

# HOW TO GET A IGAMING LICENSE IN SOUTH AFRICA



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# Quick Start: Get Licensed in 10 Steps

## 1. Define your iGaming product (exactly).

Start with the real user experience: what the player does, what they pay, what they can win, and where they are located. This matters because licence type depends on the activity.

## 2. Decide if you're doing land-based, remote betting, or "interactive iGaming."

In South Africa, "online iGaming" is not one bucket. Some online activity can sit under betting in certain provincial frameworks, while "interactive iGaming" (casino-style) has been a major legal risk area for years.

## 3. Pick the licence category you need.

You may need a primary operator licence plus key person licences, premises approvals, manufacturer/supplier approvals, or software/vendor approvals (depending on province and model).

## 4. Choose your province and licensing authority.

Licensing is provincial, so process, forms, timelines, and proof standards can change by province. However, national law still sets norms and cooperation rules.

## 5. Build your "fit-and-proper" evidence folder.

Don't treat this like admin paperwork. Boards look for clean ownership, clean funding, credible governance, and honest disclosure.

## 6. Lock your site plan and zoning position (if land-based).

Premises readiness is where many applications slow down. Get municipal and site documentation aligned early.

## 7. Write a business plan that looks licence-ready.

Your plan must show: product clarity, operational control, player protection, AML controls, financial sustainability, and who is accountable for what.

## 8. Design compliance from day one (AML/KYC + responsible iGaming).

iGaming is high-risk for money laundering. So, your controls must be practical, not decorative.

## 9. Prepare your application pack with proof points.

Every claim needs a document behind it. "We will do X" is weak. "We have policy + system + owner + evidence" is strong.

## 10. Plan for the post-approval phase before you apply.

Licences come with conditions. You should already know how you will meet reporting, audits, complaint handling, and ongoing suitability checks.



# South Africa iGaming Laws: How Regulation Works

South Africa regulates iGaming through a shared model:

- National framework: The National iGaming Act sets norms, national oversight concepts, and coordination through intergovernmental structures.
- Provincial licensing: Provinces license and supervise most iGaming operations through provincial licensing authorities and provincial laws.

## Why this Matters for you:

Because of this structure, your success depends on matching your business model to a province's licensing approach, then proving you can run the operation responsibly.



# Licence Types: Which One Do You Need?

1

## Casino-related licences

Usually tied to strict premises requirements, high scrutiny, and significant compliance obligations.

2

## Betting / bookmaker-related licences

This can cover retail betting and, in some cases, online betting offered under a licensed framework (province-specific).

3

## Bingo and Limited Payout Machines (LPMs)

Often regulated with their own rules and route-to-market. LPM structures usually include operator, site, and machine approvals (varies by province).

4

## Key person / employee licences (common add-on)

Boards often require licences or approvals for directors, key managers, and certain operational roles.

Practical rule:

If you can't explain your model in 2–3 plain sentences, you're not ready to pick a licence type. Boards dislike vague models because vague models hide risk.

# Online iGaming: Legal vs Grey vs High-Risk

This is the section where people get into trouble, so keep it clean.

## What tends to be lower risk (still needs confirmation)

- Online betting that is clearly linked to a provincial bookmaker/betting licence model, where the operator is licensed and the product fits provincial definitions. In practice, this has been a common route for legal online wagering products (but details vary by province).

## What tends to be high risk

- Interactive casino-style iGaming offered online without a clear legal framework and licensing basis. South Africa has a long history of policy and legislative attempts around interactive iGaming, with ongoing legal sensitivity.

## What “grey” usually looks like (and why boards hate it)

- Hosting offshore and marketing into South Africa
- Using “skin” arrangements where ownership/control is unclear
- Payment flows that obscure where money comes from
- Products that look like casino games but are described as “betting”

## How to protect yourself early

- what you offer,
- which licence category it fits,
- why it fits, and
- what you will not offer in South Africa.

# Fit-and-Proper Checks: What Boards Review

Fit and proper” is not a vibe. It’s an evidence test.

Boards typically look at:

## Ownership and control

- Who owns shares (directly and indirectly)
- Who controls decisions
- Whether any hidden controllers exist

## Financial integrity

- Source of funds and source of wealth
- Clean banking trails
- No unexplained “loans” that look like disguised equity

## Criminal, regulatory, and reputation history

- Past convictions or investigations
- Previous licensing outcomes
- Patterns of nondisclosure (this is a big one)

## Governance and competence

- Whether your leadership team can run a regulated operation
- Whether duties are assigned, not “shared by everyone”

Why it matters:

Even a strong business can fail if a board doubts you

# Where to Apply: Choosing the Right Province

You should choose based on fit, not convenience.

