



# Outreach Feedback Survey Report

July 2025

**Gambling Supervision Commission**  
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# Introduction

The Gambling Supervision Commission AML Forum occurs every six months and is an opportunity for GSC Stakeholders to communicate openly with the GSC AML inspections 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 July 2025 AML Forum include:**

- An introduction from GSC Chief Executive Officer, Mark Rutherford;
- Overview of the National Risk Appetite Statement (NRAS);
- Guest Presentation on the Financial Intelligence Unit's eGaming Typologies Report;
- How the GSC uses data to inform Supervision and Outreach; and
- An overview of Software Supply Licence inspections from the AML/CFT team Seniors.

## Feedback

As part of the AML Forum, the GSC encourages feedback from attendees in the form of an Outreach survey and Q&A session which covers a variety of topics to help gain an understanding of what the industry would like to see from the GSC. Feedback gathered through the AML Forum informs GSC supervision and Outreach going forward.

Feedback on our programme of outreach is fundamental to ensuring the effectiveness of our supervisory activities. The standards we are assessed against don't just look at the provision of guidance and outreach, but whether they have a positive impact on Operator compliance with AML/CFT obligations. To maximise the value of our outreach programme, we rely on open and honest feedback from operators. This allows us to tailor our approach, address emerging challenges and continuously improve upon the support we provide to the sector.

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





# Progress since the January 2025 AML Forum

## You Asked

At the previous forum we asked whether the GSC conducted sufficient Outreach. 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.

## We Did

Following this, the GSC started posting more blogs covering topics from industry reports and typologies to GSC news and public statements. More in-person Outreach was undertaken, including the introduction of drop-in sessions for Operators. Outreach to external industries was also undertaken. Following the presentation to the Law Society in 2024, the GSC has also conducted Outreach to the Banking sector to raise awareness of the industry and the GSC's role.

## You Asked

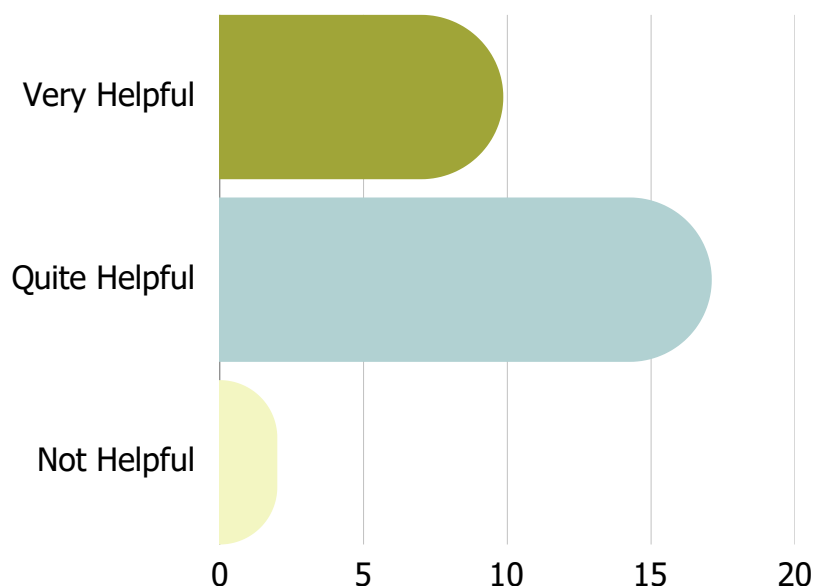
Following previous feedback from Operators that they would like clarity on the AML/CFT Inspections process and guidance, we produced a webinar video series on AML/CFT Inspections. In January, out of a total 44 participants, 45% said that the recent webinars were 'very helpful', 50% said they were 'quite helpful' and 5% said they were not very helpful.

## We Did

The webinar series started in 2024 has now been completed, with 11 total videos published that cover the entire AML/CFT inspections process, enhancing existing guidance. Additionally, given the positive feedback received, the GSC will continue to post video content on topics Operators find most valuable. Please get in touch if you have any suggestions for future content that would be of most value to you.



