



ISLE OF MAN

Outreach Feedback Survey Report

March 2025

Gambling Supervision Commission

Ground Floor, St George's Court

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Outline

The Gambling Supervision Commission AML/CFT Forum occurs every six months and is an opportunity for GSC Stakeholders to communicate openly with the GSC AML team. Forum topics are chosen based on feedback from GSC stakeholders and internal GSC inspections data and aim to help Operators to better understand emerging typologies and GSC AML/CFT requirements.

The topics chosen for the January 2025 AML Forum include:

- GSC Overview;
- Enhanced Due Diligence;
- Suspicious Activity Reporting in the Gambling sector;
- GSC Outreach; and
- Cybersecurity and Ransomware.

As part of the AML Forum, the GSC encourages feedback from attendees in the form of an Outreach survey and Q&A session on a variety of topics to help gain an understanding of what the industry would like to see from the GSC.

The following report covers the feedback given through the January 2025 AML Forum Outreach survey.



Summary

You Asked.

At the previous AML forum in July 2024, 75% of survey participants requested the GSC conduct more ongoing outreach to stakeholders. When asked if participants think the GSC communicates effectively, 35% of participants answered 'Yes', with the majority feeling GSC Outreach was "Satisfactory."

We Did.

Following this survey, new modes of communication have been established, and the frequency of outreach has increased.

The majority of GSC stakeholders who participated in the in January 2025 survey are now satisfied with current GSC outreach following the changes made in 2024. The majority of GSC stakeholders who participated in the survey are also happier with the quality of the GSC's output since the Outreach strategy enhancements were put in place.

You Asked.

In July 2024, the GSC conducted a workshop on SARs following data received from the Isle of Man Financial Intelligence Unit. Participants also requested more detailed guidance on SARs including details on red flags and Typologies to aid in identifying suspicious activity and reporting.

We Did.

In 2024, the GSC conducted a further workshop for terrestrial licensees. In total, 93% of survey participants at the January Forum stated that they found the workshops and surrounding outreach on SARs to be helpful.

You Asked.

Participants also requested more detailed guidance on the AML/CFT inspections process from the GSC in July 2024.

We Did.

In Q4 of 2024, the GSC began an ongoing webinar series on GSC AML Inspections. In total, 95% of survey participants at the January Forum stated that they found the inspections webinar series to be helpful.

As requested, we conducted more outreach following your feedback. Would you still like to see the GSC conduct more?

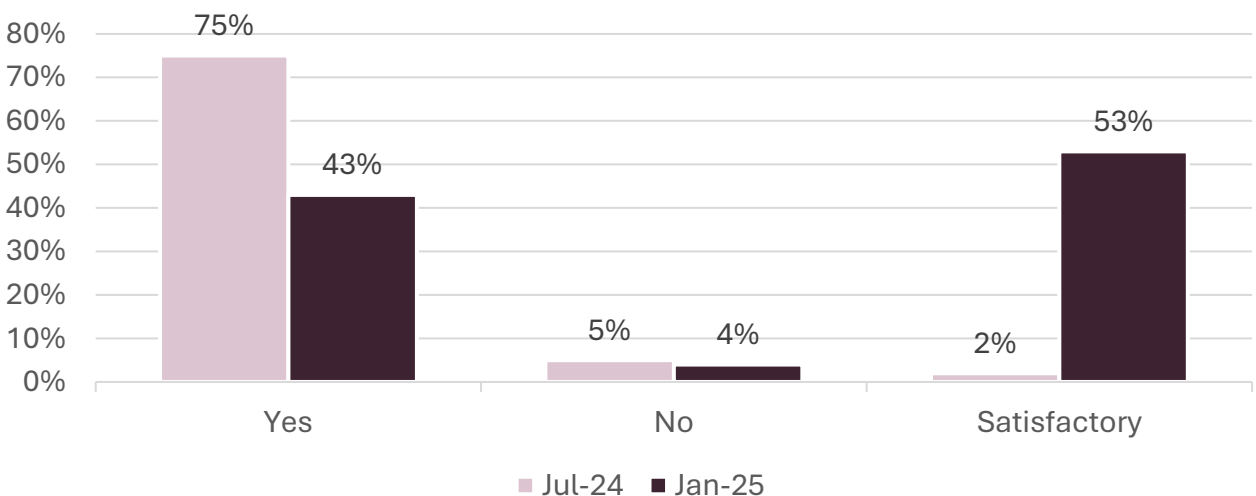
At the previous AML forum in July 2024, participants were asked if they would like to see the GSC conduct more outreach. 75% of participants requested the GSC conduct more ongoing outreach to stakeholders.

