**Monitoring Checklist – Crime and Money Laundering**

All gambling operators have a responsibility to keep financial crime out of gambling. The Proceeds of Crime Act 2002 places a legal obligation on gambling operators to be alert to attempts by customers to gamble money acquired unlawfully, either to obtain legitimate or ‘clean’ money in return or simply using criminal proceeds to fund gambling. Both modes of operation are described as ‘money laundering’. Casinos also have **additional** responsibilities under the Money Laundering Regulations 2007.

A quick guide to raise awareness and understanding of money laundering has been produced by the Gambling Commission and is available here:

[www.gamblingcommission.gov.uk/pdf/Quick-guides/Money-laundering-Information-for-licensing-officers-and-local-police.pdf](http://www.gamblingcommission.gov.uk/pdf/Quick-guides/Money-laundering-Information-for-licensing-officers-and-local-police.pdf)

This template may assist authorised local authority officers and police officers when monitoring money laundering risk within Gambling Licensed Premises. For more general compliance assessment templates, please download the relevant template at:

[www.llepbizgateway.co.uk/gambling-act-2005](http://www.llepbizgateway.co.uk/gambling-act-2005)

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| Premises name and address |  |
| Name of person in a management position/ person with responsibility for AML |  |
| Names of staff members |  |
| Type of Licence issued under GA05 | Premises Licence Number |
|  |  |
| Operator name | Operating Licence Number (where available) |
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| **Issue** | **Officer Notes** |
| **Gambling facilities offered at the premises**  For example:   * Fixed Odds Betting Terminals (Category B2 Gaming Machines/ FOBTs) * Self-Service Betting Terminals (SSBTs) * TITO Machines\* * Gaming Machines (other categories) * Betting |  |
| **Notes**  \*Gaming machines which operate on a Ticket In, Ticket Out (TITO) system will produce a ticket rather than cashing out coins or notes. They are primarily used within the Casino and Betting Sector. The enhanced Money Laundering risk associated with these machines comes from the lack of human interaction and, therefore, the anonymity of the customer. The production of a ticket also creates a potential audit trail which may legitimise the appearance of transactions. | |
| **CCTV**  Evidence measures:   * Which areas does the CCTV cover? * Does CCTV coverage leave any blind spots? * Are FOBTs and TITO (Ticket-In, Ticket-Out) Machines covered by CCTV? * How long is footage kept for? * Is CCTV signage displayed? * Who maintains the system? * Are there contact details available for the person who maintains the system? * Who can access footage upon request? * Can the staff member show footage from a specified point within the retention period? |  |
| **Acting in accordance with guidance**  Casinos only   * Can the premises evidence that they are taking into account the most recent version of the following document:   *‘The Prevention of Money Laundering and Combating the Financing of Terrorism - Guidance for remote and non-remote casinos.’*  Evidence measures:   * Is there a money laundering policy in place? If so, when was this last reviewed? * Do existing risk management systems address money laundering risks, or is there a separate system in place for that purpose? * Who is the Money Laundering Officer? * Is there evidence of Suspicious Activity Reports SARs being submitted? * Is there evidence of the consideration of SARs being submitted? * When are enhanced checks carried out on customers? * How does the casino verify the identity of customers (can be electronic, documentary or a combination of both)? * What is the operator’s policy on the acceptance and checking of identity documents? * Does the operator maintain copies (photocopied or scanned) of identity documents? * What customer due diligence (CDD) is done over and above the basic requirements at entry or threshold? * How often is this repeated for established customers? * Is the casino placing an overreliance on one source of information to conduct CDD checks?   (Ordinary Code Provision 2.1.1)  All Gambling Premises   * Can the premises evidence that they are taking into account the following document:   *‘Duties and responsibilities under the Proceeds of Crime Act 2002 - Advice for operators (excluding casino operators)’*   * Do staff members receive regular money-laundering specific training and is this recorded? * What would staff members describe as being suspicious activity in relation to money laundering? * Do staff members receive Proceeds of Crime training and is this recorded? * Do staff members understand their responsibilities under the Proceeds of Crime Act? * How would staff members escalate their suspicions of money laundering or Proceeds of Crime’? * Is there a clear process for staff to submit SARs (Suspicious Activity Reports)? * Are employees required to report any indicators of irregular and/or suspicious betting to their employer? * Are employees prohibited from using information related to irregular and/or suspicious betting for the purpose of placing their own wagers?   (Ordinary Code provision 2.1.2) |  |
