



# Responsible Gambling Industry Initiatives

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## Invitation To Tender

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## 1. Purpose and Scope of this Document

- 1.1. This document is an invitation to tender for one or more of three Responsible Gambling Industry Initiatives which the Responsible Gambling Trust (RGT) has decided to commission.
- 1.2. The Industry Group for Responsible Gambling (IGRG) is RGT's industry partner for these projects, representing most of the GB gambling industry. IGRG proactively developed these initiatives which will bring together all sectors of the industry to work collectively to promote responsible gambling.
- 1.3. Both RGT and IGRG have consulted with the Gambling Commission to define the scope of these work streams and the Commission is very supportive of these initiatives.
- 1.4. The purpose and scope of this document is to:
  - 1.4.1. Provide tenderers with sufficient information to enable them to consider the appropriateness of this invitation and to respond
  - 1.4.2. Outline the information required in the responses
  - 1.4.3. Outline the tendering process and timetable
  - 1.4.4. Set out the administrative arrangements for the receipt of proposals.

## 2. Background

### About RGT

- 2.1. RGT is the leading charity in the UK committed to minimising gambling-related harm. As an independent charity funded by donations from the gambling industry, RGT funds education, prevention and treatment services and commissions research to broaden public understanding of gambling-related harm. RGT's aim is to stop people getting into problems with their gambling, and ensure that those that do develop problems receive fast and effective treatment and support.
- 2.2. RGT develops its commissioning plans in collaboration with the Responsible Gambling Strategy Board and the Gambling Commission. These arrangements are underpinned by an 'assurance and governance framework'<sup>1</sup> agreed between the three parties and rely on openness, transparency and partnership to deliver results.

### About IGRG

- 2.3. The main trade associations for each of the five sectors of the gambling industry have been working together for some time on responsible gambling initiatives. The establishment of The Industry Group for Responsible Gambling (IGRG) in March 2014 formalised those arrangements and provides a structure to promote socially responsible gambling in the British gambling market. Building on existing relationships and work streams, it will also provide a cross-sector forum to consider matters of common interest associated with the three licensing objectives in Section 1 of the Gambling Act 2005.
- 2.4. IGRG's member associations represent some 640 operators and 8,500 licensed premises across the gambling industry.

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<sup>1</sup> [http://www.responsiblegamblingtrust.org.uk/user\\_uploads/pdfs/statementofintent.pdf](http://www.responsiblegamblingtrust.org.uk/user_uploads/pdfs/statementofintent.pdf)

## About the initiatives

- 2.5. IGRG identified three initiatives to promote social responsibility across the industry where a cooperative approach across operators would be beneficial:
  - 2.5.1. Product Messaging (Return to Player, volatility, odds etc.)
  - 2.5.2. Play Information Messaging (screen messages, limits, breaks, etc.)
  - 2.5.3. Staff training
- 2.6. The aim of the exercise is to enhance industry Social Responsibility practices, including training, to the point at which customer Social Responsibility care becomes the normality, rather than an add-on or something which is put in the “too hard” basket.
- 2.7. RGT, with the support of the Gambling Commission and confident of close cooperation from IGRG members, decided to commission initiatives in each of these areas designed to identify, develop, share and deploy best practice across the gambling industry as a whole.
- 2.8. Preparatory work indicates there may be a considerable amount of good practice in each of these areas already available within the industry. However, it is not universal; best practice has not been systematically identified, tested and shared; and there are neither agreed standards nor sufficient consistency to achieve a cumulative impact.
- 2.9. The central questions are: What are the criteria of 'good' and 'best' practice? What kinds of practice are effective in terms of harm minimisation? These require a review of what practice (existing or additional) already exists, which is largely a descriptive exercise, but more than that: evaluation of their relative and absolute impact.
- 2.10. Through IGRG, the gambling industry has indicated both a willingness and a desire to collaborate to achieve a consistent, high quality approach across the industry in each of these areas, unlocking both cost and impact benefits.
  - 2.10.1. The IGRG has committed to act as an ‘industry partner’ for each of these initiatives, thereby committing resources from a majority of the industry to ensure engagement with their development and implementation of their recommendations.
- 2.11. RGT Trustees consider each initiative to be an effective opportunity to reduce gambling-related harm, particularly in the knowledge that the majority of the industry, through the IGRG, is fully committed to supporting the initiatives and to adopting their conclusions.
- 2.12. The interventions developed for the projects set out in Appendix A and B are not targeted at those players who are already experiencing significant harm, but at players who are at risk of, or in the early stages of harm. However care should be given that any interventions do not unintentionally adversely impact those players already experiencing significant harm.
- 2.13. It will be for the industry rather than RGT to fund the large-scale implementation of the recommendations arising from these initiatives. By involving the industry through IGRG, RGT can be confident that recommendations are likely to be adopted by operators at sufficient scale to achieve a meaningful impact on reducing gambling-related harm.
- 2.14. A fourth initiative is being undertaken on behalf of IGRG to develop an industry wide approach to messaging about socially responsible gambling. IGRG has already commissioned this work separately, although RGT will commission an independent evaluation of that project.
  - 2.14.1. It is intended that the outcomes of this initiative are consistent with the outcomes of the other three initiatives. In this regard, successful tenderers will be expected to collaborate effectively to ensure a successful overall outcome in terms of identifying,