Following this survey, new modes of communication such as webinars, video recordings, workshops and [a newsletter](#) have been established, and the frequency of outreach has increased.

During the AML Forum in January 2025, attendees were asked "As requested, we conducted more outreach following your feedback. Would you still like to see the GSC conduct more?"

Of a total 47 participants, 43% said 'Yes' to receiving more outreach from the GSC 4% said 'No' and 53% said the current outreach from the GSC is satisfactory.

2024 Vs. 2025



The comparative table above shows that the majority of GSC stakeholders who participated in the survey are now satisfied with current GSC outreach following the changes made in 2024. 43% of participants in the January 2025 survey still wish to see the GSC conduct more Outreach to stakeholders. Following the AML Forum in January 2025, the GSC has undertaken its first

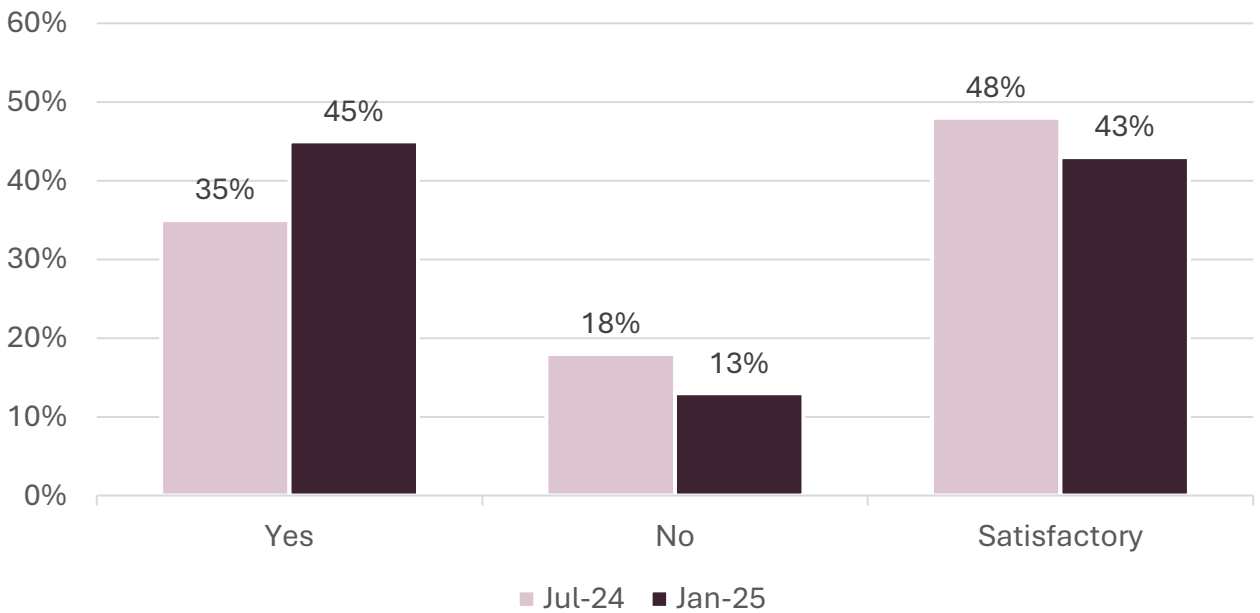
drop-in sessions to Operators, offering attendees the chance to have face to face conversations with GSC AML staff on a topic of their choice. The sessions were oversubscribed and have already received very positive feedback. The GSC plans to offer further dates for Drop-ins later in 2025 on an ongoing basis following the interest shown from stakeholders.