## Did you find the previous AML Forum (Jan 25) topics to be helpful?



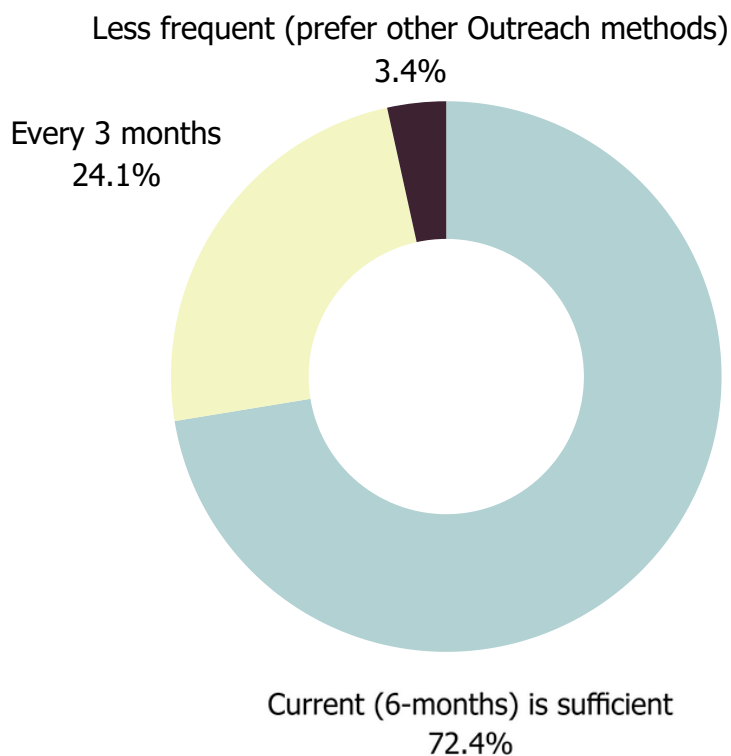
As part of the Outreach survey, we ask Operators to give feedback on the topics presented at the AML Forums. In July 2025 we asked whether they found the topics of the previous forum (January 2025) to be helpful.

34% of participants found the topics very helpful, 59.1% said that the topics were quite helpful. Two participants said they did not find the topics helpful.

## How do you feel about the frequency of the Forums?

We also asked participants about the frequency of the AML Forums. AML Forums have been hosted by the GSC for many years and the format has changed slightly over time, such as the introduction of remote attendance via teams and the publication of a recorded version of the presentations.

When asked how frequent they would like the AML Forums to be, the majority (72.4%) felt that the current frequency was sufficient, with almost a quarter (24.1%) noting that they would prefer more frequent forums.



What topics would you like to see covered at the next AML Forum?

Trends in inspections

Trends in applications

Samples of what you think is good and bad CDD

SARS

Applications

Outreach

Quarterlies

SAR's

What will be the plan after the Moneyval evaluation? .

Onboarding B2Bs

Red Flags

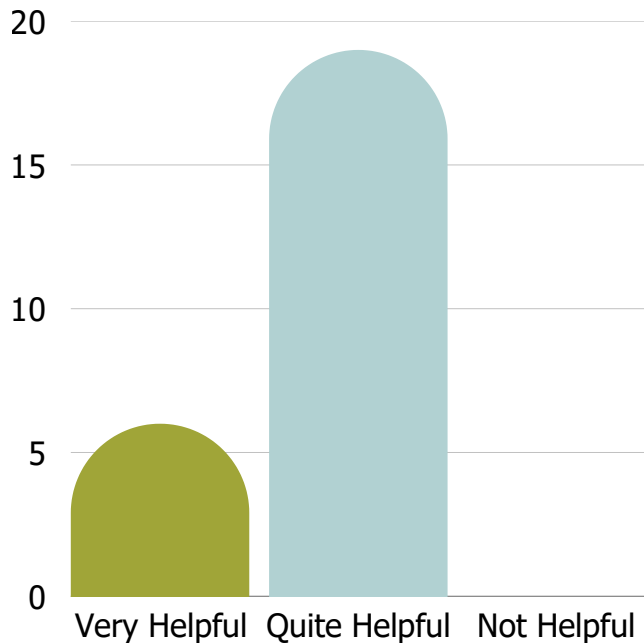
More detail on actual findings of the GSC

Examples of what you like, and don't like.

