Gambling legislation reforms consultation response

Table of Contents

Inspection & investigation Schedule Responses

13 of 15 respondents provided comments against the new inspection and investigation Schedule that is proposed for each Gambling Act.

The comments have been analysed and have been grouped generally into 6 key points, which the GSC has responded to below.

(1) Applicability of the inspection and investigation powers on unlicensed B2B software suppliers.

With respect to the B2B software supplier point, the GSC acknowledges the concern raised regarding the potential application of the new inspection and investigation powers to unlicensed B2B software suppliers who have lawfully chosen not to hold a licence under the current elective framework of the Online Gambling Regulation Act 2001 (OGRA).

It is correct that under paragraph 1(3)(c)–(e), the GSC's powers may extend to:

(a) Persons reasonably suspected of conducting online gambling without a licence;
(b) Persons who were exempt from licensing under section 2(1) of OGRA (e.g. under the Online Gambling (Exclusion) Regulations 2010); and,
(c) in some cases, service providers to licensees or investigated parties.

The GSC would emphasise that these powers are purely investigatory - they do not impose ongoing regulatory obligations on unlicensed entities, and they do not alter the current position that software licensing is elective. The GSC's ability to request information from unlicensed entities is designed to support investigations into licensed or suspected unlicensed conduct, not to regulate unlicensed businesses.

It is important to recognise the proximity of certain un-regulated business activity to regulated activity. Software suppliers, hosting providers, and other B2B entities often play a critical role in enabling or facilitating online gambling. In some cases, the distinction between support services and licensable conduct may be blurred, particularly where software suppliers are deeply integrated into the gambling operation and may therefore operate closely to the threshold which distinguishes licensable activity from non-licensable activity.

In such circumstances, the GSC must be able to monitor and investigate where it has reasonable grounds to believe that a regulated activity may have been or is being conducted without a licence.

Inspection & investigation Schedule responses

(2) Who will be exercising these inspection and investigation powers?

The scope of the authorisations is that by default, they will only apply to specific GSC officers who are trained to carry out such inspections and investigations. Other persons outside the GSC may be appointed on a case by case basis where there is need for specialised skills that authorised GSC officers may not possess, such as particular IT skills. The authorisations will be controlled via internal policy, as is currently the practice under the current inspection and investigation powers under each Gambling Act.

(3) Proportionality of the scope of these powers in relation to former, as well as current, associates, employees and service providers of a licensed operator.

The GSC acknowledges the concern regarding the breadth of paragraph 3, particularly in relation to the GSC's ability to request information from former associates, former employees, and entities no longer providing services to the subject of investigation ("O").

The purpose of these provisions within paragraph 3 (as well as the new definition of "associate") is to ensure the GSC can access relevant information that may be necessary to understand the full context of a licensee's or investigated party's conduct, especially where historic relationships, transactions, or ownership structures may have a bearing on regulatory compliance, financial integrity, or risk exposure.

The GSC recognises that the definition of "associate" being introduced to the Gambling Acts is broad, and that paragraph 3 may extend to entities and individuals outside the Isle of Man's jurisdiction, including those with no current involvement in online gambling. However, several safeguards are built into the framework:

(a) The GSC must act on the basis of a reasonable belief that the person may hold relevant information.

(b) The powers are not for routine use, they are designed for use in connection with an investigation, or other inspection scenarios where the GSC has a legitimate regulatory interest that warrants this level of scrutiny. As such enquires into entities such as former associates, former employees and entities no longer providing services to the licence holder are not powers that the GSC would consider using without good, clearly communicated reasons.

(c) Requests must be proportionate, targeted, and justified in the context of a specific investigation.

(d) Legal privilege and data protection obligations continue to apply, and the GSC will respect commercial sensitivity and third-party confidentiality.

(e) The inclusion of former service providers and associates reflects the reality that historic arrangements, including contracts, systems, or personnel decisions, may be central to understanding past conduct, especially in complex or long-running investigations. This is particularly important in cases involving money laundering, fraud or regulatory evasion, where indirect relationships may be used to obscure control or influence.

(f) Declining to provide the requested information is not, in itself, an offence. However, where the GSC considers the information to be necessary, it may compel the licence holder to provide it. In such cases, the GSC must first obtain permission from a justice of the peace before exercising this power. This requirement ensures that a statutory safeguard is in place to prevent potential misuse of the power.

