


## Anti money laundering workstream: Two-year plan

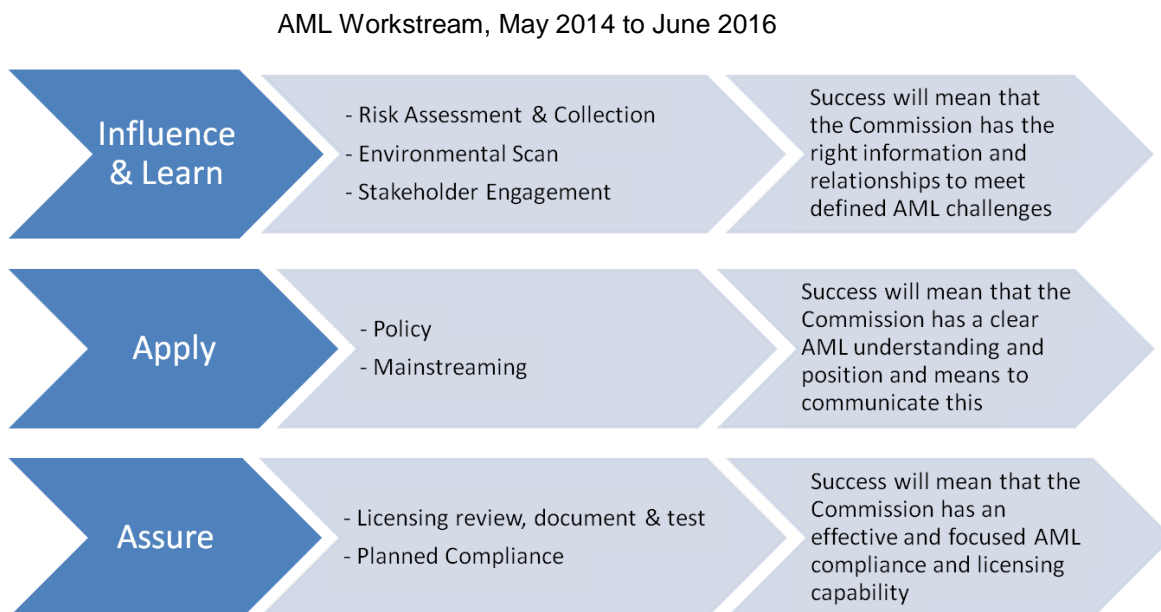
For Board approval	
For Board briefing	
For Board steer	
For Board information	

**Prepared by:**

**Date:** 14 May 2014

## Executive summary

1. This paper sets out *how* the Anti Money Laundering workstream (the workstream)) will meet the aspiration described in a paper to the Board in March 2014. It follows the same structure, marshalling effort in three areas towards the overall intent to keep money laundering out of gambling. The workstream will do this by raising standards within the industry by:
  - Influencing and learning
  - Applying this understanding
  - Assuring compliance
2. The workstream is developing and using a number of products to plan, organise and drive relevant activity in each of these areas. These include a summary of money laundering (ML) risks in the gambling industry; an environmental scan; stakeholder engagement, policy, training and compliance plans.
3. Careful planning and sustained delivery will equip the Commission to meet the challenges that are set out in the March paper. These are: legal (including EU Fourth Money Laundering Directive (4 MLD)), cultural, and technological.
4. The proposed 4 MLD presents a major challenge as it is likely to bring significant elements of the gambling industry into the regulated sector<sup>1</sup>. The revised workstream intent and approach will enable the Commission to meet this, and the other challenges, proactively anticipating and engaging the issues.
5. The paper asks, and answers the question: ‘Where does the Commission need to be in two years time (specifically, 30 June 2016 )?’. On one hand this is a useful time period for planning purposes, and on the other it anticipates the progression of the 4 MLD and a need for the Commission to prepare for its implementation within Great Britain (GB).
6. The overall approach is summarised as:



<sup>1</sup> Moving elements of the gambling industry into the Regulated Sector will impose a number of requirements on operators including appointment of a ‘nominated officer’, customer due diligence, staff training, AML policies and procedures, ML risk assessment and record keeping.