In addition, participants were asked which topics they would like to see covered at the next AML Forum. Topics for the Forum are chosen based on industry trends and typologies, trends from GSC supervisory data and feedback from the industry on what they would like to see covered.

There were multiple requests for more detail on GSC Operator data including Suspicious Activity Reports (SARs), general trends, red flags and summaries of GSC findings. The GSC takes all feedback into account and will take these comments into consideration for the next AML Forum.

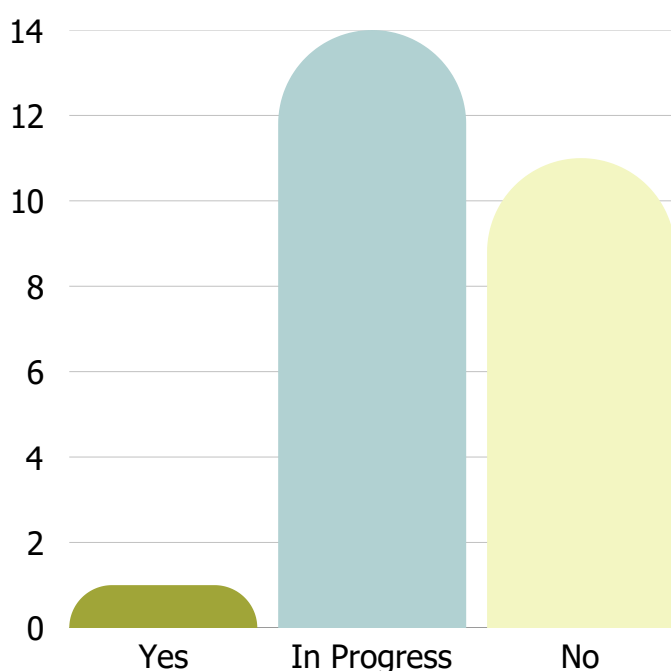
We recently posted a webinar series on AML inspections. Did you find these webinars helpful?



The GSC had previously received requests from stakeholders to produce more detailed guidance on the AML/CFT inspections process. As such, a webinar series was released which detailed the inspections process and covered each step of the AML/CFT inspections criteria. The (now completed series) can be viewed on the GSC's YouTube channel.

When asked if they found the webinars helpful, 24% of participants said they were very helpful, 76% said they were quite helpful and 0 participants voted "no".

Did you make any changes based on the information in the webinar series?

