

17 - Gaming Machine Technical (Remote and Non-Remote)

Table actions: [Turn tags off](#)

Sector rating

Sector	Previous overall risk rating	Current overall risk rating
Gaming Machine Technical (Remote and Non-Remote)	LOW	LOW

Existing inherent risk rating

As previously explained, the gambling software and gaming machine technical sectors have been assessed separately for this document as they are two separate gambling sectors.

For further information on the inherent risks (including consequences and controls), see our 2019 publication: [Money laundering and terrorist financing risk assessment within the British gambling industry: 2019 \(PDF\)](#).

Vulnerability	Risk	Previous likelihood of event occurring	Previous impact of event occurring	Current likelihood of event occurring	Current impact of event occurring	Change in risk
Operator Control	Operators failing to comply with prevention of money laundering and terrorist financing legislation and guidance	LOW	LOW	LOW	LOW	No change
Product	Gaming machines Cat B,C and D, FOBT, SSBT, TITO used to launder the proceeds of crime	LOW	LOW	LOW	LOW	No change
Product	TITO enabled gaming machines used to launder funds when used with ATR machine	LOW	LOW	LOW	LOW	No change
Means of payment	TITO used in conjunction with ATR machines in casinos, bingo halls and AGCs (machine operator issue, but provides an opportunity for manufacturers and retailers to cooperate to mitigate the risks)	LOW	LOW	LOW	LOW	No change
Means of payment	Cashless payments	N/A (no risk rating provided in previous risk assessment)	N/A (no risk rating provided in previous risk assessment)	MEDIUM	LOW	N/A
Operator Control	Inadequate/lack of due diligence checks on any third-party providers (e.g., test houses)	N/A (no risk rating provided in previous risk assessment)	N/A (no risk rating provided in previous risk assessment)	MEDIUM	LOW	N/A

New emerging risks

Lack of adherence with Technical Standards

All gaming machine technical licensees are required to comply with the Commission's Technical Standards ²⁷. The purpose of these Standards is to set out in detail the Commission's requirements with respect to game features, display notices and general machine operation. These have been developed to help ensure the three licensing objectives under the Act are met (which includes 'keeping crime out of gambling'). The Technical Standards state that gaming machines must have an ID plate permanently attached (which must include the manufacturer's details) ²⁸. There is evidence that some gaming machines are being supplied without any ID plates attached to them which raises money laundering and terrorist financing concerns as there is no verified information regarding where these machines

originated from for example if they have been purchased from the proceeds of crime. This has been given a low risk rating as there is no current widespread evidence of this practice.

References

- 27 See [Licence Condition 2.3.1. of the LCCP](#).
- 28 See paragraph 1.2 'Machine identification' of the Technical Standards.