicators across states. Prior to 1 September 2025, offshore usage stood at 68.3 percent in Delhi NCR[31], 67.8 percent in Tamil Nadu[32], and 66.7 percent in Maharashtra[33]. However, daily offshore participation remained marginal, ranging from 2 to 3.4 percent across the three states. Similarly, sessions exceeding two hours were limited to between 1 and 3.4 percent of offshore users. These figures indicate that although offshore platforms were present within user behaviour, they did not absorb the bulk of habitual intensity in the pre-ban period. Rather, the higher-frequency play, longer

[31] https://cuts-ccier.org/pdf/research-report-access-to-offshore-betting-websites-after-the-online-gaming-ban.pdf
[32] https://cuts-ccier.org/pdf/research-report-access-to-offshore-betting-websites-after-the-online-gaming-ban-tamil-nadu.pdf
[33] https://cuts-ccier.org/pdf/research-report-access-to-offshore-betting-websites-after-the-online-gaming-ban-maharashtra.pdf

session duration, and more structured daily engagement were primarily anchored in regulated domestic real-money gaming (RMG) platforms, which functioned as the central locus of sustained financial and temporal commitment prior to the prohibition.

From a financial standpoint, users across all three states tended to direct more structured and higher-value expenditure toward regulated domestic operators. For instance, in Maharashtra, pre-ban offshore spending was concentrated in lower brackets, 48 percent reported spending below ₹1,000 per month and 35 percent between ₹1,000–4,999, with only around 1 percent in the ₹10,000+ categories. A similar pattern is observed in Tamil Nadu, where 37 percent of offshore users spent below ₹1,000 and 44 percent between ₹1,000–4,999 prior to the ban. This distribution suggests that offshore platforms were embedded but financially secondary within the broader gaming ecosystem.

A similar asymmetry was visible in time allocation. Prior to the ban, domestic RMG platforms typically absorbed more frequent and recurring participation. Users were more likely to integrate domestic play into daily routines, whereas offshore participation was comparatively intermittent. Longer sessions and repeated daily play were more visibly associated with domestic platforms in the pre-ban environment, while offshore sessions remained shorter and less intensive.

Following the prohibition of domestic real-money gaming, this architecture underwent a clear structural reconfiguration. With regulated domestic monetary gaming no longer available, users who continued participating redirected both their financial expenditure and their time commitment toward offshore platforms. The centre of gravity shifted.

Offshore participation rose across all three states, reaching 82.0 percent in Delhi NCR, 83.0 percent in Tamil Nadu, and 91.7 percent in Maharashtra. The magnitude of daily offshore participation increased sharply, from 2–3.4 percent pre-ban to 42.3 percent in Delhi NCR, 45 percent in Tamil Nadu, and 43 percent in Maharashtra post-ban. Sessions exceeding two hours rose from pre-ban levels of 1–3.4 percent to 41–44 percent across states.

Financial redistribution followed a similar trajectory. In Maharashtra, the share of offshore users spending ₹5,000–9,999 rose to 31 percent post-ban, with 16 percent spending ₹10,000–24,999 and 9 percent ₹25,000+. In Tamil Nadu, 25 percent reported spending ₹5,000–9,999, 21 percent ₹10,000–24,999, and 9 percent ₹25,000+ post-ban. These higher spending brackets were comparatively rare within offshore participation before the prohibition. The evidence suggests that spending categories previously concentrated within domestic environments are now reflected within offshore platforms.

Importantly, the evidence does not indicate the emergence of entirely new financial or temporal behaviours. Rather than a sudden expansion in overall commitment, the internal composition

of offshore engagement has evolved. The behavioural markers of intensity, daily repetition, longer sessions, and higher spending brackets that were previously more associated with domestic RMG are now observable within offshore usage.

In this sense, offshore platforms appear to have inherited the engagement structure of domestic RMG rather than generating fundamentally new behavioural dynamics. The behavioural drivers underlying money-based gaming, frequency, session intensity, and financial commitment appear to persist across regulatory contexts. What has changed is the jurisdictional and institutional location in which those behaviours now manifest.

Across states, this transformation is best understood as consolidation rather than escalation. The financial and temporal commitment toward money-based gaming did not disappear following the prohibition; instead, it was reorganised geographically and jurisdictionally, moving from platforms operating within India's regulatory perimeter to operators functioning beyond direct domestic oversight.

The temporal reallocation mirrors the financial reallocation. Frequency of access, session duration, and daily repetition patterns were not extinguished; they were redirected. The prohibition altered the locus of engagement rather than its underlying behavioural structure.

Thus, the cross-state evidence consistently points toward substitution and consolidation rather than cessation. The ban reshaped where money and time are invested in gaming activity, but it did not fundamentally disrupt the behavioural architecture of engagement among surveyed users.

5.2.1 Socio-demographic Pattern in Pre-Ban Domestic RMG Spending

To properly interpret the post-ban reallocation dynamic, it is essential first to establish the socio-demographic structure of spending within domestic real-money gaming (RMG) platforms prior to the prohibition. The cross-tabulation (Table 3) of monthly household income and RMG spending categories across Delhi NCR, Tamil Nadu, and Maharashtra demonstrates a clear and statistically significant relationship between income level and spending intensity in the pre-ban environment.

Table 3: Pre Ban Crosstabulation of Household Income by Spending Categories on RMG Platforms for Delhi NCR, Tamil Nadu and Maharashtra

	Household Income	₹0–999	₹1,000–4,999	₹5,000–9,999	₹10,000–24,999	₹25,000+
Delhi NCR	< ₹50,000	34	1	0	0	0
	₹50,000–99,999	98	91	23	0	0
	₹1,00,000–1,99,999	77	329	143	29	10
	₹2,00,000+	7	34	56	22	30
Tamil Nadu	**Household Income**	**₹0–999**	**₹1,000–4,999**	**₹5,000–9,999**	**₹10,000–24,999**	**₹25,000+**
	< ₹50,000	23	0	0	3	5
	₹50,000–99,999	62	56	35	32	14
	₹1,00,000–1,99,999	62	259	161	71	49
	₹2,00,000+	6	17	60	38	35
Maharashtra	**Household Income**	**₹0–999**	**₹1,000–4,999**	**₹5,000–9,999**	**₹10,000–24,999**	**₹25,000+**
	< ₹50,000	16	4	0	3	5
	₹50,000–99,999	54	53	24	43	16
	₹1,00,000–1,99,999	64	187	170	69	57
	₹2,00,000+	14	44	80	42	45

Across all three states, higher spending brackets were systematically concentrated among middle- and upper-income households. In Delhi NCR, respondents in the ₹1,00,000–1,99,999 and ₹2,00,000+ income categories accounted for a substantial share of participation in the ₹5,000–9,999, ₹10,000–24,999, and ₹25,000+ monthly spending tiers. Comparable gradients are visible in Tamil Nadu and Maharashtra, where higher spending categories were predominantly populated by respondents from households earning ₹1,00,000 or more per month.

For instance, in Maharashtra, respondents reporting monthly RMG expenditure of ₹25,000+ were largely drawn from the ₹1,00,000–1,99,999 and ₹2,00,000+ income brackets, with relatively limited representation from lower-income households. Tamil Nadu exhibits a similar pattern, with higher-income groups more visibly represented in the upper spending categories. Delhi NCR reflects the same structured concentration of higher-value RMG participation among upper-income strata.