Do you think the GSC currently communicates effectively?

At the previous AML forum in July 2024, the GSC asked if participants think the GSC communicates effectively. 35% of participants answered 'Yes'. As noted previously, since the July 2024 AML Forum, the GSC has increased its range and frequency of output to stakeholders.

When asked the same question in the January 2025 survey, 45% of participants felt that the GSC communicates effectively, with fewer participants voting for the alternative two options than in the previous period.

2024 Vs. 2025



The comparative table above shows that the majority of GSC stakeholders who participated in the survey are happier with the GSC's output since the Outreach strategy enhancements were put in place.

We can also see that, compared to the previous Forum, the majority of participants voted 'Yes' in January 2025, when in July most felt communication from the GSC was only 'Satisfactory'.

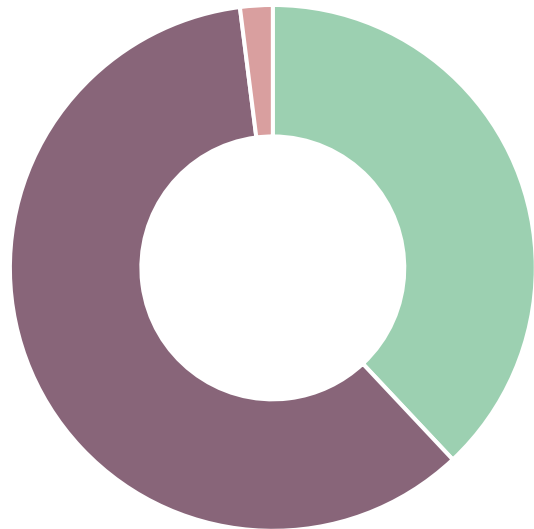
We can also see a decrease in those answering 'No' to the question.

Did you find the previous AML Forum topics to be helpful?:

At the January 2025 forum, participants were asked if they found the topics of the previous forum (July 2024) helpful.

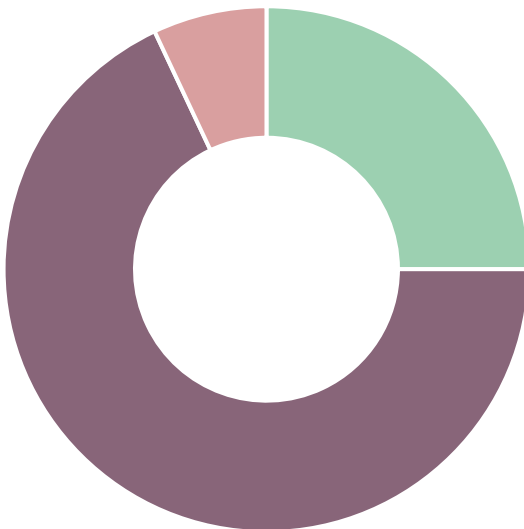
Out of a total 45 participants, 38% said that the topics were 'Very Helpful', 60% said that the topics were 'Quite Helpful' and 2% said that the topics were 'Not helpful'.