## Background

7. In March 2014 the Board considered the first of two papers concerning the workstream. GCP(14)22: Anti-money laundering – revised workstream intent and risk assessment submission to HMT. The March paper set out a revised intent and approach inviting board support for the changes. This support was given noting the need for detail of how the approach would be delivered.
8. This paper considers the three components for the workstream identified at that time – Influence and Learn; Apply; and Assure. Success in each is defined together with the necessary activity to achieve it over the next two years.
9. A final section addresses workstream administration including a refreshed approach to governance.
10. It should be emphasised that this approach and activity builds on a foundation established by the previous workstream, and described in AML papers considered by the Board in October 2013 (GCP (13) 57) and March 2014 (GCP (14) 22).

## Issues

### Influence & Learn

Success in Influence & Learn will mean that by 30 June 2016 the Commission has the right information and relationships to meet defined AML challenges.

We will achieve this by:

- I. Building upon the ML Risk Assessment for gambling within GB
- II. Developing and maintaining an ML Environmental Scan
- III. Managing and using our engagement with external stakeholders

11. The March paper sets out three key challenges faced by the Commission in the context of AML – legal, cultural and technological. It asserts the need to build on relationships with key partners, and ensure a clear and up to date awareness of issues across the AML landscape.

### Risk Assessment

12. An assessment of ML risk within the GB gambling industry was prepared and provided to HM Treasury (HMT) in April 2014<sup>2</sup>. This identifies four areas of ML vulnerability (and five for non-casinos). The analysis drew heavily from external sources such as the international Financial Action Task Force<sup>3</sup>, underpinned by a number of examples from the Commission corporate record.
13. It is anticipated that provisions of the 4 MLD will be implemented into British Money Laundering Regulations during 2015 and 2016<sup>4</sup>. HM Government (HMG) will have some

<sup>2</sup> This is mentioned in the AML WS March paper at paragraph 40.

<sup>3</sup> The Financial Action Task Force (FATF) is an inter-governmental body established in 1989 by the Ministers of its Member jurisdictions. The objectives of the FATF are to set standards and promote effective implementation of legal, regulatory and operational measures for combating money laundering and terrorist financing.

<sup>4</sup> The final text for the 4 MLD has not yet been agreed and this is anticipated later in 2014. It currently appears likely that Member States will have discretion to exclude some parts of the gambling industry where they can demonstrate very low risk of ML.

discretion in how these are implemented. It is reasonable to expect that parts of the gambling industry will be significantly impacted by the provisions and will seek to influence their development - and vital that the Commission has not only the right relationships and understanding to navigate through this period, but also a body of evidence reflecting current ML vulnerabilities and risk within the industry.

14. A collection plan will be prepared that will set out how the Commission will develop its current understanding<sup>5</sup> with the goal of a comprehensive, clear and reliable assessment by 31 July 2016<sup>6</sup> - building on the material already prepared and provided to HMT.
15. This plan will identify the gaps in our current knowledge of ML vulnerabilities and industry response. It will set out how these gaps will be filled by targeted compliance activity, seeking information from regulatory and law enforcement partners, by open source research and non-compliance engagement with the industry. It will seek to not only show where ML activity *is* taking place within the industry, but also where it *is not*<sup>7</sup>.
16. The ML risk assessment will be updated to reflect the developing and evidence based understanding. This will not only inform our engagement on 4 MLD related issues but underpin the evidence driven approach to AML policy, compliance, licensing and enforcement activity within the Commission.

An ML information collection plan will be prepared and its provisions followed through with the goal of ensuring a comprehensive, clear and reliable ML Risk Assessment by 31 July 2016.

The first iteration of the Commission ML Risk Assessment (prepared in April 2014) will be updated on a rolling basis, the first due on 31 March 2015

## Money laundering environment scan

17. The Commission needs a clear and up to date understanding of relevant ML issues to marshal its own AML response, and to effectively influence the industry, HMG, and regulatory partners during an important time in the AML context. The domestic and international ML landscape (including political, legal, commercial, procedural, technical and regulatory components) is complex, interconnected and going through a sustained period of change<sup>8</sup>.
18. An environment scan will focus on the three key challenges currently faced by the Commission and defined in the March paper - legal, cultural and technological. It will put these into a wider context across the entire ML landscape and identify emerging issues that have the potential to impact the Commission's AML understanding and position.
19. This will overlap with the ML Risk Assessment and Collection Plan mentioned above as well as acting as one driver for our stakeholder engagement<sup>9</sup>.