Table 4: Pre Ban Chi-Square Tests of Independence and Cramer's V for Delhi NCR, Tamil Nadu and Maharashtra

Delhi NCR		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**421.23**
Degrees of Freedom	df	12
p-value	p	**1.20×10^{-82}** (< 0.001)
Effect Size	Cramer's V	**0.378**
Tamil Nadu		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**241.69**
Degrees of Freedom	df	12
p-value	p	**7.37×10^{-45}** (< 0.001)
Effect Size	Cramer's V	**0.286**
Maharashtra		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**142.47**
Degrees of Freedom	df	12
p-value	p	**1.90×10^{-24}** (< 0.001)
Effect Size	Cramer's V	**0.219**

These observed patterns are statistically robust. The Chi-Square Test of Independence (Table 4) indicates a significant association between household income and RMG spending category across all three states (Delhi NCR: $\chi^2 = 421.23$, $p < 0.001$; Tamil Nadu: $\chi^2 = 241.69$, $p < 0.001$; Maharashtra: $\chi^2 = 142.47$, $p < 0.001$). The corresponding Cramer's V values (0.378 in Delhi NCR, 0.286 in Tamil Nadu, and 0.219 in Maharashtra) indicate moderate effect sizes, confirming that income level was substantively related to spending intensity in the domestic RMG ecosystem prior to the ban.

These findings suggest that pre-ban domestic RMG spending followed a structured socio-economic gradient rather than a random distribution. Higher-income households were more likely to engage in sustained and higher-value monetary participation, while lower-income households were concentrated in lower spending tiers. The pre-ban domestic RMG environment was therefore demographically stratified, with financial engagement broadly aligned with household capacity.

In addition to income, age exhibits a clear and statistically significant association with spending intensity on domestic RMG platforms in the pre-ban period. The cross-tabulation (Table 4) across Delhi NCR, Tamil Nadu, and Maharashtra indicates that monetary participation within regulated RMG platforms was not evenly distributed across life stages; rather, it was concentrated within core working-age cohorts.

Table 5: Pre Ban Crosstabulation of Age Group by Spending Categories on RMG Platforms for Delhi NCR, Tamil Nadu and Maharashtra

	Age Group	₹0–999	₹1,000–4,999	₹5,000–9,999	₹10,000–24,999	₹25,000+
Delhi NCR	18–24	71	21	8	0	0
	25–34	89	309	123	22	20
	35–44	40	44	91	0	7
	45–54	22	75	0	0	6
	55+	10	6	0	29	7
Tamil Nadu	**Age Group**	**₹0–999**	**₹1,000–4,999**	**₹5,000–9,999**	**₹10,000–24,999**	**₹25,000+**
	18–24	57	7	11	16	10
	25–34	59	246	144	68	56
	35–44	24	29	83	8	16
	45–54	17	48	16	18	10
	55+	5	2	2	35	13
Maharashtra	**Age Group**	**₹0–999**	**₹1,000–4,999**	**₹5,000–9,999**	**₹10,000–24,999**	**₹25,000+**
	18–24	62	11	5	16	10
	25–34	32	174	127	59	55
	35–44	29	40	80	12	22
	45–54	18	50	43	37	15
	55+	11	13	19	34	25

Across all three states, the 25–34 and 35–44 age groups are more prominently represented across mid- and higher-spending brackets compared to both the youngest (18–24) and oldest (55+) cohorts. In Delhi NCR, for instance, the 25–34 cohort accounts for a substantial share of participation in the ₹5,000–9,999, ₹10,000–24,999, and ₹25,000+ categories. The 35–44 group also shows visible presence in higher-value brackets, while the 18–24 cohort is more concentrated in lower spending categories.

Tamil Nadu reflects a similar pattern. The 25–34 cohort dominates participation across mid- and higher-spending tiers, with meaningful representation even in the ₹25,000+ bracket. The 35–44 group also contributes significantly to mid-tier spending. Although younger participants (18–24) are present across categories, their distribution remains comparatively more weighted toward lower and mid-tier spending relative to prime working-age groups.

Maharashtra shows comparable structuring. The 25–34 and 35–44 age cohorts account for a significant share of participation in higher spending categories, including ₹10,000–24,999 and ₹25,000+. Older cohorts (45–54 and 55+) also appear in upper brackets, though less consistently than the core working-age groups. The 18–24 cohort, while active, remains

comparatively less concentrated in the highest spending tiers relative to those in their prime earning years.

Table 6: Pre Ban Chi-Square Tests of Independence and Cramer's V for Delhi NCR, Tamil Nadu and Maharashtra

Delhi NCR		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**591.36**
Degrees of Freedom	df	16
p-value	p	**1.55×10^{-115}** (< 0.001)
Effect Size	Cramer's V	**0.385**
Tamil Nadu		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**358.7**
Degrees of Freedom	df	16
p-value	p	**1.58×10^{-66}** (< 0.001)
Effect Size	Cramer's V	**0.299**
Maharashtra		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**287.71**
Degrees of Freedom	df	16
p-value	p	**8.91×10^{-52}** (< 0.001)
Effect Size	Cramer's V	**0.268**

These patterns are statistically robust. The Chi-Square Test of Independence confirms a significant association between age group and RMG spending category across all three states (Delhi NCR: $\chi^2 = 591.36$, $p < 0.001$; Tamil Nadu: $\chi^2 = 358.7$, $p < 0.001$; Maharashtra: $\chi^2 = 287.71$, $p < 0.001$). The corresponding Cramer's V values (0.385 in Delhi NCR, 0.299 in Tamil Nadu, and 0.268 in Maharashtra) indicate moderate effect sizes, suggesting that age was meaningfully related to spending intensity within the domestic RMG ecosystem prior to the ban.

The evidence suggests that pre-ban domestic RMG spending was structured not only by income capacity but also by life stage. Core working-age cohorts — particularly 25–34 and 35–44 — were more likely to exhibit higher-value and sustained monetary participation. Younger users (18–24) were present but generally more concentrated in lower or mid-tier spending brackets, while older cohorts showed selective but less uniformly distributed high-intensity participation.

5.2.2 Socio-demographic Shifts in Offshore Spending: From Pre-Ban Baseline to Post-Ban Reallocation

Before the implementation of the PROG Act, offshore betting platforms were present in the ecosystem, but they were not the primary venue for money-based play. The dominant pattern across states was that users primarily engaged with legal domestic real-money gaming (RMG), while offshore participation, where it existed, was more limited and often secondary. This is also consistent with the broader behavioural shift observed after the ban: offshore usage rises materially in each state (Delhi NCR: 68.3% to 82.0%; Tamil Nadu: 67.8% to 83.0%; Maharashtra: 66.7% to 91.7%), indicating that once domestic options were removed, offshore platforms increasingly became the default channel for continued money-based play.

To understand who was spending on offshore platforms even before the ban, we first examine the pre-ban offshore crosstabs (Table 7).