Votes (%)



■ Very Helpful ■ Quite Helpful
■ Not Helpful

Votes (%)



■ Very Helpful ■ Quite Helpful
■ Not Helpful

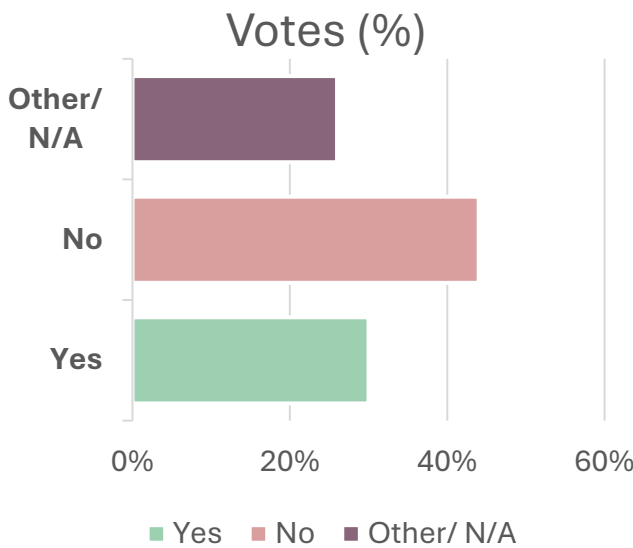
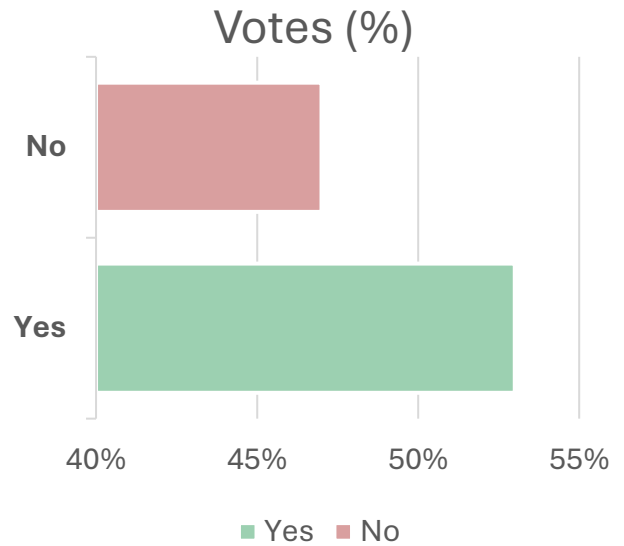
The GSC Conducted outreach on SARs in 2024. Did you find our outreach on SARs (including the workshops) helpful?

At the January 2025 forum, participants were asked if they found the workshops and other outreach on Suspicious Activity Reporting (SARs) (conducted in 2024) helpful.

Out of a total 44 participants, 25% said the outreach was 'Very Helpful', 68% said it was 'Quite Helpful' and 7% said it was not very helpful. The workshops were predominately aimed at those with B2C licences, and so focussed on customer relationships. B2B licence holders may have therefore found the sessions less relevant to their inherent risks.

Have you made any recent changes to your policies / procedures, in relation to SARs (excluding annual reviews)?

Out of a total 45 participants, 53% said 'Yes' and 47% said 'No' to updating their policies/procedures in relation to Suspicious Activity Reporting.

