



Outreach Feedback Survey Report

July 2026

Gambling Supervision Commission
Ground Floor, St George's Court
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Isle of Man
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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 AML Forum include:

- An introduction from GSC Deputy Chief Executive Officer, Nicola Libreri;
- Various key updates from the GSC;
- Targeted Financial Sanctions (guest speaker from IOM Customs & Immigration);
- Suspicious Activity Reporting (SARs) including an in-depth case study;
- Virtual Assets and the VA/VASP National Risk Assessment;
- Outreach update; and
- Mutual Evaluation Process updates from the GSC and AML/CFT Policy Office.

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 also 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 2026 AML Forum Outreach survey.



Progress since the January 2026 AML Forum

You Asked for...

Regarding National Risk Assessment (NRA) outreach, the most requested format was for online document summaries and guidance. There were also requests for in-person drop-ins and multiple requests for a summary video.

We Did

NRA Outreach throughout Q1 and Q2 2026 in collaboration with the Isle of Man Financial Services Authority (FSA) and other partner agencies in the form of in-person events, written factsheets and blog updates, as well as an online webinar and dedicated forum presentations which were recorded and uploaded in video format on our website.

You Asked for...

More detail on specific risks/typologies to be covered at the next AML forum. Including those of both B2B and B2C operators.

We Did

Issue key flags, Typology and case study publications on the GSC website including Gambling typologies from the Isle of Man Financial Intelligence Unit, National Risk Assessment summaries (including the Gambling NRA), reports from UNODC, RUSI and more, and shared via email and social media. This Forum also included flags relating to key typologies and an in-depth case study for operators.

You Asked for...

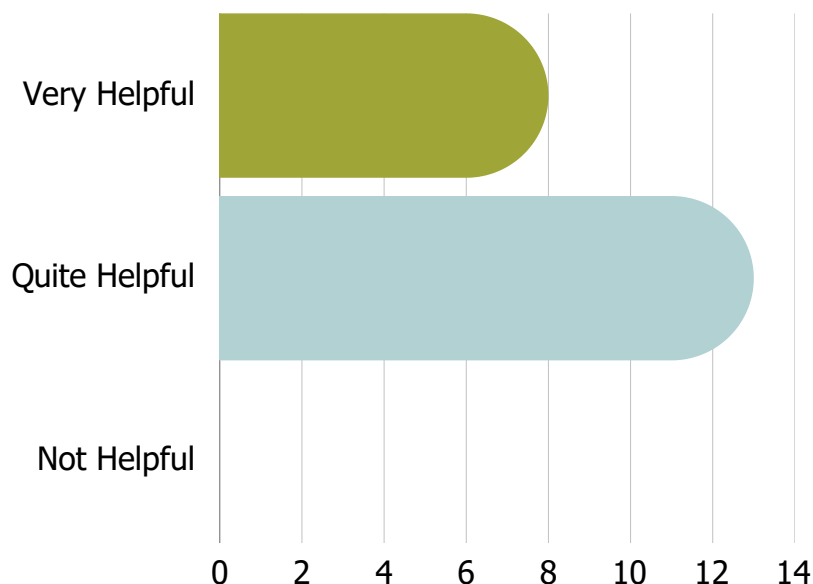
More outreach on Suspicious Activity Reporting (SARs) including statistics from the sector.

We Did

A dedicated presentation on SARs in the sector, including figures from recent years. The presentation also covered an in-depth case study, which highlighted the way in which suspicion can escalate over time through a series of ongoing flags.



Did you find the previous AML Forum (Jan 2026) topics to be helpful?



As part of the outreach survey, we ask attendees to give feedback on the topics presented at the AML Forums. In July 2026, we asked whether they found the topics of the previous forum (Jan 2026) to be helpful.

62% of respondents said that the previous forum topics were "Quite Helpful, 38% found the topics to be "Very Helpful".

