

City Gaming Limited

City Gaming Limited
of 91 Wimpole Street, London, W1G 0EF

**LICENCE CONDITIONS AND
CODES OF PRACTICE
POLICY & PROCEDURE
SYSTEMS**

AGC

**Trading as City Slots, Palace Amusements and
Game Nation**

VERSION 1.2

City Gaming Limited

GAMBLING ACT 2005 *Licence Conditions and Codes of Practice*

ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

It is illegal for any person who is under 18 years of age to be permitted entry to an Adult Gaming Centre or Adult Gaming Area.

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

- Our policies and procedures with regard to age restriction take into account the structure and layout of our gambling premises so as to prevent access to gambling by children and young persons, and that our facilities do not appeal to children and young persons.
- Clear and prominent signage is placed at the entrance(s) to our Adult Gaming Centre(s) and adult area(s) stating that it is illegal for persons under the age of 18 years to enter and for City Gaming Limited to permit entry.
- It is a matter of gross misconduct if a member of staff knowingly allows entry by any person who is under the age of 18 years to our Adult Gaming Centre(s) or Adult Gaming Area(s).
- Any person known to be under 18 years of age is refused entry.
- Any person who appears to be under 18 years of age, and has not previously provided satisfactory proof to the contrary, is asked to provide appropriate identification when it comes to the attention of staff and before an attempt to gamble. *Members of staff are trained to 'think 21' as a minimum.*
- If the person admits to being under the age of 18, they are refused entry.
- Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and has to be provided before entry is allowed. *Incidents involving suspected forged documents will be recorded and reported.*
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction. *Acceptable forms of identification include those that carry the PASS logo (e.g. Citizencard); a driving licence (including a provisional licence) with photograph, a passport and military identification cards.*
- Where there is still doubt and the person cannot produce proof of age, they are advised that they will not be permitted to enter until such time as they provide such proof.
- They will be shown, have explained to them, and be given a 'proof of age card' application form or offered an explanation on how to apply for a card.
- Should the person then refuse to leave, they are advised that the age restriction is a legal requirement.

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- If they still will not leave, the Duty Manager is immediately contacted to take over the situation.
- Any attempts by under-18s to enter the premises or designated adult area(s) and gamble are brought to the attention of the Duty Manager immediately and recorded as an entry on a log retained on the premises for this purpose. *Details of entry to include date, time, identity of the individual if known - or detailed description if unknown – member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence. Log to be countersigned by the Duty Manager.*
- Service is refused in all circumstances where any adult is accompanied by a child or young person.
- All gaming machines, other than category 'D' machines, are inscribed with a notice prohibiting play by persons under the age of 18 years.
- Stakes are returned to under-18s where they have been identified as gambling in AGCs or adult-only areas, and are not permitted to retain any monetary prize.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference; the original being retained on the employee's personnel file. Staff training policy covers all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and refresher training is carried out at appropriate intervals.

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ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

AGE VERIFICATION TESTING

City Gaming Limited Age Verification Testing Policy

- It is a requirement to conduct ongoing age verification testing or take part in collective age verification testing programs so as to provide reasonable assurance that policies and procedures to prevent underage gambling are effective.
- It is a further requirement that the results of age verification tests carried out by City Gaming Limited are provided to the Gambling Commission.

Age verification tests are carried out by { }, and that the results of testing are shared with the Commission.

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ACCESS TO PREMISES BY THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures:

City Gaming Limited acknowledges its obligation to ensure that staff openly co-operate with the Gambling Commission in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises contained under Part 15 (S.303 to S.326) of the Gambling Act 2005 (refer to page 2 of this document) and that:

- City Gaming Limited must provide the Gambling Commission with any information that the Commission would reasonably need to be aware of in exercising its regulatory functions or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code of practice provision having the effect of a licence condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating Licence.
- City Gaming Limited must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as:
 - (i) the numbers of people making use of the facilities and the frequency of such use;
 - (ii) the range of gambling activities provided by the licensee and the number of staff employed in connection with them; and
 - (iii) the licensee's policies in relation to, and experience of, problem gambling.
- City Gaming Limited must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time, and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

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PART 15

Members of staff are to co-operate at all times with the Commission's enforcement officers in the proper performance of their compliance functions.