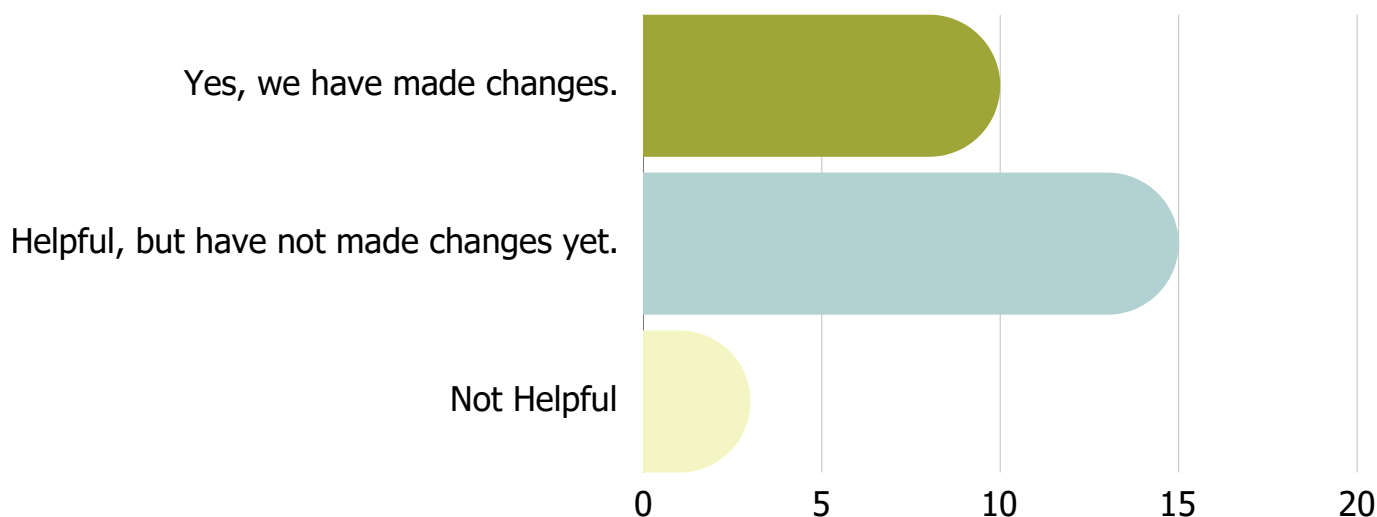


In order to ascertain whether the series content was useful to Operators, the GSC also asked if changes were made based on the content of the webinars.

As the content was predominantly covering topics already in our guidance (with some added tips), it is expected that the majority of participants would already be compliant, and so, may not need to make changes. However, Operators are expected to review their policies / procedures regularly and make changes where necessary.

Just over half of participants noted that they intend to make changes based on the content in the series, 3.8% having already done so.

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



At the previous AML Forum in January 2025, the GSC asked participants whether they felt the introduction of public statements on GSC Enforcement cases was helpful.

At the previous forum, 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.

The same question was posed again in July 2025.

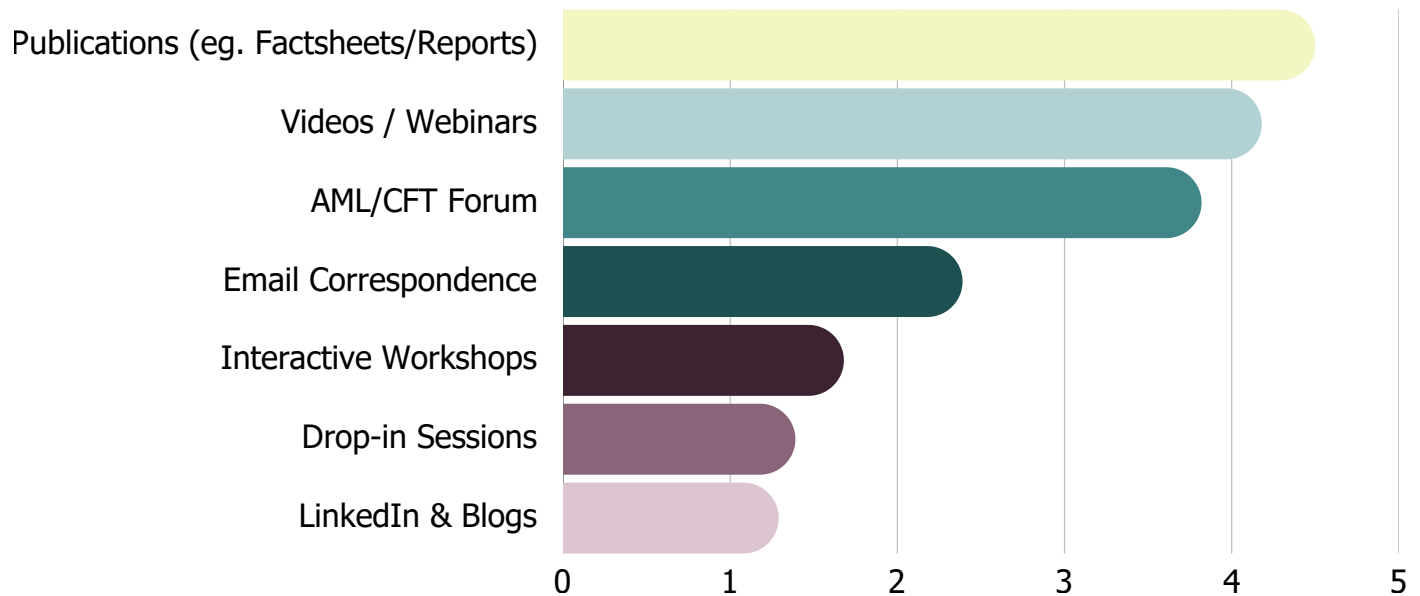
In July, 35.7% said that they have made changes based on the information provided in the enforcement public statements, with 53.6% noting that the information was informative but they are yet to make any changes. Three participants (11%) said that they found the information not to be helpful to their business in this way.

