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## What The Course Covers

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This module will look at Money Laundering and POCA (Proceeds Of Crime Act), the risks involved and your role in mitigating them in your shop.

There is a short assessment at the end to check your understanding of the material covered.

This course covers what you need to know and tells you what you need to do in order to keep financial crime and money laundering out of your shop.

There are many ways to launder money and the course only looks at some examples. You may well become aware of more.



! Criminals and terrorist financiers are trying to conceal and use again the money they 'launder' through your shop!



## How Is This Relevant To Me?

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Jenningsbet Employees have an obligation to report when we either have knowledge or suspicion that another person is using proceeds of crime or money laundering. But don't worry we will show you what you need to do to comply

**You could be breaking the law if you do not follow our procedures**

## How Can You Stop Financial Crime In Your Shop?

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There are many ways criminals launder money.

Click on each box to see a few of the ways it can be done

Someone CONVERTS the proceeds of a crime ▼

They the CONCEAL the proceeds of crime ▼

They then transfer and DISGUISE the proceeds ▼

These are all offences ▲

**You must not allow them to happen in your shop.**



## How YOU Can Break The Law Without Meaning To

Click the info tab below to find out how

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You will not be in trouble if you have reported your suspicions to your MLRO (Money Laundering Reporting Officer) and made a note of any actions you took along with the date and time. Jenningsbet MLRO is PETER JOWETT

YOU as an employee could break the law if you allow financial crime to be carried out in your shop!



If you knowingly accept stakes that are known to be the proceeds of crime then you could have 'facilitated a criminal arrangement'.

You cannot turn a blind eye to suspicious behaviour.

You may be committing a criminal offence. In particular you need to look out for people who may be committing crimes to get money to fund their gambling habit or gambling addiction.

Close

## Claire Wilson, Gambling Commission

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**I am here today to introduce the legal requirements for the prevention and detection of financial crime and terrorist financing in retail betting shops.**

We are the United Kingdoms Statutory Authority under the 4th Money Laundering Regulations 2017 for gambling and money service business activities in the gambling market. We also produce the legal framework known as the Licence Conditions and Codes of practice which operators must adhere to.

The licensing objective of keeping crime and its proceeds out of gambling impacts directly upon your day to day work. The licence conditions and codes of practice your employer is required to comply with relies upon you being observant, knowledgeable about your customers and reporting to your MLRO (Peter Jowett) suspicions and knowledge of the proceeds of crime or terrorist financing being passed into your shop.

Your action is therefore vital in stopping the proceeds of crime from gambling that is currently entering the UK's financial banking system. The transfer of the proceeds of crime by gambling may be through traditional acts of money laundering or the spending by criminals of their illegal finances through your shop.

The GC is committed to raising the standards of operators in preventing the proceeds of crime being spent through the gambling businesses and protecting consumers by reducing the threat of money laundering and terrorist financing and its association with gambling in the UK. This regular training will help you deliver your responsibilities in this important area, along with the GC's strategy to keep crime and its proceeds out of gambling in the UK.

## What You Should Be Thinking And Doing

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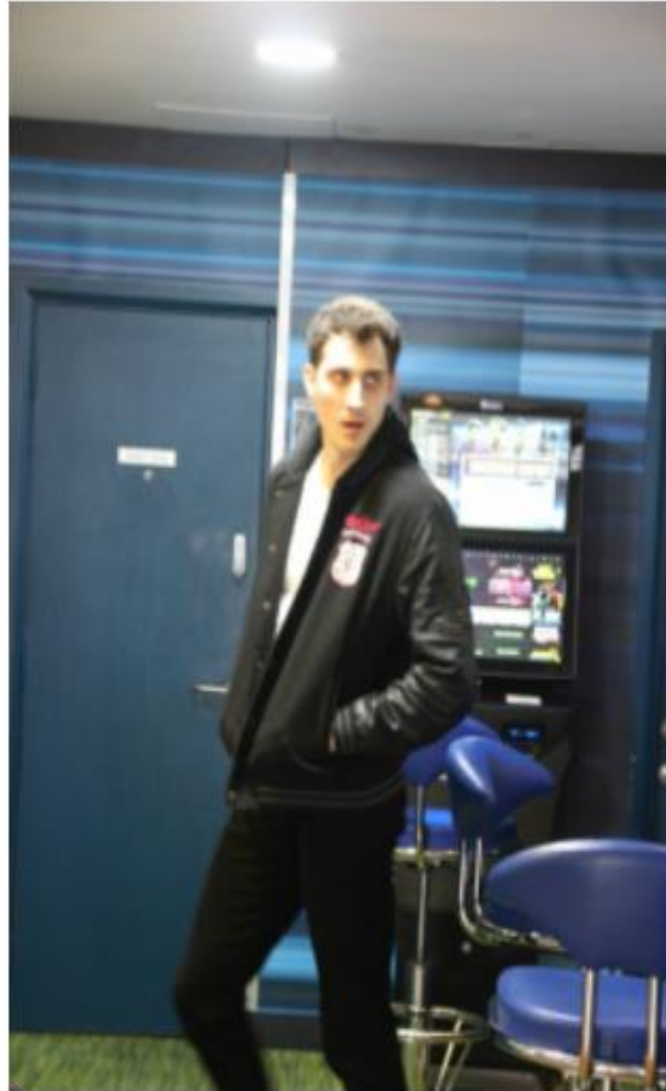
Click On Each Section Below