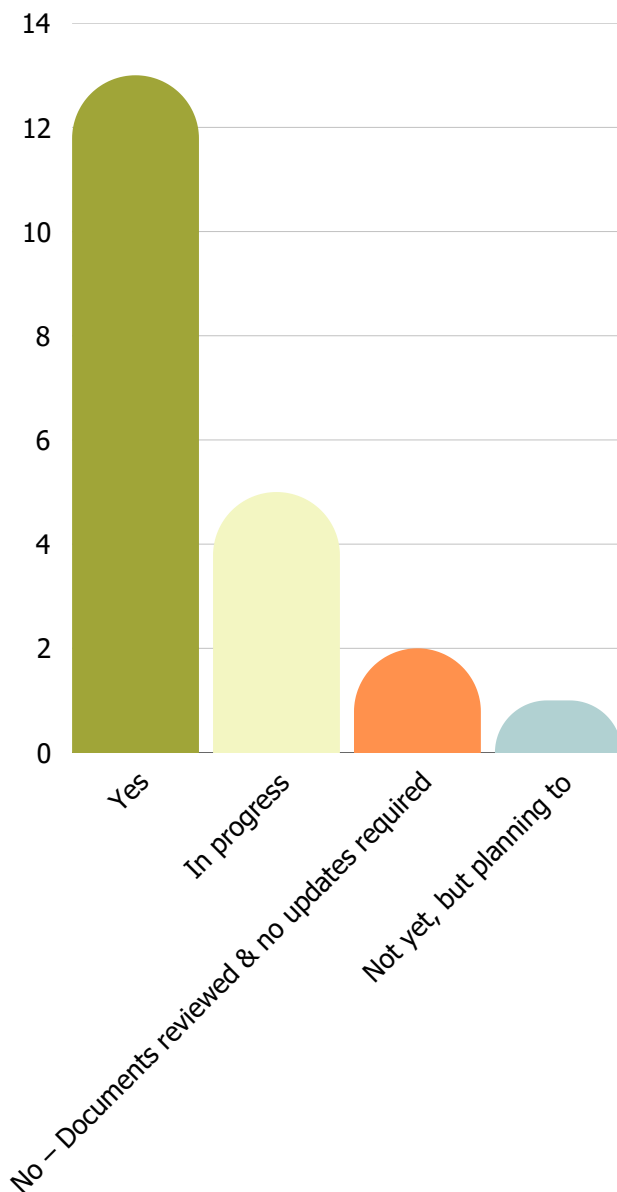
What topics would you like to see covered at the next AML Forum?



Topics for the AML Forums are chosen based on industry trends and typologies, GSC supervisory data, and industry feedback on what they would like to see covered. There were multiple requests at the previous forum for more information following the risks identified in the NRA, notably guidance on identifying and mitigating those risks.

The forum this time focused on some of those key areas of focus emerging from the NRA (VA, Sanctions, SARs). When asked the same question at the July forum, operators requested a wide variety of topics with a focus on more in-depth case studies and focus on financial flows, especially in relation to virtual assets.

Have you made any changes based on typologies/reports shared by the GSC? (eg. PF small states guidance, FIU reports...)

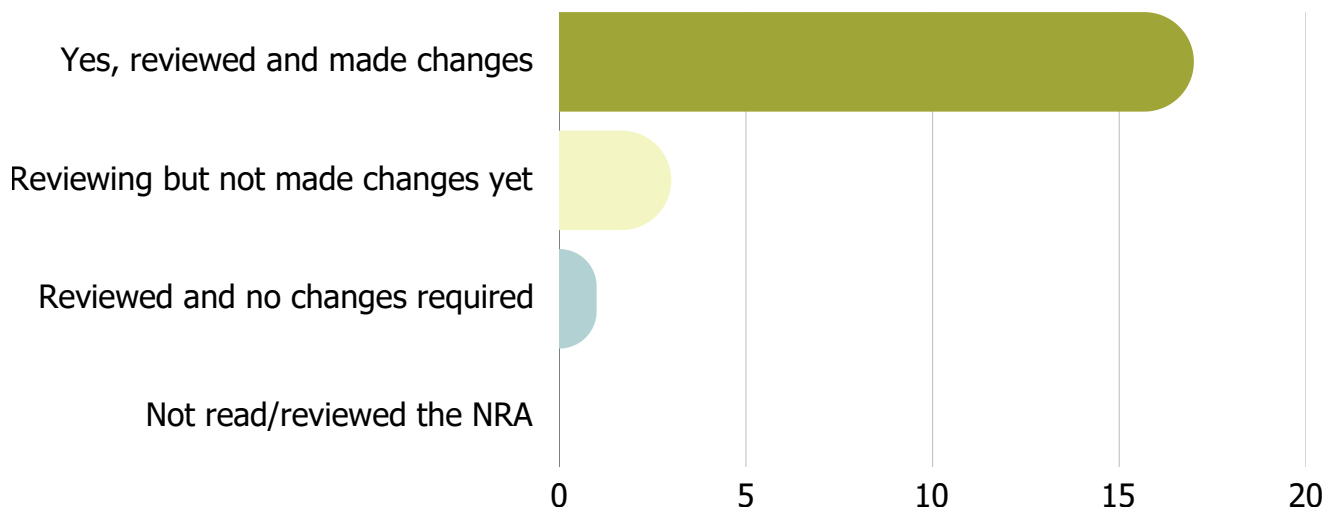


The GSC had previously received requests from stakeholders to produce more detailed guidance on emerging typologies. The GSC continued its output of typology/flag documents and 'key takeaways' of relevant reports throughout 2026.