| **Notes**  At premises other than Casinos, it’s not necessary for suspicious activity to be logged and available at the premises due to the security risk involved. Also, staff members may not be aware of the submission of SAR reports, even if they have highlighted the issue for escalation. | |
| **Threshold System**  Casinos Only - where a threshold system is operated   * What are the procedures for tracking threshold customers? |  |
| **Money Lending**  Casinos only   * What steps are taken to prevent organised money lending? * How is this monitored? * What instructions are given to staff spot organised money lending? * What instructions are given to managers about how to act on organised money lending? * What are the procedures for excluding any person who has been suspected of carrying out organised or systematic money lending? * How are cases of commercial money lending dealt with? * How are cases which may involve money-laundering dealt with? * Is there a local clustering of gambling outlets which may make it easier for a person to launder criminal proceeds over multiple venues and products?   (Ordinary code provision 3.8.1)  Non Casino Premises   * Are there arrangements in place to ensure that staff are requested to report any instances of substantial money lending when they become aware of them?   (Ordinary code provision 3.8.2) |  |
| **Cash handling**   * What are the policies and procedures concerning the handling of cash, and cash equivalents? * Do the procedures specifically address money laundering risk and the provision of illicit credit?   Are the procedures regarding cash handling kept under review and revised appropriately?  (Licence condition 5.1.1) |  |
| **Reporting key events**   * Is there an awareness of the requirement to submit a key event report to the Gambling Commission should the person responsible for Anti-Money Laundering be appointed or leave their position? * Is there an awareness of the requirement to submit a key event when a SAR (Suspicious Activity Report) is submitted? * Is there an awareness of the requirement to submit a key event with regards to any criminal investigation by a law enforcement agency?   (Licence condition 15.2.1) |  |
| **Risk Assessment**   * Has the operator conducted an assessment of the risks of their business being used for money laundering and terrorist financing?   Licence Condition 12.1.1 |  |
| **Customer Relationships**   * Is there an awareness of which behaviours may be indicative of money laundering in customers? * How is customer activity monitored? * In what circumstances would a customer relationship be terminated? * Does the operator have procedures in place to monitor customers across all platforms e.g. remote and non-remote? (Not applicable if operator does not have remote platform) * Is the operator aware of the guidance in relation to termination of customer relationships? |  |
| **Manager/ staff concerns**   * Are there any concerns around organised crime that the manager/ staff members would like to report or discuss? |  |
| **Gambling Commission's Intelligence Reports:**  Telephone: **0121 230 6655**  E-mail: [intelligencereports@gamblingcommission.gov.uk](mailto:intelligencereports@gamblingcommission.gov.uk)  **Crimestoppers 0800 555 111**  You may wish to leave one of the following advice documents produced by the Gambling Commission. (Please press the ‘Ctrl’ key and click the link to download the documents)  **Casinos:**  [Prevention of money laundering and combating the financing of terrorism guidance for remote and non-remote casinos July 2016](http://www.gamblingcommission.gov.uk/pdf/Prevention-of-money-laundering-and-combating-the-financing-of-terrorism.pdf)  **Other Gambling Premises:**  [Duties and responsibilities under the Proceeds of Crime Act 2002 - Advice to Operators](http://www.gamblingcommission.gov.uk/pdf/Duties-and-responsibilities-under-the-proceeds-of-crime-act-2002---advice-to-operators.pdf) | |