



Outreach Feedback Survey Report

January 2026

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 January AML Forum include:

- An introduction from GSC Deputy Chief Executive Officer, Nicola Libreri;
- Various key updates from the GSC;
- Overview of the Upcoming National Risk Assessment and sectoral assessment findings;
- Outreach "you asked, we did" presentation and Feedback survey; and
- An overview of the Terrorist Financing NRA with key typologies.

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 January 2026 AML Forum Outreach survey.



Progress since the July 2025 AML Forum

You Asked for...

Guidance for OGRA licence holders with Network Services Permissions.

We Did

Guidance for networks was published in October 2025 following requests from the industry for more clarity on GSC supervision of networks.

You Asked for

More fact sheets, flags and typology report summaries on our website.

We Did

In previous feedback, it was noted that Operators prefer short summary documents and fact sheets, especially where they contain key typologies or flags. As such, the GSC has tried to reshare any NRA documents from ancillary sectors (i.e., insurance and banking) that have key findings that cross over into the gambling sector.

The GSC also continues to share key typology documents from national and international resources such as the UNODC, RUSI, FATE and Isle of Man government agencies.

You Asked for...

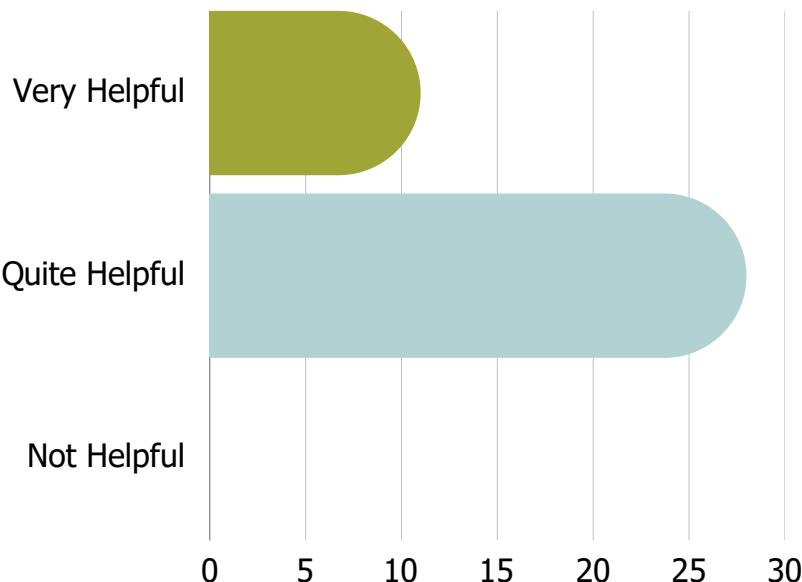
More outreach on SARs following the successful workshop in 2024.

We Did

After the positive feedback on the SARs workshop for terrestrials in 2024, another workshop was conducted in autumn 2025. The session was conducted in collaboration with the Isle of Man FIU, and attendees included frontline workers as well as MLROs from the terrestrial sector. Feedback was very positive, and the information shared with operators has already demonstrably been included within Operator training resources.



Did you find the previous AML Forum (July 25) 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 January 2026, we asked whether they found the topics of the previous forum (July 2025) to be helpful.

72% of respondents said that the previous forum topics were "Quite Helpful, 28% found the topics to be "Very Helpful".

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

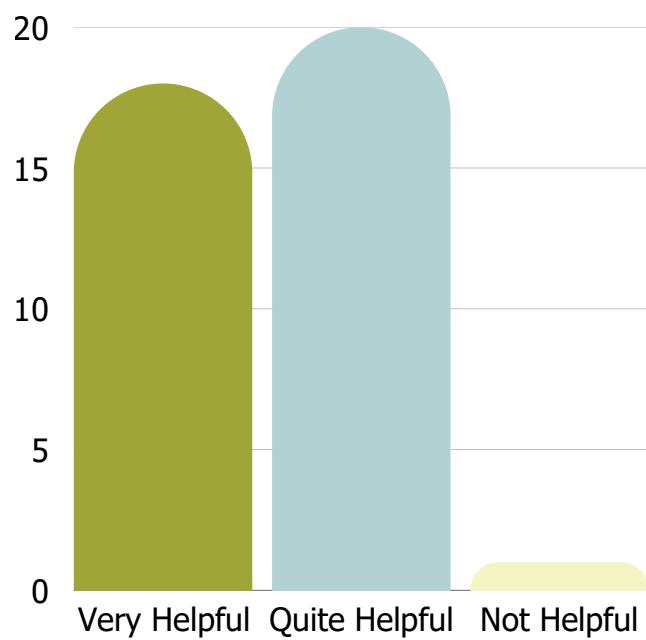


We also asked respondents what topics they would like to see covered at the next AML Forum in July 2026.