Enforcement public statements are published as part of the GSC's commitment to transparency and accountability in its regulatory decisions. Public statements act as a credible deterrent by raising awareness of regulatory standards.

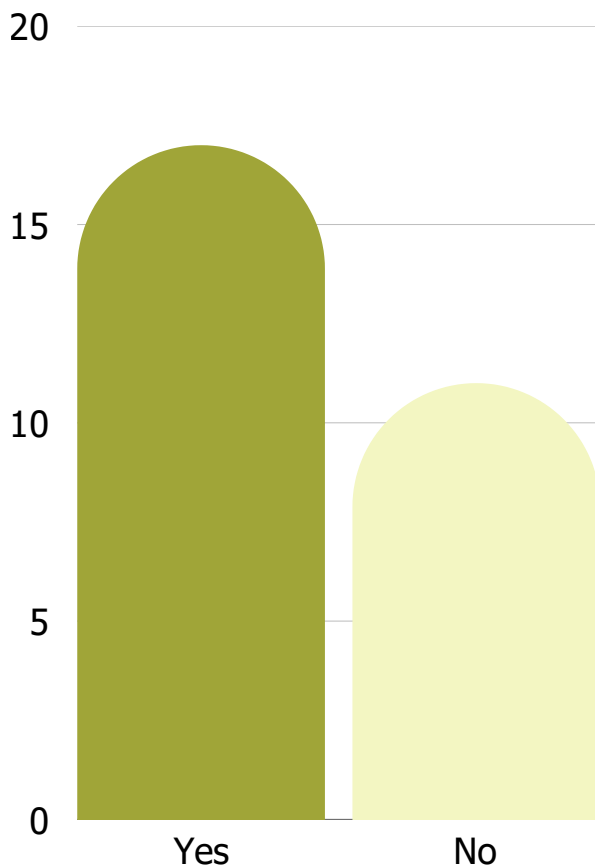


Operators are expected to reflect on enforcement public statements in the context of their own AML/CFT/CPF frameworks, identifying any relevant parallels or lessons. Where gaps or vulnerabilities exist, operators should take proactive action to strengthen their compliance programmes accordingly and communicate any changes to staff.

## What is your preferred method of Outreach/Training, excluding guidance? (Rank most to least)



## Do you follow us on LinkedIn?



The Outreach team also wanted to establish which Outreach method is used the most by Operators. This information will be used to inform the way Operators are contacted by the GSC in future.

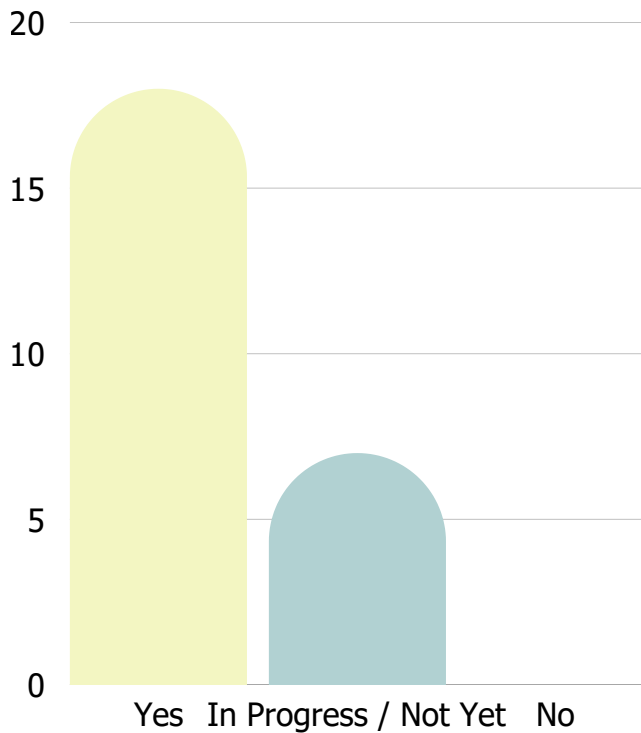
Since 2024, Outreach has increased significantly across various platforms and it is useful to ascertain where the GSC should place its resources to ensure stakeholders have access to the relevant information.