To ascertain whether the content was useful to Operators, the GSC also asked whether changes were made based on the documents shared.

The majority (62%) of respondents have made changes to their business as a direct result of GSC typologies/reports shared with operators. 10% had reviewed the documents and felt that no additional changes were required and a quarter of respondents were in the process of making updates based on information shared.

Have you reviewed the gambling NRA and made changes?



In addition to an overall National Risk Assessment, sectoral NRAs were released including a dedicated gambling sector NRA. The GSC has shared key findings of those documents containing risks relevant to the gambling sector.

Respondents were asked whether they found recent GSC outreach regarding the sectoral NRA documents helpful.

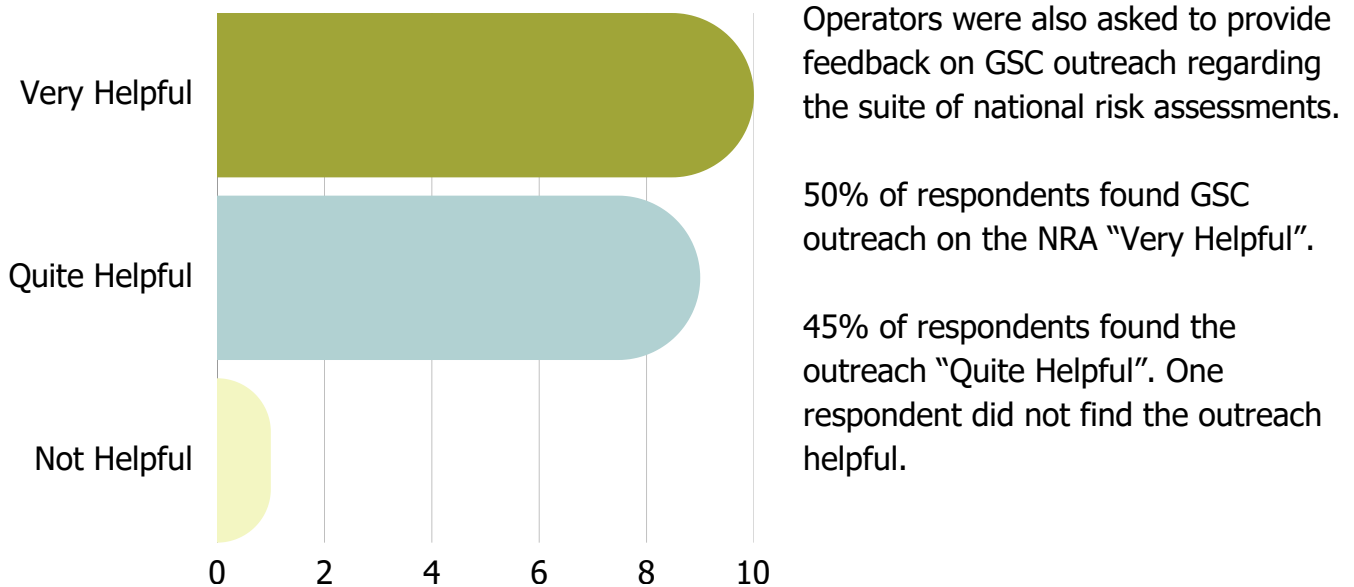
All respondents had read and reviewed the NRA.

81% of respondents had reviewed the document and had already made changes, and 14% were still in the process of reviewing and making changes.

