Compliance, AML and Responsible Gaming Officer

Training track

Compliance officers, MLRO and AML analysts, responsible gaming leads, internal audit

You will be able to say where each control lives in the system, what record it leaves, and how to pull that record when the regulator asks.

- Recommended path
- Optional, worth it
- Alternative route

DURATION	SLIDES	FORMAT	PREREQUISITES	OUTCOME	REGIONS
22.3 h of core lessons + 245 min of extension…	313 in lessons + 47 extension + 18-41 for the…	Ten to eleven remote sessions (never more than…	Two years in compliance, AML, RG or audit. No…	A two-alert case file with SAR decisions, a…	Two regions: the licensed market in full, plus the…

STAGE 1 · Session 1 — Foundations and the method

- The gambling business — 1.1
- Method and requirements sheet — 1.2

STAGE 2 · Sessions 1-2 — Platform, money and games

- Platform and bet lifecycle — 2.1
- Payments and the closed loop — 2.2
- Treasury and player funds — 2.3
- Certification — 2.4

STAGE 3 · Sessions 2-4 — KYC, AML and fraud

- KYC states and the evidence store — 3.1
- Lab: KYC and retention (review) — 3.2
- AML and anti-fraud in the system — 3.3
- Onboarding design — 3.4

STAGE 4 · Sessions 4-5 — Player protection

- Controls and registries — 4.1
- Lab: fail-closed registry check — 4.2
- Monitoring and penalty cases — 4.3
- Multi-registry adapter — 4.4

STAGE 5 · Sessions 5-8 — Location, data and evidence

- Location checks and the matrix — 5.1
- Data classes and transfers — 5.2
- Evidence pipeline and reports — 5.3
- Lab: evidence export (review) — 5.4
- Frameworks, calendar, gates — 5.5
- Deletion vs retention — 5.6

STAGE 6 · Sessions 8-9 — Incidents

- Audit logs and SIEM — 6.1
- Tabletop: wallet double credit — 6.2
- Regulator notification — 6.3

STAGE 7 · Sessions 9-10 — Region elective (pick one)

- Region: UK and Europe — 7.1
- Region: US states — 7.2
- Region: Canada (Ontario) — 7.3
- Region: Latin America — 7.4
- Region: Offshore and APAC — 7.5

STAGE 8 · Sessions 10-11 — Track extension lessons

- AML 1: risk assessment, EDD triggers — 8.1
- AML 2: monitoring rules and tuning — 8.2
- AML 3: sanctions, PEP, SAR filing — 8.3
- SAR clinic: two more alert files — 8.4
- RG clinic: harm and affordability — 8.5
- Training records as evidence — 8.6

STAGE 9 · Session 11 — Second region (pick one)

- Second region: UK and Europe — 9.1
- Second region: US states — 9.2
- Second region: Canada (Ontario) — 9.3
- Second region: Latin America — 9.4
- Second region: Offshore and APAC — 9.5

Compliance, AML and Responsible Gaming Officers: training track in detail

Compliance officers, MLRO and AML analysts, responsible gaming leads, internal audit · as of 2026-11

Duration	22.3 h of core lessons + 245 min of extension lessons + one region (70-180 min) + a short second region (50-75 min) + 50-55 min of session openings: 29.2-31.6 h in all
Slides	313 in lessons + 47 extension + 18-41 for the region + 16-20 for the second region: 394-421 in all
Format	Ten to eleven remote sessions (never more than 3.5 hours of contact each), or five and a half to six days on site. Three labs in the review variant and one incident tabletop. About 8 hours of post-work for the closing task.
Prerequisites	Two years in compliance, AML, RG or audit. No coding.
Outcome	A two-alert case file with SAR decisions, a control-to-evidence map for one market and a reviewed evidence export.
Regions	Two regions: the licensed market in full, plus the overview and enforcement lessons of a second (fixed short slot, 50 min average). The second region must be different from the first.
Assessment	Closing quiz (30 questions). Three review labs and the tabletop under the 75 percent rule. Closing task: a two-alert case file with SAR decisions and a control-to-evidence map for one market.
Certificate	Attendance record only. Hours count toward the full program.

1. Foundations and the method Session 1

1.1 The gambling business RECOMMENDED

A short common base. Officers from other sectors get the gambling business; the comparison across regimes (old lesson 1.2) is left to the roadmaps and the region slot. Lesson 1.1: 40 min, 10 slides.