developing, sharing and deploying best practice across the gambling industry in each of these dimensions (product information, play information, staff training and messaging).

2.14.2. RGT will facilitate this collaboration between successful tenderers.

### 3. Work Requirements

3.1. In essence, each initiative will follow the same process:



#### Phase 1

3.1.1. Develop a strawman vision of what best practice would look like, including a definition of what the outcome is designed to achieve and how this might be measured, considering relevant existing research.

3.1.2. Collect existing good practice from across the industry

3.1.3. Generate additional good practice (if existing good practice is unlikely fully to achieve the vision agreed in 3.1.1)

3.1.4. Conduct trials to test the range of existing and additional good practice to identify best practice, and report with recommended best practice

3.1.4.1. We would expect this to involve testing different approaches in real life situations (using a range of the possible trials as appropriate to the nature of the practice e.g. nationwide roll-out, regional clusters, down to individual premises).

3.1.4.2. The evaluation here should refer back to the vision of each of initiative, and be conducted in line with the RGSB evaluation protocol which will be published shortly and will be made available in draft form to successful tenderers.

#### Phase 2

3.1.5. Pilot the chosen best practice at scale prior to nationwide, industry-wide rollout

3.1.5.1. This pilot will be subject to evaluation by an independent third party

3.1.6. Put in place an approach to implement agreed best practice across the GB industry as a whole

3.1.6.1. At the point where best practice has been successfully identified, piloted and evaluated, RGT expects the industry itself to fund implementation. This approach may vary between the three initiatives.

3.2. For each initiative, more specific terms of reference have already been developed by IGRG, in consultation with the Gambling Commission. These are included as appendices A - C.

## 4. Programme Resources and Governance

- 4.1. The RGT Research Committee will act as the Steering Group for the initiatives as a whole, supported on a day-to-day basis by the RGT management team. DCMS, the Gambling Commission and RGSB attend the Research Committee as observers.
  - 4.1.1. The Research Committee will work in partnership with its industry partner, IGRG, to keep the leadership of IGRG informed of progress and to resolve issues.
  - 4.1.2. A 'project management forum' comprising a representative of the supplier, RGT and IGRG will meet regularly to administer the initiatives, monitor progress and resolve issues
- 4.2. All of RGT's research policies, structures and procedures designed to guarantee the independence of the research it funds will be applied to these initiatives.
- 4.3. IGRG has committed on behalf of its member trade associations, which in turn have committed their own member operators, to supporting these initiatives in the role of industry partner.
  - 4.3.1. The importance of industry input and involvement throughout the project cannot be over-emphasised. The successful implementation of the strategy will depend upon operator involvement throughout its development, and inclusion of operators from all sectors of the industry.
- 4.4. In its capacity as industry partner, IGRG will facilitate the creation of a working group for each initiative with representatives from a cross-section of the industry which will expect to meet monthly to inform and advise the projects.
  - 4.4.1. The working groups will consist of an IGRG nominee, representatives of 8 – 10 operators, a representative of RGT and will invite observers from the Gambling Commission and RGSB.
  - 4.4.2. Members of the working group will help to source inputs for the initiatives e.g. existing good practice and provide advice to the project teams.