Table 7: Pre Ban Crosstabulation of Household Income by Spending Categories for Delhi NCR, Tamil Nadu and Maharashtra

	Household Income	₹0–999	₹1,000–4,999	₹5,000–9,999	₹10,000–24,999	₹25,000+
Delhi NCR	< ₹50,000	17	1	0	0	0
	₹50,000–99,999	99	9	0	0	0
	₹1,00,000–1,99,999	150	293	42	0	0
	₹2,00,000+	24	38	10	0	0
Tamil Nadu	**Household Income**	**₹0–999**	**₹1,000–4,999**	**₹5,000–9,999**	**₹10,000–24,999**	**₹25,000+**
	< ₹50,000	14	1	3	0	0
	₹50,000–99,999	79	11	12	3	1
	₹1,00,000–1,99,999	139	250	79	4	2
	₹2,00,000+	26	34	19	1	0
Maharashtra	**Household Income**	**₹0–999**	**₹1,000–4,999**	**₹5,000–9,999**	**₹10,000–24,999**	**₹25,000+**
	< ₹50,000	13	4	1	0	0
	₹50,000–99,999	53	40	17	14	2
	₹1,00,000–1,99,999	17	113	154	19	27
	₹2,00,000+	16	67	39	23	48

Even in the pre-ban period, offshore spending was not income-neutral. In Delhi NCR and Tamil Nadu, higher-income households were more visibly represented beyond the lowest spending bracket, while lower-income households were concentrated in the lowest expenditure tier. Maharashtra also shows an income gradient, though with a comparatively different distributional pattern. In other words, offshore spending existed pre-ban, but it was already shaped by household capacity. This visual gradient is statistically confirmed (Table 7).

Table 8: Pre Ban Chi-Square Tests of Independence and Cramer's V for Delhi NCR, Tamil Nadu and Maharashtra

Delhi NCR		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**384.03**
Degrees of Freedom	Df	16
p-value	P	**8.04×10^{-72}** (< 0.001)
Effect Size	Cramer's V	**0.324**
Tamil Nadu		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**158.98**
Degrees of Freedom	Df	6
p-value	P	**9.73×10^{-32}** (< 0.001)
Effect Size	Cramer's V	**0.341**
Maharashtra		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**104.91**
Degrees of Freedom	Df	12
p-value	P	**6.05×10^{-17}** (< 0.001)
Effect Size	Cramer's V	**0.227**

The Chi-square tests indicate that household income and offshore spending category are significantly associated in all three states pre-ban (all $p < 0.001$). The strength of association is moderate in Delhi NCR (Cramer's V = 0.324) and Tamil Nadu (V = 0.341), and lower but still meaningful in Maharashtra (V = 0.227). The key point is that offshore spending before the ban was already embedded within an economically stratified participation base—it wasn't random or marginal in a purely incidental sense. A similar structured pattern is visible by age.

Table 9: Pre Ban Crosstabulation of Age Group by Spending Categories for Delhi NCR, Tamil Nadu and Maharashtra

	Age Group	₹0–999	₹1,000–4,999	₹5,000–9,999	₹10,000–24,999	₹25,000+
Delhi NCR	18–24	50	0	0	0	0
	25–34	137	206	30	0	0
	35–44	84	63	0	0	0
	45–54	19	50	22	0	0
	55+	0	22	0	0	0
Tamil Nadu	**Age Group**	**₹0–999**	**₹1,000–4,999**	**₹5,000–9,999**	**₹10,000–24,999**	**₹25,000+**
	18–24	46	2	9	1	0
	25–34	122	186	57	2	2
	35–44	61	48	12	3	1
	45–54	24	44	27	2	0
	55+	5	16	8	0	0
Maharashtra	**Age Group**	**₹0–999**	**₹1,000–4,999**	**₹5,000–9,999**	**₹10,000–24,999**	**₹25,000+**
	18–24	47	13	6	2	1
	25–34	27	113	57	30	15
	35–44	29	32	49	13	6
	45–54	3	36	46	20	19
	55+	5	13	19	39	27

Before the ban, offshore engagement was centred largely around core working-age cohorts, especially 25–34 and 35–44, which appear more represented across spending brackets than the youngest cohort. In Delhi NCR, for example, the 18–24 cohort is overwhelmingly concentrated in the lowest spending bracket pre-ban (₹0–999), suggesting that younger users were present but generally at low offshore intensity. Tamil Nadu also shows youth presence but with a similarly restrained pre-ban offshore spending profile relative to older cohorts. Again, this age structuring is statistically confirmed.

Table 10: Pre Ban Chi-Square Tests of Independence and Cramer's V for Delhi NCR, Tamil Nadu and Maharashtra

Delhi NCR		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**158.25**
Degrees of Freedom	df	8
p-value	p	**3.71×10^{-30}** (< 0.001)
Effect Size	Cramer's V	**0.34**
Tamil Nadu		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**85.73**
Degrees of Freedom	df	16
p-value	p	**1.52×10^{-11}** (< 0.001)
Effect Size	Cramer's V	**0.178**
Maharashtra		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**384.03**
Degrees of Freedom	df	16
p-value	p	**8.04×10^{-72}** (< 0.001)
Effect Size	Cramer's V	**0.324**

The Chi-square results indicate that age group and offshore spending category are statistically associated across all three states in the pre-ban period ($p < 0.001$). However, the strength of this association varies considerably. The relationship is moderate in Delhi NCR (Cramér's V = 0.34) and Maharashtra (V = 0.324), but considerably weaker in Tamil Nadu (V = 0.178). This suggests that while spending behaviour shows some variation across life stages in Delhi NCR and Maharashtra, the relationship between age and spending intensity is relatively limited in Tamil Nadu. In other words, age alone does not strongly predict offshore spending behaviour across all states.

Following the ban, the ecosystem changes in a fundamental way, as domestic real-money gaming platforms, previously the dominant channel for monetary play, are no longer available. The data suggest that offshore platforms absorb a larger share of ongoing spending across user segments. However, the relatively weak association observed in Tamil Nadu indicates that the post-ban migration toward offshore platforms may not be driven solely by older or traditionally higher-spending user groups. At the same time, the stronger association observed in Maharashtra, combined with the state's larger behavioural shift, may partly reflect the demographic composition of the sample, which includes a relatively higher share of older and higher-income respondents. This suggests that demographic factors such as age and income may influence offshore migration differently across regions.

Table 11: Post Ban Crosstabulation of Household Income by Spending Categories for Delhi NCR, Tamil Nadu and Maharashtra

	Household Income	₹0–999	₹1,000–4,999	₹5,000–9,999	₹10,000–24,999	₹25,000+
Delhi NCR	< ₹50,000	23	0	0	0	0
	₹50,000–99,999	66	103	23	0	0
	₹1,00,000–1,99,999	9	254	145	28	22
	₹2,00,000+	6	32	48	30	30
Tamil Nadu	**Household Income**	**₹0–999**	**₹1,000–4,999**	**₹5,000–9,999**	**₹10,000–24,999**	**₹25,000+**
	< ₹50,000	21	0	0	0	2
	₹50,000–99,999	48	65	24	34	9
	₹1,00,000–1,99,999	11	201	138	90	34
	₹2,00,000+	6	19	48	48	31
Maharashtra	**Household Income**	**₹0–999**	**₹1,000–4,999**	**₹5,000–9,999**	**₹10,000–24,999**	**₹25,000+**
	< ₹50,000	19	2	0	0	2
	₹50,000–99,999	47	72	27	31	6
	₹1,00,000–1,99,999	29	202	165	58	31
	₹2,00,000+	6	33	89	57	36

The post-ban crosstabulation (Table 11) continues to show a clear relationship between household income levels and offshore spending intensity. Higher spending tiers remain predominantly concentrated among respondents from middle- and higher-income households, particularly those in the ₹1,00,000–₹1,99,999 and ₹2,00,000+ income categories. Across all three states, these groups account for the majority of respondents in the ₹10,000–₹24,999 and ₹25,000+ spending brackets, indicating that offshore gaming expenditure after the ban is largely driven by users with relatively greater financial capacity.