<sup>5</sup> The Commission corporate record currently includes over 2,000 ML related entries

<sup>6</sup> The current assessment is clear and reliable. It is not however comprehensive

<sup>7</sup> It may be impossible to assert categorically that ML is not taking place in a certain sector. We can however indicate very low risk of ML for instance.

<sup>8</sup> An assessment of ML issues referred to or within the AML WS in a four week period in January / February 2014 identified over forty separate matters relating to drivers ML and AML topics identifying a need to marshal and harness this information, whilst putting it into the context of wider AML landscape.

<sup>9</sup> A recent graduate, ██████████ was appointed to the Commission on 6 May 2014 on a short term contract. ██████████ has recent experience in (academic) research. One of his primary responsibilities will be the development and maintenance of the AML Environment Scan.

An Environment Scan will be prepared and maintained on a rolling basis. The first iteration will be presented to the AML workstream board by 30 September 2014

## Stakeholder Engagement

20. The Commission enjoys an improving relationship with regulatory partners, law enforcement as well as the industry in the AML context. Over the next two years this will be tested as the requirements of the 4MLD are developed and implemented within the gambling industry. Through careful prioritising and planning there is an opportunity now to anticipate the additional demands, as well as improving existing relationships.
21. The below table shows our AML stakeholders together with reference to the purpose of the relationships.

AML / ML Stakeholders <sup>10</sup>	
Entity <sup>11</sup>	Purpose
Gambling Commission	<ul style="list-style-type: none"> <li>Internal stakeholders include Compliance, Licensing, Enforcement, Intelligence, Sector Specialists, Communications, the Executive</li> </ul>
HM Treasury (Dept for Culture Media & Sport)	<ul style="list-style-type: none"> <li>Custodian of the Money Laundering Regulations (MLR)</li> <li>Responsible for supervision of AML supervisors (including the Commission)</li> <li>Leading HM Government engagement on 4 MLD and FATF recommendations</li> </ul>
Home Office	<ul style="list-style-type: none"> <li>Proceeds of Crime Act, Suspicious Activity Reporting</li> </ul>
Other regulators and supervisors	<ul style="list-style-type: none"> <li>Identifying &amp; sharing good practice</li> <li>Aligning / synchronising activity (for example in cases of dual regulation<sup>12</sup>)</li> <li>Shared interest in policy development</li> </ul>
Gambling industry including trade bodies	<ul style="list-style-type: none"> <li>Required to implement AML controls required by Commission Licensing Conditions (all Licensees), Money Laundering Regulations (Casinos) and Proceeds of Crime Act (all UK businesses)</li> </ul>
Local Authorities	<ul style="list-style-type: none"> <li>There is potential for LAs to use AML provisions within their local plans<sup>13</sup></li> </ul>
Law Enforcement (LE)	<ul style="list-style-type: none"> <li>Customer for ML and AML information and advice</li> <li>Identifying ML cases and risk in the gambling industry</li> </ul>
Commerce	<ul style="list-style-type: none"> <li>Identifying commercial AML capabilities and limitations (informing wider engagement with the industry)</li> </ul>
UK Financial Intelligence Unit	<ul style="list-style-type: none"> <li>Source of intelligence and information</li> <li>Influencing HMG policy</li> </ul>

<sup>10</sup> This is not an exhaustive list. For instance there may be value in working with research bodies / academia in developing our understanding of the ML threat / industry response.

<sup>11</sup> Money launderers themselves are not included in this stakeholder list. It is recognised that whilst the Commission is unlikely to engage launderers directly on a regular basis, there is: (i) potential for debrief by LE partners to fill gaps in our ML understanding, and (ii) a need to understand their motivation and capability.

<sup>12</sup> Dual Regulation – where more than one regulator has simultaneous interest in a case. For instance the Solicitors Regulatory Authority may have an interest in the conduct of one of its members when they are submitting an application for gambling operator licence.

<sup>13</sup> A presentation to an informal meeting of Local Authority representatives is planned. This will explain the nature of current (and potential future) AML responsibilities of betting operators and ask the questions whether a wider awareness of these provisions would be of value to local authorities nationwide – and if so, how best to deliver this.