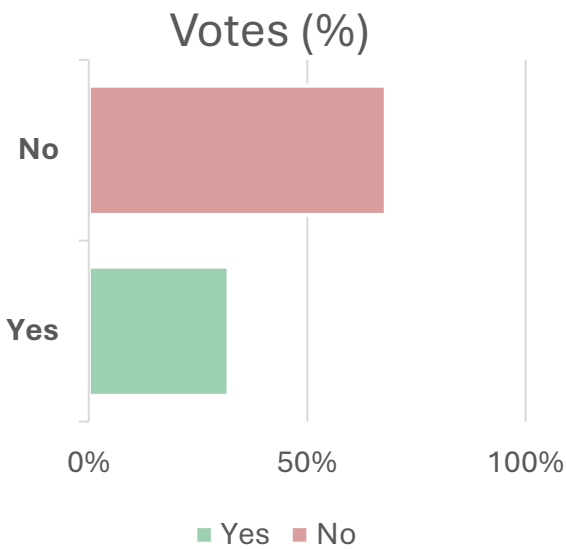
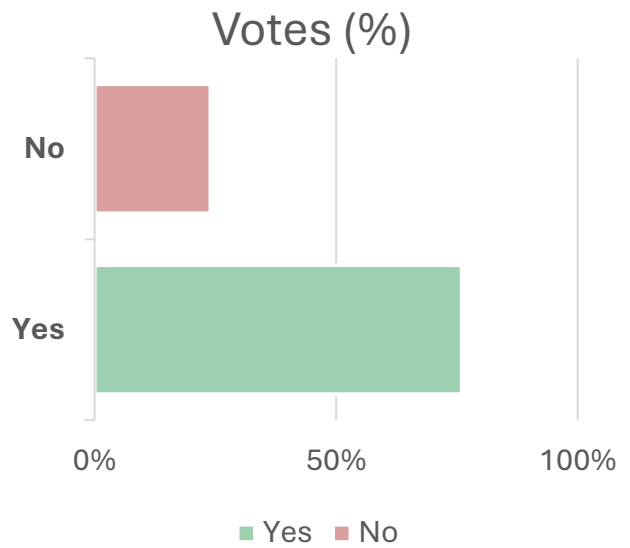


Were these changes due to recent GSC Outreach regarding SARs?

Out of a total 43 participants, 30% said that yes, these changes were due to GSC outreach regarding SARs and 44% of participants said 'No'.

Have you made changes to your BRA/TRA/CRA processes (excluding annual reviews)?

Out of a total 45 participants, 76% said 'Yes' and 24% said 'No' to making changes to their BRA/TRA/CRA processes (excluding annual reviews).

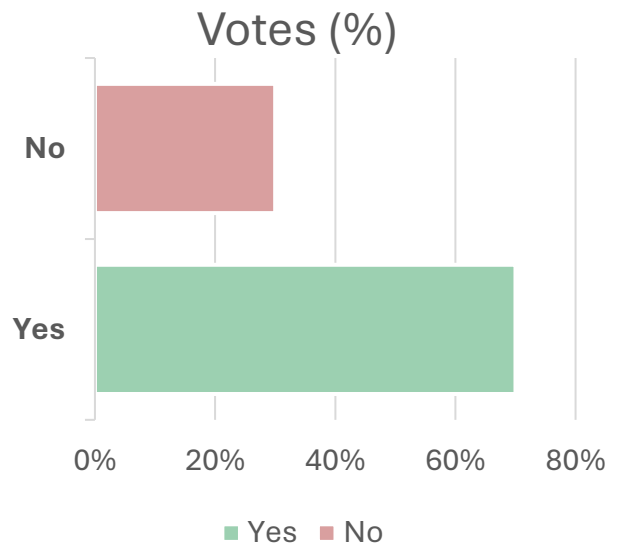


In your opinion does your BRA contain risk factors NOT relevant to your business?

Your BRA should NOT contain risk factors that are irrelevant to your business. However, the GSC asked this question at the July 2024 Forum as well during which 50% answered 'Yes', in January 2025, only 32% answered 'Yes'. We can therefore see a marked improvement in BRAs of GSC Operators.

