

Policy and Resources Committee Meeting	
Meeting Date	27 th November 2024
Report Title	Adoption of Good Causes Lottery Anti-Money Laundering Policy
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Charlotte Hudson, Head of Housing and Communities
Lead Officer	Stephanie Curtis, Community Services Manager
Classification	Open
Recommendations	1. For Policy and Resources Committee to approve the Swale Good Causes Lottery Anti-Money Laundering, Proceeds of Crime and Terrorist Financing Policy.

1 Purpose of Report and Executive Summary

- 1.1 This report asks the Policy and Resources Committee to adopt the Swale Good Causes Lottery Anti-Money Laundering, Proceeds of Crime and Terrorist Financing Policy, to be able to progress the licence with the Gambling Commission to launch the Good Causes Lottery.

2 Background

- 2.1 In July 2024, Policy and Resources Committee agreed the funding for the Swale Good Causes Community Lottery. The project team have been progressing the project and in order to launch the lottery, Swale Borough Council must have in place an Operator's Licence from the Gambling Commission.
- 2.2 As part of our application to the Gambling Commission, a series of policies must be provided to demonstrate the Council's ability to effectively and safely manage the lottery. This includes the need for a Lottery specific Anti-Money Laundering Policy.
- 2.3 The Council currently has in place a Counter-Fraud and Corruption Policy which is being reviewed. Although as part of this review, an anti-money laundering element is to be included, this overall policy is different to what is required specifically by the Gambling Commission for the good causes lottery. Therefore, it is felt that an anti-money laundering policy for the lottery should also be in place.

3 Proposals

- 3.1 For Policy and Resources Committee to approve the Swale Good Causes Lottery Anti-Money Laundering, Proceeds of Crime and Terrorist Financing Policy.

4 Alternative Options

- 4.1 To not adopt this Lottery Anti-Money Laundering Policy– This option is not recommended as without this Policy being in place, the Good Causes Community Lottery project cannot be progressed.

5 Consultation Undertaken or Proposed

- 5.1 No consultation is currently proposed.

6 Implications

Issue	Implications
Corporate Plan	The adoption of this policy is directly linked to the Community Priority: To support local groups and organisations in Swale through the delivery of the member grants programme and review the funding mechanism of a community lottery scheme
Financial, Resource and Property	There are no financial implications for adoption of this policy. There is an officer resource requirement in ensuring its effective implementation, but this is included within the resources already allocated for the development and then ongoing management of the Good Causes Lottery.
Legal, Statutory and Procurement	This Good Causes Lottery Anti-Money Laundering Policy sets out how the Council (as the lottery operator) will ensure the Lottery is run in a manner that is compliant with the Proceeds of Crime Act 2002; and The Terrorism Act 2000. As part of this policy, there is a need to have a named Money Laundering Reporting Officer. This has been agreed to be
Crime and Disorder	None identified at this stage
Environment and Climate/Ecological Emergency	None identified at this stage
Health and Wellbeing	None identified at this stage
Safeguarding of Children, Young People and Vulnerable Adults	There are no specific safeguarding implications for this policy, but this policy along with other measures in place for the Good Causes Lottery will ensure its safe operation and protection of children and vulnerable adults.
Risk Management and Health and Safety	This policy sets out a series of measures to manage the risk linked to the operation of the Good Causes Lottery.

Equality and Diversity	None identified at this stage
Privacy and Data Protection	None identified at this stage

7 Appendices

Appendix 1: Swale Borough Council Good Causes Anti-Money Laundering Policy

8 Background Papers

None