The GSC appreciates the need to balance regulatory effectiveness with privacy and commercial interests, and the GSC is committed to using these powers judiciously, with appropriate regard for the rights of third parties. Where possible, the GSC will consider limiting the scope of requests or accepting redacted or summarised materials to minimise unnecessary intrusion.

While the powers under paragraph 3 are broad, they are designed to be used responsibly and proportionality.

(4) Proportionality of the scope of these powers in relation businesses that are unconnected to online gambling in the Isle of Man.

The concern relating to paragraph 3 is valid. The use of such a power to look into unconnected businesses must be proportionate, and as such the GSC must be able to justify why such reach would be appropriate on a case by case basis. It is important to note that this is just one tool that may be used, it is not something that will be used in every instance. Where the power is used, its use will be tailored so as to provide as little intrusion as possible into separate, legitimate affairs of UBOs.

The power to request information relating to unconnected businesses is already established under the investigatory powers of the Gambling (AML/CFT) Act 2018. The GSC's authority to seek such information for AML/CFT purposes is therefore well-founded in existing legislation. The GSC remains committed to exercising these powers proportionately and in line with its established track record under the 2018 Act.

The power to look into a company with whom the UBO has a 25% or more share of the voting power is not restricted to just Isle of Man entities. The GSC may therefore enquire about companies in other jurisdictions.

(5) Power to enter private dwellings

The power of entry (in the case of OGRA) may be used in respect of any premise that the GSC reasonably suspects online gambling (within the meaning of s.1 OGRA) is occurring from. This may be a private dwelling, however additional safeguards are in place around private dwellings, whereby the GSC must provide 24 hours' notice of the intended entry, and the occupiers consent will also be required. Employees of gaming companies may be within scope of this entry power, but only where the GSC reasonably suspects that they are conducting regulated activity from their dwelling.

The GSC has responsibility for regulating the act of online gambling in the Island, and it is conceivable (and has occurred in the past) that unlicensed online gambling has been operated from private dwellings. The power of entry, with these additional safeguards, to a private dwelling has been introduced as an alternative to compelling entry, by force if necessary, in the execution of a search warrant under paragraph 5, which would be the only other alternative to regulate such activities.

(6) Applicability of powers to former licence holders.

The use of inspection and investigation powers into former licence holders is a possibility, but only in circumstances where the GSC has reasonable grounds to believe that historic misconduct has occurred. The powers themselves are only applicable for times during which the former licence holder held that licence, and as such carried on activities that are regulated by the GSC.

Additionally, these new inspection and investigation powers do introduce new offences in paragraph 8, however these would only be applicable for instances of non-compliance once the amendments come into operation. For example, if a licence holder surrendered their licence in 2023, and the GSC then initiated an investigation into conduct occurring in 2022, the former licence holder must comply with the investigation. If they refused to provide documents or otherwise obstructed the investigation, they could still be liable for an obstruction offence for their current day actions, even though the investigation related to events occurring in 2022.

Outcome, following analysis of responses

The takeaway from the consultation exercise was a general sentiment that the approach to apply a set of standardised inspection and investigation tools across the relevant Gambling Acts was generally favourable.

The responses provided above have been issued to address specific concerns that were raised in relation to some of the proposed new powers. The way to address the concerns raised will be through appropriate, proportionate and justifiable use of the powers, most of which will be made clear through public facing guidance, into the GSC's policy around the use and exercise of these powers.

The GSC concludes that the proposed powers will be progressed in their current form.

Definitions of “associate”, “beneficial owners”, “controllers” and “senior managers” responses

This section of questions was split into 2 separate questions:

Definitions of “associate”, “beneficial owners”, “controllers” and “senior managers” responses.

4 of 15 respondents provided comments against the first question within this group relating to the definitions of “associate”, “beneficial owner”, “controller” and “senior manager” that are proposed for inclusion within the new Gambling Acts. These definitions relate primarily to use in the new inspection and investigation powers, which are being inserted into relevant Gambling Acts, but are also used in relation to licensing controls specifically within the Casino Act 1986 and the Online Gambling Regulation Act 2001.

The comments have been analysed and have been grouped generally into the following key points which the GSC has responded to below.