## 5. Programme Schedule

- 5.1. Each initiative will need to develop its own detailed schedule.
- 5.2. The maximum timescale for this programme work (including any pilots but excluding industry-wide implementation) will be up to 14 months with the following indicative key deliverables and milestones:
  - Projection inception for phase 1 (collection and creation of best practice) – April 2016
  - Phase 1 report – December 2016
  - Project inception for phase 2 (pilot and evaluate best practice) – January 2017
  - Phase 2 report – May 2017
  - Industry wide implementation – June 2017 onwards (or sooner if possible)
- 5.3. These are maximum timescales, and accelerated schedules are welcome provided they demonstrate sufficient time has been allocated for an effective trial and testing phase
- 5.4. Regular monthly written progress reports to the project management forum and RGT Research Committee will be expected.

- 5.5. The contract will include a break clause after phase 1, as RGT will commit to commissioning phase 2 only if it is satisfied with phase 1.

## 6. Tendering Process and Timetable

- 6.1. The proposal should outline the organisation(s) previous experience in this area (or related areas), and provide a candid assessment of the potential strengths and weaknesses of the proposed approach. It should explain the specific benefits of using this approach over others.
- 6.2. Proposals should be explicit about the aims and objectives of the project, and should identify appropriate outputs and outcomes, and explain how these will be measured, monitored, and used in project review and development.
- 6.3. The proposal should detail what inputs the project will require to perform effectively.

### Evaluation Process and Timeline

- 6.4. The Evaluation Panel will be made up of the RGT's Research Committee and other experts or advisers it wishes to appoint.
- 6.5. Tenders will be submitted by 5pm on Tuesday 26<sup>th</sup> April 2016.
- 6.6. On receipt of the proposals, an RGT-selected panel will perform an evaluation of proposals, with a view to selecting one or more organisations to perform the research.
- 6.6.1. IGRG will be offered the opportunity to provide feedback on the proposals to the Evaluation Panel but the Panel will make the selection decision, not IGRG, to preserve the independence of the research, given that it includes a significant element of evaluation which will need to stand up to external scrutiny.
- 6.7. Tenderers may be required to attend a meeting to discuss any aspect of proposals.

### Questions

- 6.8. Tenderers may submit, by no later than 17.00hrs GMT on Monday 17<sup>th</sup> April 2016 any queries that tenderers have relating to this ITT. Please submit such queries by email to [IGRGITT@responsiblegamblingtrust.org.uk](mailto:IGRGITT@responsiblegamblingtrust.org.uk).
- 6.9. If you intend to submit a proposal, you may notify the RGT at this email address by **Noon on 22<sup>nd</sup> April 2016**, and all those who have notified us will be provided with an anonymised summary of our answers to questions raised by other tenderers soon after this deadline.
- 6.10. Any queries should clearly reference any appropriate paragraph in the documentation. As far as is reasonably possible, RGT will respond to all reasonable requests for clarification of any aspect of this ITT and supporting documents, if made before the above deadline.
- 6.11. Proposals must be submitted by 17.00hrs GMT on Tuesday 26<sup>th</sup> April 2016 to the following e-mail address [IGRGITT@responsiblegamblingtrust.org.uk](mailto:IGRGITT@responsiblegamblingtrust.org.uk). RGT reserves the right to extend any deadline. Any extension granted will apply to all tenderers.
- 6.12. RGT reserves the right to reject any proposals:
- 6.12.1. received after the deadline; and/or
- 6.12.2. which do not comply with the conditions and requirements set out in this ITT.

6.13. All documents and all correspondence relating to the tender must be written in English. Tenderers should consider only the information contained within this ITT and supporting documents, or otherwise formally communicated to tenderers in writing when making an offer.

6.14. The submission of tender documentation should include:

- An understanding of the project objectives and work requirements
- An outline of and justification for proposed research methods
- A summary of key activities to support specified outputs
- A timetable linked to key activities (e.g., GANTT chart), which clearly identifies stage 1 and stage 2 activities
- A summary of any propriety intellectual property which will be used to carry out the research
- Full disclosure of costs, including number of days required for each task, day rates for different members of the research team, VAT (as applicable) and anticipated expenses
- A brief risk assessment with proposed remedies relating to identified risks
- A CV or brief biography for each member of the team
- Contact details for two referees.

