

From: Mandy Veti [mailto:mveti@gamblingcommission.gov.uk]
Sent: 14 August 2018 17:05
To: Tracy McLuckie
Subject: RE: Gambling Policy Review - City of Bradford Metropolitan District Council

Tracy

Thank you very much for this, this looks really comprehensive.

My only comments are around the risk assessments.

The first is a money laundering risk assessment (under LC 12.1.1) as follows:

Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.

Although we would probably expect this to be kept at the Head Office for larger operators but the understanding would be needed on the premises (and for the monitoring checklist).

The second is a local areas risk assessment (SR 10.1.1)

Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy¹.

We would expect that the local area risk assessment to be on the premises and available for inspection (see this link for further information <http://www.gamblingcommission.gov.uk/for-licensing-authorities/Local-risk-assessments.aspx>)

The LCCP has been slightly updated and can be found at <http://www.gamblingcommission.gov.uk/PDF/LCCP/Licence-conditions-and-codes-of-practice-April-2018.pdf>

If you need anything else please let me know.

Many thanks and kind regards
Mandy

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