### You Have A Suspicion ^

- Report the suspicion to your MLRO (Peter Jowett) 07764 897030
- They will investigate and you must follow their instructions

### You Have A Concern v

### Only Concrete Information Can Help An Investigation v



### You Have A Concern ^

- Ask yourself are they actually gambling or not
- Do they ask for receipts for winning bets?
- Do they ask for money won to be put on a card?
- Obtain information from the customer by simply talking and listening
- Do you still have a suspicion?

### Only Concrete Information Can Help An Investigation ^

### **You must take detailed notes about your concerns and suspicions**

- These can be logged on the social responsibility reporting website

## The Potential For Messing It Up

Rollover the Info button for some arresting information!



You must not talk about an investigation to anyone else. Once you have reported your suspicion it effectively becomes an official investigation. And obviously you must not tell the customer that you have reported them.

Full details of Jenningsbet Proceeds of Crime & Anti Money Laundering Policy can be found in the Staff Portal Library in the SOCIAL RESPONSIBILITY 2019 folder.



**Section 342 of POCA describes the offence of prejudicing an investigation. This carries up to 5 years in prison if you as a staff member are convicted.**

Close



## Monitoring Regulars

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- **BIG CHANGES IN BETTING BEHAVIOUR**

**A big spike in activity compared to normal may be an indication of a money laundering risk - even in someone you think you know well. Their circumstances and life pressures may have changed and you are unaware.**

**By monitoring customers the raceroom and compliance team can monitor any spikes in stakes or unusual patterns.**

- **ONE OFF BIG STAKE**

**Either a single or a series of higher than usual bets may indicate a potential for financial crime.**

**IF A CUSTOMER ATTEMPTS TO PLACE A CASH OR DEBIT CARD BET TOTTALLING £10,000 OR MORE, YOU MUST REQUEST PHOTO ID.** Which would need to be verified by Peter Jowett.

## Being Vigilant With Strangers

Place the cursor on the box to find out what you should do.

### Appearance ^

You get an instinct for when someone is spending beyond their means. This may be a red flag for criminal or terrorist finance activity.

Make a note of any concerns, on the reporting website, you may have about a particular customer.

### Wanting Receipts v

### Requesting Cash Payout Put On To A Bank Card v

### Requesting Payment After No/Little Play On Machines v



### Wanting Receipts ^

Requesting receipts for machine or over the counter bets may be what someone does to make spending the proceeds of crime in your shop appear legitimate.

**Jenningsbet do not provide receipts**

### Requesting Cash Payout Put On To A Bank Card ^

Winnings on EGMs, SSBTs or OTC must be paid using the original payment method!

Take careful note of anyone who asks for anything different, do not comply.

### Requesting Payment After No/Little Play On Machines ^

Using an SSBT or EGM with card or cash and then printing receipts for collection at the counter is a big red flag for ML.

## Further Types Of Unusual Activity?

Please click on each section below

Using Shops From Other Firms

**This is more difficult to monitor unless you can share intelligence with each other. Is someone trying to spread the risk of being detected.**

Low Risk Bets OTC

Low Risk Bets SSBTs

Using Different Jenningsbet Branches

Low Risk Bets OTC

**Short odds bets with either large stakes or high frequency/low stakes to cover all outcomes of an event could be used in order to launder the proceeds of crime through your shop.**

Low Risk Bets SSBTs

**Short odds bets with either large stakes or high frequency/low stakes to cover all outcomes of an event could be used in order to put criminal spend through the system.**

Using Different Jenningsbet Branches

**Customers may use different Jenningsbet branches to avoid their behaviour and/or spending levels being monitored as closely.**

**Accurate monitoring will help to reduce this risk.**

## Other Shops Involved?

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Thanks to the consistent application of rules and processes like the ones discussed, betting shops have become less appealing to criminals.

Having a consistent policy, along with other shops in your area, really helps the industry as a whole.

! A customer may attempt to use different shops from your company in order to reduce the chance of their business being flagged as suspicious and anyone knowing the true total of their spending.