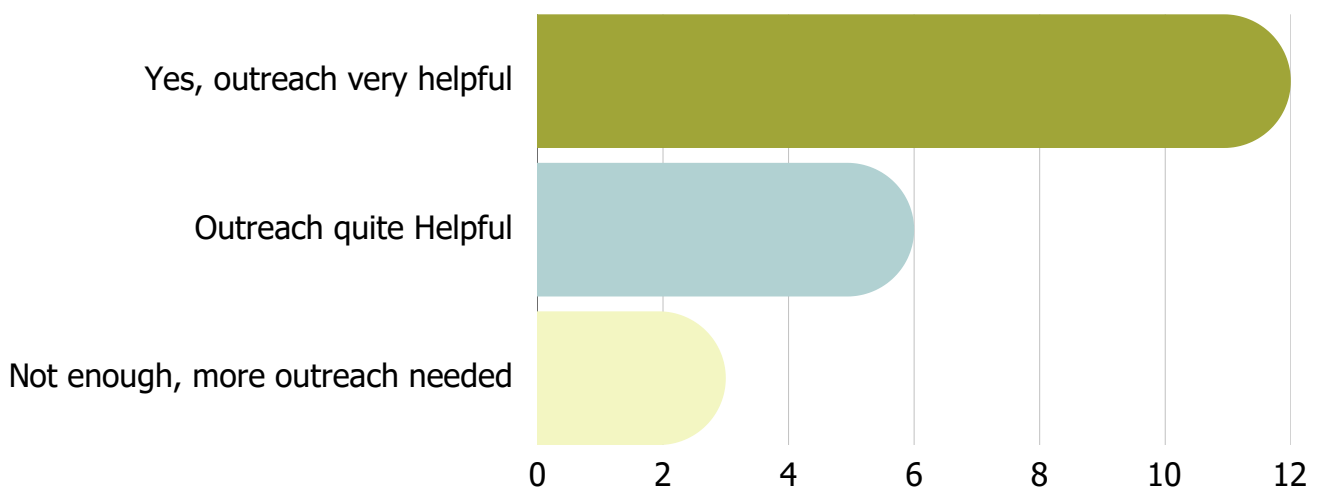


The GSC and FSA expect licensed operators to have read and reviewed the relevant NRA documents by September 2026.

How would you rate GSC outreach on the NRA?



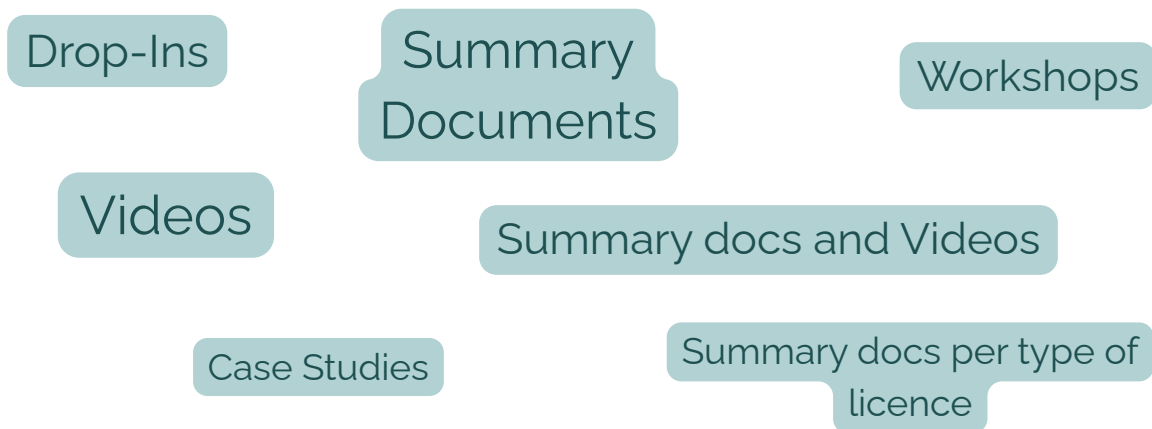
Has GSC/Gov NRA outreach helped your understanding of NRA findings? (events, webinars, blogs, emails)