(1) Is the definition of “associate” appropriate, acknowledging its breadth, including into family members

3 respondents raised particular comments at the appropriateness of the broad definition of “associate”. Specifically, concern was raised over the breadth of the term “associates” in relation to the inspection and investigation powers, as well as the licensing process under OGRA. Under these powers, the GSC take into account the integrity of “associates” of controllers and beneficial owners of the licence holding company into account when making its licensing assessment, as well as on an ongoing basis through its general supervision function.

In relation to these powers, the GSC would not routinely correspond directly with individuals who are not actively involved in the operation of the business or otherwise in a direct business relationship with the licence holder. While the powers do provide scope for the GSC to contact such individuals, this is not a practice the GSC anticipates undertaking in the normal course of its regulatory activities.

The inclusion of individuals such as family members, partners, employees, and close contacts within the definition of “associate” is intended to reflect the reality that influence and control over a licensee or applicant may be exercised through informal or indirect relationships.

However, the GSC fully recognises that:

(a) These individuals may have no formal relationship with the GSC.

(b) They may be unaware of their inclusion in an application, and the applicant can have a reasonable expectation that their application remains confidential.

Definitions of “associate”, “beneficial owners”, “controllers” and “senior managers” responses

(c) They are entitled to exercise their rights under data protection legislation, including the right to withhold consent for the processing of their personal data.

In practice, the GSC will:

(a) Only request information about associates where it is material to the assessment of an application or variation.

(b) Apply a risk-based approach to determine whether such information is necessary.

(c) Ensure that any request is proportionate, targeted, and compliant with applicable data protection laws.

Where information regarding an associate is not provided, this will not automatically be treated as suspicious. The GSC will consider:

(a) Whether the decision not to provide the information is reasonable in the circumstances.

(b) Whether alternative sources of information are available.

(c) Whether the absence of information materially affects the GSC’s ability to assess the application.

In some cases, the GSC may need to pause or decline an application if it cannot satisfy itself as to the fitness and propriety of key individuals or their associates. However, this would be based on a lack of necessary information, not on the mere fact of non-consent by any “associate”.

1. Thresholds for the ownership of vote carrying shares to be considered a “controller”.

6 of 15 respondents provided comments against the second question within this group relating to the threshold of vote carrying shares a person should hold, in order to be considered a “controller” of an operator.

The breakdown was as follows:

- 2 respondents were in favour of the suggested thresholds within the proposed draft of 5% in the case of a private company and 20% in the case of a company that publicly trades on a stock exchange.
- 1 respondent was in favour of a blanket 25% threshold for both private and public companies.
- 1 respondent was in favour of a blanket 15% threshold for both private and public companies.

Definitions of “associate”, “beneficial owners”, “controllers” and “senior managers” responses

- 2 respondents were in favour of a blanket 10% threshold for both private and public companies.

Given the diversity of responses, the GSC is minded to maintain its current practice, in providing for a split of 5% in the case of a private company and 20% in the case of a company that publicly trades on a stock exchange. The GSC considers that this is acceptable additionally on the basis that the definition of “controller”, and therefore these specific thresholds, may be amended by secondary legislation. As such, following a further bedding in period of these provisions, the GSC will retain the ability to amend these thresholds as required.

Outcome, following analysis of responses

The GSC considers the current definition and scope of the definition of “associate” to be both justifiable and necessary in order for it to effectively regulate certain areas of gambling, particularly in the case of licenses issued under the Online Gambling Regulation Act 2001.

The GSC also proposes to retain its originally suggested vote carrying share ownership thresholds, used within the definition of “controller” – those being 5% in the case of a private company and 20% in the case of a company that publicly trades on a stock exchange.

The definition of both “associate” and “controller” may be changed via secondary legislation under the proposals, and as such, there is an appropriate mechanism to make further adjustments based on experience and feedback over time.

Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018 responses

Gambling (Ant-Money Laundering and Countering the Financing of Terrorism) Act 2018 responses

9 of 15 respondents provided comments against the proposed amendments to the Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018.

The comments have been analysed and have been grouped generally into 2 key points, which the GSC has responded to below.

(1) Effects of new individual civil penalty power.

There were 2 main sentiments about the effect of increasing the scope of the civil penalty power under section 22 to include the power to impose civil penalties on “key persons” and “senior managers” in respect of any AML/CFT related failures that were either deliberately or negligently caused.

Some respondents welcomed the change, noting that it would help clarify individual accountability within organisations. In particular, it was seen as a way to protect individuals who may otherwise be expected to assume responsibility for AML/CFT related failures that occurred, despite relying on the expertise of others.

