

COMPLIANCE CHECKLIST FOR ONLINE GAMING PLATFORMS

WHAT COMPANIES NEED TO BUILD, MONITOR, AND MAINTAIN

A practical guide for operators navigating India's PROG Act, 2025, and PROG Rules, 2026—with reference to international best practices

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BUILD

Create robust governance, policy, KYC, grievance and internal control frameworks.



MONITOR

Track compliance, gameplay systems, financial flows, risk indicators and reporting obligations.



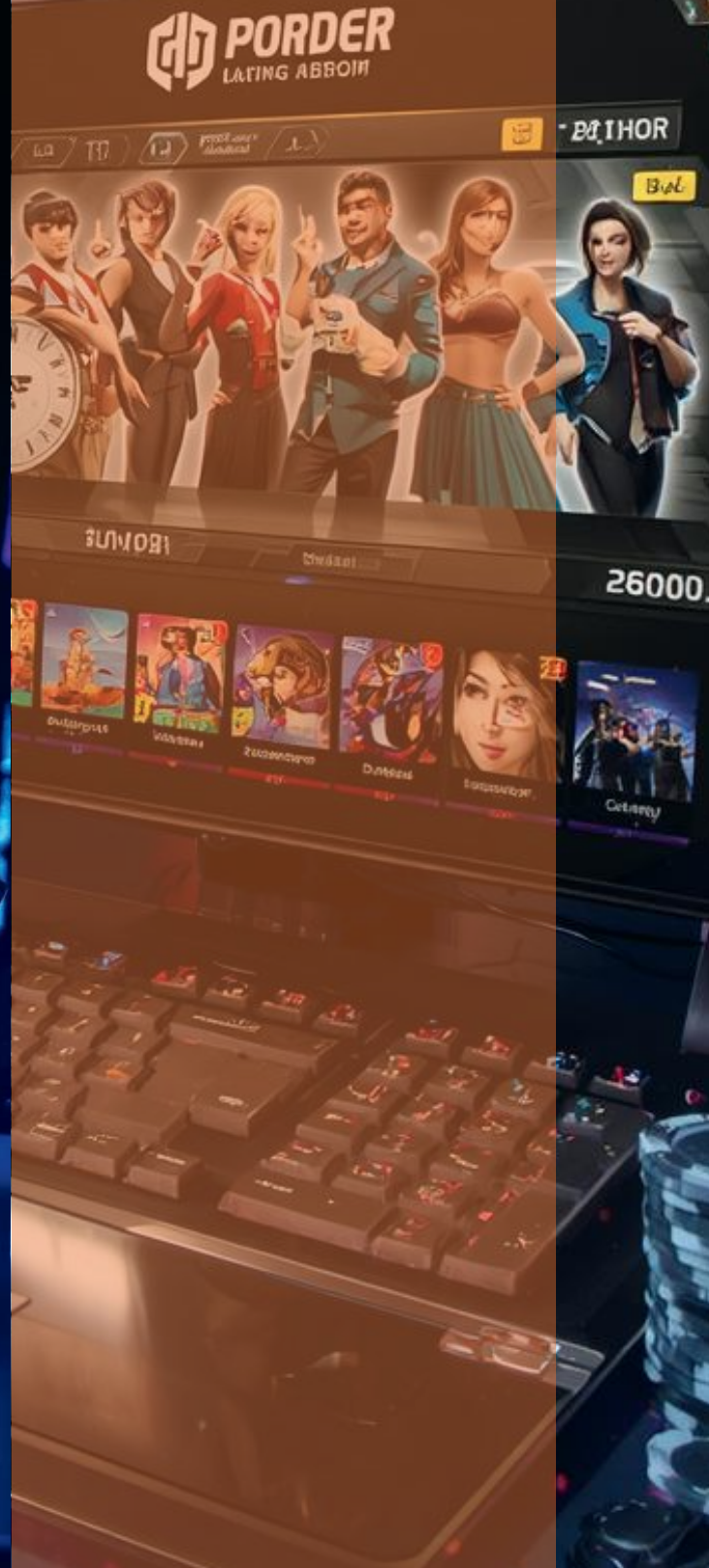
MAINTAIN

Sustain documentation, audit readiness, updates, user safeguards and operational resilience.