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 for more information following the risks identified in the National Risk Appetite Statement (NRAS) and the upcoming National Risk Assessment, notably guidance on identifying and mitigating those risks. Both from a private and public sector perspective.

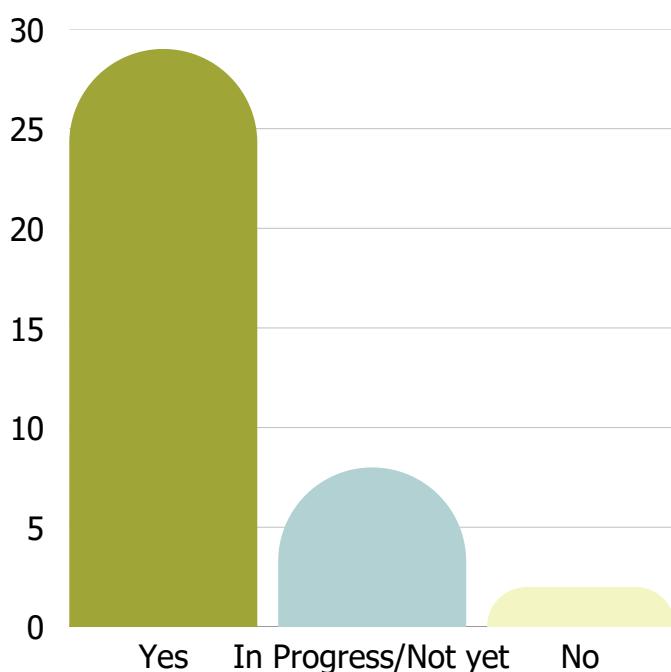
The GSC regularly shares typologies and reports with 'key takeaways' to its website/email list. Do you find these Helpful?



The GSC had previously received requests from stakeholders to produce more detailed guidance on the AML/CFT inspections process. Additionally, requests were made for more detailed breakdowns of emerging typologies and key flags. As such, the GSC increased its output of typology/flag documents and 'key takeaways' of relevant reports in 2025.

51% of respondents found these documents to be 'Quite Helpful', with 48% finding them 'Very Helpful'. Only one respondent said that they did not find them helpful.

Have you made any changes based on typologies/reports shared by the GSC?



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

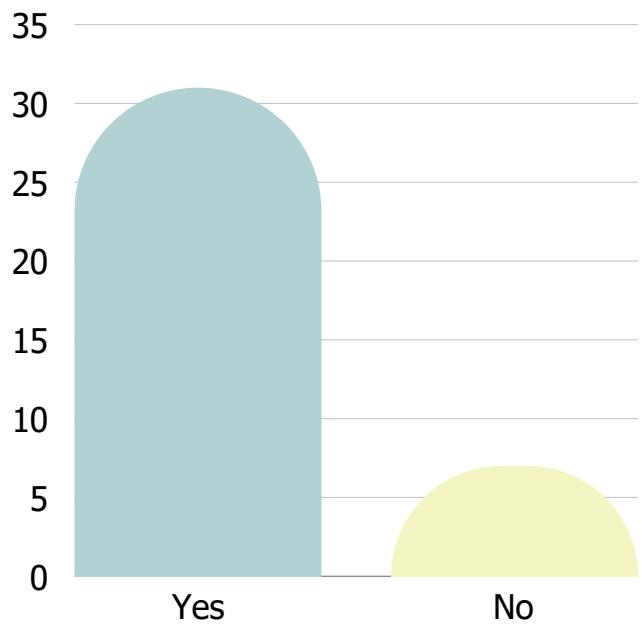
74% of respondents said that 'Yes', they did make changes to their processes based on the content shared by the GSC. 21% said they intend to, but the changes are in progress/not yet started. Two respondents stated that they did not make changes based on these documents.