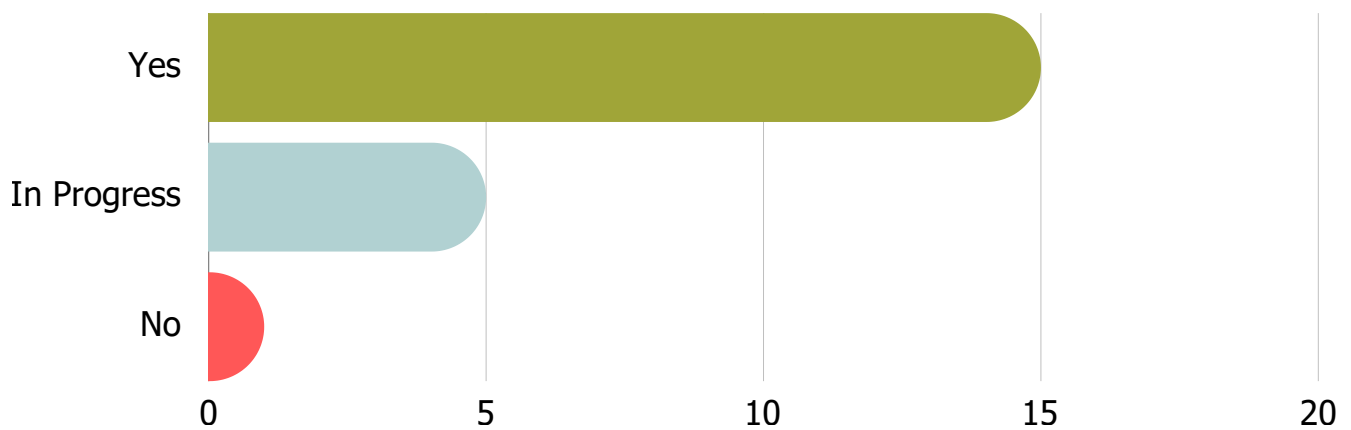
Operators were also asked whether outreach improved their understanding of the NRA (above the publicly available NRA document). 57% of respondents said that the outreach was helpful and that it had improved their understanding of the NRA findings.

29% of respondents found GSC outreach on the NRA quite helpful, and 14% would still like further outreach from agencies on the NRA.

What further Outreach would you like regarding the NRA?
(summary docs, events, videos, drop-ins?)



Have you reviewed/ made changes to your risk framework following the NRA?



When asked if they had made changes to their risk framework following the publication of the NRA, 71% of operators said that yes, they had already made changes.

24% were in the process of making changes, and one respondent had not made changes to their risk framework following the NRA.

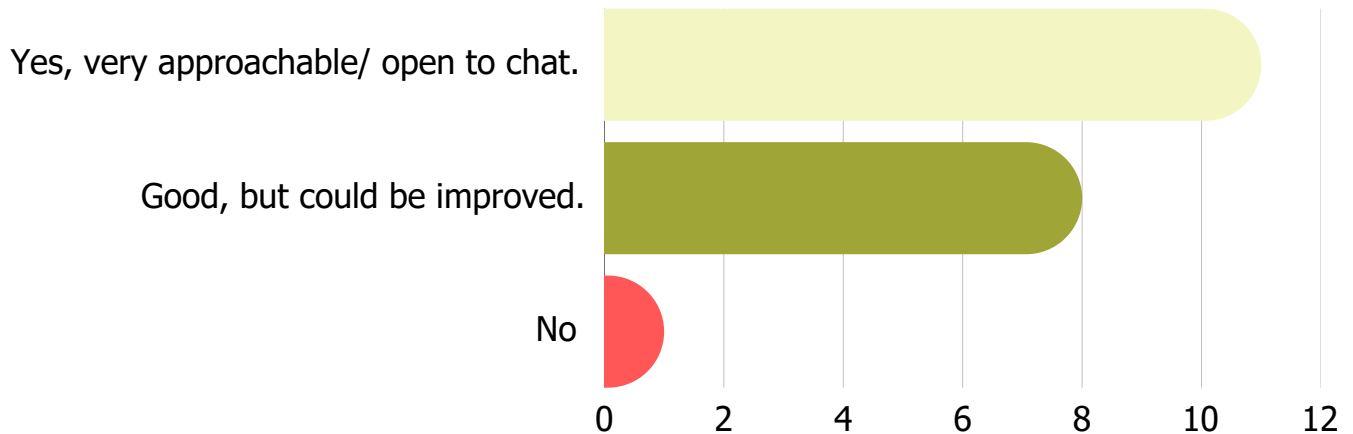
What has been your biggest AML challenge this year?



What do you see as the biggest (ML/TF/PF) risk to your business?



Do you find the GSC approachable (eg., in person, at Q&A, or over phone/email)?



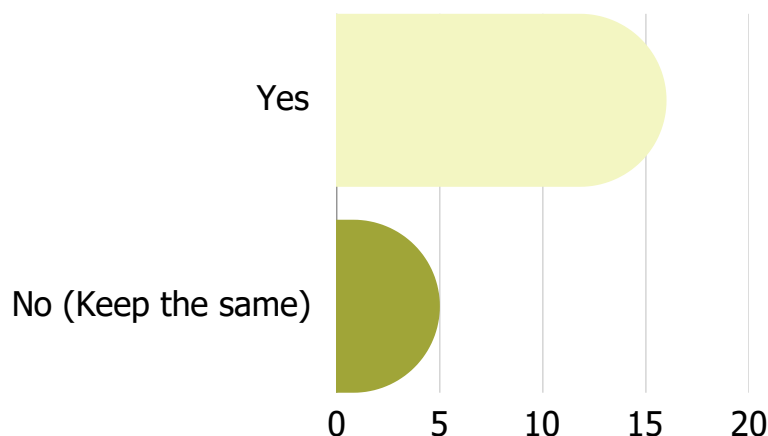
In order to assess the quality of GSC outreach, operators were asked how approachable they find GSC staff. 55% of respondents felt that GSC staff were very approachable and open to chat when queried.