## 7. Intellectual Property

7.1. RGT is committed to delivering an independently commissioned research programme that focuses on gambling behaviour and the effectiveness of various treatment, prevention and education strategies in minimising gambling-related harm. This is intended to improve knowledge amongst all those involved in this issue, so RGT will wish to publish the results of the research it funds. Our requirements below in respect of intellectual property and confidentiality are intended to promote good project management, quality assurance and research integrity, and are not included in order to influence the independent conclusions of this research or its presentation.

7.2. The successful supplier(s) will be required to assign to RGT all rights in and to any intellectual property created or arising from the work carried out by the supplier(s) (or by the supplier's employees or agents).

7.3. RGT acknowledges that the supplier(s) may own proprietary software, analytic tools and techniques which may not be assigned to RGT. Where such software, tools or techniques exist and will be used by the supplier(s) in the proposed research, the supplier(s) should provide details in its tender of the methodology, to be used in the proposed research highlighting clearly where such software, tools or techniques will not be assigned to RGT and/or may not be shared with the public.

7.4. On completion of the initiatives, RGT plans on publishing a research paper which may include details of the methodology, techniques and tools used by the supplier(s) in carrying out the initiatives.

## 8. Confidentiality and publicity

- 8.1. The successful supplier will be required to enter into a legally binding agreement with RGT which will contain, inter alia, confidentiality provisions pursuant to which the supplier will be required to:
  - 8.1.1. keep confidential all intellectual property and know-how, including confidential commercial and financial information, disclosed by RGT or any operator to the supplier during the course of the initiative;
  - 8.1.2. not disclose to third parties without the express prior written consent of RGT any information arising from the work performed as part of the initiative; and
  - 8.1.3. ensure that all proposed publications are submitted to RGT for approval prior to publication with the expectation that approval will be given unless there are reasonable grounds not to do so.
- 8.2. RGT may from time to time require that the successful supplier's employees and/or other person working on the initiative enter into a confidentiality agreement with RGT.

## 9. Budget

- 9.1. The total overall budget for both phases of the three projects is up to £200,000 (including VAT if applicable).
- 9.2. We would expect to divide this budget broadly equally between the three projects, but tenderers who can demonstrate efficiencies by delivering more than one of the initiatives will be viewed favourably.
- 9.3. Seeing as though the focus of these projects is on the trialling and testing of initiatives we would expect more of the budget to be allocated to this element of the work.
  - 9.3.1. Evaluation of the Phase 2 pilot will be conducted independently and separately funded
- 9.4. Proposals should make clear the cost for each initiative if awarded separately, and the collective cost of any combination of projects if more than one is awarded to the same supplier.
- 9.5. Industry will provide some administrative coordination through the IGRG and will provide facilities for meetings etc. to keep costs down. Industry will also of course devote a significant amount of time to work with the appointed team to help the industry collectively deliver the outcome, including the resource required from industry to facilitate the testing, trial and pilot stages of the initiatives.

## 10. Eligibility

- 10.1. Applications will be accepted from all locations. Those teams located outside Great Britain must ensure they specify, in their proposal, how they will facilitate meetings with RGT, industry collaborators and other stakeholders and manage communication during the project. Cost proposals must be inclusive of travel expenses.



## 11. Conditions of Tender

- 11.1. RGT reserves the right to issue the response to any clarification request made by tenderers to all tenderers unless tenderers expressly require it to be kept confidential at the time the request is made.
- 11.2. The information contained in this ITT and the supporting documents and in any related written or oral communication is believed to be correct at the time of issue but RGT does not accept any liability for its accuracy, adequacy or completeness and no warranty is given as such. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of RGT or to any other liability which cannot be excluded at law.
- 11.3. By issuing this ITT, RGT is not bound in any way to enter into any contractual or other arrangement with tenderers or any other party.
- 11.4. It is intended that the remainder of this procurement will take place in accordance with the provisions of this ITT but RGT reserves the right to terminate, amend or vary the tendering process by notice to all tendering organisations in writing. RGT does not accept any liability for any losses caused to tenderers as a result of such termination, amendment or variation.
- 11.5. Tenderers will not be entitled to claim from RGT any cost or expenses that tenderers may incur in preparing a proposal irrespective of whether or not the tender is successful.
- 11.6. All information supplied to tenderers by RGT, either in writing or orally, must be treated in confidence and not disclosed to any third party (save to professional advisers) unless the information is already in the public domain.
- 11.7. There must be no publicity by tenderers regarding the project or the future award of any contract unless RGT has given express written consent to the relevant communication.
- 11.8. **Tenderers must declare any potential conflicts of interest within their proposal and state how these would be managed.** RGT reserves the right to refuse any application based on such conflicts.