Have you read/reviewed Network guidance?

Following the release of guidance for operators with Network Services permissions, the GSC asked attendees to provide feedback on the document.

82% of respondents stated that they had read the guidance. 18% had not read the guidance.

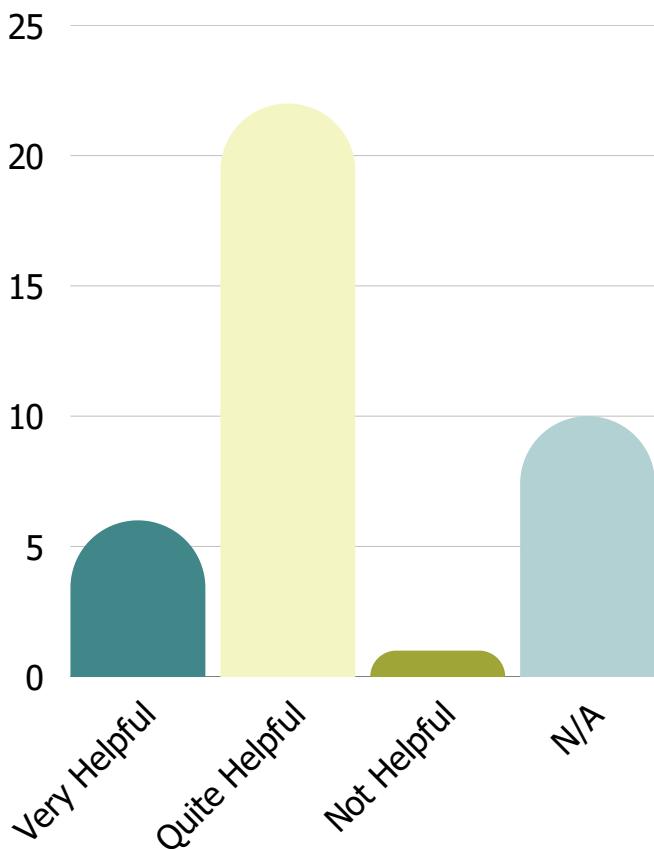
All respondents with Network permissions have read the guidance document, and notably, even some of those without Network permissions have also reviewed the document.



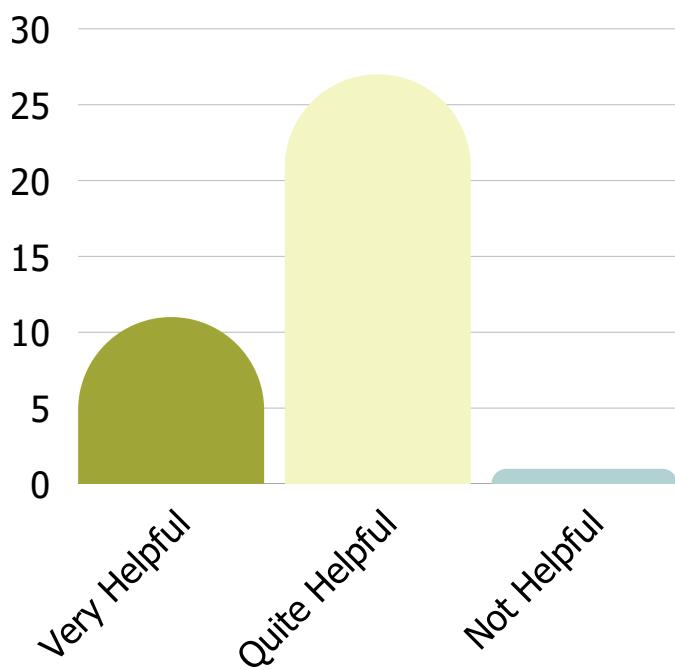
Did you find the Network guidance helpful?

56% of respondents said that they found the guidance to be "Quite Helpful", 15% found the guidance "Very Helpful", and only one respondent selected "Not Helpful."

As the guidance is aimed at those with Network services licence permissions, it was not relevant to all respondents. As such, an option was included for those attendees to whom the document would not be applicable. The guidance was not relevant (N/A) to the remaining 10 respondents, none of whom reported having Network permissions.