40% of operators thought GSC staff approachability was good but could be improved. Only one respondent did not find GSC staff approachable.

The GSC regularly surveys operators to ensure outreach remains effective, evolving over time to meet operator needs.

The GSC operates an "open door" policy, always endeavouring to respond to queries in a fair and timely manner. If operators have any issues or queries, they are encouraged to call or email their preferred contact at the GSC.

Should we open the AML forums to other staff members of operators (eg., directors, other staff)

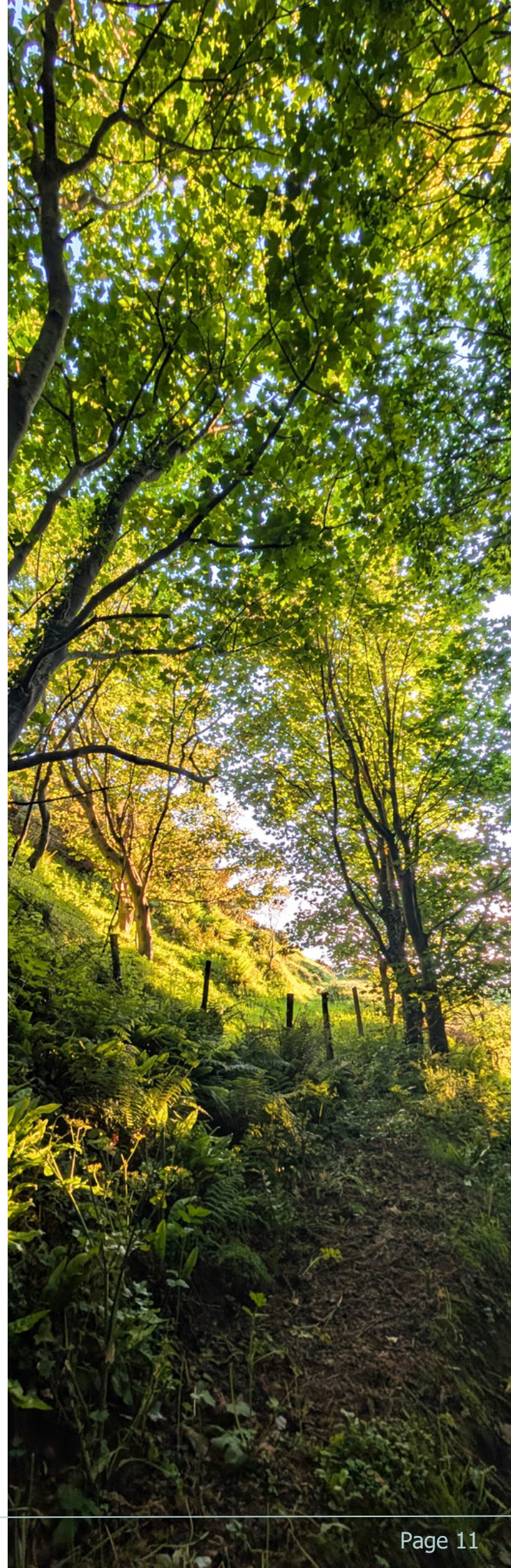


The GSC also asked operators whether they felt it would be beneficial to open up the AML Forum to a wider audience.

76% of respondents felt that it would be beneficial to allow non-compliance roles/wider audiences to the forums. 24% of respondents would like forum attendance to remain the same.

Key Takeaways

- 1** 100% of survey respondents had already read and reviewed the Gambling National Risk Assessment.
 - 2** 81% of respondents had already read and reviewed the National Risk Assessment and made changes to their risk frameworks accordingly. This is well ahead of the deadline given by Isle of Man regulators.
 - 3** The biggest AML challenges/risks were those beyond the immediate/obvious reach of operators, such as cryptocurrency, downchain risks for B2Bs and criminal lifestyle spend.
 - 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 and Q&A session at the forum.



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