## Use these decision filters

1. Licence availability for your activity (some categories are tightly controlled)
2. Your premises footprint (if land-based)
3. Your target market reality (where players/customers are)
4. Regulatory expectations (proof burden, technical standards, reporting style)
5. Speed vs certainty (a “fast” route that collapses later is not fast)

## A practical approach

- Shortlist 2 provinces.
- Request guidance on required forms and minimum documents.
- Compare what they require for: ownership, premises, tech controls, and compliance.



# Business Plan: What Your Application Must Include

A “licence-ready” business plan reads like an operator who already runs compliance daily.

Include these sections:

## 1) Your model in plain words

- What games/betting you offer
- Who your customers are
- How money moves (player → operator → payouts)

## 2) Governance and accountability map

- Who owns compliance
- Who owns AML
- Who owns player complaints
- Who owns system integrity and incident response

## 3) Risk register (simple but real)

- AML risks
- Fraud risks
- Underage play risks
- Insider risks
- Vendor risks
- Data/security risks



#### 4) Operating controls (not promises)

- KYC steps (what you verify, when, and how)
- Transaction monitoring triggers
- Payout controls
- Bonus controls (if any)
- Audit trails and logs

#### 5) Financial plan that matches your controls

##### Capex and opex

- Cashflow
- Player funds handling
- Vendor costs
- Compliance staffing costs



# Premises & Zoning: What Site Readiness Means Before You Apply

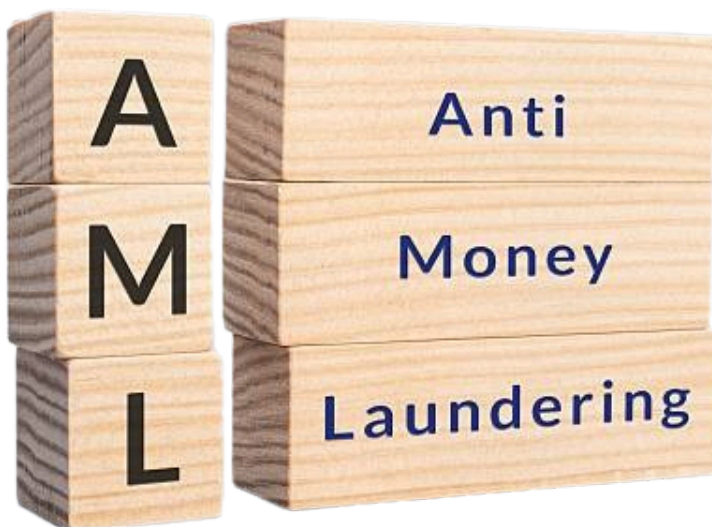
If you need premises approval, treat it like a project.

## What “site readiness” usually means

- Clear legal right to occupy (lease/ownership evidence)
- Municipal/zoning alignment where required
- Floor plan and layout details
- Security plan (CCTV, access control, cash handling where relevant)
- Fire and safety readiness (often requested or expected)

Common failure pattern:

People sign a lease first and solve zoning later. That reverses the risk.



# Compliance Basics: AML/KYC + Responsible iGaming

## AML/KYC: build controls that actually work

iGaming businesses carry money laundering risk, so South Africa's AML framework and expectations matter.

Your controls should answer:

- When do you identify the customer? (before deposit? before payout? before thresholds?)
- How do you verify identity? (documents, data sources, checks)
- How do you detect suspicious patterns? (rules + human review)
- How do you report? (who files, what evidence you keep)

## Responsible iGaming: make player protection operational

You need real tools, not a disclaimer page:

- Age gates and verification
- Deposit limits and cooling-off options
- Self-exclusion process
- Clear complaint handling

South Africa has a structured responsible iGaming ecosystem, including self-exclusion support and programme resources.

# Technology Requirements: Payments, Logs, Security

Boards care about two things: integrity and traceability.

## Minimum controls you should be ready to show

- Tamper-evident logs: bets, outcomes, changes, payouts, admin actions
- Role-based access: least privilege, admin approvals, dual control for sensitive actions
- Payments controls: reconciliation, refund rules, payout approval logic
- Security controls: patching, monitoring, incident response
- Data retention and audit readiness: who can retrieve what, and how fast

Proof point idea:

Prepare screenshots + written system descriptions + a one-page control matrix. That makes your review easier.



# Application Documents: Checklist of What to Submit

Treat your pack like a court file: everything must be consistent.

## Core document families (typical)

- Corporate docs: registration, shareholding, group structure
- Identity docs: directors, key persons, beneficial owners
- Financial docs: statements, funding proof, source of funds
- Premises docs: lease/ownership, plans, zoning-related evidence
- Policies: AML/KYC, RG, complaints, security, data protection
- Vendor docs: contracts, SLAs, platform description, support model
- Tax and statutory compliance (where required)

## Proof point rule

For every major claim, attach:

- a policy,
- a system control, and
- a named owner.