The second sentiment is that the increased liability on further roles, in particular, on money laundering reporting officers, deputy money laundering reporting officers and AML/CFT compliance officers (“key roles”), will have a negative effect on industry, due to these roles already being in short supply. By further increasing the liability of these roles, it was considered that this would only serve to disincentivise potential new entrants to this role, exacerbating an already short supply of individuals within these roles.

In relation to the second sentiment, this is a valid point. The GSC acknowledges the concerns raised regarding the potential impact of extending civil penalty powers to individuals occupying key roles, particularly in light of existing challenges in recruiting and retaining qualified persons for key roles within the sector.

The proposed amendments aim to strengthen accountability and ensure that those in positions of significant influence, such as controllers, key persons, and senior managers, are held to appropriate standards in relation to AML/CFT compliance.

However, the GSC recognises the need to apply these powers proportionately and with regard to the realities of hiring or obtaining these services within the sector.

The following safeguards have been built into the framework, including that:

- Civil penalties will only be imposed following an investigation process, during which individuals will have the right to make representations.

Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018 responses

- A civil penalty may only be imposed following an investigation that concludes the AML/CFT breach occurred due to the individual's consent, connivance, or negligence. In other words, aside from cases involving deliberate misconduct, an individual who can demonstrate that they took all reasonable steps to prevent the breach would not be liable for a civil penalty.
- A requirement for the GSC to publish a clear policy statement outlining how civil penalties will be applied.
- The exclusion of civil penalties for certain administrative failures (e.g. AML/CFT returns).
- The ability to appeal decisions to the Gambling Appeals Tribunal.

(2) Clarification of Deputy Money Laundering Reporting Officers (DMLRO) in relation to the definition of "key person".

A DMLRO would be considered a "key person" under the new definition within the Act. The definition links to the definition of money laundering reporting officer ("MLRO") within the Gambling AML/CFT Code, which sets out that an "MLRO" also includes a "DMLRO".

Outcome, following analysis of responses

The GSC has welcomed the feedback received during the public consultation on the proposed amendments to the Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018 ("Gambling (AML/CFT) Act 2018"). The consultation provided valuable insights from stakeholders across the sector, and the GSC is grateful for the time and consideration given to the proposals.

Following careful review of the submissions, the GSC confirms that it will be progressing with the draft of the Gambling (AML/CFT) Act 2018 as presented during the consultation. While the GSC will proceed with the draft as consulted upon, it remains committed to ongoing dialogue with stakeholders.

Gambling Supervision Act 2010 responses

5 of 15 respondents provided comments against the proposed amendments to the Gambling Supervision Act 2010.

The comments have been analysed and have been grouped generally into 2 key points, which the GSC has responded to below.

(1) GSC Regulatory objectives: removal of section 5(3)(h)

There was a general sentiment conveyed which is that the removal of section 5(3)(h) (below) signals a shift of the GSC towards a more regulatory focus, which may be at the expense of the GSC's wider industry awareness. This could stymie efforts to grow industry and otherwise ensure that the Island's sector is a good and attractive place from which to do business.

(h) the desirability of —

(i) facilitating the development of the gambling industry in the Island;

(ii) securing competition within that industry; and

(iii) ensuring that gambling products promoted by that industry can compete effectively throughout the world.

The GSC acknowledges the concerns raised about the removal of section 5(3)(h), and the perception that this change may signal a shift in emphasis away from supporting sectoral growth.

It is important to clarify that the GSC's role is to act as an independent regulator, with a statutory duty to uphold the integrity of the sector and safeguard the Island's reputation. The responsibility for promoting and developing the gambling industry lies with the Department for Enterprise (DfE), which works closely with the GSC to ensure that regulatory oversight and industry development are aligned, but appropriately separated.

This division of responsibilities is intentional. It ensures that the GSC can regulate impartially, free from any perceived conflict of interest, while DfE continues to champion the sector's growth and competitiveness.

The removal of section 5(3)(h) does not prevent the GSC from engaging constructively with industry or from considering commercial realities when applying its regulatory framework. The GSC is still obligated to proceed with its regulation in a proportionate manner that is responsive to commercial developments, pursuant to section 5(3)(a). Leaving this subsection (3)(a) in place while removing the more commercially focused provision of section 5(3)(h) is intended to reinforce the principle that regulation and promotion should be distinct functions, without completely disregarding the need for regulation to be implemented in a proportionate and balanced manner.