The officers' rights of entry to premises are contained in Part 15 of the Act which deals with inspection (Sections 303 to 326). A constable, enforcement officer or authorised person under the Act may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed. A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed (Section 306). Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating licence or premises licence is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating licence (Section 307).

Entry may also be made to assess the likely effects of activity when application has been made for a premises licence. A constable or enforcement officer may require the holder of an operating licence to produce, within a specified period, a copy of the authorisation (Section 316). Failure to comply without reasonable excuse to a request to produce a copy of the authorisation may result in an offence and be liable on summary conviction to a fine not exceeding level 2. Section 317 sets out powers of the constable, enforcement office or authorised person and include inspection of any part of the premises or any machine on anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or beach of terms and conditions. Section 20 provides that the power of inspection must be exercised only at a reasonable time. The enforcement officer or authorised person must provide evidence of his identify and authority (Section 321). Section 323 provides that a constable, enforcement officer or authorised person may use reasonable force to enter a premises. Section 326 provides that it is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

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GAMBLING ACT 2005 *Licence Conditions and Codes of Practice* **ADVERTISING STANDARDS AND MARKETING**

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedure

All advertising and marketing by City Gaming Limited complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). We ensure that our marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008), including 'free bet' offers, do not amount to or involve misleading actions or misleading omissions within the meaning of those regulations.

We adopt the general principles that our advertising is:

- legal, decent, honest and truthful;
- prepared with a sense of responsibility to consumers and to society;
- respectful to the principles of fair competition generally accepted in business; and
- not intended to bring advertising into disrepute.

Specifically, we ensure that:

- advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise;
- advertisements and promotions are socially responsible and do not encourage excessive gambling;
- care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable;
- advertising is not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear. No medium is used to advertise gambling if more than 20% of its audience is under 18 years old;
- persons shown gambling are not, nor do they appear to be, under 25 years of age;
- there is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer;
- advertising and promotional material carries a reference for the need to keep gambling under control;
- it is never suggested or implied that gambling is a means of getting out of financial difficulty.
- Advertising and marketing material should not appear on any primary web page/screen or micro-site that provides advice or information on responsible gambling

Marketing and Promotion

Any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or other advantage (including the discharge in whole or in part of any liability (the benefit)) the scheme is designed to operate, and be operated, in such a way that neither the receipt nor the value or amount of the benefit is:

- (a) dependent on or calculated by reference to the length of time for or the frequency with which the customer gambles or has at any time gambled; or
- (b) dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency.

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If the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases. Incentives and rewards are proportional to the type and level of the customer's gambling.

Members of staff, as appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

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CUSTOMER INTERACTION IN RELATION TO IDENTIFYING CUSTOMERS WHO MAY BE SUSCEPTIBLE TO GAMBLING HARM

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

City Gaming Limited makes use of all relevant sources of information to ensure effective customer interaction and decision making in relation to identifying possible gambling disorders; equally to identify at-risk customers who may not be displaying obvious signs of problem gambling, and in respect of customers designated 'high value' or 'VIP'.

Customer activity and behaviour will be monitored for any behaviour that could indicate problem gambling.

If members of staff have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager is to be informed at the earliest available opportunity. Indicative behaviour may include signs of distress, agitation, aggression, intense mood swings, hysteria, remorse and perhaps even damage to property and violence or the threat of violence to staff or other customers. Other indicators may include:

- Increased amount of time spent gambling
- Changes to amount and frequency of spend
- Information or hints from the customer such as complaints about not winning

Notwithstanding any initial urgent action taken to deal with the customer's behaviour, the Duty Manager is required thereafter to observe the individual and make a judgement as to whether it is appropriate to suggest to the customer that they might want to be provided with information regarding where they can seek professional advice about the nature of their gambling activity or have the process of self-exclusion explained for consideration.

If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts the staff or other customers in potential danger, the Duty Manager will implement City Gaming Limited's procedures for dealing with antisocial situations.

The Duty Manager may give consideration to refusing service or barring the customer from the premises and, in extreme situations, contacting police for assistance. *Whenever police are called to the premises for assistance in handling any incident, a log entry will be made whether police attend or not.*

Notwithstanding any other action that may have to be taken immediately to prevent an incident from worsening, the Duty Manager will log all such reports which may result in future customer interaction or where it has been ruled out where otherwise it would have taken place. The interaction is conducted between the appointed manager and the customer in a confidential and meaningful manner.