In the book: Ch. 01 The Online Casino Ecosystem, Ch. 05 Differences Between Betting Sites and Online Casinos

1.2 Method and requirements sheet RECOMMENDED

The five steps, then a roadmap read into a requirements sheet. Compliance owns the rule and evidence columns. Lessons 1.3 and 1.4: 95 min, 15 slides.

In the book: Ch. 07 Casino Implementation Planning and Timeline, Ch. 06 Licensing Guide

2. Platform, money and games Sessions 1-2

2.1 Platform and bet lifecycle RECOMMENDED

The component inventory: which service holds the wallet, the player account, the game sessions and the logs, then the bet lifecycle that shows which record each step leaves. Every later lesson points back to this map. Lessons 2.1 and 2.2: 75 min, 25 slides.

In the book: Ch. 10 Complete Platform Architecture, Ch. 01 The Online Casino Ecosystem, Ch. 28a Distributed Systems Deep Dive

2.2 Payments and the closed loop RECOMMENDED

How deposits and withdrawals move, and why money should leave by the route it came in. Lesson 3.4: 40 min, 11 slides.

In the book: Ch. 36 Financial Operations, Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 33d Disputes, Chargebacks, and Player Support

2.3 Treasury and player funds RECOMMENDED

Segregation of player funds and the daily reconciliation that proves it. Lesson 3.5: 40 min, 11 slides.

In the book: Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation

2.4 Certification RECOMMENDED

What the lab certificate covers, and why an uncontrolled change can void it. Lesson 4.4: 30 min, 11 slides.

In the book: Ch. 17 Random Number Generation (RNG), Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 06 Licensing Guide

3. KYC, AML and fraud Sessions 2-4

3.1 KYC states and the evidence store RECOMMENDED

KYC as a state machine and the store that holds the documents: who can read them, for how long, and what is logged. Lessons 5.1 and 5.2: 65 min, 22 slides.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 20 Hardware Security Module Infrastructure, Ch. 20b OpenBao Operations: Secret Engines, Dynamic Credentials and Disaster Recovery

3.2 Lab: KYC and retention (review) RECOMMENDED

The review variant: check the transitions against a regulator expectation checklist and read the retention report for gaps. Lesson 5.3: 60 min, 4 slides.

In the book: Ch. 24d KYC Evidence Lifecycle

3.3 AML and anti-fraud in the system RECOMMENDED

Where transaction monitoring, risk scoring and case handling sit, then a worked case from alert to SAR decision (45 minutes, the first of two casework blocks), and the signals that come from fraud tooling. Lessons 5.4, 5.4b and 5.5: 110 min, 24 slides.

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 34b Data Governance for iGaming Platforms, Ch. 12 Real-Time Cash Flow Management for Online Casinos, Ch. 19 Anti-Fraud System Deep Dive

3.4 Onboarding design RECOMMENDED

A two-market onboarding flow on the whiteboard, with compliance writing the rules and the evidence. Lesson 5.6: 55 min, 5 slides.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation

4. Player protection Sessions 4-5

4.1 Controls and registries RECOMMENDED

Limits, time-outs and the national self-exclusion registries (GAMSTOP, Spelpaus, ROFUS and others) as system components. Lessons 6.1 and 6.2: 60 min, 22 slides.

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 26b Self-Exclusion Registries: From API to Audit Trail

4.2 Lab: fail-closed registry check RECOMMENDED

Review variant: read the audit log of a registry check and decide whether it proves that an excluded player was blocked. Lesson 6.3: 65 min, 4 slides.

In the book: Ch. 26b Self-Exclusion Registries: From API to Audit Trail

4.3 Monitoring and penalty cases RECOMMENDED

Markers of harm and graduated intervention, then enforcement cases read for what the audit trail should have caught. Lessons 6.4 and 6.5: 65 min, 17 slides.

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 26b Self-Exclusion Registries: From API to Audit Trail

4.4 Multi-registry adapter RECOMMENDED

A short design exercise on one adapter for several registries. Lesson 6.6: 30 min, 3 slides.