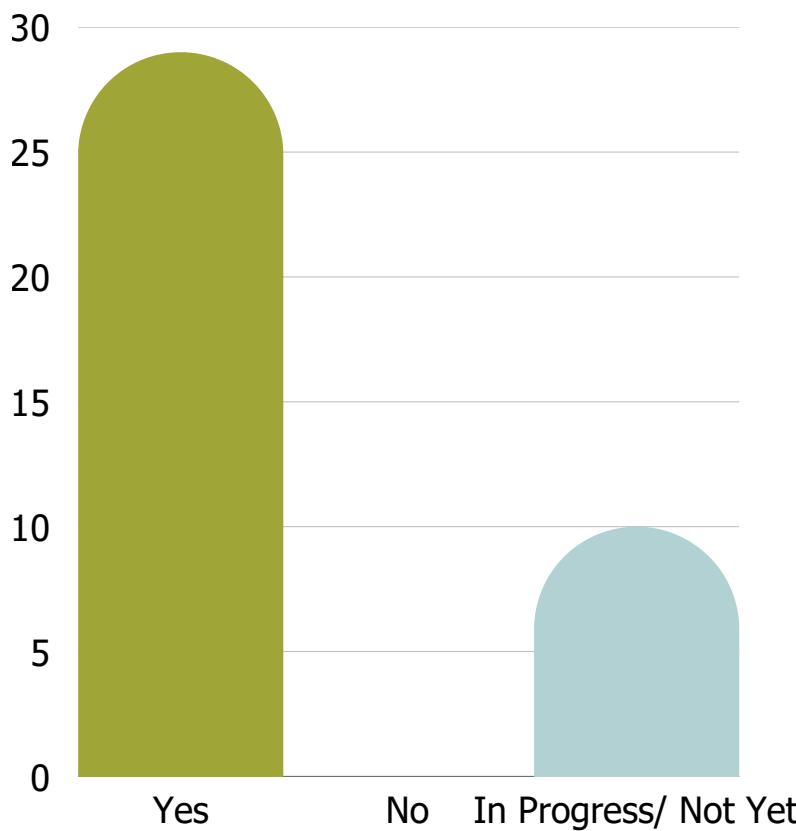
The GSC has shared recent NRA documents (TF NRA, Banking, Insurance NRA). Did you find this helpful?



In addition to an overall National Risk Assessment, sectoral NRAs are in the process of being released, which contain a detailed breakdown of risks and typologies relevant to each sector. 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 National Risk Assessment documents helpful.

69% of respondents found the documents to be "Quite Helpful", 28% found them to be "Very Helpful", and only one respondent did not find them helpful.

Following publication of the TF NRA, have you reviewed your risk framework?



In order to assess the impact of GSC outreach, respondents were asked whether they reviewed their risk framework following the publication of the Terrorist Financing (TF) NRA, which was summarised and shared by the GSC.

74% of respondents have already reviewed their risk framework following the publication of the TF NRA. The remaining 26% of respondents are in the process of doing so or intend to soon.

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

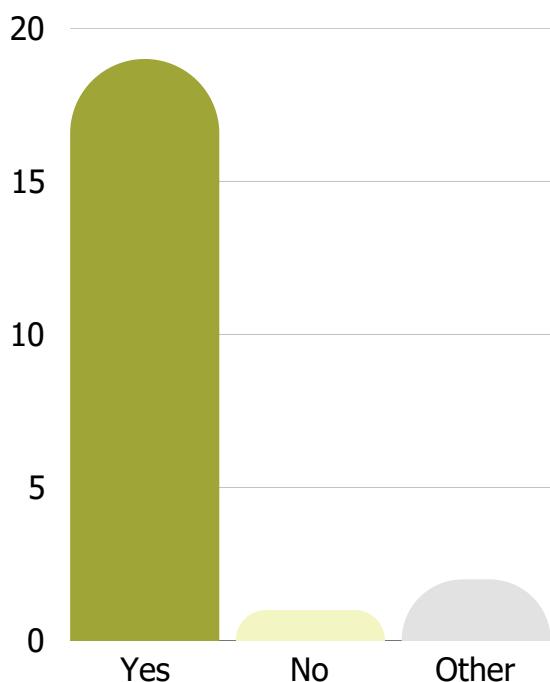
What Outreach would you like regarding the NRA? (summary docs, events, videos, drop-ins?)