# Approval Process: Notices, Objections, Hearings

In many licensing processes, there is a public-facing step.

Typically, you can expect:

- Submission and completeness checks
- Public notices (where required)
- Objection windows and responses
- Hearings (if objections arise or board requires)
- Clarification requests and supplemental documents

## What helps you win here:

A clean narrative and consistent evidence. If your pack contradicts itself, objections become more damaging.



# Due Diligence: What Happens After Submission

Due diligence is not only “background checks.” It often includes:

- Ownership mapping and beneficial ownership review
- Funding trace and banking trail review
- Criminal and regulatory checks
- Site verification (where premises matter)
- Operational capability review (do you have real staff and controls?)
- Vendor and platform integrity review (where relevant)

## Reality:

If anything looks hidden, boards slow down. So, disclose early and explain clearly.

# After Approval: Conditions + Launch Checklist

Approval often comes with conditions. So, your launch should be a checklist, not excitement.

## Typical condition themes

- Reporting schedules
- System audit or certification steps
- Premises final approvals
- Key staff licensing completion
- Advertising restrictions
- Responsible iGaming measures going live

## Launch readiness checklist

- All policies signed and trained
- Monitoring running
- Incident process tested
- Player support ready
- Reconciliation process running daily

# Ongoing Compliance: How to Stay Licensed

Licensing is not a finish line. It's an operating standard.

## What ongoing compliance usually includes

- Periodic reporting
- Renewals and fees
- Audits / inspections
- Change approvals (ownership, key persons, systems, premises)
- AML reporting and record-keeping
- Responsible iGaming reporting and enforcement

## Simple way to stay safe:

Create a monthly compliance calendar with named owners and evidence folders.

# Common Rejection Reasons: Mistakes to Avoid

## 1. Wrong licence category for the actual product

Fix: map product → legal category early.

## 2. Hidden ownership or unclear control

Fix: submit a full ownership chart and disclose controllers.

## 3. Weak source-of-funds story

Fix: show clean banking trails and contracts.

## 4. Premises not ready (or zoning ignored)

Fix: validate the site path before submission.

## 5. Compliance policies that don't match operations

Fix: write policies you can run daily, with owners and logs.

## 6. Tech controls are hand-waved

Fix: prepare a control matrix + demo evidence.

# Templates & Checklists You Can Reuse

## Template 1: One-page “Licensing Model Summary”

- Operator name and group structure
- Product description (plain language)
- Licence type sought
- Province and authority
- Player journey (deposit → play → payout)
- Key compliance controls (KYC, AML monitoring, RG tools)
- Key vendors (payments, platform, hosting)
- Named accountable owners

## Template 2: Control Matrix (simple)

Control | Risk it reduces | Owner | Evidence

Example:

- “Payout approval rules” | fraud/abuse | Finance lead | payout log + SOP

## Checklist: “Before you submit”

- Ownership chart complete
- Funding evidence attached
- Premises pack complete
- AML/KYC policy final + trained owners
- RG tools defined and operational
- Tech control evidence prepared
- All forms match the same facts (names, addresses, share %)

# Resources, Glossary, and References

## Key resources you should keep open while working

- National policy and regulatory overview of iGaming in South Africa (DTIC publication).
- National regulatory framework and regulations (National iGaming Regulations).
- Policy position on interactive iGaming and the fact that key amendments were not implemented (National iGaming Board policy discussion).
- Responsible iGaming and self-exclusion support (NRGP).
- Legal analysis on online/remote betting vs interactive iGaming risk areas (reputable legal/industry commentary).

## Mini glossary

- Provincial licensing authority: the provincial regulator that issues and oversees licences.
- Fit and proper: checks on integrity, competence, and financial reliability of owners and key persons.
- Interactive iGaming: commonly refers to online casino-style iGaming; high legal sensitivity in SA context.
- Remote betting: betting offered through licensed betting/bookmaker structures (province-dependent).
- AML/KYC: controls to identify customers and stop money laundering.

# Conclusion

Getting a iGaming license in South Africa is not “just paperwork.” It’s a full readiness test. Regulators want proof that your ownership is clean, your money trail is explainable, your site is lawful, and your operations can stay controlled after launch.

If you treat licensing like a checklist you rush at the end, you usually lose time and credibility. However, if you build the application around three things the right licence type, a compliant operating model, and evidence-backed documents your approval chances improve and your go-live becomes smoother.

Final thought: the fastest path is not “filling forms quickly.” The fastest path is submitting once with fewer gaps, because most delays come from missing evidence, unclear ownership, weak compliance plans, or location issues.

If you want, share your business model (retail casino, LPM route, bookmaker, or online) and the province you’re considering. I’ll help you map the most realistic licensing route and the documents you should prepare first.