22. An engagement plan will be prepared to plan and drive the Commission's relationships in these areas. This will include: -

- nature and purpose of the relationships
- priority according to levels of stakeholder interest / capability / influence
- Commission goals from the engagement
- methods / options including identified Commission leads
- risks /opportunities
- relationship with other areas of Commission business<sup>14</sup>

An engagement plan will be prepared and maintained on a rolling basis. The first iteration will be presented to the AML workstream board by 31 July 2014

## Apply

Success in Apply will mean that the Commission has a clear and defined AML understanding and position, and capability to apply this.

We will achieve this by:

- I. Sustaining and refreshing a clear AML policy framework, whilst ensuring this is clearly communicated to the gambling industry
- II. Mainstreaming AML understanding and capability across the Commission

## Policy

23. A suite of Guidance and Advice publications currently define the Commission's AML position, requirements and advice to the industry:

<b>Gambling Commission Policy Documents</b>
Anti Money Laundering: Approach to Supervision
Money Laundering: Guidance for Remote and Non Remote Casinos
Duties and Responsibilities Under the Proceeds of Crime Act: Advice to Operators (excluding Casinos)
Proceeds of Crime Act: Information for Small Businesses

24. In addition to routine refresh, these documents will be updated over the next years in light of wider changes including the implementation of the Gambling (Advertising and Licensing) Bill, and implications arising from the application of the 4 MLD. A more flexible and bespoke approach is currently being considered so that individual sectors receive separate advice tailored to their products<sup>15</sup>.

25. A policy plan will be prepared setting out how the Commission will ensure appropriate Guidance and Advice captures its position and communicates this to the industry. The paper will record the purpose of each document, requirement for any additional material,<sup>16</sup> frequency of refresh, how best to communicate the provisions and how this

<sup>14</sup> Other areas of Commission business that may have an interest in AML stakeholder engagement include Social Responsibility, Sector Specialists and Shared Regulation

<sup>15</sup> Advice currently generalizes to Casino and Non Casino

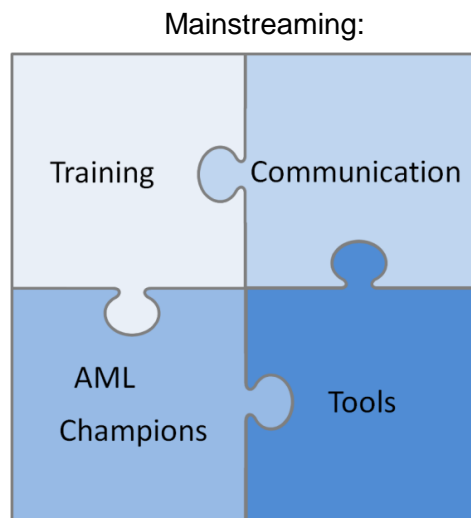
<sup>16</sup> Additional documents include for instance the preparation of an AML Remote Guide for Operators that is currently planned

links to wider AML workstream and Commission activity including the Stakeholder Engagement Plan.

A policy refresh and update plan will be prepared taking into account the above requirements and presented to the AML workstream board by 31 July 2014

### **‘Mainstreaming’**

26. AML capability within the Commission is currently confined to a number of specialists<sup>17</sup>. The March workstream paper identified the need to mainstream or embed AML understanding and effort within the Commission. This reflects the increasing AML significance and profile within the industry and Commission, and will best ensure that AML effort is aligned to other Commission business (for instance with Social Responsibility and High Impact Operator workstreams where significant overlaps with AML have been identified).
27. Effective mainstreaming will mean that all workstreams and business areas have the understanding and appetite to consider ML/AML at appropriate times. This will be factored into all compliance activity for instance – removing the need for specialist AML managers.
28. The AMLworkstream will mainstream AML understanding and ability across all elements of the Commission by 30 June 2016 enabling the organisation to meet the challenges described at paragraphs 3 and 18 above. This will entail four separate but interconnected components: training, communication, champions, and a suitable tool set.



#### **Mainstreaming (i) Training**

29. A training needs analysis (TNA) has been prepared identifying training requirements at three levels within the Commission: -
  - generic to all staff
  - Enhanced to Compliance, Licensing, Intelligence, Enforcement and Sector Specialists

<sup>17</sup> AML specialists are: AML WS lead, policy lead, Financial Intelligence Officer within the Intelligence team, 4 AML Compliance Managers and a financial consultant.