As such, participants were asked to rank (most to least) their preferred method of Outreach from the GSC (excluding the guidance and legislation documents themselves) as well as whether they follow us on LinkedIn to receive information.

Aside from published guidance documents, participants felt that guidance in the form of factsheets, reports or videos were the most helpful. With LinkedIn being the least helpful.



## Following publication of the NRAS on eGaming, have you reviewed your risk framework?



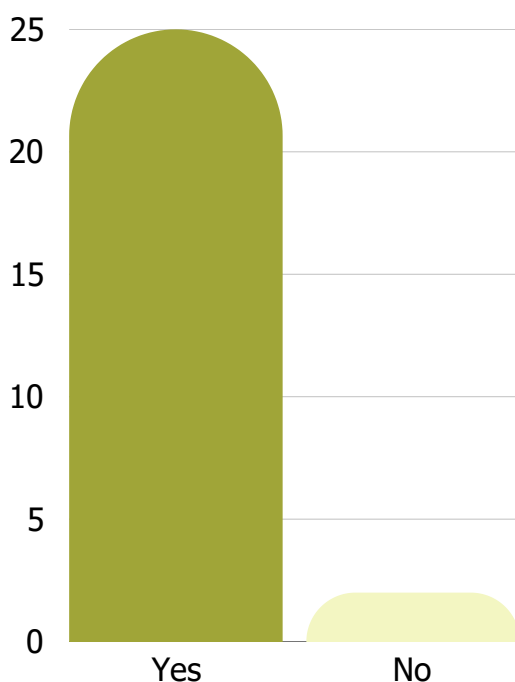
A series of questions were asked about the National Risk Appetite Statement on eGaming (NRAS) which was published in May 2025.

The government have released a series of frequently asked questions following this publication aid understanding. The document is available on the GSC publications page.

The NRAS is defined as a trigger event for Operators and, as such, should trigger a review of the Operator's risk framework. When asked, the majority of participants stated that they had already conducted a review, the rest were in the process of doing it. No participants stated that they had not undertaken a review.

The GSC has taken these questions and comments onboard, and will update the NRAS FAQs document accordingly.

## Have you reviewed the FIU Online Gambling Typologies Report (May 2025)?



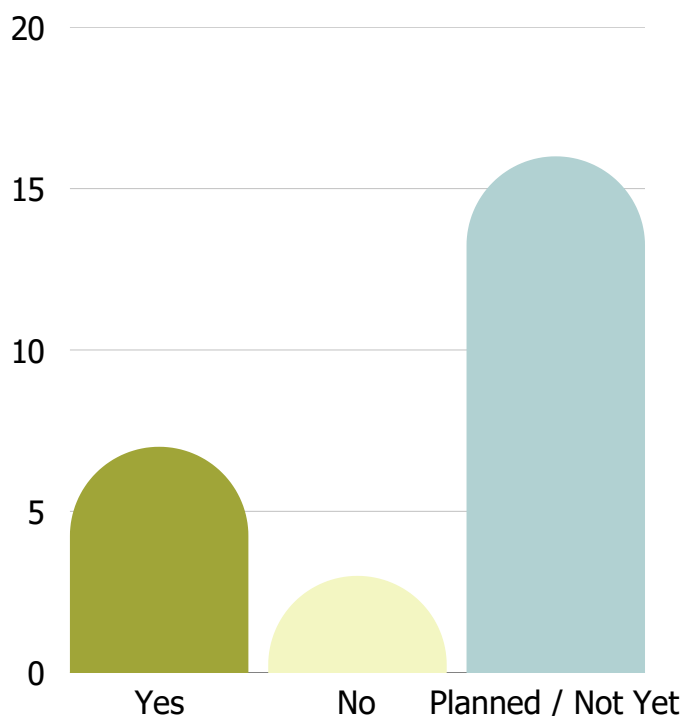
Additionally, the Isle of Man Financial Intelligence Unit (FIU) also published "Online Gambling: Red Flags and Typologies".