Introduction

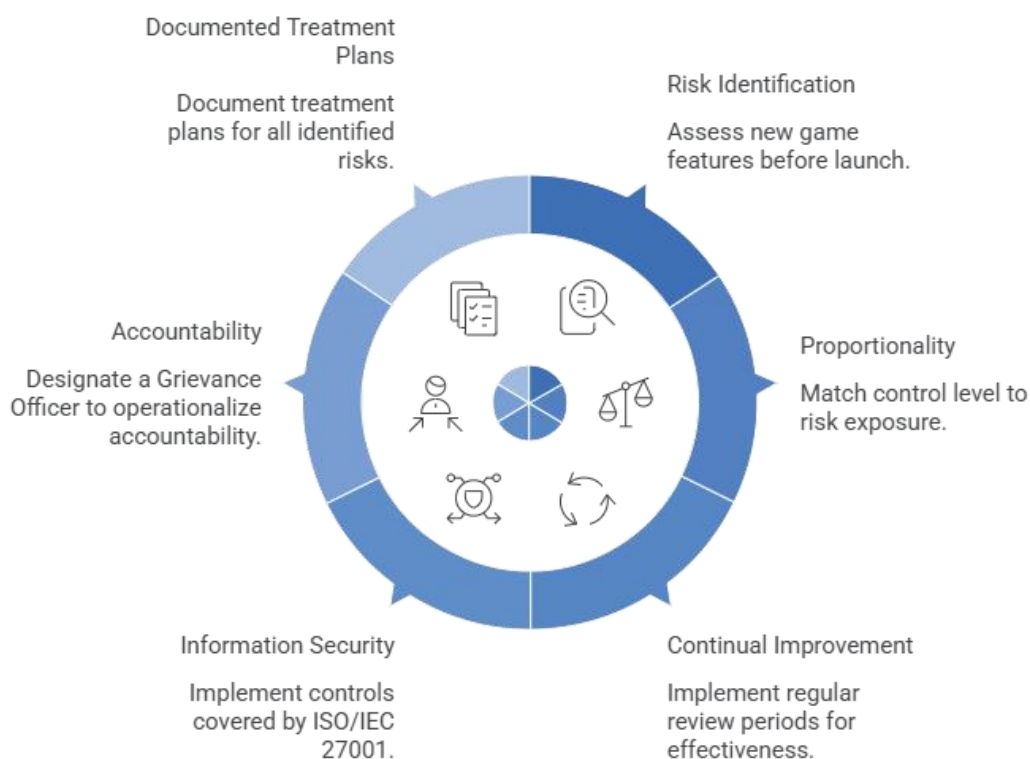
India has ushered in a new era for online gaming. [The Act for Promotion and Regulation of Online Gaming \(PROG\) 2025](#), passed by Parliament in August 2025, along with the [PROG Rules, 2026](#), came into force from 1 May 2026, and it establishes India's first national regulatory regime for online gaming. The new, centralised body, the Online Gaming Authority of India (OGAI), functioning as an attached office under MeitY, now serves as the only regulator in the gaming sector.







Operators, whether online gaming platforms or hybrid formats, can no longer sideline compliance, as it is now a condition precedent for registration. The five-pillar checklist below discusses the foundations each platform will need to sustain its business with the best industry practices.



ISO 31000 Best Practices

These are principles that must be followed while integrating compliance requirements within a wider risk governance structure. ISO 31000 lays down key principles for enterprise risk management. In the context of the online gaming industry, the following principles emerge:



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Risk identification before launch: A systematic risk assessment of every new game feature, payment feature, or other customer-facing change is to be carried out before launch.
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Proportionality: The level of controls deployed is to match the level of risk exposure
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Continual improvement: Regular review periods to be functionalised
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Information security governance: The OGAI could seek to implement controls covered by ISO/IEC 27001. This should assure OGAI and other stakeholders that practices have been assessed to the highest standard.
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Accountability: The PROG Rules, 2026, designate a Grievance Officer to operationalise accountability
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Documented treatment plans: All identified risks need to have a clearly documented treatment plan (avoid, reduce, transfer, or accept), including the ownership and review date of the identified risks.

KEY PILLARS

"User safety features" have been defined by [Rule 2\(1\)\(i\) of the PROG Rules, 2026](#) to mean "a mechanism that relates to the technological, procedural, operational, behavioural or systems aspect of the game and is commensurate with the risks posed by each game".



Key elements to build:

1. Age verification & age-gating
Rigorous KYC at onboarding is essential. Age verification should be completed before play, reflecting evolving global regulatory expectations.

