



ISLE OF MAN



## Decision-Making Process Enforcement & Sanctions

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# Version Control

Version	Date Published	Comments
1	June 2024	Initial version
2		
3		
4		

**Important note:** *This document explains the Decision-Making Process ("DMP") which the Isle of Man Gambling Supervision Commission (the "GSC") follows when the Board of the Commission (the "Commissioners") itself, or a sub-committee of it or a person(s) authorised by it (herein referred to as the "Decision-Maker")<sup>1</sup>, exercises the Commission's statutory powers to take any of the significant administrative decisions listed in Appendix 1 hereto ("Enforcement and Sanctions"). This DMP does not apply to the decision-making process of the officers (i.e. staff) of the Commission (the "Inspectorate"), nor does it apply to the decision-making process involved in any other non-enforcement decision (e.g. the issue of a licence, permit or similar). Furthermore, this DMP does not apply to the investigative stage of an enforcement case that is not part of the DMP. Wherever possible, the Subject will be informed that they are being investigated by the GSC where any resulting actions may be determined in accordance with this DMP. Where a Subject has been informed that they are being investigated and that investigation is then discontinued by the GSC, the Subject will be informed of the discontinuation. Any decision made under this DMP will be reached based on evidence supporting a decision being made on the balance of probabilities.*

## 1. Introduction

- 1.1. The GSC is not a judicial body. Court rules and procedures do not apply to the decisions that it takes. The GSC takes administrative decisions in accordance with its statutory powers. In doing so, the GSC will act as supervisor, investigator and decision-maker. It is only the significant regulatory intervention DMP that is the subject of this document.
- 1.2. The point at which an administrative decision is taken is reached via a series of stages that are described below. The DMP set out in this document is designed to ensure that the final decision taken:
  - 1.2.1. is one that the GSC is empowered to take;
  - 1.2.2. is one that is made in accordance with the GSC's regulatory objectives;
  - 1.2.3. has been arrived at in accordance with the principles of natural justice; and
  - 1.2.4. is reasonable based on all known relevant information before the GSC at that time.
- 1.3. In making a decision subject to this DMP, the GSC is continually mindful of the "fit and proper" test applicable to licensed operators, senior management, officers and individuals associated with any licensed operator subject to the GSC's Regulatory Framework<sup>2</sup>.
- 1.4. The GSC is committed to ensuring that it is consistent, fair and proportionate in its approach to decision-making when carrying out its statutory functions.

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<sup>1</sup> Any reference to "Board" in this document includes a reference to any person(s) authorised by the Board of the Commission to take any of the decisions which are the subject of the DMP.

<sup>2</sup> The "Regulatory Framework" comprises statute, regulations, codes, guidance or similar that are subject to oversight by the GSC.

1.5. The table below details other documents issued by the Isle of Man Gambling Supervision Commission that are associated with this policy and can be found on our website.

Document name	Content(s)
Enforcement Strategy	<ul style="list-style-type: none"> <li>An overview of the GSC’s strategy of its enforcement activities</li> </ul>
Discretionary Civil Penalties – Guidance	<ul style="list-style-type: none"> <li>Criteria to be assessed by the GSC when considering the imposition of a penalty.</li> <li>The level(s) of penalty that can be imposed</li> <li>Availability of discounts</li> </ul>
Settlement Policy	<ul style="list-style-type: none"> <li>When and in what circumstances the GSC will consider entering into settlement discussions with a subject</li> </ul>
Publication Policy	<ul style="list-style-type: none"> <li>When the GSC publishes enforcement outcomes</li> <li>Notice and timing of any publication</li> </ul>
Prohibition Policy	<ul style="list-style-type: none"> <li>When the GSC issues a prohibition</li> </ul>
Use of Appropriate Experts Policy	<ul style="list-style-type: none"> <li>When the GSC issues a direction to an Operator, requiring the appointment of an appropriate professional to remedy AML/CTF deficiencies</li> </ul>
Referral to the GSC Enforcement Division	<ul style="list-style-type: none"> <li>Factors relevant to a referral to the GSC Enforcement Investigation for further investigation</li> </ul>
Making a Referral to the Police and/or the Attorney General	<ul style="list-style-type: none"> <li>In what circumstances the GSC will consider referring actual, suspected or prima facie criminal offences (including contraventions of the AML/CFT Code<sup>3</sup>).</li> </ul>