Members of staff are aware of the appointed Manager who is specifically designated to deal with requests for self-exclusion, and are aware of where customers can be directed for confidential advice should they be directly approached for assistance.

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Interactions will be evaluated to understand the impact of the interactions on a consumer's behaviour and whether any further action is needed. An evaluation of the effectiveness of the approach will be undertaken to determine which types of interactions and tools work best to help consumers manage their gambling in a way that works for them. City Gaming Limited recognises its responsibilities detailed within the Gambling Commission Formal Guidance for Premises Based Operators.

This policy and procedure is consistent with, and implemented with due regard to City Gaming Limited's duty in respect of the health and safety of members of staff.

Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

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EMPLOYMENT OF CHILDREN AND YOUNG PERSONS

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

It is an offence for children (under-16s) and young persons (those aged 16 and 17) to be engaged, or permitted to be engaged in:

- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on Adult Gaming Centre licensed premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence.

All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.

It is strict Company policy that:

- Children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place.
- Gaming machines sited in Adult Gaming Centres or adult gaming areas are turned off if children and/or young persons are working on the premises outside the hours when the premises are open for business.
- Due diligence is given to verifying the age of all new members of staff where there is reason to doubt authenticity of birth dates supplied.
- The movement of children and young persons employed on the premises are carefully monitored and supervised so as to ensure compliance.

Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

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GAMBLING ACT 2005 *Licence Conditions and Codes of Practice*

FAIR AND OPEN PRACTICE ~ COMPLAINT AND DISPUTE RESOLUTION

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Complaints Procedure

City Gaming Limited is committed to providing a high quality, accessible and responsive service to customers and the local community. However, dissatisfied customers may communicate a complaint to us either verbally or in writing. All complaints are taken seriously, investigated thoroughly and handled in a confidential manner. If the complaint cannot be resolved to the satisfaction of both parties on site, a copy of our written procedure for dealing with complaints, together with a complaint form, is supplied to the complainant at the earliest opportunity together with the name and status of City Gaming Limited representative delegated to deal with the complaint.

Complainants should provide us with a comprehensive description and nature of the complaint; whether it is an original complaint, or where the outcome of a previous complaint was found unacceptable, and their name and postal address including a contact telephone number.

A 'complaint' means a complaint about any aspect of City Gaming Limited's conduct of the licensed activities, and a 'dispute' is any complaint which:

- (a) is not resolved at the first stage of the complaints procedure; and
- (b) relates to the outcome of the complainant's gambling transaction.

In the first instance, City Gaming Limited will endeavour to resolve the complaint to the satisfaction of both parties within fifteen working days. Should this not be possible we will explain why and provide a date by which the complainant can expect a full response.

In the event of a complaint relating to the outcome of a customer's gambling is unable to be satisfactorily resolved between City Gaming Limited and the complainant, the complainant will be given contact details of an Alternative Dispute Resolution (ADR) entity. The City Gaming Limited ADR is the Centre for Effective Dispute Resolution (CEDR).

- Complainants also have the means and opportunity of submitting their own version of events.
- The dispute is investigated in full by the ADR entity.
- Both parties are notified in writing of the review outcome with suggestions of a resolution if appropriate.
- This procedure may, but need not, provide for the ADR entity's resolution of the dispute to be binding on both parties.

City Gaming Limited is obliged to keep a record of all complaints and disputes, other than those considered to be trivial, including all disputes referred to the ADR entity that are not resolved at the initial stages of the complaints procedure. There is a requirement to submit reports of the outcome of disputes referred to the ADR entity to the Gambling Commission at intervals determined by the Commission either by the ADR entity or by City Gaming Limited.

City Gaming Limited is satisfied that the terms on which gambling is offered are not unfair within the meaning of the Consumer Rights Acts 2015 and is compliant with those terms.

City Gaming Limited LCCP policies and procedures version 1.2 dated 24 February 2020

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An accurate summary of the contractual terms on which gambling is offered is available to customers who are notified of material changes to terms before they come into effect.

