



# 2026 Key Aims

2025 Achievements & Key Aims for 2026

# Looking Back at 2025

This year has been one of reflection, vigilance and action for the IOM. The GSC's primary objectives to ensure gambling is conducted in an open and fair manner, to protect children and the vulnerable and to prevent gambling being a source or enabler of crime, remain constant. These objectives underpin GSC supervision and guide our response to emerging risks that cause harm to society through financial crime and associated criminal conduct, and which seek to destabilise the reputation of the gambling sector and the jurisdiction.

The GSC's 2025 priorities advanced its existing focus outlined in our 2024 Annual Report on capacity building, enhanced outreach, proportionate enforcement, and legislative development. Over the past year, our supervisory focus has continued to evolve in response to a changing risk environment and a more diverse online gambling landscape. A central theme has been accountability — ensuring that regulatory attention is directed towards those Operators that present the greatest risk or are slow to address identified weaknesses.

Where concerns arise, our approach has been deliberately targeted. Focused supervisory engagement, thematic work, and, where necessary, enforcement action are used to drive meaningful change. At the same time, we have been equally clear that Operators demonstrating strong governance, effective controls, and a sustained low-risk profile should expect a proportionate regulatory relationship. This balance allows us to concentrate effort where it has the greatest impact.

A significant enabler of this approach has been continued investment in data and technology. Improving the quality, consistency, and usability of regulatory data has taken time, but it is foundational to effective risk-based supervision. Better intelligence allows us to identify patterns, test assumptions, and respond more quickly as risks emerge.

Looking outward has been just as important. Global analysis continues to highlight increasingly sophisticated money laundering typologies, including activity linked to organised crime and underground financial networks. Understanding how, or whether, such typologies could manifest within the Island's gambling sector is essential. This has informed deeper thematic work and strengthened how international intelligence feeds into our own risk assessments.

Together, these strands reinforce a supervision model that is intelligence-led, proportionate, and responsive. As risks continue to evolve, so too will our approach grounded in data, informed by global insight, and focused on maintaining the integrity of the Isle of Man's gambling sector.

## Fostering Public Confidence and Supporting Sustainable Growth

Maintaining public confidence in the Island's regulatory framework remained a core priority in 2025. A key component of the regulatory strategy is supporting a stable, reputable, and sustainable industry. The GSC recognises that clear expectations, timely guidance, and constructive engagement enable Operators to innovate responsibly while maintaining robust financial crime controls.

The GSC worked to strengthen partnerships with industry, domestic agencies, international counterparts, and the public, building on the previous year's work to improve communication and outreach. These partnerships help to ensure that the Island's regulatory framework is responsive, transparent, and trusted.

The GSC has enhanced its ability to share information with law enforcement and other regulators, both domestically and internationally, through new legislation—the Gambling Supervision Disclosures Order 2025—and strengthened Memoranda of Understanding (MoUs).

### Island-Wide AML/CFT Initiatives in 2025

On an island-wide scale, the focus has been primarily on working collaboratively to combat emerging threats to the island. In recent years, the global threat landscape has shifted dramatically, exposing the island to the threat of international organised crime. The Island has worked hard to provide a coordinated response to these emerging threats over recent years and continues to work towards a vibrant future for the Island.

This work has been supported by a well-established and increasingly mature regulator sector. Many businesses operating on the island have invested in compliance capability and systems designed to identify, mitigate and prevent misuse by bad actors. These controls play a vital role in protecting the island's reputation by deterring those bad actors.

An updated National Risk Assessment will be published shortly. This includes various topical and sectoral assessments, building a comprehensive foundation of risk understanding. A key priority for the Isle of Man in 2026, for both the public and private sectors, will be to incorporate NRA findings into AML/CFT frameworks. This assessment will help regulated entities to understand threats, strengthen their own controls, and target resources effectively.

A safe jurisdiction is a strong jurisdiction, and with global threats constantly evolving, the island is committed to working with stakeholders to ensure its sectors remain reputable, resilient, and competitive as a sector.

### Strengthening the AML/CFT/CPF framework

The 'Securing Our Borders' Strategy, published in September 2024, sets out the Isle of Man's strategic intent to protect its borders from criminal exploitation and prevent illicit activities facilitated through the Island's ports.

Immigration processes and systems have been significantly strengthened to reduce the risk of exploitation, with far greater rigour applied to application processing, supported by improved data and intelligence.

Substantial investment has also been made in law enforcement and investigative capability, including the establishment of the ring-fenced Proactive International Money Laundering Investigation Team (PIMLIT), which focuses on complex, cross-border financial crime posing the greatest risk to the Island and beyond.

### **Building a Secure and Efficient Immigration Framework**

A considerable amount of work has been undertaken by the Isle of Man Government's immigration service to modernise and improve processes.

There is now much greater rigour in the processing of immigration applications underpinned by improved data and information. There is also multi-agency work underway to review historic visa applications, to identify any patterns of concern. Further work is underway over the longer term, including active involvement in a project being undertaken by the UK Government to digitise its immigration process and systems.

### **Dedicated Resources to Counter Financial Crime**



The Isle of Man Government has invested significantly in law enforcement and regulatory capacity, including the establishment of dedicated AML/CFT units and enhanced monitoring programmes. Collaboration between regulators, law enforcement, and international partners remains central to our approach.

A key element of this investment is the Proactive International Money Laundering Investigation Team (PIMLIT), a ring-fenced unit within the Isle of Man Constabulary focused on complex, cross-border money laundering cases posing the greatest risk to the Island and beyond. PIMLIT operates proactively, converting intelligence into action through warrants, arrests, and financial restraints, and works closely with domestic agencies and overseas counterparts to disrupt organised crime and protect the integrity of the jurisdiction.