This pattern is particularly visible in Maharashtra and Tamil Nadu, where the higher income categories contribute a substantial share of the respondents in the upper spending tiers. The presence of higher-income users in these categories is consistent with expectations, as respondents with greater disposable income are more likely to sustain or increase monetary gaming activity even after domestic platforms become unavailable.

At the same time, a limited number of respondents from lower-income categories also appear within offshore spending brackets in the post-ban data. However, these observations are relatively small in number and should therefore be interpreted cautiously. So, the evidence suggests that offshore spending after the ban remains primarily concentrated among middle- and higher-income users, rather than being evenly distributed across income groups.

Table 12: Post Ban Chi-Square Tests of Independence and Cramer's V for Delhi NCR, Tamil Nadu and Maharashtra

Delhi NCR		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**441.09**
Degrees of Freedom	df	12
p-value	p	**7.34×10^{-87}** (< 0.001)
Effect Size	Cramer's V	**0.419**
Tamil Nadu		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**326.89**
Degrees of Freedom	df	12
p-value	p	**1.04×10^{-62}** (< 0.001)
Effect Size	Cramer's V	**0.363**
Maharashtra		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**282.14**
Degrees of Freedom	df	12
p-value	p	**2.61×10^{-53}** (< 0.001)
Effect Size	Cramer's V	**0.321**

The Chi-square tests confirm a significant association between income and offshore spending post-ban in all three states (all $p < 0.001$). More importantly, the strength of association is stronger post-ban—especially in Delhi NCR (Cramer's V = 0.419, higher than the pre-ban V of 0.324), with Tamil Nadu (V = 0.363) and Maharashtra (V = 0.321) also showing moderate relationships. This indicates that post-ban offshore spending is not only structured by income, but in at least some contexts the income-spending relationship becomes more sharply expressed**.** Age-based patterns show an equally important post-ban shift.

Table 13: Post Ban Crosstabulation of Age Group by Spending Categories for Delhi NCR, Tamil Nadu and Maharashtra

	Age Group	₹0–999	₹1,000–4,999	₹5,000–9,999	₹10,000–24,999	₹25,000+
Delhi NCR	18–24	43	29	8	0	0
	25–34	34	234	123	22	20
	35–44	27	48	75	8	7
	45–54	0	73	10	0	18
	55+	0	5	0	28	7
Tamil Nadu	Age Group	₹0–999	₹1,000–4,999	₹5,000–9,999	₹10,000–24,999	₹25,000+
	18–24	44	14	8	8	4
	25–34	22	181	118	86	36
	35–44	19	36	60	30	7
	45–54	0	50	19	18	18
	55+	1	4	5	30	11
Maharashtra	Age Group	₹0–999	₹1,000–4,999	₹5,000–9,999	₹10,000–24,999	₹25,000+
	18–24	61	19	8	4	4
	25–34	19	173	113	51	27
	35–44	20	45	76	27	11
	45–54	0	52	59	31	16
	55+	1	20	25	35	17

The post-ban crosstabulation of age group and offshore spending categories (Table 13) indicates that spending intensity varies across life stages, but the pattern is not uniformly driven by younger users. While respondents in the 18–24 cohort appear across several offshore spending brackets in the post-ban data, the number of observations in higher spending tiers remains relatively small. For example, in Tamil Nadu and Maharashtra, only a handful of respondents in this cohort appear in the highest spending category (₹25,000+), suggesting that these instances should be interpreted cautiously rather than as a broad behavioural trend.

Instead, the more pronounced pattern in the table is the stronger representation of older age groups in higher offshore spending tiers, particularly among respondents aged 45–54 and 55+. Across states, especially in Maharashtra, these cohorts appear more frequently in the ₹10,000–₹24,999 and ₹25,000+ categories compared with younger respondents. This suggests that a portion of offshore gaming expenditure in the post-ban period may be driven by users with greater financial capacity and longer engagement histories with gaming platforms.

At the same time, the presence of younger respondents across multiple spending brackets indicates that offshore participation is not limited to older users alone. However, the overall distribution suggests that higher spending offshore remains more concentrated among older

cohorts, while younger users are more commonly represented in the lower and mid-range spending tiers.

So, these patterns suggest that the post-ban migration toward offshore platforms reflects both continuity among established, higher-spending users **and** limited participation by younger cohorts, rather than a wholesale shift driven primarily by young or financially vulnerable segments.

Table 14: Post Ban Chi-Square Tests of Independence and Cramer's V for Delhi NCR, Tamil Nadu and Maharashtra

Delhi NCR		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**504.61**
Degrees of Freedom	df	16
p-value	p	**3.54×10^{-97}** (< 0.001)
Effect Size	Cramer's V	**0.392**
Tamil Nadu		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**307.67**
Degrees of Freedom	df	16
p-value	p	**6.55×10^{-56}** (< 0.001)
Effect Size	Cramer's V	**0.305**
Maharashtra		
Test	**Statistic**	**Value**
Chi-Square Test of Independence	χ^2	**384.03**
Degrees of Freedom	df	16
p-value	p	**8.04×10^{-72}** (< 0.001)
Effect Size	Cramer's V	**0.324**

Across states, the Chi-square tests show that age group and offshore spending category are significantly associated post-ban (all $p < 0.001$). Effect sizes remain moderate, Delhi NCR ($V = 0.392$), Tamil Nadu ($V = 0.305$), and Maharashtra ($V = 0.324$). So, the statistics show that offshore spending post-ban is systematically structured by age, and not random.

A closer examination of the age-wise distribution suggests that the offshore shift is not demographically uniform. The patterns visible in the cross-tabulations indicate that different cohorts appear to respond to the post-ban environment in different ways. For the youngest cohort (18–24), offshore participation prior to the ban was already largely concentrated in the lowest spending bracket (₹0–999), with very limited representation in mid- or higher-value

tiers. This suggests that younger users were present in the ecosystem but generally at relatively low spending intensity.

In the post-ban environment, the distribution of spending among this cohort appears to broaden across offshore brackets. The 18–24 group is now visible not only in the lowest tier but also across some mid-range spending categories such as ₹1,000–4,999 and ₹5,000–9,999, with occasional observations in higher brackets in Tamil Nadu and Maharashtra. One possible interpretation is that younger users who were previously splitting their activity between domestic platforms and limited offshore engagement may now be consolidating their participation within offshore platforms after domestic options became unavailable. As a result, spending that was previously distributed across platforms may appear more visible within offshore categories in the post-ban data.

At the same time, the number of observations for younger users in higher spending brackets remains relatively small in absolute terms. These instances should therefore be interpreted cautiously rather than as evidence of a large-scale structural shift. While the data suggest some broadening of offshore participation among younger cohorts, further research with larger samples and longitudinal tracking would be necessary to determine whether this represents a sustained behavioural change or a temporary adjustment within the post-ban environment.

In contrast, the largest absolute offshore spending volumes continue to be associated with the 25–34 age group. This cohort already dominated domestic RMG participation in the pre-ban period and maintained some offshore presence even before the regulatory change. Following the ban, the 25–34 group appears prominently across mid- and higher-value offshore brackets, particularly in the ₹5,000–9,999 and ₹10,000–24,999 categories. In Maharashtra especially, this group is visibly represented in the ₹25,000+ offshore spending tier. Thus, while younger users show some relative expansion in offshore participation, the bulk of post-ban offshore expenditure continues to be driven by the core working-age cohort.