## 2. When this DMP applies

2.1. This DMP applies only to the decisions listed in Appendix 1 hereto.

2.2. The Subject of any decisions listed in Appendix 1 (“the **Subject**”) has a right of appeal under the relevant statute to the Gambling Appeals Tribunal.

2.3. For the avoidance of doubt, this DMP does not apply:-

2.3.1. to administrative decisions taken by the GSC as part of routine or enhanced supervision;

2.3.2. to the exercise of operational investigations including, for example, decisions to request or compel production of information or attendance for interview;

2.3.3. where the particular circumstances require urgent action to be taken (for example, but without limitation, where customer funds are at risk or where there is evidence of financial crime), but always subject to any statutory requirement to provide advance notification (e.g. a preliminary notice in advance of issuing a prohibition);

2.3.4. where an alternative process is appropriate and reasonable in the circumstances in light of perceived urgency and in considering the public interest; and

<sup>3</sup> *Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Code 2019*

2.3.5. where an application is to be made by the GSC to the Isle of Man Court.

- 2.4. Where a person, who is subject to the GSC's regulatory framework, voluntarily self-reports non-compliance and in doing so accepts responsibility for the reported non-compliance, the matter will be progressed by the GSC in accordance with this DMP where it is identified that the imposition of a regulatory sanction may be appropriate in the circumstances.
- 2.5. If at any stage it is determined by the GSC in relation to a matter subject to this DMP that no further regulatory intervention is necessary, or that the matter should be addressed through normal or enhanced supervision, the DMP will be terminated.
- 2.6. The DMP may be suspended where and whilst the GSC and the Subject engage in discussions with a view to settlement (see paragraph 3).
- 2.7. If the GSC determines to adapt any part of this DMP to suit the circumstances of any particular case, it will (unless it is not practicable or appropriate to do so; for example, where the case requires an urgent decision) inform the Subject of this fact and the reason for adapting the process.

### 3. Settlement

- 3.1. Persons subject to this DMP are expected to interact with the GSC in an open, honest and transparent manner.
- 3.2. The GSC's Settlement Policy sets out the circumstances in which the GSC may choose to enter into settlement discussions with a Subject, and how any discount that may be applied to a civil penalty aligns to each separate stage of this DMP.
- 3.3. If settlement is not reached, this DMP will continue to apply.

### 4. Serious Case Review Panel ("SCR")

- 4.1. This DMP comprises 5 distinct stages (see Appendix 2). Before the DMP is invoked, the GSC will conclude its investigation into the Subject and present a report setting out the findings of that investigation, the material failings of the Subject and any recommended enforcement actions (the "**Draft Enforcement Report**"). The Draft Enforcement Report will be prepared by the persons authorised by the GSC to undertake the investigation (the "**Investigators**")<sup>4</sup>.
- 4.2. The Investigators will present their Draft Enforcement Report to an internal panel, the Serious Case Review Panel. The SCR Panel is composed of senior members of the GSC Inspectorate and up to two Commissioners. Any Commissioners participating in this DMP as a member of the SCR on any particular case will be recused from participating in stages 3 and/or 4 of this DMP in relation to that same particular case.
- 4.3. The SCR Panel is convened on a case-by-case basis and will include members of the GSC who are involved in the investigation and other members who are not directly involved in it.
- 4.4. The SCR Panel will consider the Draft Enforcement Report and will determine, from a range of possible options, the most appropriate way of dealing with a matter (the "**First SCR Review**").
- 4.5. The First SCR Review involves consideration by the SCR Panel of the information presented by the Investigators, paying particular attention to:

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<sup>4</sup> For clarity, if settlement is concluded prior to Stage 1 of this DMP, the identified and agreed non-compliance will be set out in the Settlement Agreement.