Mandatory KYC

2. Parental Controls
Parents or guardians should have simple tools to block, monitor, or disable a child's access.

Easy Controls

3. Time Restrictions & Usage Limits
Mandatory session caps, cooling-off reminders, daily limits, self-exclusion, and spending limit tools should be available.

Usage Limits

4. In-app user reporting tools
Players should be able to report bad content, suspicious activity, or harmful behavior directly within the platform.

Direct Reporting

5. Counselling Support Integration
At-risk users should be provided access to counselling and support services.

Support Access

6. Fair Play and Integrity Monitoring
Use automated detection for bots, collusion, and match-fixing, supported by anti-cheat systems and annual third-party verification.

Anti-Cheat & Monitoring

7. Accessibility
Platforms should comply with WCAG 2.1 Level AA so safety, grievance, and reporting mechanisms remain usable for people with visual, motor, or cognitive impairments.

WCAG 2.1 AA

Protect Users
Build trust and safer experiences.

Comply with Confidence
Meet global regulatory standards.

Sustainable Growth
Responsible today, resilient tomorrow.


Security by Design
Safety built into every layer of the platform.

What to monitor: Audit these features quarterly. Verify that age-gating has not been bypassed, that time-limit tools are functioning, and that reporting flows are operational end-to-end.

PILLAR B: GRIEVANCE REDRESSAL MECHANISMS

PROG Rules 2026 provides a [two-tier grievance structure](#) where a user is given the right to escalate their complaint within 30 days (from resolution/non-resolution) to the platform. Should the platform's outcome be unsatisfactory to the user, Tier 2 allows the user to appeal to the OGAI, which must deliver a response within a further 30 days. The [UK's Online Safety Act 2023](#) outlines similar requirements for accessible and transparent user complaint systems with clear turnaround times, a two-tier model that is very much analogous to India's.

Key elements to build:

FOCUS AREA	COMPLIANCE REQUIREMENT	KEY REQUIREMENT EXPLAINED	KEY ACTION / TAKEAWAY
	Designated Grievance Officer <i>Rule 23 of PROG Rules 2026</i>	A clearly designated and contactable officer must be in place at each platform to receive and investigate complaints from users. This officer's name and contact information should be readily available for public viewing within the platform. The company must not use a general email inbox to manage complaints.	 Publicly visible officer details required
	In-platform Complaint System	Users must be given the facility to submit, monitor, and receive decisions on their complaints from within the platform itself.	 Submit + track + receive decisions inside the platform
	Clear Turnaround Times	Develop internal Service Legal Agreements (SLAs) that fall comfortably within the regulated timeframes. <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="border: 1px solid orange; padding: 5px; text-align: center;">  Acknowledgement: 48 hours </div> <div style="border: 1px solid orange; padding: 5px; text-align: center;">  Resolution: 15 days </div> <div style="border: 1px solid orange; padding: 5px; text-align: center;">  Outcome communicated: 21 days </div> </div>	 Use time-bound SLA checkpoints
	Transparency on the Complaint Escalation Route	Users must be informed at the point a complaint is concluded (or non-concluded) of their right to appeal to the OGAI. An email response from the platform stating "no further action" without indicating the appeal path would constitute a lack of disclosure.	 Always disclose the OGAI appeal path
	Detailed Complaint Log	Each platform must maintain a comprehensive log detailing every complaint received, categorizing it based on issue type, the time taken for its resolution, and the overall outcome. This contributes directly to Pillar E compliance documentation.	 Maintain an audit-ready complaint log



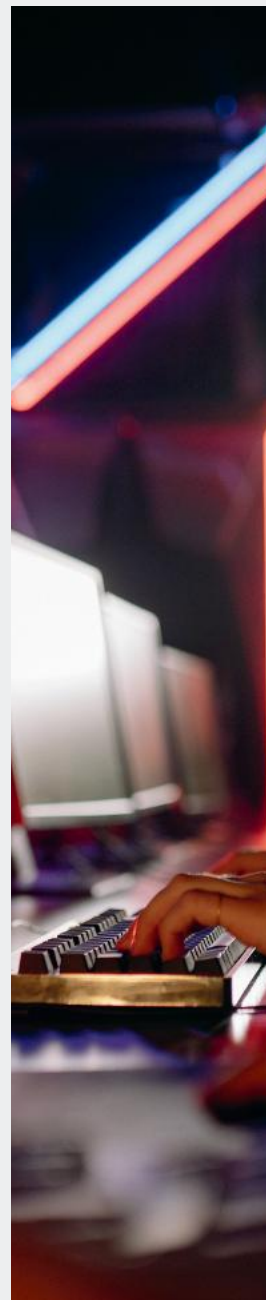
PILLAR C: PAYMENTS AND FINANCIAL COMPLIANCE

While the PROG Act, 2025, [banned money games in their entirety](#), financial compliance for permitted platforms (e-sports and notified social games) becomes limited but highly scrutinized. Furthermore, Australia's [Gambling Commissioner Licensee Checklist](#) can be used to get a reference to detailed AML policies and procedures.