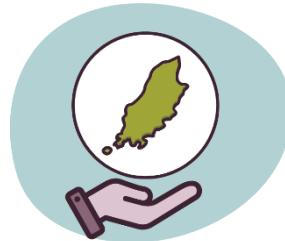
The Financial Services Authority (FSA) pursues a risk and impact-led approach to supervision to ensure its resources are focused on the biggest threats to its regulatory objectives of reducing financial crime, protecting consumers and maintaining confidence in the finance sector.

The Financial Intelligence Unit (FIU) continues to work with public and private partners to review key data provided through Suspicious Activity Reporting. The FIU built upon its strategic aims, playing a significant role in keeping the Island safe from criminal activity.

More information on agencies within the Island's AML/CFT framework can be found on the Isle of Man Government - [Anti-Money Laundering and Countering the Financing of Terrorism \(AML/CFT\) webpage](#).

# Looking Ahead To 2026

The Isle of Man continues to take a proactive and robust approach to countering financial crime, demonstrating a strong commitment to safeguarding the integrity of its financial and non-financial sectors. Our approach seeks to maintain a careful balance—ensuring AML/CFT measures are robust and proportionate to the risks faced, while continuing to foster innovation and investment across both financial and non-financial sectors. This balance is subject to ongoing review to reflect emerging threats and opportunities.



## Safeguarding the Isle of Man: Balancing Growth and Security

Following the publication of the eGaming National Risk Appetite Statement in 2025, a comprehensive all-sector NRAS will be released in 2026, aligned with the findings of the National Risk Assessment. Industry engagement in shaping this wider NRAS is both acknowledged and essential to its effectiveness.

The National Risk Assessment (NRA) is currently being finalised and will be published very soon. Industry engagement is critical, and authorities invite stakeholders to share their views on how NRA outreach can be most effectively delivered. Extensive outreach will accompany the publication of the NRA to ensure clarity and accessibility.

The NRA forms the cornerstone of the Isle of Man's AML/CFT framework, ensuring that risk understanding and mitigation measures remain robust, proportionate, and aligned with international standards.

The Isle of Man Government remains dedicated to both promoting and protecting its industries, safeguarding integrity while supporting sustainable growth. The Isle of Man authorities are continuing to enhance inter-agency working across the regulators and law enforcement to further strengthen the financial crime prevention regime.

## Contributing to International AML/CFT/CPF efforts

Regulators and law enforcement work proactively to alert sectors to new and evolving threats, with strong engagement from industry. The Isle of Man will continue to publish reports on [emerging typologies](#) and maintain active dialogue with peer jurisdictions to ensure a coordinated international response to threats that transcend borders and demand global solutions. Recently, the [GSC shared typology information](#) as part of its ongoing commitment to sharing key risk information with the sector and associated industries.

## Strengthening Public–Private Partnerships

Public–private partnerships continue to develop and remain central to the Isle of Man’s Countering Financial Crime Strategy 2024-2026. The private sector plays a critical role as the first line of defence, and its proactive engagement is essential to identifying and mitigating risks.

The island’s authorities extend our sincere thanks to businesses across all industries for their ongoing support and collaboration at a time which has been challenging. These efforts make the Island stronger, and we are proud of the progress achieved together.

## Money Laundering NRA

The Money Laundering report for the Isle of Man Gambling sector builds substantially on the 2020 ML/TF NRA, assessing risk for both online and terrestrial gambling sectors. However, software supply business does not easily fit into the parameters of the World Bank risk assessment tool, which has been used for the NRA, so the tool has been adapted accordingly to assess the ML risk of this segment.

Gambling is inherently vulnerable to money laundering through high-value and rapid transactions. Both terrestrial and online gambling can be exploited to move or disguise large sums quickly, with proceeds of crime laundered by presenting them as gambling winnings.

Risk Assessments and Typology Reports play a vital role in strengthening detection and prevention efforts by highlighting how criminals exploit systems to launder illicit proceeds, finance terrorism, and support proliferation activities. The GSC recommends Operators familiarise themselves with [the island's NRA documents](#) and use them to inform their own business risk frameworks.

## GSC 2026 Key Aims

Going forward, the GSC will move to engage with stakeholders to ensure stability in the sector. Its goals for 2026 will enhance existing island-wide initiatives to secure a sustainable future for the Isle of Man through:

- Building cross-agency collaboration, and public-private partnerships;
- Deepening engagement with international regulatory counterparts;
- Improving internal GSC processes for managing intelligence and information;
- Applying regulated effort efficiency and proportionately, reducing unnecessary burden on compliant Operators.

Key messages for industry include:

- Maintaining a robust understanding of risk and applying effective preventive measures, such as Customer Due Diligence (CDD), strong internal controls, and timely reporting of suspicious activity;
- Working proactively with government and regulators—including through initiatives such as the Isle of Man Financial Crime Prevention (IOMFCP) Online Gambling Group—to identify risks and implement appropriate measures and guidance;
- Assessing the findings of the NRA and incorporating the relevant information into Operator AML/CFT frameworks, being cognisant of the national picture outlined; and
- Keeping abreast of emerging threats/typologies, maintaining vigilance against known and emerging threats.

"The Islands regulatory and law enforcement agencies are responding robustly to threats, and that is something we should all be proud of. By working together—government, regulators, and industry—we can continue to protect the integrity of our Island and ensure it remains a safe, competitive, and trusted jurisdiction."

Mark Rutherford - Chief Executive Officer, Gambling Supervision Commission