- 4.5.1. the GSC's regulatory objectives;<sup>5</sup>
  - 4.5.2. matters indicating non-compliance;
  - 4.5.3. any aggravating factors;
  - 4.5.4. any mitigating factors;
  - 4.5.5. the potential for any adverse impact on the reputation of the Isle of Man as a respected jurisdiction for the regulation of gambling and medicinal cannabis;
  - 4.5.6. any other appropriate way of dealing with the matter (for example, in the case of a personal data breach, referring the matter to the Information Commissioner).
- 4.6. The SCR Panel may recommend any action at this stage, including without limitation:
- 4.6.1. that the matter requires no further action and that the investigation should be discontinued;
  - 4.6.2. that further investigation is necessary (in which case, the Investigators will bring an updated Draft Enforcement Report back to the SCR Panel when the further investigation is concluded and the process set out in this paragraph will apply equally to such an updated Draft Enforcement Report);
  - 4.6.3. that the matter should be addressed through routine or enhanced supervision;
  - 4.6.4. instructing the Investigators to commence settlement discussions with the Subject;
  - 4.6.5. providing the Investigators with parameters within which settlement discussions should remain; or
  - 4.6.6. that the case should proceed to **Stage 1** of this DMP (Disclosure of Draft Enforcement Report).
- 4.7 For the avoidance of any doubt, the First SCR Review is not part of the formal DMP. The SCR Panel is merely performing a recommendation role, not a decision-making role. The formal DMP comprises Stages 3-5 only. Stages 1-2 are preliminary stages.

## 5. Stage 1: Disclosure of Draft Enforcement Report

- 5.1 If the SCR Panel determines that the Draft Enforcement Report (or, if applicable, the updated Draft Enforcement Report) discloses a case to answer and that it is appropriate to proceed under the DMP, the SCR Panel will instruct the Investigators to disclose the Draft Enforcement Report to the Subject together with a copy of this DMP document.
- 5.2 The Subject will be invited to:
- 5.2.1 confirm whether the facts set out in the Draft Enforcement Report are correct or, if not, set out precisely what factual corrections to the Draft Enforcement Report they suggest. The Subject should provide evidence at this stage to support any proposed correction(s);
  - 5.2.2 submit any additional information that they consider is material or relevant to the matter in any way; and
  - 5.2.3 submit any comments or representations they may wish to make in relation to the recommendations (including, if prepared at this stage, the content of any draft public statement) contained in the Draft Enforcement Report.

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<sup>5</sup> Section 5 of the Gambling Supervision Act 2010 sets out the GSC's regulatory objectives, which are: (a) ensuring that gambling is conducted in a fair and open way; (b) protecting children and other vulnerable persons from being harmed or exploited by gambling; and (c) preventing gambling from being (i) a source of crime or disorder (ii) associated with crime or disorder, or (iii) used to support crime. In addition, there is the objective of preventing the misuse of cannabinol, cannabinol derivatives, cannabis or cannabis resin.

- 5.3 The SCR Panel will determine the date by which the response should be provided by the Subject (the “**Initial Response Date**”)<sup>6</sup>, taking into account the nature and volume of information involved and the extent to which individual items may have been available to the Subject for review and comment.<sup>7</sup>
- 5.4 Any submissions made by the Subject at this **Stage 1** should be in writing and must be received by the Initial Response Date.
- 5.5 In some cases, the SCR Panel may judge it appropriate to meet with the Subject to discuss the Draft Enforcement Report. This opportunity will only be offered to the Subject at this stage provided that the response is received by the Initial Response Date and it is appropriate to do so. The GSC will not countenance a meeting which is considered to be a delaying tactic. In any such meeting, the appointed Investigators together with other members of the Inspectorate will represent the GSC.
- 5.6 Although the position of the GSC is that settlement discussions should take place at the earliest possible stage in order to save the time and resource involved in an enforcement investigation, this disclosure stage will generally be a further opportunity for a Subject to request settlement discussions with the GSC. As stated in paragraph 3.2 above, any settlement offer at this stage will likely be on less attractive terms than those which would have been available had the Subject agreed to settle at an earlier stage in the investigation.
- 5.7 The purpose of this disclosure stage is to give the Subject notice of the general nature of the case against them and an opportunity to make factual corrections and representations. The Investigators will consider and evaluate carefully any comments or representations received in writing from the Subject (the “**Initial Representations**”).

