

Údarás Rialála Cearrbhachais na hÉireann Gambling Regulatory Authority of Ireland



Webinar: December 2025

Remote Betting Operator Licence Application Process

Agenda

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- Introductions
- Legislation & Timings Update
- GRAI Progress to Date
- Overview of Licence Application
- Licensing Application Requirements
- Demonstration of Licensing Portal

Introductions: Gambling Regulatory Authority of Ireland

Anne Marie Caulfield - CEO

Linda Kerr - Director of Licensing

Conor McCormack – Assistant Director of Licensing (Legal)

Paddy O'Shea – Assistant Director of Licensing (Financial)

Legislation & Timings Update

Courts and Civil Law (Miscellaneous Provisions) Act 2025

- Contains essential amendments which are necessary to repeal the old regime and allow GRAI to open to accept licence applications

Regulations & Commencements for Licencing

- Commencement plans are currently being reviewed by the Office of the Parliamentary Counsel to the Government (OPC)
- Regulations are currently with the Minister for approval

Open for applications for betting **6th January 2026**

Main purpose of today's webinar is to provide an oversight of licensing requirements and the application process, and to engage early with Operators

Some of GRAI's Progress in 2025 ...



- ✓ **Legal Establishment** – Seven Authority Members appointed in March.
- ✓ **Statement of Strategy 2025 – 2027** launched by Minister in October.
- ✓ **Licensing** – development of processes for Betting, licence application fees, Commencement planning.
- ✓ **ICT Systems** – Licencing system completed, other systems in planning.
- ✓ **Website Launched** - to communicate with public/stakeholders on the activities of the GRAI and to point to supports available.
- ✓ **Stakeholder Engagement** – extensive outreach with operators, advocates, other regulators.
- ✓ **Codes of Practice** – development of guidance to clarify and support licensees to meet their legal obligations progressing
- ✓ **Social Impact Fund** – Pobal appointed, Strategy drafted
- ✓ **Governance** – development of P&P to comply with Code of Practice for State Bodies, moving towards self financing

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Overview of Licence Application

Licensing – Phased Approach

Phasing	Estimated Date for Opening for Licence Applications	Licence Type
Phase 1	2026 (Jan)	B2C Betting (Remote & In Person)
Phase 2	2026 (Q4)	B2C Gaming (Remote)
Phase 3	2027	B2C Gaming (In Person) B2C Lottery (Remote & In Person)
Phase 4	2027 / 2028	B2B Charitable & Philanthropic

Licensing – Transition

Betting Licence Type	Current Licensing Body	Expiry Date
Remote Betting	Revenue Commissioners	30 June 2026
Remote Betting Intermediaries	Revenue Commissioners	30 June 2026
In-Person Betting	Revenue Commissioners	30 November 2026

Licensing Team – GRAI Application Overview

Notice of Intent

- Published 28 days before licence application
- National newspaper for remote betting operators
- National and Local newspapers for in-person betting operators

Business Registration

- Account registration with GRAI
- Corporate, legal and financial information
- Policy submissions