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INFORMATION ON HOW TO GAMBLE RESPONSIBLY AND HELP FOR GAMBLERS WITH PROBLEMS

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Stay in control advice

Without breaching the principle that customers are responsible for their own gambling, the nature of the activity suggests that they should be reminded of the need to exercise caution. Accordingly, signage in the form of an appropriate number of posters or other appropriate means is displayed on our premises:

- Giving clear guidance that in order to keep gambling a fun social activity the customer needs to 'stay in control'.
- Drawing attention to further information, such as leaflets that are available on the premises.
- Indicating sources of help such as the National Gambling Helpline operated by GamCare.
- Large enough and written in language so as to be easily seen and understood.
- Prominently displayed.
- Maintained in a clean and tidy condition, preferably within a glass fronted frame.

Advertising sources of help

At the core of exercising a duty of care is the principle of assisting customers who may wish to express concern about their gambling. This tenet is drawn to the attention of customers on our premises in the following ways:

- The prominent display of 'Responsible Gambling' or 'Stay in Control' information.
- There are holders or racks containing leaflets in appropriate places that emphasise the need to keep gambling under control and where to seek help should anyone be concerned about their own or a family member's gambling. These leaflets are available to be taken away from the premises without the necessity of having to ask for them.
- The leaflets are available at all times for customers to take discreetly without having to ask a member of staff, and are located in the gambling area either near to exit doors, ATMs or toilets. We endeavour to maintain an effective stock control system to ensure that such leaflets are always available to supply. Signposting Information may also be made available through the use of links for online or smart technology.
- Details of GamCare, giving the National Helpline telephone number is inscribed on all appropriate categories of gaming machines.

Protecting those who seek assistance

Responding to someone who admits to having a problem with their gambling is a delicate matter that has to be timely and needs to be approached sensitively. It is our policy that:

- rules and procedures relating to a policy of responding to problem gamblers are clearly formulated and incorporated into our day-to-day operation;
- at least one member of staff who has been trained to deal with situations that might require a response is on duty at any one time, or available without undue delay;
- a positive response including communicating sources of help and the possibility of self-exclusion is offered to any customer who admits to having lost control of their gambling;
- the facility of a self-exclusion policy for customers who wish to voluntarily self-exclude themselves from these premises, and other premises offering the same style of gambling in the locality, that

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stipulates a minimum exclusion period of six months - with a further 24-hour 'cooling off' period thereafter;

- we draw to the attention of relatives who express concern about a family member's gambling the options available to that person should they wish to address the extent of their gambling;
- members of staff do not collude with customers when asked to lie on their behalf, and
- where services are marketed in one or more foreign languages, we make available information on how to gamble responsibly, access to help, guides to the playing of any game, and a summary of the contractual terms on which gambling is offered in that, or those, foreign languages.

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MONEY LAUNDERING, CASH HANDLING AND SUSPICIOUS TRANSACTIONS

Introduction

As part of its procedures for compliance with the requirements in respect of the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, City Gaming Limited takes into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the proceeds of Crime Act 2002 – Advice for operators (excluding Casino operators)*.

Money Laundering Definition

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. This definition of money laundering means that potentially any employee could contravene the Regulations if they were to become aware of or suspect the existence of criminal property and continue to be involved in a matter which relates to that property without reporting their concerns.

Policy

- City Gaming Limited is committed to ensuring that all necessary safeguards are in place with regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.
- City Gaming Limited has appointed a Designated Money Laundering Officer (MLO)
- All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions to the MLO for the purpose of informing the relevant authorities.

Disclosure Procedure

- Where it is suspected by a member of staff that money laundering activity is taking/has taken place, a disclosure must be made to the MLO as soon as possible. Because of the importance attached to the process, notification should normally take place immediately by telephone or, where that is not possible, by any other expedient means.
- No discussion will take place with colleagues as confidentiality is paramount.
- The MLO will determine whether or not to submit - online or otherwise - a suspicious activity report (SAR) to the National Crime Agency (NCA) and will maintain records of all notifications received detailing the method of verification used to identify the suspected person.

Cash Handling

Operating policies and procedures are in place with regard to accounting practices and record keeping in respect of:

- (i) Monetary stakes introduced to machines (gross takings),
- (ii) Money introduced to re-float machines
- (iii) Token transactions
- (iv) Customer refunds due to machine malfunctions.
- (v) Money removed from machines (net takings)

Members of staff, where appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

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SELF-EXCLUSION

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

Whilst most customers are able to enjoy and control their gambling, this Company recognises its duty of care to those who cannot. Accordingly, we provide a self-exclusion process for those customers who seek to prevent their own access to our premises and others in the locality offering a similar style of gambling as defined by the premises licence.