## 6. Stage 2: Review of Final Enforcement Report by the SCR Panel

- 6.1 Following a careful review and evaluation of the Initial Representations<sup>8</sup>, the Investigators will update the Draft Enforcement Report as appropriate and necessary (the “**Final Enforcement Report**”).
- 6.2 The Investigators will present the Final Enforcement Report and the Initial Representations to the SCR Panel.<sup>9</sup>
- 6.3 The SCR Panel will review the Final Enforcement Report and the Initial Representations<sup>10</sup> and will determine, from a range of possible options, the most appropriate way of dealing with the matter (the “**Second SCR Panel Review**”).
- 6.4 The Second SCR Panel Review involves consideration by the SCR Panel of all the information available to it, paying particular attention to the Initial Representations and the Investigators’ assessment of

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<sup>6</sup> The GSC considers that an Initial Response Date of 21 days from the date of the letter/e-mail enclosing the Draft Enforcement Report will be sufficient. In exceptional cases, the Subject may be granted a longer period of time. It is important to note that the Subject will have a further opportunity to make written representations under this DMP.

<sup>7</sup>For example, items may have originated from the Subject, items may have been available via routine or enhanced supervision activities, or items may have been disclosed to the Subject during the investigation.

<sup>8</sup> If the Subject has not provided any Initial Representations, the Investigator will update the Draft Enforcement Report to record (a) the fact that an opportunity to do so was given to the Subject, (b) the Subject’s failure to take this opportunity and (c) whether any change has taken place since the date of the Draft Enforcement Report which is material to the recommendation(s) contained in that Report. Where no Initial Representations are received, this updated report is the “**Final Enforcement Report**” for the purposes of the DMP.

<sup>9</sup> The membership of the SCR Panel at this stage does not need to be the same as the SCR Panel which convened prior to Stage 1 (Disclosure) provided that its membership complies with the requirements of paragraph 4.2 above

<sup>10</sup> It should be noted that the SCR Panel at each meeting has complete and unabridged access to all investigation files including, for example, all documentary and other evidence, interview transcripts etc.



such representations. The SCR Panel will continue to have regard to the matters set out at paragraph 5.2 above.

- 6.5 The SCR Panel may take any action at this stage, including without limitation, determining that:
- 6.5.1 the matter requires no further action and the investigation should be discontinued;
  - 6.5.2 the matter should be addressed through normal or enhanced supervision; or
  - 6.5.3 the Final Enforcement Report (with or without further amendment) should be passed to the Decision-Maker. On a case-by-case basis, the Decision-Maker appointed may be either the Commission itself<sup>11</sup>, or a sub-committee of the Board or a person or person(s) of any description duly so authorised by the Board – referred to hereafter (whether as a group or as an individual, as the case may be) as the “Decision-Maker” - for consideration of the facts and recommendation(s) contained therein.
- 6.6 For the avoidance of any doubt, the Second SCR Panel Review is not part of the formal DMP. The SCR Panel is merely performing a recommendation role, not a decision-making role. The formal DMP comprises stages 3 - 5 only. Stages 1 - 2 are preliminary stages.

