



## **Suspicious Activity and Information Requirements Policy**

Heartbeat will make all reasonable efforts to ensure that the Gambling Commission is provided with any information that we know relates to, or suspect may relate to an offence under the Gambling Act 2005, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licencing condition.

Actual or suspected criminal activities will be immediately reported to the police and the Gambling Commission.

All suspicious activity will be logged by Heartbeat for reporting purposes. Heartbeat will inform the Gambling Commission of any involvement it may have in criminal investigations

If Heartbeat or its employees knows or suspects someone is using money obtained illegally (the proceeds of crime) to play the Heartbeat Lottery, Heartbeat has a legal duty to report this and will terminate or refuse lottery membership.

Heartbeat will also make all reasonable efforts to ensure that all key events that could have a significant impact upon the nature or structure of a licensee's business are notified to the Gambling Commission as soon as is reasonably practicable and in any event within 5 working days of the licensee becoming aware of the event's occurrence. This will include the key events specifically itemised within condition 15.1 and 15.2 of the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), dated October 2018.

All incidents will be recorded in an Incident Reporting Log.