

Money Laundering RISK ASSESSMENT



Premises

Premises Name:	Palace Amusements
Premises Address:	322 Neasden Lane London
Premises Post Code:	NW10 0EP
Premises Licence Number:	
Category of Premises:	AGC

Company

Operating Company:	East Kent Leasing Limited
Operating Licence Number:	000-034401-N-315687-005

Assessment Writer

Name of Person Writing this Assessment:	Stephen Lawrence
Position within Company or Name of Authorised Agent:	Chief Operating Officer
Date that Original Assessment was Written	6 th March 2017

Customer Base It is accepted that the customer base in AGCs is wide ranging, to a degree unpredictable and variable in demographic terms as to where a venue is located.

However, it is helpful to assess using operating experience, trends and averages.

'A' – Very Low Risk 'B' - Low Risk 'C' – Medium Risk

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Business Profile				
Factor	Risk Management/Mitigation	A	B	C
What risk is posed by the business profile of customers using the gambling facilities?	Customers are efficiently monitored throughout the time they are on the premises to satisfy age restriction requirements, prevention of machine related crime, effective customer interaction, and the detection of self-excluders We apply the same approach in order to be alert to suspicious monetary transactions	√		
What style(s) of gambling is provided to customers?	Solely confined to the provision of gaming machines.		√	
What categories of gambling products are provided to customers?	Categories D, C, B3		√	
Is the business high or low volume?	High Volume		√	
Do gambling products pay out low or high stake prizes?	Low stake ranging from 10p to £2 on gaming machines. An enhanced level of diligence is applied to monitoring customers gambling on B3 machines on £2 maximum stakes		√	
What risk is posed by transactions with business associates and suppliers?	The Company takes responsibility for third parties with whom it contracts for the provision of any aspect of the business as if they are bound by the same licence conditions and codes of practice.	√		
How is payment delivered to customers and in what form?	Category D and C machines operate using cash either in the form of coins or notes. Category B3 and some B3 operate by the method of TITO with in-built software protection to identify suspicious activity and alert staff.		√	
Location of the gambling venue. Are there any local factors that might have a bearing on risk?	The venue is located in a typical high street location where the level of crime is in line with national averages. The company will maintains a good relationship with local police to keep abreast of current crime trends and perpetrators. The company is registered to receive crime bulletins from Bacta.		√	
Customers that might pose a risk				
Factor	Appropriate Risk Management/Mitigation	A	B	C

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<p>Do new customers stake large amounts of money over short periods of time?</p>	<p>This style of gambling is considered very unlikely to occur and certainly not in line with the gambling products we offer to customers. Should such activity be detected it would be the subject or reporting to the COO.</p>	<p>√</p>		
<p>Do the majority of customers live and/or work local to the venue?</p>	<p>This company will provide a service predominantly to local residents and workers.</p>	<p>√</p>		
<p>Are any customers known to have criminal backgrounds or association with the criminal fraternity?</p>	<p>Very occasionally, customer interaction may provide knowledge of criminal background and/or association leading to closer scrutiny and monitoring of such customers. Our business is not conducive to attracting the criminal fraternity outside of the norm experienced by other licensees.</p>		<p>√</p>	
<p>Reluctant to give you identification, or identification that isn't satisfactory?</p>	<p>Our staff are well versed in the practice of asking customers for satisfactory proof of ID in order to satisfy other requirements such as compliance with age restriction and self-exclusion. We would treat anyone reluctant in providing identification with suspicion that would trigger further investigation.</p>		<p>√</p>	
<p>Loading change machines or TITO machines with cash but gambling minimal amounts</p>	<p>Regarded as low risk and outside our operating experience. However, it is recognised that both facilities have risk potential. Customers using change machines are subject to the same degree of close scrutiny and TITO products operate under industry best practice with software identifying suspicious activity and alerting staff to interact with customers should instances be identified.</p>		<p>√</p>	

Useful Links

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National Crime Agency (NCA) - Suspicious Activity Reports (SARs):

<http://www.nationalcrimeagency.gov.uk/contact-us/reporting-suspicious-activity-sar>

National Crime Agency (NCA) – Suspicious Activity Report (SAR) Online System

[https://www.ukciu.gov.uk/\(ero0v5550ikzu355oj4qvbiz\)/saronline.aspx](https://www.ukciu.gov.uk/(ero0v5550ikzu355oj4qvbiz)/saronline.aspx)

National Crime Agency (NCA) - Guidance on submitting better quality Suspicious Activity Reports (SARs)

<http://nationalcrimeagency.gov.uk/publications/732-guidance-on-submitting-better-qualitysars/file>

UKFIU guidance of the revised glossary codes and the reporting routes

<http://www.nationalcrimeagency.gov.uk/publications/725-sar-glossary-code-and-reportingroutes/file>

Money Laundering Regulations: report suspicious activities:

<https://www.gov.uk/guidance/money-laundering-regulations-report-suspicious-activities>

Gambling Commission - latest anti-money laundering news:

<http://www.gamblingcommission.gov.uk/Gambling-sectors/AML/Latest-anti-money- laundering-news.aspx>