This document is intended to assist professionals across a range of reporting sectors to identify signs of potential money laundering (ML), terrorist financing (TF), and proliferation financing (PF) associated with online gambling.

The GSC asked participants if they had reviewed the FIU report. Only two participants stated that no, they had not reviewed the report.

It is expected that Operators review relevant typology reports as part of their internal AML/CFT processes.

## Have you delivered internal training to staff on the NRAS?

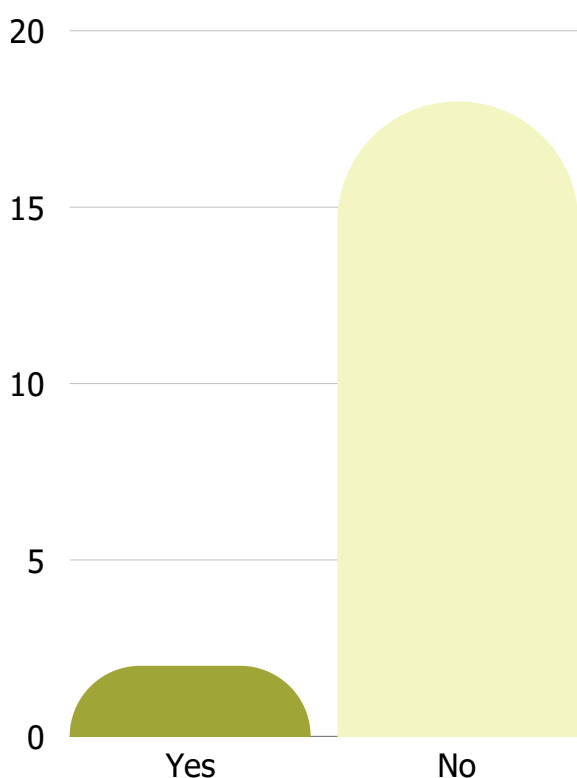


Participants were also asked whether they had undertaken internal staff training regarding the NRAS.

The majority of participants are in the process of conducting updated training to internal staff following the publication of the NRAS. Three Operators responded "No".

The GSC would like to reiterate that all Operators should remain up to date on relevant flags and typologies.

## Have you declined or exited business based on the NRAS?



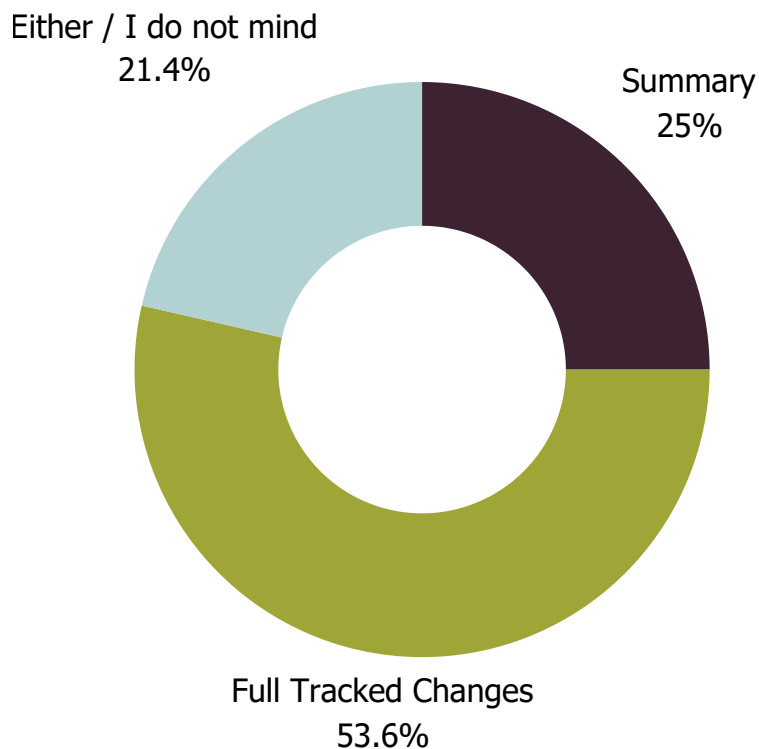
Participants were also asked whether they had declined or exited business based on the information published in the NRAS.