! Or they may try to spread their risk between different operators, to avoid being noticed and anyone knowing the true total of their spending.

## Issues With Cash

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### Are there any traces of dye?

Money taken in a robbery is often a blue or purple colour



### Are notes from an unusual part of the country?

Scottish or Ulster notes being used in large amounts, large distances from where they originated



## Recording Suspicious Activity

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Record as much as possible when you have suspicions about a customer's activity. **ON THE ONLINE REPORTING WEBSITE OR SPEAK TO THE COMPLIANCE TEAM**

- dates and times
- customer name (if you know it) or description
- what activity aroused your suspicion
- if you spoke to the customer, and what was said
- any information gathered about the customers income

**Remember, this is a legal obligation, if the case gets investigated, it is a crime if you falsify, destroy or dispose of any notes or documentation about what has happened with the customer in the shop!**

## Question 1

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What two sentences describe the MLRO




- The Gambling Commission's department for financial crime.
- The person at Jenningsbet responsible for reporting suspected financial crime. 
- The ABB's guidelines on Money Laundering.
- A Scotland Yard department for financial crime.
- The person at Jenningsbet I must report any suspicious behaviour to. 

✓ Submit

## Question 2

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A customer who has previously played the machines with cash now asks you to put cash she has won (through cash-in) onto her debit card. Which of the following are the three correct actions to take?

- Explain this is not possible. 
- Take a note of her name for the reporting website. 
- Put the money back onto her card.
- Give her, her winnings in cash. 
- Tell her that you will have to report this.



✓ Submit



### Question 3

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If you have concerns about a significant change in the behaviour of one of your customers and you believe that they may be using the proceeds of crime to gamble, which two of the following apply?


- Tell them you are watching them.
- Try and establish their identity. 
- Note your concerns on the reporting website for your team members and compliance team. 
- Tell staff members in other shops about your concerns.
- Talk to other customers about your concerns.

✓ Submit

## Question 4

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Which one of the following is NOT a criminal offence?




- If you are involved in an agreement that facilitates the use of criminal property by or on behalf of another person.
- Reporting suspicious activity to your MLRO 
- If you disclose the knowledge of an existence of an investigation into a crime.
- Telling customers what you have noticed about someone.

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## Question 5

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For customers who regularly spend large amounts of cash in your shop, which three of the following questions should you be able to answer about them?


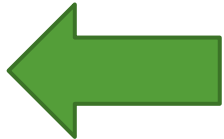
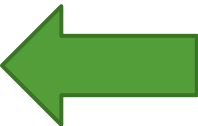
- Are they funding their gambling from a big win, or other known sources? 
- Are they a problem gambler?
- Are they placing bets on behalf of someone else, and if so, do you know who that person is? 
- Is there any local knowledge about that person which might lead you to suspect them of criminal activities? 
- The exact details of their name and where they live

✓ Submit

## Question 6

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Which three of the following activities could be used by criminals as part of their illegal activities?

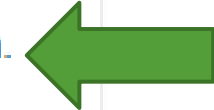
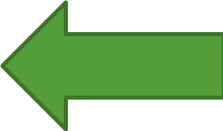

- Playing the machines with cash and asking for payout on debit card. 
- Placing large cash bets at low returns. 
- Playing numbers games regularly.
- Asking someone else to place bets for them. 
- Giving money to other customers once in a while.

✓ Submit

## Question 7

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Which three of the following behaviours would you consider suspicious?

- A customer who suddenly places much larger bets than normal, with cash. 
- A customer who uses several debit cards. 
- A customer who comes into the shop but does not bet.
- Playing the EGMs in a way which minimises risk, and asking for a cashout receipt. 

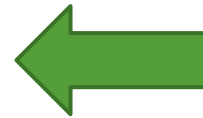
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## Question 8

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If you allow someone to launder money through your shop, you are likely to be found guilty of which one of the following offences?

Facilitating a criminal arrangement.



Acquiring criminal property.

Prejudicing an investigation.

Aiding and abetting.

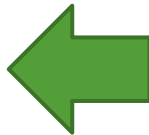
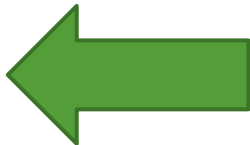
perverting the course of justice.

✓ Submit

## Question 9

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What two things must you do to avoid facilitating a criminal arrangement?




- Tell the police.
- Report it to your manager if your not a Duty Manager. 
- Report it to the MLRO (Peter Jowett). 
- Tell your colleagues.
- Call the gambling Commission reporting hotline.

✓ Submit

## Question 10

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What three pieces of information do you need to provide about the suspicious activity?

- Name and address of customer.
- Full description of customer. 
- The full facts of what they did. 
- Exact times of the event. 
- Your theories about what is going on.

✓ Submit