## 12. Evaluation Criteria

- 12.1. The principal purpose of this evaluation is to determine the tender(s) which best meet the requirements of the RGT and deliver best value for money. The evaluation should be a rigorous examination and comparison of all submissions received on an equal and consistent basis without bias.
- 12.2. Tenders will be subject to an initial compliance check to confirm that:
  - Tenders have been submitted on time, completed correctly and meet the requirements of the invitation to tender.
  - Tenders are sufficiently complete to enable them to be evaluated in accordance with these criteria.
  - The Tenderer has not contravened any of the terms and conditions of the tender process.
- 12.3. Tenders that do not meet these requirements may be rejected at this stage. Tenders that pass the initial screening assessment check will be distributed to Evaluation Panel members who are expected to subject them to a detailed evaluation in accordance with the criteria as set out in this document.

12.4. All tenders will be scored in accordance with the marking system set out below:

Score Key Assessment	Score	Interpretation
Excellent	5	Excellent standard with no reservations about acceptability.
Good	4	Good standard with no reservations about acceptability.
Acceptable +	3	Acceptable standard with minor reservations about acceptability.
Acceptable -	2	Acceptable standard with reservations that require review.
Serious Reservations	1	Meets minimum requirements - but serious reservations.
Unacceptable	0	Fails to meet the minimum requirements.

The following table will be used to guide the evaluation.

Theme	Criteria	Score (0-5)	Comments
The tenderer	The tenderer demonstrates sufficient depth and breadth of relevant experience		
	The tenderer has a relevant corporate or personal network to support their work		
	The tenderer will command credibility within the gambling industry and with other key stakeholders		
The project	The approach outlined in the tender will achieve the project goal		
	The tender outlines sufficient internal project governance		
	The tenderer adopts effective quality assurance procedures		
	The approach to testing and evaluation is robust		
	The timescale is within that outlined in the ITT		
The cost	The costs are clearly explained and certain		
	The benefits of an economy of scale are clear and reasonable if bidding for more than one initiative		
	The overall tender cost represents value for money		
	There are sufficient resources of suitable quality allocated to deliver the project		

## 13. Appendix A - Product Information

### Objectives:

- To work in association with key stakeholders, to assess and make recommendations on ways to improve the effectiveness of product information to all consumers in order to educate, in particular, those who are at risk of, or in the early stages of experiencing harm.

### Activities:

- Develop an understanding of the characteristics of the players that the information will be targeted at.
- Examine the current forms of product information across the industry, test its effectiveness at informing and educating players and set this as a benchmark to compare any improvements or new initiatives.
- Incorporate findings from research associated with product information.
- Work with operators and suppliers to facilitate the development of product information, that either makes existing information easier to understand or creates alternatives to current practice, where greater transparency isn't possible.
- Carry out trials of the initiatives that have been developed to test to what extent they are effective at informing and educating players and in the longer term changing behaviour, and whether there are any unintended consequences. Part of this test will be against the initial benchmarking of existing information.
- Make recommendations for best practice that should be disseminated across the industry, taking into account the capability of, and relevance for, each sector
- Conduct a large-scale pilot of this recommended best practice, in partnership with the industry as a whole, facilitating independent evaluation by a third party.

## 14. Appendix B - Play Information Messaging

### Objectives:

- To work in association with key stakeholders, to assess and make recommendations on ways to develop and improve the effectiveness of play information, which is bespoke to an individual's own gambling behaviour, in order to educate, in particular, those who are at risk of, or in the early stages of experiencing harm.