Older age segments (35–44 and 45–54) show a somewhat different pattern. These groups were already present in mid- and higher-value offshore brackets prior to the ban, and their post-ban distribution appears to reflect consolidation rather than the emergence of new exposure. For these cohorts, the behavioural shift seems less about entering offshore markets and more about continuing existing participation in a different venue after domestic options became unavailable.

A similar distinction emerges in the income-wise analysis. In terms of absolute spending volumes, the ₹1,00,000–₹1,99,999 income group remains the most prominent across offshore spending categories. This middle-income segment already formed the largest base of domestic RMG participants in the pre-ban environment and maintained some offshore engagement as well. Post-ban, this group appears prominently across the ₹5,000–9,999 and ₹10,000+ offshore spending tiers, particularly in Maharashtra.

At the same time, lower-income groups (< ₹50,000 and ₹50,000–₹99,999) also appear across a wider range of offshore spending brackets in the post-ban data. However, these observations remain relatively limited in absolute numbers and should therefore be interpreted with caution. While the data suggest that offshore participation is not confined exclusively to higher-income groups, the overall distribution indicates that higher-value offshore spending remains primarily concentrated among middle- and higher-income users.

So, the evidence points toward a pattern of reallocation rather than exit. Before the PROG Act, most monetary gaming activity took place on domestic RMG platforms, with offshore platforms playing a more limited role. Following the ban, offshore platforms appear to absorb a larger share of ongoing engagement. The cross-tabulations suggest that this shift reflects both continuity among established users and limited expansion across other demographic segments, though the latter should be interpreted cautiously given the relatively small number of observations in certain categories.

From a consumer protection perspective, this development raises important questions. Spending that previously occurred within a domestically regulated ecosystem—where some institutional oversight and grievance mechanisms were at least theoretically available—now appears to be increasingly channelled toward offshore platforms where regulatory safeguards are more uncertain. While the present analysis does not claim causal relationships at the individual level, the before–after patterns across states suggest that when regulated domestic options are removed, a portion of users may redirect their participation toward offshore alternatives rather than disengage from monetary gaming altogether. Further empirical research would be useful to better understand how different socio-demographic groups adapt to such regulatory changes over time.

6 Qualitative Findings: Ease of Access, Platform Ecosystem, and the Substitution to Offshore Platforms

The qualitative responses across Delhi NCR, Tamil Nadu, and Maharashtra provide important context to the quantitative findings discussed earlier. While the statistical analysis demonstrates a clear reallocation of spending and time from domestic real-money gaming (RMG) platforms to offshore operators following the PROG Act, the qualitative evidence helps explain the behavioural logic underpinning this shift.

6.1 Perceived Ease-of-Use and Transactional Continuity

Across all three states, respondents consistently describe offshore platforms as convenient, accessible, and user-friendly. Deposits and withdrawals are widely perceived as smooth and relatively frictionless. Importantly, users do not frame this convenience as a new development following the ban. Rather, many indicate that offshore platforms were already easy to access and operate even prior to the prohibition of domestic RMG.

This suggests that the post-ban increase in offshore usage is not driven by the emergence of new efficiencies, but by the continued availability of platforms that were already perceived as functionally reliable. In other words, offshore platforms did not become easier after the ban; they simply remained available when domestic alternatives were removed.

The perception of low transactional friction, particularly in relation to payment flows, appears central to continued engagement. Respondents frequently describe deposit and withdrawal processes as straightforward, reinforcing the idea that offshore platforms offer a seamless continuation of prior gaming routines.

6.2 Platform Continuity and Concentration

Qualitative responses also indicate that offshore engagement is concentrated around a relatively small set of high-visibility platforms. Users across states repeatedly mention familiar names such as Aviator, Stake, Parimatch, 1xBET/1xBAT, RajaBets, and similar operators.

Crucially, respondents do not describe a shift toward entirely new or unknown platforms after the ban. Instead, they indicate that migration largely occurred toward already recognised

offshore operators. This reflects consolidation rather than expansion, users gravitated toward established brands with perceived credibility and existing user networks.

Several respondents explicitly describe these offshore operators as "big" platforms with structured ecosystems. References to organised Telegram and WhatsApp groups for players are common. These groups serve multiple functions, sharing access links, communicating updates, circulating promotional offers, and providing informal peer validation. The existence of such organised communities contributes to perceptions of scale.

6.3 Access Pathways: Network-Based and Platform-Embedded

Across Delhi NCR, Tamil Nadu, and Maharashtra, informal and network-based pathways emerge as central mechanisms of access. Friend referrals, peer sharing through Telegram and WhatsApp groups, and circulation of links within trusted networks are repeatedly mentioned.

Even in the post-ban period, these peer-mediated pathways remain resilient. In fact, respondents suggest that the removal of domestic options may have strengthened reliance on known networks. Trusted referrals appear to lower hesitation, reduce perceived risk, and normalise offshore participation.

At the same time, a more intentional mode of access becomes visible post-ban. Respondents report directly visiting known URLs, using bookmarked links, or accessing web-app versions of offshore platforms. This suggests routinisation: offshore engagement is no longer occasional or exploratory but integrated into regular behavioural patterns.

Although social media advertising and search-based discovery are mentioned less frequently in direct responses, prior research indicates substantial online visibility of major offshore platforms. It is therefore plausible that awareness is shaped indirectly through advertising, even if final access occurs via peer or direct routes.

6.4 Reported Drivers of Post-Ban Migration

A recurring qualitative theme across Delhi NCR, Tamil Nadu, and Maharashtra is the presence of an explicit substitution logic in user behaviour. Respondents frequently indicated that their shift to offshore platforms was not driven by preference for foreign operators, but by the unavailability of legal domestic real-money gaming options after the PROG Act. Their explanations were typically pragmatic rather than ideological, framed in terms such as "there is no other option," "it is easily available," "the same games are there," and "we can continue as before." This suggests that the migration to offshore platforms was not primarily rooted in experimentation or novelty-seeking, but in continuity. Users described offshore platforms as allowing them to retain access to preferred games and formats, familiar gameplay interfaces,

smooth deposit and withdrawal processes, and active player communities. In addition, the continued accessibility of these platforms despite domestic restrictions appeared to reduce the friction associated with switching. In this sense, offshore platforms functioned as a substitute channel that enabled users to maintain existing gaming habits.

At the same time, qualitative responses also reveal how users interpreted and responded to the ban itself. Some respondents expressed awareness that the regulatory environment had changed and acknowledged that continuing to access offshore platforms might involve greater uncertainty or perceived risk. However, many participants indicated that the ban did not significantly alter their behaviour because offshore platforms remained easily accessible and widely used within their peer networks. Several respondents described the ban less as a deterrent and more as a shift in where gaming activity occurred. In other words, while the policy intervention was recognised, its practical impact on individual participation decisions appeared limited for users who were already engaged with digital gaming platforms. These perceptions suggest that enforcement visibility and perceived risk may play an important role in shaping behavioural responses to regulatory interventions in digitally accessible markets.

6.5 Payment Pathways and Adaptive Transactional Flows

Respondents across states report using mainstream digital payment channels such as UPI, bank transfers, and, in some cases, wallet-linked payments to transact on offshore platforms. Some users describe intermediary accounts, QR codes, or dynamically generated payment handles.

It is important to note that these accounts are based on self-reported experiences; the study does not independently verify payment routing structures or the identity of receiving entities. However, the qualitative descriptions suggest adaptive and flexible transactional flows that reduce friction and sustain engagement.

From a behavioural standpoint, what matters is user perception: respondents experience these payment pathways as functional and workable. This perception of operational continuity reduces deterrence and facilitates ongoing offshore participation.