The GSC remains committed to proportionate, risk-based regulation and will continue to work collaboratively with DfE and stakeholders to support the sector's success within a robust and trusted regulatory environment.

(2) GSC regulatory objectives: addition of section 5(2)(d)

There was a general sentiment conveyed that the addition of section 5(2)(d) (below) meant placing too great a focus on the GSC to implement and apply international standards, some of which may poorly fit the Island's business context, as well as generally standards over which the Island has had little to no input. The GSC acknowledges this concern.

(d) implementing and applying recognised international standards;

The inclusion of this objective is intended to ensure that the Island remains responsive to global developments in gambling regulation and anti-money laundering, which will help to maintain the credibility and recognition of its regulatory framework internationally.

The GSC does not intend to adopt international standards uncritically or without regard to local relevance. The regulatory framework will continue to be applied in a proportionate and commercially aware manner, with careful consideration given to the suitability and practicality of any change before implementation.

The GSC also works closely with the Department for Enterprise, which leads on industry development, to ensure that regulation supports—not hinders—the Island's attractiveness as a place to do business. The aim is to strike a balance between maintaining high standards and enabling innovation and growth.

Outcome, following analysis of responses

The GSC has welcomed the feedback received during the public consultation on the proposed amendments to the Gambling Supervision Act 2010. The consultation provided valuable insights from stakeholders across the sector, and the GSC is grateful for the time and consideration given to the proposals.

Following careful review of the submissions, the GSC confirms that it will be progressing with the draft of the Gambling Supervision Act 2010 as presented during the consultation. While the GSC will proceed with the draft as consulted upon, it remains committed to ongoing dialogue with stakeholders.

Online Gambling Regulation Act 2001 responses

8 of 15 respondents provided comments against the proposed changes to the Online Gambling Regulation Act 2001.

The comments have been analysed and have been grouped generally into 3 key points, which the GSC has responded to below.

(1) Fitness and propriety guidance

The GSC is moving towards the fitness and propriety standard in respect of licensing decisions under the Online Gambling Supervision Act 2001, as well as the Casino Act 1986 (it is already the standard used in respect of individuals under the Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018). Generally the move towards consistently pointing to this standard has been welcomed.

While the guidance is not yet published, it will be made available soon, and will set out the GSC's expectations and typical assessment criteria. This will help stakeholders understand how the standard is intended to operate in practice, where referenced within the relevant Gambling Acts.

It is important to note, however, that the underlying statutory provisions will not change. The GSC is committed to progressing with a fitness and propriety framework as the regulatory standard. That said, feedback received during the consultation and in response to the guidance itself will be used to shape future versions of the guidance, ensuring it remains practical, proportionate, and responsive to industry.

(2) License surrender process guidance

While generally the intention of the licence surrender process was well understood and received, there were some apprehensions raised particularly on the effects to an operator or persons providing services to the operator in cases where a surrender is delayed or conditions are imposed post-surrender.

The new process under section 7 is designed to ensure that licence surrender is not used to circumvent regulatory obligations or avoid scrutiny. It provides the GSC with the necessary discretion to manage risks that may remain at the point of surrender, including unresolved compliance issues or concerns about the conduct of individuals associated with the licence holder.

To support transparency and predictability, the GSC will be issuing public guidance before the provision becomes operational. This guidance will outline the expected process and requirements for surrendering a licence. However, the GSC will retain discretion to depart from the guidance on a case-by-case basis, where individual circumstances warrant a tailored approach.

Online Gambling Regulation Act 2001 responses

The GSC recognises the importance of ensuring that this process does not create undue burden or delay for compliant businesses. The ability to impose conditions and withhold approval is not intended to create unnecessary delay or uncertainty, but rather to safeguard the integrity of the sector and protect both players and the Island's reputation.

In relation to section 15A(4), which allows the GSC to issue directions that may result in criminal liability if not complied with, it is important to note that:

- Such directions will be issued with clear reasoning and in writing.
- The GSC will take into account the role and responsibilities of individuals, including those acting under corporate service providers, and will not seek to penalise those who have acted in good faith or without knowledge of any wrongdoing.
- The GSC will continue to engage with corporate service providers to ensure that expectations are clear and that any risks of collateral impact are minimised.

(3) Control of management, controllers, owners, advertising etc.