In the book: Ch. 26b Self-Exclusion Registries: From API to Audit Trail

5. Location, data and evidence Sessions 5-8

5.1 Location checks and the matrix RECOMMENDED

Multi-signal location checks, who may play from where, how the session is checked again when the player moves, and the false positives that block a legitimate player at a border. Lessons 7.1, 7.2 and 7.6: 70 min, 24 slides.

In the book: Ch. 24e Geofencing and Location Verification, Ch. 24 Security and Compliance, Ch. 40 Case Study -- Launching in a New Regulated Market

5.2 Data classes and transfers RECOMMENDED

Data classification, residency rules and the gateway that controls transfers across borders. Lessons 8.1 and 8.3: 75 min, 22 slides.

In the book: Ch. 27 Data Residency and Backup/Recovery, Ch. 27b The Jurisdiction Transfer Gateway and Cookie Consent, Ch. 34b Data Governance for iGaming Platforms

5.3 Evidence pipeline and reports RECOMMENDED

Evidence as a product with an owner, and the report formats and deadlines by regulator. Lessons 9.1 and 9.2: 75 min, 24 slides.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 06 Licensing Guide

5.4 Lab: evidence export (review) RECOMMENDED

Review variant: request an export, check its audit entry and judge whether it would satisfy a regulator's request. Lesson 9.3: 65 min, 4 slides.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 24d KYC Evidence Lifecycle

5.5 Frameworks, calendar, gates RECOMMENDED

GLI-GSF, ISO 27001, PCI DSS and regulator standards side by side, then the compliance calendar. Lessons 9.4 and 9.5: 65 min, 22 slides.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 24 Security and Compliance, Ch. 25b Regulatory Reporting and Evidence Export

5.6 Deletion vs retention RECOMMENDED

A case on a deletion request that collides with a retention duty. Lesson 9.7: 20 min, 4 slides.

In the book: Ch. 34b Data Governance for iGaming Platforms, Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 27 Data Residency and Backup/Recovery

6. Incidents Sessions 8-9

6.1 Audit logs and SIEM RECOMMENDED

What gets logged, where it goes and how long it stays. Enough to ask the security team the right questions. Lesson 10.3: 30 min, 10 slides.

In the book: Ch. 24b Wazuh SIEM for iGaming Compliance, Ch. 24c AWS SIEM Implementation for iGaming Compliance, Ch. 10 Complete Platform Architecture, Ch. 24f Network IDS/IPS: Suricata and AWS Network Firewall for iGaming

6.2 Tabletop: wallet double credit RECOMMENDED

An incident tabletop. Compliance plays its real role: assess, decide on notification, draft the notice. Lesson 10.4: 75 min, 7 slides.

In the book: Ch. 35 Incident Management, Ch. 35b Cash-Flow Integrity Incident Response, Ch. 39 Case Study -- Security Incident Response

6.3 Regulator notification RECOMMENDED

Notification duties and timelines across regimes, and the incident record that supports them. Lesson 10.5: 35 min, 12 slides.

In the book: Ch. 35 Incident Management, Ch. 35b Cash-Flow Integrity Incident Response

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7. Region elective (pick one) Sessions 9-10

7.1 Region: UK and Europe ALTERNATIVE

Six licences in two families: point-of-consumption markets (Great Britain, Sweden, Denmark) and hub licences (Malta, Gibraltar, Isle of Man). This track takes the lessons on player controls, identity, reporting and enforcement cases, in full for the licensed market. Lessons 11.2, 11.3, 11.6a, 11.6b and 11.9: 180 min, 41 slides.

In the book: Ch. 06 Licensing Guide, Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 26b Self-Exclusion Registries: From API to Audit Trail, Ch. 24d KYC Evidence Lifecycle, Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation, Ch. 25b Regulatory Reporting and Evidence Export

7.2 Region: US states ALTERNATIVE

New Jersey, Pennsylvania and Michigan: a land-based partner, servers inside the state and a location check on every session. This track takes the lessons on player controls, identity, reporting and enforcement cases, in full for the licensed market. Lessons 12.1, 12.7 and 12.8: 95 min, 28 slides.

In the book: Ch. 06 Licensing Guide, Ch. 02 Regulation and Compliance Landscape, Ch. 24 Security and Compliance, Ch. 26b Self-Exclusion Registries: From API to Audit Trail, Ch. 26 Responsible Gaming and Player Protection Systems

7.3 Region: Canada (Ontario) ALTERNATIVE

Ontario: registration with the AGCO, an operating agreement with iGaming Ontario, and standards written as outcomes. This track takes the lessons on player controls, identity, reporting and enforcement cases, in full for the licensed market. Lessons 13.1 and 13.2: 70 min, 22 slides.

