

Policy and Resources Committee Meeting	
Meeting Date	5 th November 2025
Report Title	Good Causes Lottery Anti-Money Laundering Policy Review
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Charlotte Hudson, Head of Housing and Communities
Lead Officer	Stephanie Curtis, Strategic Policy and Communities Manager
Classification	Open
Recommendations	1. For Policy and Resources Committee to approve the reviewed Swale Good Causes Lottery Anti-Money Laundering, Proceeds of Crime and Terrorist Financing Policy for 2025-26.

1 Purpose of Report and Executive Summary

- 1.1 This report asks the Policy and Resources Committee to approve the reviewed Swale Good Causes Lottery Anti-Money Laundering, Proceeds of Crime and Terrorist Financing Policy, in line with the Gambling Commission Operators licence requirements for management of the Good Causes Lottery.

2 Background

- 2.1 In November 2024, Policy and Resources Committee agreed the adoption of the Good Causes Lottery Anti-Money Laundering, Proceeds of Crime and Terrorist Financing Policy. This policy was required to be put into place in order to fulfil the Operators Licensing conditions by the Gambling Commission in order to set-up a Good Causes Lottery. Although the Council has in place a separate Counter-Fraud and Corruption Policy, it was felt that this separate policy was required to fulfil the Gambling Commission licence requirements.
- 2.2 There is also a requirement as part of the licence for this policy to be reviewed annually.
- 2.3 As part of this annual review, no amendments have been made to the version of this policy dated November 24.
- 2.4 No concerns related to money laundering have been raised to the Council or to Gatherwell our External Lottery Manager (ELM) since the development of this policy last year and the launch of the lottery in March 25.

3 Proposals

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

4 Alternative Options

- 4.1 To not adopt this reviewed Lottery Anti-Money Laundering Policy– This option is not recommended as without a regularly reviewed 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 the refresh 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 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.
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 2025-2026

8 Background Papers

None