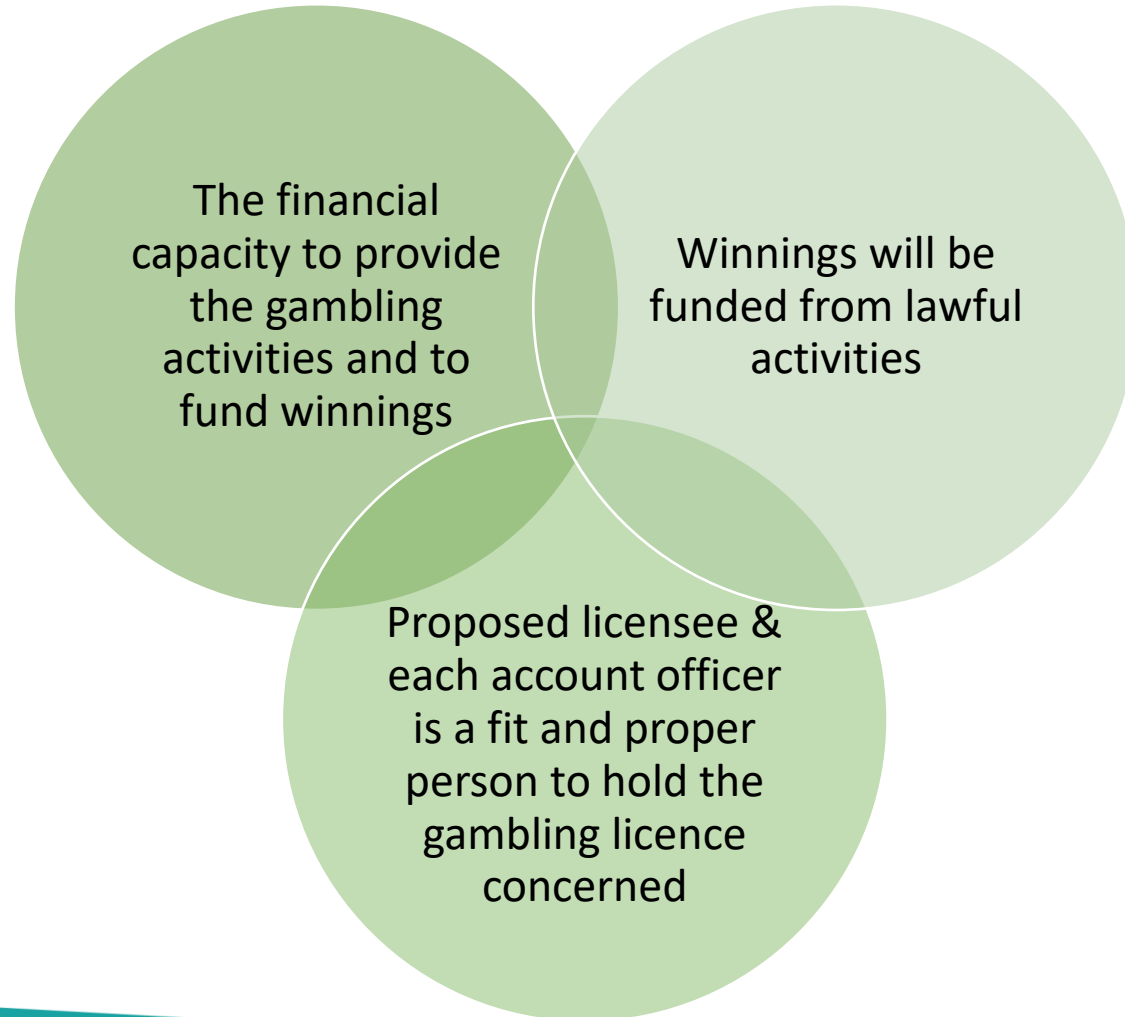
Account Officers

- Beneficial Owners
- Relevant Officers
- “Fit and Proper” checks

Licence Application

- Licence type selection
- Technical information
- Input of relevant information
- Calculation of application fee
- Submission of application

Licensing – Application Determination



Gambling licences will be determined by the Authority being satisfied that these 3 principles are met, along with:

- The information supplied for each licence type
- For in-person gambling, the premises is suitable for use for gambling activities

Account Officer Requirements

Account Officer is the catch-all term being used to describe natural individuals that the GRAI are required to gather specific information on as part of the licence application process.

Account Officers are split into two areas: Beneficial Owners & Relevant Officers

Account Officer Requirements

- **Beneficial Owner** means any natural person(s) who ultimately owns or controls a company and can be broader than just those whose name is listed as the official owner.
- **Relevant Officers** will be those individuals who exercise control over the organisation, most likely Directors, Company Secretary(s), MLRO, Chief Executive Officer or Managing Director.

There may be occasions where a person is both a Beneficial Owner and a Relevant Officer. In this situation, the individual should be recorded under Beneficial Owner.

Account Officer Requirements (contd.)

Document requirements for Account Officers:

- Identification Documents
- Tax Clearance
- Gambling licence history, both in Ireland and elsewhere
- Police clearance, where applicable
- Declarations regarding other relevant licences, bankruptcy and convictions in relation to relevant offences
- Other relevant details.

Account Officer – Liability

“Where an offence under this Act is committed by a person and the offence is proved to have been committed with the consent or connivance of, or to be attributable to the wilful neglect of, another person who, when the offence was committed, was a relevant officer or a beneficial owner of the first-mentioned person, that person, as well as the first-mentioned person, is guilty of an offence and is liable to be proceeded against and punished as if he or she were guilty of the first-mentioned offence.”

Therefore, all Account Officers must be of fit and proper standing, and fully appreciate the serious nature of the role they are undertaking.

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Legal, Corporate & Technical Requirements

The Legal Corporate Assessment Framework will be completed to:

“review the information and documentation submitted by the proposed licensee under sections 96 and 97 of the Act which relates to legal and corporate matters; and determine if the proposed licensee is fit and proper to hold the gambling licence.”

- Useful Information has been published online on www.grai.ie to assist the proposed licensee: [Licensing Application Guidance](#)
- We intend to publish additional information on “Legal and Corporate Guidance” and “Notice of Intent Guidance” shortly.