Key elements to build:

FOCUS AREA	COMPLIANCE REQUIREMENT	KEY REQUIREMENT EXPLAINED	KEY ACTION / TAKEAWAY
	Payment Gateway Compliance & Disclosure	A platform must adhere to payment facilitation directives issued as part of its license. The entire payment integration should align with RBI directives, the financial model disclosed at the time of application, and PCI DSS-12 principles, which are globally considered a basic requirement.	<p>Align payment systems with RBI directives, licensed disclosures, and PCI standards</p>
	KYC / AML Procedures	Since most non-money-game platforms may involve entry fees, prize money, or in-game purchases, they are bound to KYC procedures outlined under PMLA.	<p>Apply PMLA-based KYC and AML checks for fee, prize, and purchase flows</p>
	Revenue Model Transparency	A platform operator needs to disclose its revenue model to OGAI at the time of applying for a license. All significant changes in the revenue model must be disclosed and may require reassessment.	<p>Disclose the revenue model up front and report major changes promptly</p>
	Review of In-game Asset Monetization	The Determination Test under the Rules considers in-game asset monetization when assessing whether a game is a prohibited money game. Therefore, a pre-launch review of virtual currencies or any tradable item on the platform is advisable.	<p>Review virtual currencies and tradable items before launch</p>
	GST Compliance	The 28% GST applicable to certain categories of online games from October 2023 remains effective. Platforms need to ensure that invoicing, TDS, and return filings are fully up to date.	<p>Keep GST invoicing, TDS, and return filings fully up to date</p>




















Pillar D: Content Moderation and Platform Governance

PROG registration is not a one-off process; it is an ongoing governance relationship with the OGAI. Platforms have an affirmative obligation to maintain the circumstances under which they are registered.


Key elements to build:

AREA	KEY REQUIREMENT	HIGHLIGHTED FOCUS (ORANGE)	KEY ACTION
 DETERMINATION TEST READINESS	A new objective "Determination Test" defined in the PROG Rules measures whether any aspect of a game constitutes a prohibited money game. Your organization should maintain an in-house legal/product review system whereby every new game mode, feature, or update is tested according to this protocol prior to launch.	 <ul style="list-style-type: none"> Every new game mode, feature, or update must be assessed. Determine if any aspect constitutes a prohibited money game. Must be completed prior to launch. 	 <p>Establish and document an in-house legal/product review process and maintain records of all Determination Tests conducted.</p>
 GAME CLASSIFICATION GOVERNANCE	The PROG Act categorises games as e-sports, social games, or prohibited money games. Each of these classifications carries different compliance obligations. If your platform supports games across more than one of these categories, you'll need a classification matrix which outlines the relevant category for each supported title.	 <ul style="list-style-type: none"> Maintain a classification matrix for all supported titles. Map each title to: e-sports, social games, or prohibited money games. Ensure compliance obligations are clearly understood for each category. 	 <p>Create and periodically update a classification matrix and review compliance obligations for each game category.</p>
 ADVERTISING & PROMOTION STANDARDS	The PROG Act proscribes the advertisement of prohibited online money games. For even permitted platforms, promotional material can not create false impressions in the eyes of the consumer about game mechanics, prize structures, or competition. (E.g., An e-sports platform promoting "guaranteed cash prizes for tournament participation" without the fine print clarifying conditions for entry, consumer protection and PROG Act risks.)	 <ul style="list-style-type: none"> No ads for prohibited online money games. Promotions must not mislead consumers. Ensure clarity on mechanics, prizes, and eligibility conditions. 	 <p>Implement an advertising review process to ensure all promotions are accurate, transparent, and compliant with the PROG Act.</p>
 PLATFORM ARCHITECTURE DISCLOSURE TO OGAI	The OGAI may inspect the underlying mechanics of game play, payment systems and the overall architecture of the platform prior to issuing registration. For any gameplay element with a random component, an OGAI will expect to see proof of current RNG (Random Number Generator) certification from an accredited testing lab (e.g. BMM, GLI, iTech Labs). This is international best practice and is key to the OGAI scrutinizing mechanics.	 <ul style="list-style-type: none"> Full disclosure of platform architecture, gameplay, and payment systems. RNG (Random Number Generator) certification is mandatory for random gameplay elements. Certification from accredited labs (e.g. BMM, GLI, iTech Labs). 	 <p>Prepare and maintain complete technical documentation and RNG certification to be shared with OGAI during registration and inspections.</p>
 FOREIGN OPERATOR RESPONSIBILITIES	If your company is not an Indian domestic company and supports services to Indian consumers, it will be bound by India's requirements on registration, user safety, financial transactions, and grievance resolution. A well-tested and audited geo-IP compliance system will be mandatory.	 <ul style="list-style-type: none"> Comply with India's requirements (registration, user safety, financial transactions, grievance resolution). Geo-IP compliance system must be well-tested and audited. 	 <p>Implement and audit geo-IP compliance and ensure full adherence to India's regulatory obligations.</p>