### Activities:

- Develop an understanding of the characteristics of the players that the information will be targeted at.
- Examine the current forms of play information across the industry, its effectiveness at informing and educating, and ultimately at changing behaviour and set this as a benchmark to compare any improvements or new initiatives.
- Incorporate findings from research or any key bodies associated with play information.
- Work with operators (to get access to players) and suppliers (to understand what is technically possible) to identify what play information is most useful to the player, and identify the best method of delivering such information i.e. what data in what form.
- Develop play information that is bespoke to an individual's own gambling behaviour.
- Carry out trials of the initiatives that have been developed to test to what extent they are effective at informing and educating players, and in the longer term changing behaviour, and whether there are any unintended consequences.
- Test the initiatives, through the effectiveness of any improvements to content and presentation to the play information, in terms positive customer reaction (in the short term) and change of behaviour (in the longer term). Part of this test will be against the initial benchmarking of existing information.
- Make recommendations for best practice that should be disseminated across the industry, taking into account the capability of, and relevance for, each sector. Conduct a large-scale pilot of this recommended best practice, in partnership with the industry as a whole, facilitating independent evaluation by a third party.

## 15. Appendix C - Social Responsibility Staff Training

### Objectives:

- To work in association with key stakeholders, to produce a standard framework for industry training in Social Responsibility and to then ultimately build this into National Occupational Standards that can be used to develop NVQs for the sector. As part of the process, tools will be built that allow for the evaluation of the success of the training, not just in terms of staff understanding and deployment but also in outcomes for those customers whose behaviour indicates that they may be at risk of, or in the early stages of experiencing harm

### Activities:

- Research Social Responsibility training provision, capacity and effectiveness amongst the gambling industry, other industries and in foreign jurisdictions.
  - As part of the scoping process last year, IGRG received 40+ responses to a questionnaire on social responsibility training from operators across the industry, many of whom provided examples of their training material. These responses can be provided to the successful tenderer when they begin the project.
  - Effective evaluation of the training (much more than a log of training undertaken and staff's understanding of training provided) is absolutely key to improving customer SR care
- Consider induction and refresher training in Social Responsibility. Not only is this a requirement of the LCCP but training on SR issues at the point of induction is critical.
- Produce guidelines to industry on what SR training looks like, how it can be best delivered and measured for effectiveness. Importantly to include culture change to make customer SR care, a normal activity.
- Develop a description of and recommendations on the creation of an audit body which can be utilised by companies and others to assess effectiveness of SR training, delivery and outcomes.
- Develop a tailored evaluation standard for use by this body and by companies to assess SR training, delivery and outcomes universally across the industry to allow a common measurement of the effectiveness of the training.
- Develop standard training material (and potentially delivery mechanisms) for use by companies across the gambling sector. With a recognition of the different needs and capabilities of the different sectors.
- Build NVQs and possibly Apprenticeships for the sector over the longer term which incorporates compulsory elements on social responsibility.
- Conduct a large-scale pilot of this recommended best practice, in partnership with the industry as a whole, facilitating independent evaluation by a third party.

### Current Situation

Comprehensive training already exists through IGRG member associations, external suppliers and individual companies.

Operators have a wide variety of Responsible Gambling programmes in places, using a variety of techniques, including online and eLearning packages.

IGRG has collated information on the social responsibility training which the 5 trade associations provide or support, as follows:

- Association of British Bookmakers – has developed and provides an on-line training package for smaller operators.
- BACTA – provide tailored training packages on the LCCP and other matters through their team of Regional Compliance Officers. This is complemented by the Toolkits for AGC, FEC and Operator Members, which provide guidance and template forms for members to use, to record those items required under the LCCP. BACTA have recently produced a workbook for arcade staff that addresses the main areas of responsibility of staff that interact with customers.
- Bingo Association – dedicates a section of their Operators Handbook to staff training in terms of the LCCP requirements in this area. The BA has access to the training programmes for key companies such as Gala & Mecca within the bingo industry. The BA is also looking at options for developing an on-line training package for smaller operators.
- National Casino Forum – Playing Safe is the casino industry’s commitment to responsible gambling. It is a programme of activities and initiatives designed to deliver more than the minimum legal requirements for responsible gambling. The Accreditation, Certification and Evaluation (ACE) Panel is an independent group of academics and experts who advise NCF and the Playing Safe Forum on social responsibility matters. . The ACE Panel has completed evaluations and accreditations representing 78% of the casino industry and is planning to complete the programme in 2016. Evaluations will be conducted every two years.
- Remote Gambling Association – promotes external companies such as ICA (International Compliance Association) who provide a Specialist Certificate in Money Laundering Risk in Betting and Gaming. The training provides an opportunity to understand the key anti-money laundering and counter terrorist financing risks and the risk-based approach in managing these risks. The course is suitable for a range of people from senior practitioners to operational staff.