6.6 Substitution, Not Transformation

So, the qualitative evidence across Delhi NCR, Tamil Nadu, and Maharashtra reinforces the substitution narrative identified in the quantitative analysis. Post-ban offshore engagement reflects continuity in perceived ease-of-use, consolidation around established and recognisable platforms, persistence of peer-network access channels, adaptive payment mechanisms, and explicit migration driven by the absence of legal domestic alternatives. Users do not describe a fundamentally new behavioural pattern; rather, they describe a relocation of existing routines.

The platforms changed, but the underlying behavioural architecture, frequency, spending, and mode of engagement, appears largely intact.

Importantly, respondents portray offshore platforms as structured, organised, and socially embedded environments rather than obscure or inaccessible alternatives. References to dedicated Telegram and WhatsApp groups, coordinated promotional ecosystems, and familiar transaction pathways contribute to perceptions of scale, stability, and normalcy. This embeddedness appears to lower perceived risk and facilitate routinised participation. In this context, the qualitative findings align closely with the broader statistical pattern: the prohibition of domestic real-money gaming did not eliminate demand but redirected engagement into offshore channels that were already present within user networks and considered accessible. These observations also suggest that effective policy responses may need to account for the networked and socially embedded nature of these ecosystems, rather than relying solely on blunt prohibitions that may unintentionally displace activity into less visible offshore environments.

7 Case Studies: Real World Harms Linked to Illegal Money-Gaming Pathways

The quantitative findings in this report show a clear post-ban reallocation of money-based gaming activity toward offshore platforms. The qualitative evidence further explains the mechanisms behind this shift, including ease of access, peer-network discovery, frictionless digital payments, and the continuity of familiar game formats. The purpose of the following case studies is not to establish causal relationships but to illustrate how financial harm associated with money-based gaming can manifest in real-world contexts. When such activity occurs in environments that are difficult to monitor or regulate, the pathways for harm may become harder to detect or address. These cases therefore help contextualise the report's broader findings by highlighting how behavioural shifts in gaming participation can interact with household vulnerability, financial stress, and social consequences.

Case Study 1: Household Financial Distress and Youth Addiction in Offshore Gaming Networks

This case is based on qualitative inputs gathered through conversations during the research process. A parent discussed severe financial distress linked to a child's involvement in offshore money-based games. According to the account, the child had previously lost approximately ₹50,000 and subsequently incurred an additional loss of about ₹70,000. The household's financial situation was described as precarious—the father works as a daily-wage labourer and had taken a loan of around ₹5 lakh intended for home repairs and related expenses. A significant portion of this loan amount was reportedly diverted and lost due to the child's continued gaming activity. The parent further described the child as "completely addicted" and in urgent need of professional counselling and support.

This case reflects the broader consumer-protection concern highlighted throughout the report, when legal domestic options are removed but offshore platforms remain accessible, gambling-like products can remain available through digitally embedded ecosystems that are easy to access and difficult for families to monitor—especially when they are supported by informal peer networks, messaging groups, and fast, low-friction payment pathways. The risk is particularly acute for younger users and economically vulnerable households, where losses have outsized welfare impacts and recovery options are limited.

Case Study 2: From Gaming Losses to Violent Extortion—Kidnapping for Ransom in Bengaluru[34]

In February 2026, Bengaluru police arrested three individuals for allegedly kidnapping a spa owner and demanding a ₹2 lakh ransom. According to police accounts reported in the media, the incident occurred when the victim and a colleague were returning home after closing the establishment, and the attackers intercepted them, assaulted the colleague, and abducted the victim. The victim was later rescued from a deserted area, and the accused were arrested. During interrogation, police reportedly found that one of the accused had misappropriated funds (from his workplace) and lost the money in online gaming, after which the group allegedly planned the kidnapping to recover losses.

This case illustrates an extreme point on the broader harm continuum associated with money-based gaming losses. In situations where individuals experience substantial financial losses, attempts to recover money or manage resulting debt pressures may lead to risky or unlawful behaviour. Such outcomes are not unique to offshore or illegal gaming environments and can arise in various gambling or money-gaming contexts. However, the case highlights how financial distress linked to gaming losses can spill beyond the individual user and generate wider social consequences when financial pressures escalate.

Together, these cases align with the report's core empirical argument. The ban appears to have shifted the *location* of money-based gaming activity rather than eliminating demand. When users describe offshore platforms as easy to access, supported by Telegram/WhatsApp ecosystems, and operationally frictionless, the risk environment changes, participation becomes harder to regulate, and harms become harder to prevent or remedy. The first case highlights household-level financial strain and youth vulnerability linked to uncontrolled gaming behaviour, while the second illustrates how severe financial losses can interact with broader social and economic pressures to produce wider social consequences. These cases therefore underscore the importance of understanding the full spectrum of potential harms associated with money-based gaming participation, particularly in environments where monitoring, consumer safeguards, and support mechanisms may be limited.

[34] https://indianexpress.com/article/cities/bangalore/bengaluru-man-kidnaps-spa-owner-to-recover-money-lost-in-online-gaming-arrested-with-2-aides-10539411/

8 Recommendations

The consolidated evidence from Delhi NCR, Tamil Nadu, and Maharashtra points to a consistent behavioural outcome: when legal domestic real-money gaming (RMG) options are removed, a sizeable share of users do not exit the market, they substitute toward offshore platforms that remain digitally accessible and socially routinised (through peer networks and platform communities). This substitution is not confined to "high-income" users; it is visible among relatively lower-income segments and younger cohorts as well. The policy goal, therefore, should be to reduce harm and exposure, not merely to displace activity into harder-to-govern channels.

A blanket prohibition, while often motivated by legitimate concerns around financial harm and addiction, can unintentionally reallocate user activity to offshore environments where consumer safeguards are uncertain and regulatory oversight is limited. The behavioural evidence presented in this report suggests that when regulated domestic options are withdrawn but offshore alternatives remain digitally accessible, many users do not exit the market; instead, they shift their participation to platforms operating beyond direct domestic supervision. In such contexts, the policy objective of harm reduction may not be fully realised, as activity persists but moves into less transparent and harder-to-govern spaces.

A more balanced approach would therefore involve adopting a risk-based regulatory framework that differentiates between varying levels of risk within the ecosystem. This includes distinguishing between lower-risk and higher-risk gaming formats, between compliant and auditable operators and unaccountable offshore entities, and between recreational participation and harmful or problem gaming patterns. Such differentiation allows regulation to be proportionate, targeted, and responsive to actual risk exposure rather than uniformly restrictive across all segments.

Importantly, a risk-based approach does not imply liberalisation without safeguards. Rather, it acknowledges the reality of user substitution dynamics and seeks to design regulation that minimises net harm in practice. By recognising that demand may persist despite prohibition, policymakers can focus on creating enforceable standards, strengthening oversight where it is feasible, and reducing consumer vulnerability in real-world conditions instead of relying solely on formal restrictions that may be circumvented.

If the core objective of policy is consumer protection, an effective strategy is to ensure the existence of a credible and safer domestic alternative that can compete, in practical terms, with

the accessibility and convenience of offshore platforms. Where no regulated pathway exists, user demand does not necessarily disappear; it may instead migrate to less transparent environments. A tightly regulated domestic framework allows the State to retain supervisory visibility while embedding safeguards directly into the design of platforms and participation structures.