- When a customer has requested that they be refused entry to our premises, the customer and the appointed manager will formally acknowledge and document the request on a self-exclusion request form, or directly on the web-based AGC national self-exclusion scheme. This will be preceded by a meaningful discussion about the terms and conditions applicable to the scheme and will include other options available to assist a person having a gambling disorder, including being signposted to counselling and support services. A copy of the terms and conditions will be signed by the excluder as acknowledgement of understanding and consent. Customers are given the opportunity of discussing self-exclusion in private where possible.
- Photo identification and signature of the excluder is required for self-exclusion agreements except where an alternative means of identification is at least as effective. Photographs, preferably of the passport style, should be full-faced and a good likeness both initially and throughout the duration of the self-exclusion agreement.
- The Duty Manager will offer the exclusion for a minimum duration of not less than six months, nor more than twelve months; the customer thereafter may request to extend the length of the self-exclusion for one or more further periods of at least six months, reliant on City Gaming Limited's ability to manage longer agreements. City Gaming Limited will not allow the excluder admittance to the premises during the term of the self-exclusion agreement, and will have in place procedures for preventing self-excluded individuals from gambling during the period of the self-exclusion agreement including taking into account the internal structure and layout of the premises.
- It is made clear to the customer that they may not revoke the self-exclusion during the agreed period and that if found either in the gambling area or attempting to gamble they will be asked to leave. Members of staff are trained to be alert to self-excluded individuals attempting to breach agreements and instances of them getting another person to gamble on their behalf. It is a requirement that staff regularly pay heed to self-exclusion agreement records that are currently active (particularly photographs) in order to stay alert to the identity of those excluded in the locality of the premises.
- Self-excluders have the opportunity of also excluding from other premises owned by City Gaming Limited without necessarily having to enter areas licenced for gambling. Where the self-exclusion agreement is extended to other Company's premises we will consider any specific requests made by a customer in setting the bounds of the exclusion area.
- City Gaming Limited will offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling we offer, the ability to exclude from facilities for the same kind of gambling offered in our locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes. In addition, City Gaming Limited is participating in the possible development of a multi-operator self-exclusion scheme that will apply to all styles of gambling.

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- A self-exclusion log is maintained on the premises for recording detail of those currently excluded in addition to records stored digitally.
- Those self-excluded will be removed from any marketing databases held by this Company within two days of receiving the completed self-exclusion form, but we will take all reasonable steps to prevent details being knowingly sent as soon as practicable.
- At the end of the self-exclusion period, the exclusion will remain in place for a further six months, unless the customer takes positive action in order to gamble again.
- At the end of the exclusion period, the Duty Manager and customer will, together, review the terms of agreement either by telephone or in person. The review process is recorded on a self-exclusion review form.
- Where a customer chooses not to extend the self-exclusion and makes a positive request to begin gambling again, the customer is offered a 24-hour 'cooling off' period before being allowed access to the gambling facilities.
- Customers are given the opportunity to discuss self-exclusion in private where possible.
- City Gaming Limited retains self-exclusion records for the length of the agreement plus a further 6 months.
- Members of staff are trained both on induction and refresher sessions thereafter in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

City Gaming Limited

City Gaming Limited:
Serial No. /

Site Address:

Site Ref:

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Attempts by Children and Young Persons to enter an Adult Gaming Centre

Note: This log is used where it is established that a person, known to be under the age of 18 years, enters an adult gaming centre, and attempts to gamble therein. Instances where proof of age has been sought by staff, and verified as being over 18 years, may be recorded for other purposes on a 'customer refusal register.'

Date	Time	Circumstances including at what stage the young person was asked for Identification	Identity or Description	Action, outcome & preventative measures adopted	Member of Staff requesting Identification	Duty Manager Informed (signature)

TO BE RETAINED ON THE PREMISES To be used in conjunction with City Gaming Limited's policy and procedure concerning 'Access to Gambling by Children & Young Persons'.

City Gaming Limited

City Gaming Limited:
Serial No. /

Site Address:

Site Ref:

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Customer Interaction in Relation to Identifying Customers who may have a Gambling Disorder or the Potential of Developing Difficulty with their Gambling

To be completed in circumstances when a customer has either requested information on who to contact for help with a gambling disorder, or where a member of staff considers it appropriate to interact with a customer who is showing signs of distress associated with their gambling, or where it is suspected that a customer's gambling style is no longer under control.