In the book: Ch. 40 Case Study -- Launching in a New Regulated Market, Ch. 02 Regulation and Compliance Landscape, Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 26b Self-Exclusion Registries: From API to Audit Trail, Ch. 24e Geofencing and Location Verification

7.4 Region: Latin America ALTERNATIVE

Brazil, Colombia, Mexico and Buenos Aires. Brazil is taught as a design problem behind a legal status gate, because MP 1.394/2026 banned fixed-odds betting in September 2026. This track takes the lessons on player controls, identity, reporting and enforcement cases, in full for the licensed market. Lessons 14.1, 14.1b, 14.3 and 14.4: 115 min, 35 slides.

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 29f Latin America Datacenter Infrastructure for Regulated Gaming, Ch. 06 Licensing Guide, Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation, Ch. 36 Financial Operations, Ch. 25b Regulatory Reporting and Evidence Export

7.5 Region: Offshore and APAC ALTERNATIVE

Curacao under the LOK and the Philippines under PAGCOR, where the roadmap reports new operator accreditations frozen and the partner route as the open one. This track takes the lessons on player controls, identity, reporting and enforcement cases, in full for the licensed market. Lessons 15.1 and 15.3: 70 min, 18 slides.

In the book: Ch. 06 Licensing Guide, Ch. 29e Datacenter Infrastructure for Africa and Offshore Jurisdictions, Ch. 41b Case Study: The Grey-Market Doorway and the Regulated Alternative, Ch. 16 Cryptocurrency and DeFi Integration

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8. Track extension lessons Sessions 10-11

8.1 AML 1: risk assessment, EDD triggers OPTIONAL

The business-wide risk assessment, customer risk scoring and the triggers for enhanced due diligence: source of funds, source of wealth, high-value and high-velocity patterns. Written for officers who already know the rules and need to see where each trigger lives in the system. Not built yet; estimate 45 min, 13 slides (lecture).

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 24d KYC Evidence Lifecycle, Ch. 19 Anti-Fraud System Deep Dive

8.2 AML 2: monitoring rules and tuning OPTIONAL

Teams tune three monitoring rules against a labelled alert sample: thresholds, look-back windows, false positives against missed cases, and how each change is documented. Needs a labelled alert data file; no code. Not built yet; estimate 50 min, 5 slides (whiteboard design).

In the book: Ch. 19 Anti-Fraud System Deep Dive, Ch. 33b Workflow Engine and Case Management, Ch. 12 Real-Time Cash Flow Management for Online Casinos

8.3 AML 3: sanctions, PEP, SAR filing OPTIONAL

Sanctions and PEP screening as system components, what a suspicious activity or transaction report must contain and when it is due, and the tipping-off rule that limits what the system and staff may say to the player. Not built yet; estimate 45 min, 13 slides (lecture).

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 19 Anti-Fraud System Deep Dive, Ch. 24d KYC Evidence Lifecycle

8.4 SAR clinic: two more alert files OPTIONAL

Part two of lesson 5.4b, 85 minutes of casework in all. Two more anonymized alert files worked in pairs: what the system showed, what was missing, report or not, and what goes in the case note. Needs two alert data files. Not built yet; estimate 40 min, 4 slides (case study).

In the book: Ch. 19 Anti-Fraud System Deep Dive, Ch. 33b Workflow Engine and Case Management, Ch. 12 Real-Time Cash Flow Management for Online Casinos

8.5 RG clinic: harm and affordability OPTIONAL

Pairs work three player histories: which markers of harm show, what the affordability check says, which intervention follows and what goes in the record. Aimed at responsible gaming leads who own the decision, not the code. Not built yet; estimate 45 min, 4 slides (case study).

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 26b Self-Exclusion Registries: From API to Audit Trail

8.6 Training records as evidence OPTIONAL

What a regulator expects to see about staff training: who, when, what, and how effectiveness was checked. It shows how to keep this track's attendance and quiz results in that form. Not built yet; estimate 20 min, 8 slides (lecture).