Such a framework should begin with clear and enforceable identity and age-verification requirements within a regulated domestic RMG ecosystem. India's emerging data protection framework already provides an important foundation for responsible data handling and user verification. Allowing regulated operators to function within this framework would enable authorities to apply existing data protection obligations to real-money gaming platforms, thereby strengthening accountability and oversight.

In addition, several RMG industry bodies have previously developed voluntary codes of conduct covering responsible gaming practices, advertising standards, player safeguards, and grievance mechanisms. A pragmatic policy approach would be to convert these voluntary standards into binding regulatory requirements accompanied by a robust monitoring and compliance mechanism. Independent oversight—potentially involving civil society organisations, consumer groups, and accredited auditors—can help ensure that these safeguards are implemented effectively rather than remaining purely aspirational commitments.

Harm reduction can also be strengthened through accessible support and early-intervention mechanisms for individuals experiencing gaming-related distress. This may include dedicated de-addiction and counselling services, helplines, and referral pathways integrated with existing mental health and community support systems. Platforms operating within a regulated domestic framework can also play a role by prominently displaying warning messages, risk advisories, and links to support services for users who may be experiencing problematic gaming behaviour. Such measures focus on early awareness and assistance rather than solely on restricting participation, recognising that the objective of policy should be to minimise harm and provide support to those who may be vulnerable.

An effective domestic pathway must also include a strong grievance-redress and dispute-resolution mechanism. Mandated response timelines, transparent escalation procedures, and an independent ombuds-like layer can enhance user confidence and provide institutional recourse in cases of disputes or misconduct. In addition, a clearly defined liability framework should require licensed operators to participate in compensation or insurance pools that can provide restitution in cases of fraud, platform failure, or verified consumer harm. Such mechanisms ensure that users have meaningful avenues for redress rather than being left without recourse. Independent audits—covering aspects such as game integrity, randomness where relevant, anti-

fraud controls, and compliance transparency—should also form an integral part of licensing and renewal processes.

Clear accountability standards for advertising and promotional practices are equally important. In India, the Advertising Standards Council of India (ASCI) has already undertaken important work in developing and enforcing guidelines related to gaming advertisements, including restrictions on misleading claims and "risk-free" framing. Building on these efforts, broader participation from consumer organisations, civil society groups, and independent watchdog bodies can further strengthen monitoring and accountability. Establishing a dedicated consumer-support or awareness fund—potentially financed through industry contributions could help support public education initiatives, independent monitoring of advertising practices, and mechanisms for reporting misleading or harmful promotional content. Advertising norms should therefore reflect the sensitivity of money-based engagement and avoid normalising or glamorising high-intensity play.

The central principle is pragmatic, create a regulated environment in which standards can be enforced, outcomes monitored, and consumers meaningfully protected. By retaining governance within a supervised domestic space, policymakers are better positioned to mitigate risk and address grievances, rather than allowing demand to consolidate in offshore channels that operate beyond effective oversight.

Even if a regulated domestic pathway is established, enforcement against offshore operators remains a necessary component of a balanced policy framework. However, enforcement should move beyond a purely formal declaration of illegality and instead concentrate on practical accessibility and visibility. In digitally distributed markets, platforms often adapt quickly through mirror sites, clone domains, and alternative access routes. As such, enforcement must be continuous, coordinated, and technologically responsive rather than episodic.

A pragmatic approach would prioritise reducing discoverability and ease of access. This includes faster and more coordinated action against mirror domains, mirror links, and clone websites[35] that replicate blocked platforms and allow users to bypass restrictions. Where feasible, cooperation with app-store ecosystems, hosting providers, and digital infrastructure intermediaries can help limit the mainstream availability of clearly non-compliant operators. While no blocking regime is fully impermeable, sustained and coordinated efforts can meaningfully raise friction and reduce casual or incidental exposure. Alongside these measures, innovative public-awareness initiatives can play an important role in informing users about the risks associated with unregulated platforms and encouraging safer participation choices.

[35] https://cuts-ccier.org/pdf/policy-report-fixing-the-odds-a-policy-blueprint-for-curbing-illegal-online-gambling-in-india.pdf

Enforcement should also address organised promotion networks that amplify the reach of unregulated gaming platforms. Affiliate ecosystems, influencer-led promotions, and misleading advertising narratives can significantly expand platform visibility and normalise participation. A more effective policy approach may involve reconsidering the artificial distinction between offshore and onshore operators. Any entity seeking to provide real-money gaming services to Indian users should be required to register with and comply with the regulatory requirements of Indian authorities, regardless of where the platform is headquartered. This principle can help establish a clearer accountability framework for platforms targeting Indian consumers.

In addition, stronger coordination among domestic regulatory bodies and law-enforcement agencies will be necessary to address illegal operators and organised promotional networks that knowingly facilitate access to unregulated platforms. Where feasible, cooperation with international enforcement agencies and digital infrastructure intermediaries can support efforts to identify, investigate, and take action against illegal operators serving Indian users without regulatory authorisation.

Importantly, this enforcement agenda should be framed primarily as a consumer-protection measure rather than narrow compliance policing. The objective is to reduce exposure to platforms operating outside domestic safeguards, not merely to assert regulatory authority. To be credible and sustainable, enforcement should be backed by predictable processes, transparency in action taken, and strong inter-agency coordination across digital, consumer-protection, and law-enforcement bodies. In parallel, policymakers can promote "safe gaming" as a competitive advantage within the regulated ecosystem by encouraging transparency around consumer-protection features across different providers. Public disclosure or comparison of safety mechanisms—such as grievance redress systems, responsible gaming tools, dispute resolution practices, and player safeguards—can help users make more informed choices while incentivising operators to compete on safety and trust. This approach enhances legitimacy while increasing the practical effectiveness of regulatory intervention.

The case narratives referenced in this report—ranging from loss accumulation and family distress to extreme behavioural spillovers—highlight that the consequences of harmful gaming are not confined to financial loss alone. They often manifest in psychological strain, social breakdown, indebtedness, and in rare cases, coercive or violent conduct. As such, policy responses should not be framed exclusively through a law-and-order lens. A more comprehensive approach would treat gaming-related harm as both a consumer-protection and public-health issue.

This requires institutional support systems that operate alongside regulatory controls. A dedicated national or state-level helpline, integrated with counselling referral pathways, can

provide an accessible first line of assistance. At the same time, community-level support mechanisms should also be strengthened so that early signs of gaming-related distress can be identified and addressed locally. Partnerships with community organisations, educational institutions, and local health or counselling services can help create accessible referral pathways for individuals and families seeking assistance. Such services should be visible not only through public communication campaigns but also within relevant digital environments, ensuring that users encountering distress have clear signposts to support.

Given that the 18–24 cohort overlaps significantly with students and early earners, educational institutions may represent an important context for understanding gaming behaviour among younger users. While the present analysis provides some indications of participation patterns within this group, further research will be necessary to better understand the motivations, risk perceptions, and behavioural dynamics shaping their engagement with money-based gaming. Future work could therefore focus on exploring these patterns in greater depth, including through targeted studies and pilot interventions in school and college environments. Such efforts could help inform the development of digital literacy modules, structured risk education, and awareness programmes that provide practical guidance about financial risk, behavioural cues, and available support. Building a stronger evidence base around younger cohorts will be important for designing effective and proportionate policy responses in the next phase.

Training for frontline stakeholders—including community organisations, educators, and select local health services—can further strengthen early identification and referral mechanisms. Family-facing awareness initiatives can also play a role by equipping households with practical knowledge about early signs of distress and available avenues for assistance. The objective is not to assume universal cessation of participation, but to reduce harm among those who continue to engage—recognising that behavioural substitution suggests many users will remain active in some form.

