

Information exchange between the Gambling Commission and police services in England and Wales

Information note 2018

This information note describes how the Gambling Commission (the Commission) and police forces in England and Wales can exchange information in relation to the Gambling Act 2005 (the Act). It does not offer guidance as to other legislation and powers.

A separate information note sets out the [role and powers of police](#) in relation to inspection and enforcement within gambling premises and another information note sets out the [police role in gambling premises and permit application processes](#).

1 Overview

1.1 The Commission is dependent on the exchange of information to uncover illegal activity associated with gambling, and to monitor the incidence of gambling in Great Britain.

1.2 Section 30 of the Gambling Act 2005 enables the Commission to exchange information with the police and other law enforcement agencies, including bodies listed in Schedule 6 of the Act such as the national Crime Agency, The Financial Conduct Authority and the Serious Fraud Office. The Commission also has separately signed Memoranda of Understanding with various additional organisations.

The exchange of information is for the purpose of:

- A criminal investigation (whether in Great Britain or elsewhere)
- Criminal proceedings (whether in the Great Britain or elsewhere)

1.3 Under Schedule 2, Part 1 of the Data Protection Act 2018 personal data is exempt from the non-disclosure provisions where the disclosure is:

- the prevention or detection of crime;
- the apprehension or prosecution of offenders;
- The assessment or collection of any tax or duty or any imposition of a similar nature;
- is necessary for the purpose of, or in connection with, legal proceedings (including prospective legal proceedings);

- is necessary for the purpose of obtaining legal advice;
- is otherwise necessary for the purposes of establishing, exercising or defending legal rights, to the extent that the application of those provisions would prevent the controller from making the disclosure.

1.4 Requests for information should initially be made by email or phone call to the Intelligence Unit at the Commission.

Intelligencereports@gamblingcommission.gov.uk

0121 237 5913

In certain circumstances a pro forma as contained in Annex A may be requested. Requests for information may also be made by police officers through the Government Agency Intelligence Network, based in each Regional Organised Crime Unit (ROCU).

2 The Commission's intelligence unit

2.1 The intelligence unit collects, collates, analyses and disseminates information about gambling to and from a wide range of sources, including the police and local authorities. Information of value to the unit includes, but is not restricted to:

- intelligence report on some instances of police activity at gambling premises
- reports of suspected illegal gambling
- sports betting integrity referrals
- reports of underage gambling
- all aspects of financial and other criminality where gambling is a principal element of the offence either as the focus or as an enabler i.e. money laundering.
- surveys undertaken by agencies highlighting gambling issues.

3 National Intelligence Model

3.1 The Commission's intelligence unit operates in accordance with the National Intelligence Model (NIM).

4 Indenting

4.1 Police officers wishing to provide intelligence to the Commission should submit the information on a 5x5x5 report or a 3x5x2 report. The intelligence is then managed to ensure security.

4.2 Reports should be sent to:

- Intelligencereports@gamblingcommission.gov.uk

4.3 Sensitive reports or messages can be sent securely on:

- intelligence.reports@gc.cjsm.net

4.4 The Commission will disseminate intelligence on 5x5x5 reports or 3x5x2 reports.

5 What information is the Commission able to provide police services?

- 5.1 Police officers may contact the intelligence unit when they require advice or an intelligence check on individuals to assist them to develop their enquiries, if we alone cannot resolve the query we will point them in the direction of other suitable points of contact.

6 Sports Betting Intelligence Unit (SBIU)

- 6.1 The Sports Betting Intelligence Unit (SBIU) collects information and develops intelligence concerning betting-related corruption usually associated to, but not limited to, sport. The SBIU focus is on potential criminal activity that has at least one of the following elements:

- it relates to an event in Great Britain
- it involves parties (athletes, officials, participants, and so on) based within Great Britain
- betting has occurred with a Gambling Commission licensed business.

Police requiring further information or advice can contact the SBIU via sbiu@gamblingcommission.gov.uk.

- 6.2 The Commission has a remit to ensure that crime is kept out of gambling. The Commission's approach to discharging its responsibilities as a supervisory authority, and regulator of gambling activity, involves the following aspects:

- providing information and guidance through a variety of channels (licensing and contact centre, published guidance)
- promoting operators' requirements to discharging their responsibilities under the Proceeds of Crime Act 2002 and the Regulations through individual and collective engagement with operators and multi-agency forums to identify and promote best/good practice
- issuing guidance for remote and non-remote casinos
- monitoring the submission of suspicious activity reports and law enforcement activity
- undertaking assurance activity through regulatory compliance assessments of operators' understanding and application of Anti Money Laundering (AML) risk management controls. We have produced a [quick guide](#) for police in relation to money laundering and gambling.
- producing operator and sector risk assessments to assist the planning of compliance assessments
- ensuring that Commission staff are equipped to take decisions on whether a casino's systems and controls are appropriate in view of the risks identified
- ensuring that the integrity of the licensed community is not compromised by the licensing of persons who would seek ownership or control of gambling enterprises through the use of criminal funds, and or who would manage licensed activity in such a way that it facilitates money laundering.

- 6.3 Police officers seeking specific information regarding money laundering within the gambling industry should initially contact the Commission using the details shown in section 1.4 above.

- 6.4 If you still have problems please speak to the comms team who are always happy to help and offer advice on formatting.

Keeping gambling fair and safe for all

www.gamblingcommission.gov.uk

Gambling Commission / Police Information Request

The organisation requesting information should complete sections A, B & C. The receiving organisation should complete section D. All fields marked* should be completed.

This form should be transmitted via a method agreed between the Gambling Commission and Police Force

If you need any help completing this form, please contact the Commission Intelligence Team on 0121 237 5913

Section A – Request Details

A1 Request To:

Name*

Organisation*

A2 Request From:

Name*

Organisation*

Tel.* Fax.

Email

Section B – Enquiry Details

B1 Enquiry Date* Date Required*

B2 Individual / Organisation about whom information is sought:

Name

Address

Date of Birth

Other Relevant Information
(e.g. Description, Reference Numbers)

B3 Nature of Enquiry (Details of Investigation/Proceedings and purpose of enquiry)*:

Information Sought*:

Section C – Legal Basis and Authorisation

C1 Legal basis for information sharing request*:

S.29 Data Protection Act 1998

RESTRICTED when complete

Gambling Commission / Police Information Request

S.35 Data Protection Act 1998
(S.30/350 Gambling Act 2005
Gateway)
Other (please state) |

Section D – Recipient Organisation Response

D1 Identity of requestor known / verified*? Yes No

D2 Information request granted*? Yes (D4) No (D3)

D3 Reasons for denying request:

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D4 Does the information exist?

No (negative response) <input type="checkbox"/>	Details	
Yes (response attached) <input type="checkbox"/>	Document Reference	

D5 Responding Officer*:

Response Date	
Name	
Rank/Role	
Location	

D6 Authorising Officer*:

Police: Inspector for granted requests, Superintendent for refused requests

Gambling Commission: Intelligence Officer for granted requests, Head of Intelligence for refused requests

Date

Name

Rank/Role

Location

RESTRICTED when complete