## 7. Stage 3: First Meeting of the Decision-Maker

- 7.1 If the SCR Panel determines to refer the matter to the Decision-Maker, the SCR Panel shall provide the Decision-Maker with (a) the Final Enforcement Report including all its accompanying evidence/materials etc. and (b) the Initial Representations, and request that the Decision-Maker convenes to consider the matter.
- 7.2 The Decision-Maker will convene a meeting at which they will consider the Final Enforcement Report and the Initial Representations.<sup>12</sup> The Investigators or a member of the SCR Panel will present the Final Enforcement Report and answer any questions raised by the Decision-Maker.
- 7.3 After considering carefully the matters at paragraph 7.2 above, the Decision-Maker may take any action at this stage, including without limitation:
- 7.3.1 requesting further information;
  - 7.3.2 determining that the matter requires no further action, and that the DMP should be discontinued, in which case the DMP will terminate for the matter in question; or
  - 7.3.3 determining that the Decision-Maker is minded to take the recommended action, or some other action(s) (which may be less or more severe than that/those recommended by the Investigators).
- 7.4 If the Decision-Maker is minded to exercise one or more of the significant administrative decisions to impose a regulatory sanction subject to this DMP (see Appendix 1), the Subject will be notified in writing of that fact (a “**minded to**” notice). It is important to note that in issuing a “minded to” notice to the Subject, the Decision-Maker has not made any decision, they are merely communicating to the Subject that, based on the evidence before the Decision-Maker (including the Subject’s Initial Representations), there appears to be a case to answer. The Decision-Maker will keep an open mind in considering both the Investigator’s case and the Subject’s response to it.

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<sup>11</sup> It should be noted that the Board at this point and thereafter, if it determines so to do, has complete and unabridged access to all investigation files including, for example, all documentary and other evidence, interview transcripts etc.

<sup>12</sup> It should be noted that the Board at this point and thereafter, if it determines so to do, has complete and unabridged access to all investigation files including, for example, all documentary and other evidence, interview transcripts etc.

- 7.5 The GSC recognises the importance of the Subject receiving a copy of all documentation provided by the Investigators to the Decision-Maker in **Stage 3**.
- 7.6 At this stage, the Subject will be provided with copies of the Final Enforcement Report provided by the Investigators to the Decision-Maker at **Stage 3** (the "**First Decision-Maker Meeting Pack**").
- 7.7 The Decision-Maker will provide the Subject with written notification of their "minded to" notice. That notification will:
- 7.7.1 enclose a copy of the First Decision-Maker Meeting Pack;
  - 7.7.2 state the date on which the Decision-Maker will meet to consider the matter and make a decision on what sanctioning measures they may impose<sup>13</sup>, if any<sup>14</sup>;
  - 7.7.3 invite the Subject to make written representations to the Decision-Maker within a specified timeframe<sup>15</sup> setting out the Subject's case in relation to the material non-compliance identified in the Final Enforcement Report, the recommended regulatory sanction(s), the content of any draft public statement and the reasons given by the Investigators for any regulatory intervention and/or public statement. It is important to note that the Subject is being given the opportunity to present their case and, if they consider it appropriate, to make representations to the Decision-Maker as to why the recommended regulatory intervention(s) should not be imposed;
  - 7.7.4 request that the Subject advises the Decision-Maker within a specified time frame whether the Subject and/or their representative (e.g. a legal adviser) intends to make oral submissions<sup>16</sup> at the Second Decision-Maker Meeting; and
  - 7.7.5 where a written submission is made by, or on behalf of, the Subject within the Decision-Maker's specified time frame, the Investigators may prepare comments on that submission. Where this is the case, the comments will be provided to the Decision-Maker and the Subject in advance<sup>17</sup> of the Second Decision-Maker Meeting.
- 7.8 Oral submissions made on the day of the Second Decision-Maker Meeting will be subject to the procedure set out in paragraph 8.5 below.