Two Operators responded "Yes" with the majority of respondents answering no.

As noted in the NRAS FAQ document, Activities or jurisdictions mentioned in the NRAS are not expressly prohibited. However, you must adequately consider any identified risks posed by the relationship, in line with any procedures and controls for taking a risk-based approach. Enhanced measures in line with AML/CFT legislation must be applied where higher risk factors are present.

You can find a link to the FAQ document on our [publications page](#).

## Would you like to receive tracked/summarised changes when we release guidance updates?

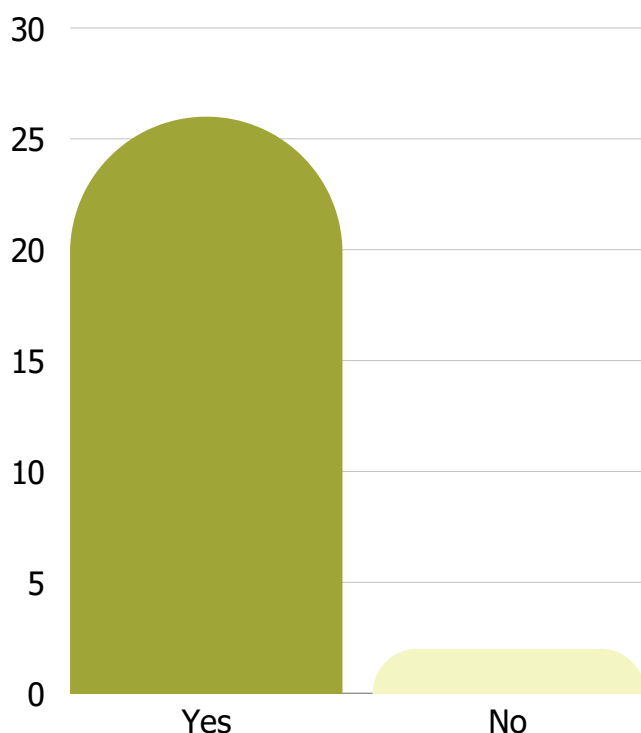


Participants were asked whether they would like to receive tracked changes when guidance documents are updated by the GSC.

Guidance is updated regularly by the GSC to ensure it remains up to date, as well as in response to feedback undertaken by stakeholders.

When asked about this, over 50% of participants said that they would prefer a full list of tracked changes to be released when changes have been made to guidance. A quarter of respondents felt that a summary of changes was sufficient, with the remaining 21% stating that either would be sufficient.

## We are considering hosting an event for C-Level / Directors, do you think this would be helpful?



Finally, participants were asked whether events aimed at C-Level / Directors would be helpful to Operators. The majority of participants stated that they would find that helpful, with only two participants responding in the negative.

The GSC conducts regular outreach aimed predominantly at AML/CFT role holders as well as posting publicly on its website and social media. The AML Forum is aimed at AML/CFT role holders, specifically MLROs/DMLROs and received positive feedback. As such, consideration is being given to hosting events specifically for C-level / Directors who may not typically attend GSC events, to raise awareness of key sector topics, placing a compliance culture at the heart of all business operations



# Key Takeaways

- 1** The GSC communicates well. Operators like the frequency and mediums of GSC Outreach, but would still like to see more detailed breakdowns of data and processes.
- 2** Boards and Directors play a critical role in effective AML/CFT governance. Extending outreach activities to senior leadership ensures that AML/CFT priorities are embedded at the highest level, with compliance culture at the core of all business activities.
- 3** The GSC would like to highlight the sector's responsiveness to emerging threats and vulnerabilities, notably those highlighted in the National Risk Appetite Statement (NRAS). A coordinated response to risk as a jurisdiction is paramount to combat financial crime and secure the island's economic interests.
- 4** Get in touch! If you have any suggestions for future content that would be of most value to you, or would like to organise a 1-2-1 drop-in session with the GSC - do not hesitate to contact us!
- !** The GSC would like to thank all those who participated in the Outreach Feedback Survey in July 2025.



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