Some concerns were raised over the reach of the power to issue directions which to an operator to make a change with respect to a director, senior manager, controller or beneficial owner, on the grounds that the GSC does not consider them to be a fit and proper person to hold such a role.

The GSC acknowledges the concerns raised about the expanded scope of section 15, which now includes beneficial owners, controllers, and senior managers alongside directors.

This change aligns with the requirements of section 4 of the Online Gambling Regulation Act 2001, which already mandates that the GSC be satisfied as to the fitness and propriety of these individuals before granting or maintaining a licence.

The purpose of this amendment is to ensure that the GSC can act decisively where there are reasonable grounds to believe that any person in a position of influence over a licence holder may pose a risk to the integrity of the sector or the Island's reputation. This is not intended to interfere with legitimate corporate activity, such as share purchases or appointments, but rather to provide a mechanism for intervention where concerns arise.

To support transparency and predictability, the GSC will be issuing public-facing guidance on how it assesses fitness and propriety. This guidance will outline the criteria typically considered and the process followed. However, the GSC will retain discretion to depart from the guidance where individual circumstances warrant a tailored approach.

Outcome, following analysis of responses

Online Gambling Regulation Act 2001 responses

The GSC has welcomed the feedback received during the public consultation on the proposed amendments to the Online Gambling Regulation Act 2001. The consultation provided valuable insights from stakeholders across the sector, and the GSC is grateful for the time and consideration given to the proposals.

Following careful review of the submissions, the GSC confirms that it will be progressing with the draft of the Gambling (AML/CFT) Act 2018 as presented during the consultation. While the GSC will proceed with the draft as consulted upon, it remains committed to ongoing dialogue with stakeholders.

The GSC will work to provide copies of the proposed fitness and propriety guidance, as well as the licence surrender guidance as soon as possible.

Gaming, Betting and Lotteries Act 1988 responses

This section of questions was split into 2 separate questions:

1. Gaming, Betting and Lotteries Act 1988 responses

2 of 15 respondents provided comments against the proposed amendments to the Gaming, Betting and Lotteries Act 1988.

One of the responses was not relevant to the scope of the proposed reforms at present, and the other outlined a general support for the proposed amendments, with particular reference to the updated cross references to UK legislation contained within the Act's lottery provisions.

2. Thresholds for the GSC to consider with relation to allowing certain kinds of prize draws

None of the respondents provided a relevant comment with respect to this question.

Outcome, following analysis of responses

The GSC has welcomed the feedback received during the public consultation on the proposed amendments to the Gaming, Betting and Lotteries Act 1988.

Following careful review of the submissions, the GSC confirms that it will be progressing with the draft of the Gaming, Betting and Lotteries Act 1988 as presented during the consultation.

Casino Act 1986 responses

Casino 1986 responses

None of the respondents provided a comment that was relevant to the scope of these reforms.

Outcome, following analysis of responses

The GSC has welcomed the feedback received during the public consultation on the proposed amendments to the Casino Act 1986.

Following careful review of the submissions, the GSC confirms that it will be progressing with the draft of the Casino Act 1986 as presented during the consultation.

Gaming (Amendment) Act 1984 responses

2 of 15 respondents provided comments against the proposed amendments to the Gaming (Amendment) Act 1984.

The comments have been analysed and have been grouped generally into the following key point, which the GSC has responded to below.

(1) Purpose of the new direction power at section 12A

The power to issue directions is new to the Gaming (Amendment) Act 1984, with there being no clearly analogous provision. The introduction of a power to issue directions forms part of the standardised amendments being introduced across all of the Gambling Acts. The power is designed to fit alongside the GSC's standardised inspection and investigation powers, with the power expected to be used regularly as an alternative to certain enforcement outcomes. This therefore represents another regulatory tool for the GSC to utilise, before enforcement action would be required.

Guidance on the use of the directions power is envisaged to be issued in advance of the provisions becoming operational across the Gambling Acts.

In the case of a direction which relates to the surrender process however, non-compliance will be considered a criminal offence, by virtue of the fact that none of the previously cited consequences would be particularly effective in the case of a someone that is in the process of surrendering their certificate or licence.

Outcome, following analysis of responses

The GSC has welcomed the feedback received during the public consultation on the proposed amendments to the Gaming (Amendment) Act 1984

Following careful review of the submissions, the GSC confirms that it will be progressing with the draft of the Gaming (Amendment) Act 1984 as presented during the consultation.