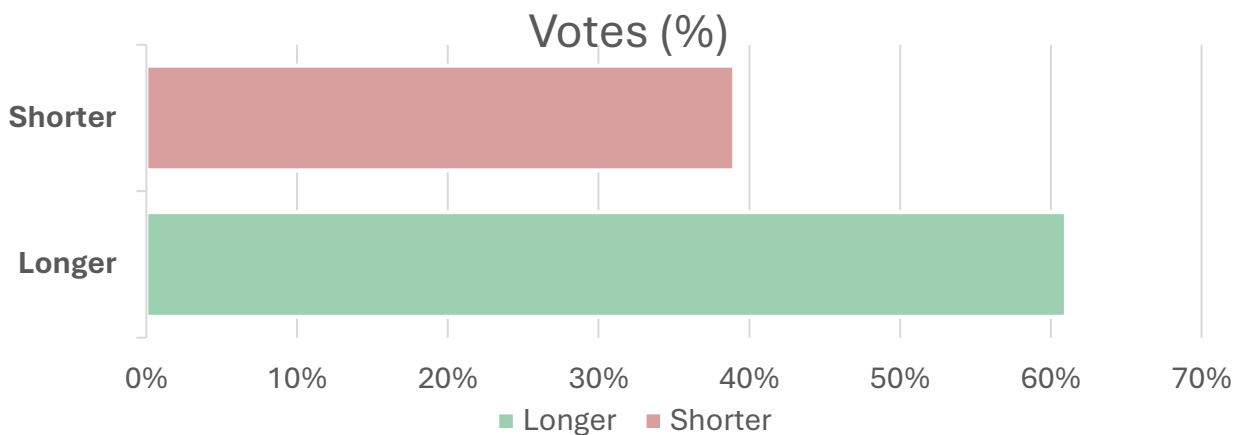
Does your BRA include consideration of other countries' NRAs, especially those of your main target market?

Out of a total 43 participants, 70% said that yes, their BRA considers other countries' NRAs and 30% of participants said 'No', it does not.



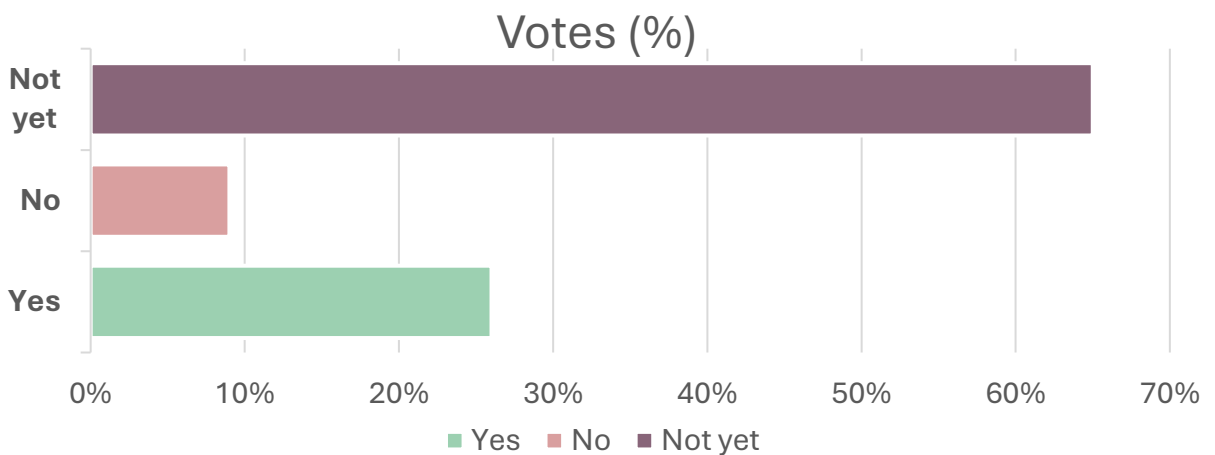
Recently, the GSC released some longer public statements regarding enforcement actions. Do you prefer:

Out of 46 total participants, 61% said that they prefer longer public statements regarding Enforcement actions which include more detail. 39% prefer shorter public statements regarding Enforcement cases with less detail. The publication of [Enforcement](#) public notices was outlined in the Enforcement policies which were publicised in June 2024 and will continue to be part of the enforcement process.



Have you considered making changes to your internal policies/ procedures based on information in an Enforcement Public Statement?

26% of participants said that they find the statements helpful and have changed their internal policies/procedures based on the information in the public statements. 65% said that they found the information but have not yet made changes. 9% said that they did not find the information helpful in this way.



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