The post-ban ecosystem is dynamic. Offshore accessibility, user behaviour, enforcement strategies, and market adaptation are all evolving. In such an environment, a static regulatory framework risks becoming outdated. Policy effectiveness depends on continuous evidence and the capacity to adapt in response to emerging trends.

Government should institutionalise regular prevalence and harm surveys across states using a consistent instrument and comparable indicators. These surveys should ideally be conducted or overseen by independent research institutions to ensure methodological credibility and public trust. Such an approach would allow policymakers to track changes in participation intensity, migration patterns, and risk exposure over time. Standardised reporting obligations for licensed domestic operators can complement this effort by providing aggregate data on consumer-protection metrics, complaint volumes, grievance resolution timelines, self-

exclusion uptake, and other relevant indicators, while ensuring that data analysis and evaluation remain subject to independent scrutiny.

An independent research and evaluation function—potentially housed within an academic or policy-research consortium—can periodically assess what elements of the regulatory framework are working and where gaps remain. Such an evidence infrastructure enables a shift from reactive policymaking toward adaptive governance grounded in observed behavioural outcomes.

Digital markets do not operate within neat jurisdictional boundaries. Fragmented rules or uneven enforcement across states can create regulatory arbitrage and reduce overall effectiveness. A coherent governance model is therefore essential.

A pragmatic approach would establish a minimum national baseline for consumer-protection standards and operator obligations, ensuring consistency in core safeguards across the ecosystem. Consumer protection should not be treated as optional or variable; all operators providing services to Indian users—regardless of size or market share—must comply with clearly defined protection requirements. Such standards should apply uniformly across the market to ensure that users receive comparable safeguards irrespective of the platform they use. At the same time, states may retain the flexibility to introduce context-specific measures where local conditions warrant additional interventions.

Clarity in the division of roles among regulators and enforcement agencies is equally important. Overlapping mandates or ambiguous authority can weaken accountability and delay action. Structured stakeholder consultation—incorporating consumer groups, researchers, child-protection advocates, and civil-society voices alongside industry participants—can further enhance legitimacy and ensure that policy design reflects diverse perspectives. At the same time, regulatory decisions in this evolving sector should avoid knee-jerk responses and instead be grounded in systematic evidence. Conducting Regulatory Impact Assessments (RIAs) before major policy interventions can help evaluate potential economic, social, and consumer-protection outcomes. In addition, regulatory sandbox mechanisms can allow policymakers to test new regulatory approaches or technological safeguards in controlled environments before broader implementation, helping identify what works in practice and reducing the risk of unintended consequences.

So, the evidence from this consolidated report suggests that prohibition alone is unlikely to eliminate underlying demand and may, in practice, redirect participation toward offshore platforms operating beyond domestic oversight. A more effective policy stance combines calibrated regulation with targeted enforcement and harm-mitigation measures.

A tightly regulated domestic pathway with strong safeguards can reduce the relative attractiveness of offshore platforms by offering a supervised environment with enforceable standards. Targeted enforcement against offshore accessibility and promotion can raise friction and limit recruitment. Public-health–oriented interventions can mitigate harm among vulnerable groups, including younger users and lower-income households. Continuous monitoring ensures that policy remains responsive as market dynamics evolve.

The overarching objective should not be framed as maximising restriction for its own sake, but as minimising real-world harm. A balanced, risk-based approach—grounded in evidence and adaptive governance—offers a more sustainable pathway toward consumer protection in digitally open markets.

9 Conclusion

This consolidated analysis across Delhi NCR, Tamil Nadu, and Maharashtra presents a consistent and policy-relevant finding, the prohibition of domestic real-money gaming under the PROG Act has been associated with a significant behavioural reallocation toward offshore platforms rather than widespread cessation of participation. Across all three states, offshore usage increased materially in the post-ban period, with statistically significant directional shifts confirmed through transition analysis. The magnitude of change varies by state, but the pattern is uniform—when regulated domestic options were withdrawn, a substantial share of users migrated to offshore alternatives.

Importantly, the evidence suggests substitution and consolidation rather than the emergence of entirely new behavioural dynamics. Financial commitment, frequency of play, session duration, and daily engagement patterns appear to have been redirected rather than extinguished. Offshore platforms have absorbed the structural role previously played by domestic RMG operators. This reallocation is visible across income and age groups, including younger cohorts and relatively lower-income households, raising important consumer-protection considerations.

The qualitative findings reinforce this interpretation. Respondents consistently frame their shift as pragmatic and continuity-driven—motivated by availability, familiarity, and ease of access rather than novelty. Offshore platforms are described as structured, socially embedded ecosystems supported by peer networks and organised digital communities. In such an environment, prohibition alters the jurisdictional location of engagement more than the underlying behavioural architecture.

From a policy perspective, the findings underscore a central tension in digitally open markets: regulatory withdrawal does not automatically eliminate demand when parallel offshore channels remain accessible. This does not invalidate the objectives of harm reduction, but it does highlight the need for calibrated, evidence-based approaches that combine enforceable safeguards, targeted oversight, and adaptive governance.

The core takeaway is therefore pragmatic. The PROG Act has reshaped where money-based gaming activity occurs, but not necessarily whether it occurs. Any long-term policy response must therefore recognise the substitution dynamics observed in digitally open markets and move beyond narrow regulatory framing alone. A sustainable approach would integrate regulatory safeguards with broader social and economic considerations, including consumer

protection, awareness, support systems, and evidence-based governance. In effect, addressing money-based gaming risks requires a human-centred policy framework that balances enforcement with harm reduction, institutional support, and responsible market design while remaining adaptable to evolving technological and behavioural realities.

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ANNEXUR

Annexure 1: Detailed Demographic Profile of Respondents

Demographic Variables	Delhi NCR		Tamil Nadu		Maharashtra	
Gender	**Frequency**	**%**	**Frequency**	**%**	**Frequency**	**%**
Male	934	93.4	950	95	970	97
Female	66	6.6	50	5	30	3
Total	**1000**	**100**	**1000**	**100**	**1000**	**100**
Age Group	**Frequency**	**%**	**Frequency**	**%**	**Freq**	**%**
18–24	100	10	101	10	104	10.4
25–34	563	56.3	573	57	448	44.8
35–44	182	18.2	160	16	183	18.3
45–54	103	10.3	109	11	163	16.3
55+	52	5.2	57	6	102	10.2
Total	**1000**	**100**	**1000**	**100**	**1000**	**100**
Occupation	**Frequency**	**%**	**Frequency**	**%**	**Frequency**	**%**
Student	79	7.9	73	7	75	7.5
Salaried	739	73.9	728	73	648	64.8
Self-employed	140	14	164	16	222	22.2
Homemaker	13	1.3	10	1	9	0.9
Unemployed/Other	29	2.9	25	3	46	4.6
Total	**1000**	**100**	**1000**	**100**	**1000**	**100**
Income	**Frequency**	**%**	**Frequency**	**%**	**Frequency**	**%**
< ₹50,000	35	3.5	31	3	28	2.8
₹50,000–99,999	212	21.2	199	20	190	19
₹1,00,000–1,99,999	588	58.8	603	60	548	54.8
₹2,00,000+	149	14.9	156	16	225	22.5
Prefer not to say	16	1.6	12	1	9	0.9
Total	**1000**	**100**	**1000**	**100**	**1000**	**100**

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