- bespoke to 'AML Champions' (see paragraph 33)<sup>18</sup>

30. A training plan is currently being developed based on the requirements identified in the TNA. This builds on existing AML training that has been successfully delivered over the last 18 months.

### **Mainstreaming (ii) Communication**

31. The means by which AML messages<sup>19</sup> are cascaded within the Commission is being refreshed. A quarterly newsletter will capture headlines providing information in a way that is interesting, stimulating and accessible<sup>20</sup>.

32. Ongoing communication within the Commission will be considered within the Stakeholder Engagement Plan mentioned above at paragraph. 22. This will include 1-2-1 and 1-2-many briefings (typically in existing workstreams and similar groups), the role of the AML Champions mentioned at paragraph 33 as a means of communication, as well as the newsletter and more formal briefing arrangements

### **Mainstreaming (iii) AML Champions**

33. AML Champions are workstream members in key positions across the Commission – Compliance, Licensing, Intelligence, Enforcement, Legal and Sector Specialists. These individuals are already involved in workstream planning and delivery. Their role will be enhanced to represent AML issues and understanding within their respective teams where over time they become the front line for AML support and information.

34. Consideration will be given to the development of AML Champions to equip them in the role. This has been identified within the TNA and will be arranged on an individual bespoke basis.

35. The AML workstream will have AML Champions in key positions with their development needs being addressed by 30 June 2016.

### **Mainstreaming (iv) AML Tools**

36. The final piece of the mainstreaming jigsaw will be the provision of suitable tools to enable Commission members to identify and address AML issues.

37. Planned training will be augmented by ML and AML guidance material that will be published on the intranet. This will offer accessible information about the threat and Commission / industry response complementing the more formal Commission documents mentioned above at paragraph 22.

38. As well as AML Champions the Commission currently offers the expertise of an external consultant who advises on complex licensing applications and delivers AML training.

39. An AML internal and external single point of contact has been established within the Intelligence team offering advice and access to relevant individuals and departments within external partner agencies.

40. A core brief will be prepared and updated on an ongoing basis that will briefly set out:-

- Commission AML responsibility and approach

<sup>18</sup> A Senior Manager (Compliance) recently completed the UK Advanced Certificate in AML and a second has just embarked on the same course – offering an example of bespoke training that may be relevant to other AML Champions (recognising that there will be other, less extensive options to compliment this).

<sup>19</sup> Key AML messages include for instance: legal and regulatory developments; good practice; what this means for Commission business areas).

<sup>20</sup> The first Newsletter will announce WS changes and plans, identify members and what this means to individuals in the Commission, and briefly describe the 4 MLD and issues arising. It will be published by the end of June 2014.



- Commission's position re relevant AML issues
- Current and planned activity

This summary document will be agreed by the AML workstream board and made available to all colleagues as a reference. It will be particularly useful in external engagement, giving confidence to make reference to AML issues without risk of offering the wrong information or position.

The following documents will be prepared in a coordinated approach to mainstream AML activity across the Commission:

- I. Training plan
- II. Quarterly AML Newsletter
- III. ML and AML Guidance
- IV. AML Core Brief

In addition, AML Champions will be identified in key areas of Commission business and their development needs addressed.

Timescales for this activity will be agreed with the AML workstream board with the goal of mainstreaming AML understanding and ability across all elements of the Commission by 30 June 2016.

## Assure

Success in Assure will mean that by 30 June 2016 we have an effective and focused AML compliance and licensing capability that is embedded in Commission wide activity.

We will achieve this by building on past achievements and

- I. reviewing and testing licensing systems whilst updating policy and process that underpins this work
- II. undertaking a review of AML capability within the GB gambling industry including remote operators (continuous with and consistent to past and current compliance activity)
- III. generating a clear understanding of AML strengths and weaknesses across the industry
- IV. embedding AML compliance activity into routine compliance work.

## Licensing

41. Over the last 18 months Licensing has introduced AML focused procedures and training with the goal of preventing applicants that present a money laundering risk from being licensed. This is particularly focused on the source of funds to acquire and finance gambling enterprises, and the nature and antecedents of the ultimate beneficial owners. This has directly led to a number of applications being challenged and applications being refused or withdrawn.