Pillar E: Recordkeeping and Compliance Documentation

The key connection to each pillar is the importance of documentation. [Data retention orders of the OGAI](#) must be adhered to as per PROG Rules, 2026. Penalties are scaled according to recurrence, user loss, and user remediation efforts; all to be evidenced through documentation, according to the Act.

Key elements to build:

AREA	DESCRIPTION	★ KEY HIGHLIGHT	COMPLIANCE ACTION
 COMPLIANCE REGISTER	A living document recording all relevant regulatory obligations, the state of implementation, and how the obligation is satisfied.	 Maintain a single source of truth for all regulatory obligations and their compliance status.	 Maintain and regularly update the Compliance Register with implementation status and evidence.
 USER SAFETY FEATURE DISCLOSURES	Every platform applying for a determination or registration must disclose user safety features and internal complaint processes. These disclosures must be kept updated on any material changes made and logged accordingly (Rule 23).	 Disclose, update, and log all user safety features and complaint processes as per Rule 23.	 Publish and keep updated user safety features and complaint processes on the platform.
 CERTIFICATE OF REGISTRATION	Every issued Certificate of Registration (valid for a maximum of 10 years) must be displayed prominently on a platform interface.	 Display the valid Certificate of Registration (up to 10 years) prominently on the platform.	 Display the Certificate of Registration prominently on all relevant platform interfaces.
 AUDIT TRAILS FOR AGE VERIFICATION/ KYC	All age verification checks and KYC records must be retained in a form that will stand scrutiny by a regulator.	 Retain age verification and KYC records in a secure, immutable format for regulatory review.	 Store and secure age verification and KYC records for audit and regulatory access.
 COMPLAINT LOGS	As explained under pillar B, logs, which are time-stamped, categorized, and have a recorded outcome, are a necessity, not a feature.	 Maintain time-stamped, categorized complaint logs with documented outcomes.	 Implement and maintain complaint logging system with outcome tracking.
 COMPLIANCE AUDIT SCHEDULE	As industry experts emphasize, compliance is an ongoing process. Conduct formal internal audits at least semi-annually that span all 5 pillars. Document findings and track them to closure. Obtaining SOC II Type 2 attestation to verify that the platform's controls around security, availability, and confidentiality are operating effectively will be an added benefit in proving operational trustworthiness. Use data pipelines compliant with ISO/IEC 5259 (Data Quality for Analytics and ML) when building tools that use AI for fraud detection, user analytics, moderation, etc.	 Conduct semi-annual audits across all 5 pillars and track to closure. Leverage SOC II Type 2 attestation and ISO/IEC 5259 compliant data pipelines for analytics and AI tools.	 Perform internal audits at least semi-annually, document findings, and track remediation.

A NOTE ON PENALTY CALIBRATION



The PROG Act, 2025 and PROG Rules, 2026, represent a significant turning point in Indian regulation of online gaming by bringing in transparency, safety, and responsibility as central elements. For operators, compliance is integral to business success going forward, and for platforms to develop responsible and user-friendly compliance structures is crucial.

CONCLUSION

The PROG Act, 2025 and PROG Rules, 2026, represent a significant turning point in Indian regulation of online gaming by bringing in transparency, safety, and responsibility as central elements. For operators, compliance is integral to business success going forward, and for platforms to develop responsible and user-friendly compliance structures is crucial.





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