Legal and Corporate Requirements

Requirements

- Corporate Details: Business Name, Trading Name, Address, Foundational Documents, Constitutions
- Details of any Previous Gambling Licence in Ireland
- Details of any Overseas Gambling Licences
- Other Licences in Ireland related to the control of credit (pawnbrokers, high-cost credit, credit intermediary, mortgage intermediary)
- Details of any ongoing Legal Disputes relating to the conduct of their gambling activities
- Details of any Convictions or Pending Proceedings relating to relevant offences
- Relevant Offences are set out in Schedule 1 of the Gambling Regulation Act

Assessment

The Majority of the assessment is internal, however, the GRAI will verify the documents received by:

- Utilising online tools/platforms (CORE / Land Direct /LA Planning Websites, etc.)
- engage with the Revenue Commissioners and overseas Regulators (in certain circumstances).
- where applicable consult with An Garda Síochána

Premises Assessment Requirements

The Premises Assessment Framework will be completed:

Having regard to section 99-101 of the Act; in accordance with same, the GRAI is responsible for determining:

- (1) *That the premises is suitable for the proposed gambling activity*
- (2) *That the premises is permitted to admit Children onto the premises*
- (3) *That the premises is permitted to permit ATMs on the premises*

Useful Information has been published online on www.grai.ie to assist the proposed licensee: [Premises Assessments Guidance](#)

Useful content in this publication on the distinction for “Relevant Premises” and “Non- Relevant Premises”

PLEASE NOTE:

The GRAI will undertake a physical “boots-on-the-ground” assessment of the premises as part of their determination [*proximity to ATMs, schools etc.*]

The GRAI will also engage and consult with the Local Authority – *Planning Department* and *Fire Department* for the locality the premises is situated

Premises Assessment Requirements

Requirements for 'Non-Relevant Premises' applicants

- Maps or plans of the premises.
- Evidence of Ownership/Occupation
- Certificate of Compliance with Planning Permission and Building Regulations.
- Fire Safety Certificate
- Planning Permission and associated documentation
- Insurance Details
- Confirmations in relation to the Betting Act 1931 (*Declaration*)

Additional Information if required

- Layout of Premises
- Details on Lighting
- Position of gaming machines/tables/equipment etc.
- CCTV
- Information on non-gambling activities on premises (e.g. Public House)
- Size, location of external spaces and lighting

Policy Requirements

Anti-Money Laundering / Countering the Financing of Terrorism (AML / CFT) Policy - Outlining standard EU and Irish AML requirements such as risk-based approach, internal procedures and record keeping, MLRO, SARS etc.

Know Your Customer (KYC) Policy - Some of the requirements that should be noted: CCD, EDD, Ongoing Monitoring and Risk Assessment

Responsible Gambling Policy - Outlining safer gambling tools and information that is available to the participant.

Customer Terms and Conditions - Fair terms and written in plain English.

IT Security Policy - Addressing GDPR, Asset Management, Risk Management, Access Control and Incident response

Whistleblowing Policy - Standard format for a company with over 50 employees, compliant with the Protected Disclosures Act 2010. Employer Requirements, What constitutes a Protected disclosure and Key protections for Workers.

Disaster Recovery Plan and Business Continuity Plan - Identifying critical functions, conducting a risk assessment and setting out Business Continuity plan

Technical Requirements

There are no Technical Standards in place at the time of opening for Phase 1: Licencing in-person and Remote betting operators. These will be developed in line with opening for B2B Licences, and will be subject to public consultation.

The remote operator will be asked to submit

- the details of their ICT (Information Communications Technology) software and hardware providers that are used to provide gambling activities on the website
- Remote Gambling Operational Map

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Financial Requirements

Financial Requirements

“the financial information furnished with the application demonstrates the capacity of the proposed licensee to provide the gambling activity or activities sought to be licensed and to fund winnings, and that the winnings will be funded from lawful activities”

- The application process in the portal requires all licensees to submit a comprehensive range of financial information. This allows the licensing team to review that information and ensure the financial viability of the licence holder.
- The Licensing Department have determined that applicants should provide the following documentation to show their financial viability.

Financial Document Requirements

For all applicants (tailored to organisation type i.e. PLC vs Sole Trader etc)

- Annual Returns for last 3 years (including audited Financial Statements)
- Profit & Loss, Balance Sheet and Cash Flow Statements
- Business Plan (with financial forecasts)
- Bank Statements (last 12 months)
- Details around Loans and Debt
- Corporate Structure Chart
- Foundation Document
- Register of Members/Shareholders, Directors and Secretaries
- Memorandum of Association and Articles of Association and/or Constitution
- Organisation Chart
- Board Terms of Reference
- Risk Management Policy / Risk Register / Business Risk Assessment
- Company Number/Tax reference numbers
- Relevant Bankruptcy/Composition Agreements