## 8. Stage 4: Second Meeting of the Decision-Maker (Decision)

- 8.1 Prior to the Second Meeting of the Decision-Maker, the Investigators will provide the Decision-Maker and the Subject with:
- 8.1.1 any information or documents that have been added to the First Decision-Maker Meeting Pack;
  - 8.1.2 any written submissions made by, or on behalf of, the Subject;
  - 8.1.3 the comments of the Investigators on any such written submission; and
  - 8.1.4 the latest draft of any recommended public statement.

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<sup>13</sup> The "Fitness Meeting"

<sup>14</sup> If the Decision-Maker is minded to take some action other than that recommended in the Final Enforcement Report, they will state that conclusion clearly in the "minded to" notice and specify the action they are minded to take.

<sup>15</sup> The Board will determine what this time period should be in each case. Any time period imposed by the Board will, in any event, comply with any applicable statutory time limits in respect of a particular regulatory intervention (e.g. 28 days in the case of a proposed prohibition under section 26 of the Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018).

<sup>16</sup> At this time, the Subject shall also inform the GSC of the identity of all proposed attendees at the Second Decision-Maker Meeting, including any legal advisers or other person(s) who will accompany them to the meeting. The GSC will make every effort to ensure that it can accommodate such attendance 'in person' or 'virtually'. For the avoidance of any doubt, the Decision-Maker may refuse to permit the Subject to be accompanied by a particular person at the Second Decision-Maker Meeting if that person is involved as a Subject or key witness of the relevant or any related investigation. The Investigators will also inform the Decision-Maker and the Subject of the identity of its proposed attendees.

<sup>17</sup> The GSC will make every reasonable endeavour to provide its comments as far in advance of the Second Decision-Maker Meeting as possible. How feasible that is depends on (a) how far in advance of the Decision-Maker Meeting the Subject submits their written submission; and (b) the time period allocated by the Decision-Maker when determining the date of the Second Decision-Maker Meeting (see paragraph 7.2 above).

- 8.2 The Decision-Maker will convene for the Second Meeting.
- 8.3 The Investigators may attend the Second Decision-Maker Meeting. The Decision-Maker may also invite anyone else that they consider will assist them in their deliberations. The Subject (with, if applicable, their legal advisers or other person(s) accompanying them) has the right to be in attendance<sup>18</sup>.
- 8.4 At the start of the Second Decision-Maker Meeting, the individual appointed by the Decision-Maker as Chair of the Meeting will welcome all attendees and set out the procedure to be followed during the course of the Second Decision-Maker meeting.
- 8.5 During the course of the Second Decision-Maker Meeting, the Chair will invite:
- 8.5.1 the Investigators<sup>19</sup> to present its case (including the reasons for the recommended sanction(s) and any recommended public statement)<sup>20</sup>;
  - 8.5.2 the Subject to make oral submissions on the Investigator's case, paying particular attention to why the recommended regulatory intervention (including the content of any proposed public statement) is not necessary, appropriate or justified;
  - 8.5.3 the Investigators and the Subject, in that order, to make comment on any matter raised (either at the meeting or in written materials) by the other party or to clarify any matter or to answer any questions the Decision-Maker may have<sup>21</sup>.
- 8.6 The Second Decision-Maker Meeting is intended to be interactive rather than adversarial in nature. For the avoidance of any doubt, court rules, process and procedures do not apply. The Chair of the Meeting will determine the procedure that will be followed at the Meeting.
- 8.7 The Second Decision-Maker Meeting will be formally recorded through the use of audio equipment. After formal notification under paragraph 9.1 of the decision of the Decision-Maker, the Subject may request a copy of the audio recording.
- 8.8 When the Decision-Maker has received all submissions, all persons in attendance other than the Decision-Maker will leave the Meeting.
- 8.9 The Decision-Maker will then begin their deliberations. In reaching their decision(s), the Decision-Maker will have regard to the written and oral submissions received and all other information in the documents before them. It is for the Decision-Maker to decide which, of the matters before them, they accept and which they do not, on the balance of probabilities.