Respondents were asked what formats of outreach they would prefer regarding the upcoming NRA publication. The GSC uses various channels for outreach and regularly asks the industry which formats they find most useful.

The GSC has taken these comments on board and will use them to inform future outreach regarding the National Risk Assessment. Summary documents will be sent around, and invites to any relevant events will be forwarded to GSC stakeholders.



We are hoping to reissue the Proliferation Financing Survey this year. Would you have capacity for this?



The GSC and FSA have previously conducted a survey regarding Proliferation Financing awareness amongst their associated sectors. As the National Risk Assessment is due to be released during the survey issuance period, the GSC asked respondents if they had the capacity/felt it was still fair to conduct the survey.

Over 86% of respondents stated that they would have the capacity for the survey were it to be conducted again this year. Only one respondent said they would not have the capacity.

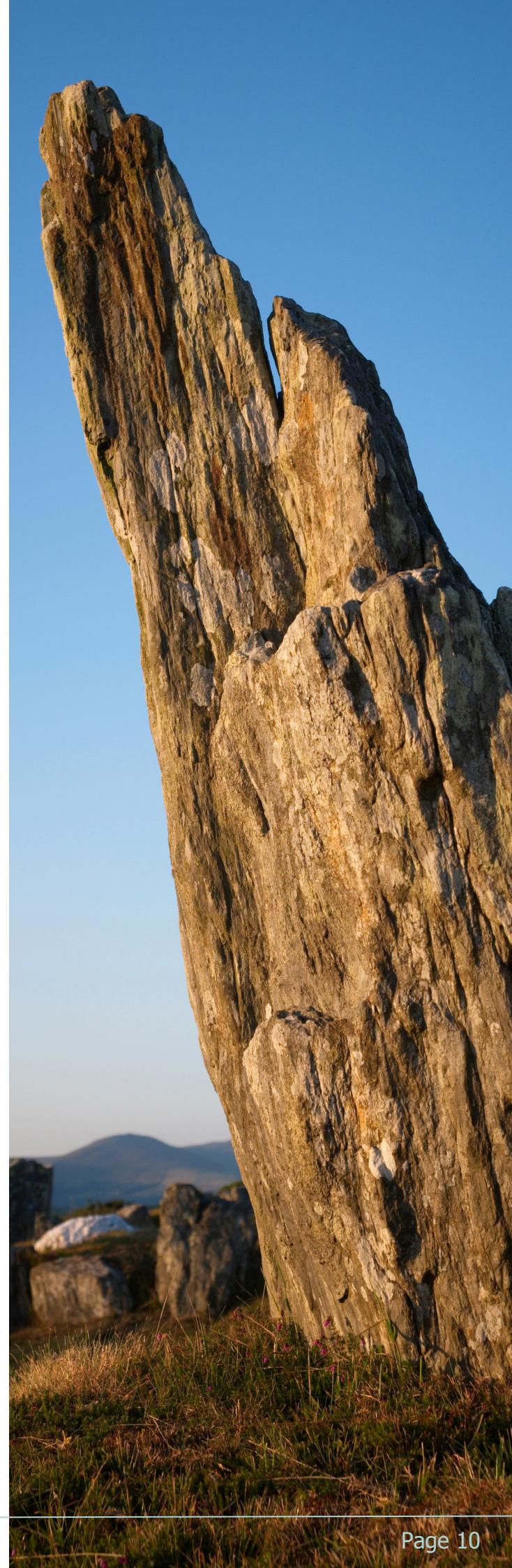
Any suggested topics/projects for the Public-Private Partnership eGaming Group to cover?

The GSC also asked respondents if they had any suggested topics for the new eGaming Group to discuss in 2026. Responses were broad in scope and covered various topics, including emerging risks, unlicensed software companies and ancillary services. The suggested topics have been forwarded to the eGaming group for discussion.



Key Takeaways

- 1** Regarding National Risk Assessment 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.
- 2** All respondents with Network permissions have read and reviewed the new guidance, and operator's understanding of emerging risks/adoption of documents is good.
- 3** The Money Laundering Gambling NRA will be available soon on the counteringfinancialcrime.im website. Operators are reminded to keep an eye out for government communications regarding the sectoral and overall NRA.
- 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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