42. Licensing will continue to develop its understanding in this area to ensure it remains appraised of any AML related developments. During the relevant period it will review and update the policy that governs its AML activity. A suite of processes will be updated to ensure consistency and accuracy in approach.
43. Licensing will contribute to, and reference the ML risk assessment mentioned above at paragraph 12, ensuring the understanding it represents is included in decision making processes within the team.
44. During the next two years Licensing will introduce to the system dummy test applications that include identified ML risk triggers. The handling of these cases will be assessed to determine whether the ML risks are identified and appropriate action taken. If weaknesses are identified these will be addressed and if necessary processes adjusted to reflect this. Target dates for this activity have not been determined.

## **Compliance**

45. AML compliance is currently undertaken by 'generalist' as well as AML specialist Compliance Managers. This considers the extent to which operators conform to Commission Guidance and Advice, the Proceeds of Crime Act, and for Casinos the Money Laundering Regulations. It takes place as a follow up to case work, when information is received about ML within the industry as well as in the context of 'baselining' where a representative sample of operators is considered.
46. A plan of AML focused compliance activity for the next two years will be prepared. This will include detail of how every land based and remote operator's AML controls will be considered<sup>21</sup>, appropriate response to get best value from those cases where weaknesses are identified<sup>22</sup>, more probative compliance work within High Impact Operators or other identified higher risk operators, and the means by which compliance activity and operator behaviour will be evaluated.
47. This plan will align with the HIO, Complex Case, Licensing, Proactive and Reactive Compliance workstream. It will be informed by the recently published ML risk assessment within the GB Gambling Industry, and by the collection plan and mainstreaming activity associated with this, mentioned at paragraph 14.
48. Implementing this plan over the next two years will generate a clear understanding of AML controls, informing the Commission's position and debate with the industry and HMT at the time the 4 MLD is applied within GB. It will benchmark the industry approach, informing future planning and engagement.

## **Analysis**

49. Effective analysis of industry data may present new ways to identify ML activity locally<sup>23</sup>. The AML workstream will trial this approach with a focus on a particular geographical area to determine whether there will be value in adopting this more widely to identify possible ML within the industry.

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<sup>21</sup> 'Every land based and remote operator' – in some instances this may be a representative and statistically significant sample.

<sup>22</sup> Where weaknesses are identified, steps are taken to ensure remedial action by the operator. At the same time this presents opportunity to identify and cascade wider learning and best practice. Public statements, 'What Does Good Look Like', and policy development can be complimented by the use of softer powers to influence industry behaviour.

<sup>23</sup> For example: a betting shop that enjoys significantly higher turnover than its competitors in the same street. This may be as a result of good practice, or a dependence on for instance cash being laundered through the business. Analysis of industry data may identify opportunities for targeted compliance activity to expose this.

Licensing policy will be updated and a suite of processes prepared documenting its AML approach.

Licensing will introduce test applications to test its processes.

A plan of focused AML compliance activity for the next two years will be prepared by 30 June 2014.

New analytical tools to identify possible ML will be trialled.

## Workstream governance

50. Governance is provided to the workstream through its board, supported by a working group and, where necessary ad-hoc groups. Membership and focus of these groups have been refreshed following discussion at the respective meetings. This tightens the group composition consistent with the workstream goals and activity described in this paper. A summary of the groups, their membership, focus and frequency of meeting is shown at Appendix 1.
51. Again, following discussion at the relevant meetings a standard template agenda has been agreed for the workstream board and working group. This is also shown at Appendix 1.
52. The various actions and plans described in this paper are shown at Appendix 2 alongside timescale for delivery. Each existing milestone is captured within the planned work ensuring consistency and seamless transition. The AML workstream board will oversee quality and delivery of the plans.
53. Existing workstream performance measures have been reviewed in light of the revised approach described in this paper<sup>24</sup>. Future measures will objectively assess performance against the plans shown at Appendix 2, marshalled by the workstream board.
54. Necessary resource to complete the work set out in this paper is agreed. All but one of the required staff members are in post, and a selection procedure to appoint the final individual (a senior officer) planned for early June. A number of colleagues are committed to workstream activity as described within the Mainstreaming section of this paper. Those dedicated to AML are:

- Senior Manager [REDACTED] WS Lead
- Senior Manager [REDACTED] AML Compliance Lead (alongside other activity)
- Policy Manager [REDACTED] AML Policy Lead
- Senior Officer Vacant Post AML Senior Officer
- Graduate [REDACTED]

## Recommendations

54. Support for the WS activity described in this paper, including plans and deliverables set out at Appendix 2 is requested.