## **9. Stage 5: Subject notified of the decision(s) of the Decision-Maker**

- 9.1 As soon as reasonably practicable after concluding its deliberations, the Decision-Maker will give the Subject and the Investigators written notice of the Decision-Maker's decision(s). If that decision is to exercise one or more of the GSC's statutory powers to impose a regulatory sanction, the notice will

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<sup>18</sup> Subject to the same considerations as paragraph 7.7.4 above.

<sup>19</sup> Any reference to the Investigators or the Subject in paragraph 8 includes a reference to any legal adviser in attendance on behalf of either party.

<sup>20</sup> The GSC expects any oral representations by or on behalf of either party at the Second Decision-Maker Meeting to very much be in a succinct summary form noting that both the Subject and the Investigators will have had opportunity to make detailed written representations which will have been read and considered by the Decision-Maker in advance of the Second Decision-Maker Meeting. The Chair of the Second Decision-Maker Meeting, in their absolute discretion, noting the intent of this DMP to be that a decision can be reached based on documentary evidence, is perfectly at liberty to impose a time limit on both parties for conclusion of their oral submissions. Any attempt by either party (Subject or Investigators) to introduce new information or evidence that could reasonably have been produced at an earlier stage of this DMP, may lead the Decision-Maker to draw inferences as to why such information or evidence was not previously submitted.

<sup>21</sup> Again, the Chair of the Second Decision-Maker Meeting is perfectly at liberty to impose a time limit on both parties for conclusion of their comments.

include a written statement of the reasons for the decision. If the Decision-Maker has resolved to issue a public statement, the Decision-Maker will send a copy of the public statement (along with the reasons for the public statement) to the Subject<sup>22</sup>.

- 9.2 The Decision-Maker's notice to the Subject will also set out any right of appeal the Subject may have.
- 9.3 If the Subject determines to appeal one or more of the Decision-Maker's decisions to the Gambling Appeals Tribunal, such appeal(s) and subsequent events thereafter form no part of, and are not subject to, this DMP.