In the book: Ch. 08 Team Structure and Operations, Ch. 25b Regulatory Reporting and Evidence Export

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9. Second region (pick one) Session 11

9.1 Second region: UK and Europe ALTERNATIVE

Six licences in two families: point-of-consumption markets (Great Britain, Sweden, Denmark) and hub licences (Malta, Gibraltar, Isle of Man). Lessons 11.1 and 11.9: 50 min, 16 slides.

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 06 Licensing Guide, Ch. 29c European Datacenter Infrastructure for Regulated Gaming, Ch. 26b Self-Exclusion Registries: From API to Audit Trail

9.2 Second region: US states ALTERNATIVE

New Jersey, Pennsylvania and Michigan: a land-based partner, servers inside the state and a location check on every session. Lessons 12.1 and 12.8: 65 min, 18 slides.

In the book: Ch. 06 Licensing Guide, Ch. 02 Regulation and Compliance Landscape, Ch. 24 Security and Compliance, Ch. 26b Self-Exclusion Registries: From API to Audit Trail

9.3 Second region: Canada (Ontario) ALTERNATIVE

Ontario: registration with the AGCO, an operating agreement with iGaming Ontario, and standards written as outcomes. Lessons 13.1 and 13.4: 75 min, 20 slides.

In the book: Ch. 40 Case Study -- Launching in a New Regulated Market, Ch. 02 Regulation and Compliance Landscape

9.4 Second region: Latin America ALTERNATIVE

Brazil, Colombia, Mexico and Buenos Aires. Brazil is taught as a design problem behind a legal status gate, because MP 1.394/2026 banned fixed-odds betting in September 2026. Lessons 14.1, 14.1b and 14.10: 65 min, 17 slides.

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 29f Latin America Datacenter Infrastructure for Regulated Gaming, Ch. 06 Licensing Guide, Ch. 46 Building a Brazilian Betting Platform: Architecture, Compliance, and Implementation

9.5 Second region: Offshore and APAC ALTERNATIVE

Curacao under the LOK and the Philippines under PAGCOR, where the roadmap reports new operator accreditations frozen and the partner route as the open one. Lessons 15.1 and 15.3: 70 min, 18 slides.

In the book: Ch. 06 Licensing Guide, Ch. 29e Datacenter Infrastructure for Africa and Offshore Jurisdictions, Ch. 41b Case Study: The Grey-Market Doorway and the Regulated Alternative, Ch. 16 Cryptocurrency and DeFi Integration

Common pitfalls

- Knowing the policy by heart and not knowing which service enforces it or which table holds the proof.
- Skipping the lab because it has code in the room. The review variant is where the evidence questions get answered.
- Treating the vendor's dashboard as the audit trail. If the operator cannot export it, it is not evidence.
- Writing one global policy and assuming it covers every market's registry, limit and reporting rule.
- Counting attendance at this track as a regulatory qualification. It is a training record, nothing more.

Sources

1. UK Gambling Commission, AML guidance for casinos, Part 4.5 Training
   https://www.gamblingcommission.gov.uk/guidance/the-prevention-of-money-laundering-and-combating-the-financing-of-terrorism/prevention-of-ml-and-combating-the-financing-of-terrorism-part-4-5-training

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2. UK Gambling Commission, AML guidance for casinos, Part 5.1 Standing of the nominated officer
   https://www.gamblingcommission.gov.uk/guidance/the-prevention-of-money-laundering-and-combating-the-financing-of-terrorism/prevention-of-ml-and-combating-the-financing-of-terrorism-part-5-1-Standing-of-the-nominated-officer
3. Malta Gaming Authority, Key Functions
   https://www.mga.org.mt/licensee-hub/key-function/
4. AGCO, Registrar's Standards for Internet Gaming, Standard 2.12 employee training
   https://www.agco.ca/en/responsibilities-and-resources/employee-training
5. Brazil, Portaria SPA/MF 1.143 of 11 July 2024 on AML policies (third-party copy on LegisWeb)
   https://www.legisweb.com.br/legislacao/?id=461891
6. Brazil, Medida Provisória 1.394 of 25 September 2026 (Planalto)
   https://www.planalto.gov.br/ccivil_03/_ato2023-2026/2026/Mpv/mpv1394.htm

Companion to *The Backend of Luck* and its jurisdiction roadmaps. Hours and slide counts come from the lesson tables in the training plan.