<sup>24</sup> A number of performance measures have been considered in the past including the number of SARs submitted by the gambling industry, operator license applications that were identified as requiring specialist AML support, and engagement opportunities with industry / partner agencies. As the WS progressed it became clear however that these were useful as Management Information but did not give an unambiguous indication of performance.

## APPENDIX 1

### Anti Money Laundering Workstream Governance

Group	Composition	Frequency	Purpose
AML Project Board	<ul style="list-style-type: none"> <li>• Relevant Executive Directors</li> <li>• Programme Director</li> <li>• AML WS Leads (Overall WS, Policy, Compliance)</li> <li>• Lead Intelligence Specialist</li> <li>• Others invited to individual meetings relevant to agenda</li> </ul>	Monthly	<ul style="list-style-type: none"> <li>- Decision Making</li> <li>- Aligning WS activity at a strategic level</li> </ul>
Working Group	<ul style="list-style-type: none"> <li>• AML WS Leads</li> <li>• AML 'Champions' (Compliance, Licensing, Enforcement, Intelligence, Legal, Relevant Sector Specialists)</li> <li>• AML Compliance Managers</li> <li>• 'Critical Friends' (currently Mike Garrity, Roger Parkes)</li> <li>• AML WS Graduate</li> <li>• Others invited to individual meetings relevant to agenda</li> </ul>	Monthly	<ul style="list-style-type: none"> <li>- Filter, assure, support decision making</li> <li>- Align WS activity at a tactical level</li> <li>- Generate ideas, direction</li> <li>- WS Delivery</li> </ul>
Sub Groups	<ul style="list-style-type: none"> <li>• Membership according to topical requirement</li> </ul>	Ad hoc	<ul style="list-style-type: none"> <li>- To address topical issues and report to AML WG / Board</li> </ul>

### AML workstream board & working groups – template agenda

1	Previous Minutes / Notes and Actions Arising
2	<b>Influence &amp; Learn</b> <ul style="list-style-type: none"> <li>○ Risk Assessment</li> <li>○ Environment Scan</li> <li>○ Stakeholder Engagement</li> </ul>
3	<b>Apply</b> <ul style="list-style-type: none"> <li>○ Policy</li> <li>○ Mainstreaming</li> </ul>
4	<b>Assure</b> <ul style="list-style-type: none"> <li>○ Licensing</li> <li>○ Compliance</li> </ul>
5	Risks / Issues
6	WS Administration
7	Any Other Business

**APPENDIX 2**

**Planned AML WS Activity**

<b>WS Area</b>	<b>Activity</b>	<b>Due Date</b>	<b>Lead</b>
<b>Influence &amp; Learn</b>	ML Risk Collection Plan (for period 01/08/14 to 30/06/16)	31/07/14 <sup>25</sup>	AML WS Lead (AML WS Senior Officer)
	Second version ML Risk Assessment (or earlier if nec. to meet HMT timescales)	31/03/15	AML WS Lead (AML WS Senior Officer)
	Environmental Scan – first iteration (then at 3 month intervals)	30/09/14	AML WS Lead (Graduate)
	Stakeholder Engagement Plan (for period 01/08/14 to 30/06/16)	31/07/14	AML WS Lead
<b>Apply</b>	Policy Refresh & Update Plan (for period 01/08/14 to 30/06/16)	31/07/14	AML Policy Lead
	Training Plan (for period 01/08/14 to 30/06/16)	30/07/14	AML WS Lead (Supported by Casino Specialist)
	1 <sup>st</sup> AML Newsletter & Core Brief	30/06/14	AML WS Lead
<b>Assure</b>	Refresh Licensing Policy, Prepare Processes	To be determined	AML Licensing Lead
	Test Licensing Processes by dummy applications	To be determined	AML Licensing Lead
	Two Year AML Compliance Plan (for period 01/10/14 to 30/06/16)	30/06/14	AML Compliance Lead
	New analytical tools to identify ML activity	To be determined	To be determined

<sup>25</sup> Target date of 30<sup>th</sup> June 2014 subject to the timing of the appointment of an AML WS Senior Officer