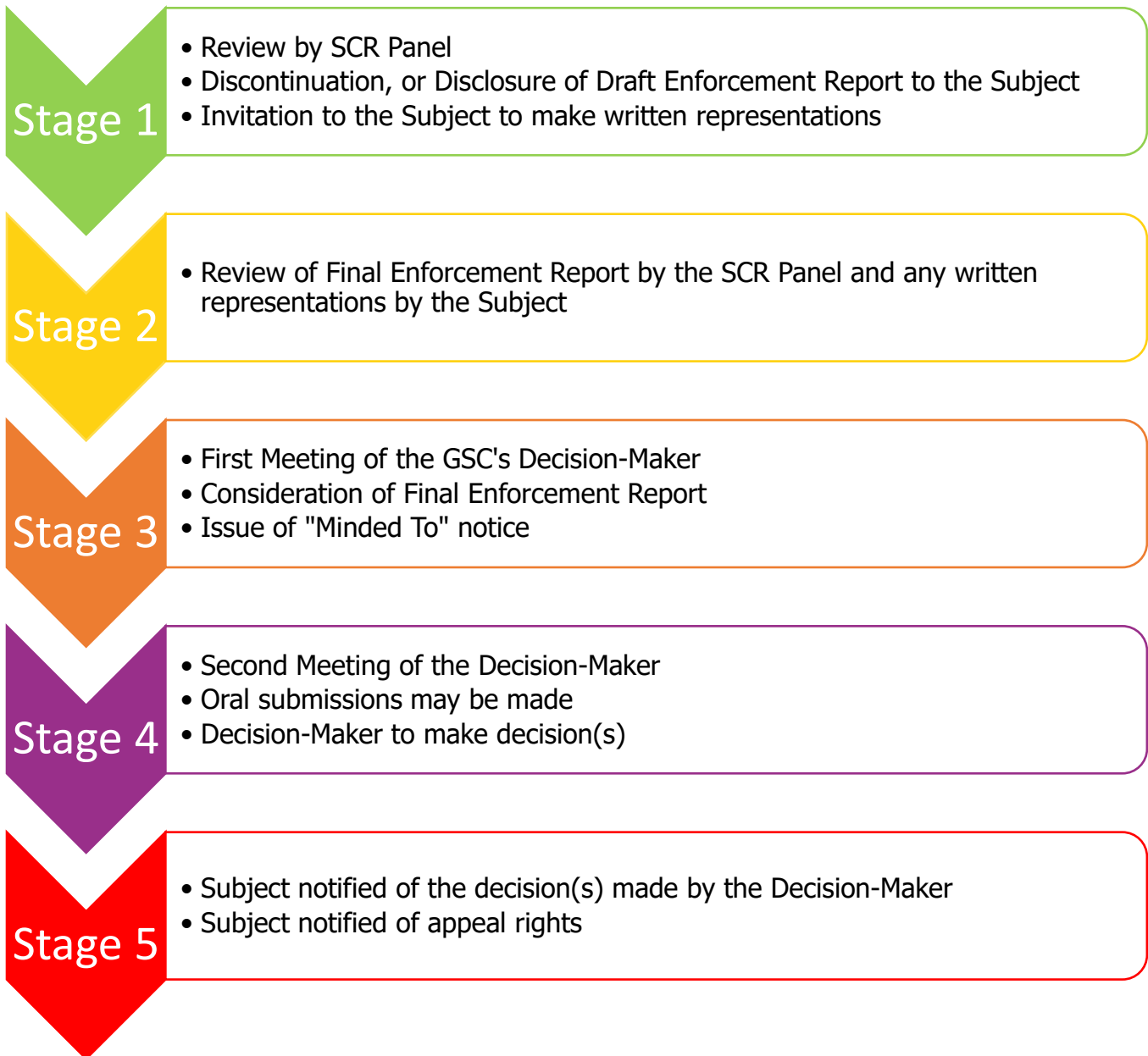
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<sup>22</sup> The implementation of any decision of the Decision-Maker will have regard to the relevant statutory time period(s).

## APPENDIX 1 – MATTERS SUBJECT TO THIS DECISION-MAKING PROCESS

Legislation	Section	Description
Online Gambling Regulation Act 2001	13	Cancellation or suspension of a licence
Online Gambling Regulation Act 2001	15(1)	Direction to remove director etc. from a licence holder
Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018	22	Discretionary civil penalty
Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018	23	Warning notice
Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018	25(1)(a)	Direction (persons unfit to be appointed as a director, controller, senior manager etc.)
Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018	25(1)(b)	Direction (persons unfit to continue as director, controller, senior manager etc.)
Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018	26	Imposition of a prohibition
Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018	28	Application to vary or revoke a prohibition
Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018	30	Suspension or revocation of a licence, certificate, permit or similar
Gaming Amendment Act 1984	Para. 9 to Sch.1	Revocation and suspension of certificate
Gaming Amendment Act 1984	Para. 3 Sch. 3	Revocation of a licence
Casino Act 1986	12F	Revocation or suspension of [Temporary Premises] Certificate
Gaming Betting and Lotteries Act 1988	22(2)	Cancellation of a racecourse licence
Gaming Betting and Lotteries Act 1988	24(4)	Revocation of a licence
Gaming Betting and Lotteries Act 1988	33A (4)	Refusal or revocation of a registration
Pool Betting (Isle of Man) Act 1961	5 (3)	Revocation of a registration
Online Gambling (Advertising) Regulations 2007	4	Enforcement
Casino Regulations 2011	4(1)	Revocation or suspension of a licence
Casino Regulations 2011	Para. 4(1) to Sch. 2	Revocation of approval
Casino (Temporary Premises) Regulations 2013	Para. 2 to Sch. 1	Revocation of certificates

## APPENDIX 2 – DMP FLOWCHART



*This document is correct at the date of publication but is subject to change from time to time.*