It should also be recorded where interaction has been subsequently ruled out, where otherwise it would have taken place.

An entry should also be made where an approach has been made by a relative or friend of a customer considered by them to be experiencing difficulties with their gambling.

Date	Time	Circumstances including signs of distress or where it is suspected that a customer's gambling is no longer in control.	Identity or Description of Customer	Limited Exposure Offered (Y/N)	Referred to GamCare (Y/N)	Self-Exclusion Explained (Y/N)	Notes of outcome including where interaction has been ruled out.	Duty Manager Informed (signature)

TO BE RETAINED ON THE PREMISES
'Customer Interaction'.

To be used in conjunction with City Gaming Limited's policy and procedure concerning

City Gaming Limited

City Gaming Limited:
Serial No. /

Site Address:

Site Ref:

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

Incidents Requiring Police Assistance

Ref	Date	Time	Nature of Incident	Time Police Called	Time Police Arrived	Outcome	Duty Manager
1							
2							
3							
4							
5							
6							
7							

TO BE RETAINED ON THE PREMISES
whether they attend or not.

To be used when police are called to the premises to assist the licensee

City Gaming Limited

City Gaming Limited:
No. /

Site Address:

Site Ref:

Serial

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

SELF-EXCLUSION LOG FOR RECORDING DETAIL IF NO IMMEDIATE ACCESS TO THE CEDR WEB-BASED SCHEME

Ref	Name	Start Date	Attempts to Enter Date(s)	Attempts to Gamble Date(s)	Preventative Measures Deployed	End Date	'Cooling off' (Y/N)	Resumed Gambling Y/N
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								

City Gaming Limited

TO BE RETAINED ON THE PREMISES
concerning 'Self-Exclusion'.

To be used in conjunction with City Gaming Limited's policy and procedure

City Gaming Limited:

Site Address:

Site Ref: Serial No. /

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

SUMMARY OF STAFF TRAINING

Management and Staff, as appropriate, declare that they have read and understood the following documents, are fully aware of Company policy and procedures and their own respective requirements in relation to them:

- | | |
|--|--|
| <ul style="list-style-type: none"> 1. Access to Gambling by Children and Young Persons 2. Access to Premises by the Gambling Commission's Enforcement Officers 3. Advertising Standards and Marketing 4. Customer Interaction 5. Employment of Children and Young Persons | <ul style="list-style-type: none"> 6. Fair and Open Practice and Dispute Resolution 7. Information on how to Gamble Responsibly and Help for Gamblers with problems 8. Money laundering, Cash handling & Suspicious Transactions 9. Self-Exclusion |
|--|--|

Interval not to exceed 7 days

Tick against

relevant Policies

Name	Position	Joining Date	Training Date	Signature	Leave Date	1	2	3	4	5	6	7	8	9

City Gaming Limited

TO BE RETAINED ON THE PREMISES

To be used for recording staff training carried out by City Gaming Limited.

City Gaming Limited

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

It is illegal for any person who is under 18 years of age to be permitted entry to an Adult Gaming Centre

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

- Our policies and procedures with regard to age restriction take into account the structure and layout of our gambling premises so as to prevent access to gambling by children and young persons, and that our facilities do not appeal to children and young persons.
- Clear and prominent signage is placed at the entrance(s) to our Adult Gaming Centre(s) and adult area(s) stating that it is illegal for persons under the age of 18 years to enter and for City Gaming Limited to permit entry.
- It is a matter of gross misconduct if a member of staff knowingly allows entry by any person who is under the age of 18 years to our Adult Gaming Centre(s) or Adult Gaming Area(s).
- Any person known to be under 18 years of age is refused entry.
- Any person who appears to be under 18 years of age, and has not previously provided satisfactory proof to the contrary, is asked to provide appropriate identification when it comes to the attention of staff and before an attempt to gamble occurs. *Members of staff are trained to 'think 21' as a minimum.*
- If the person admits to being under the age of 18, they are refused entry.
- Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and has to be provided before entry is allowed. *Incidents involving suspected forged documents will be recorded and reported.*
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction. *Acceptable forms of identification include those that carry the PASS logo (e.g. CitizenCard); a driving licence (including a provisional licence) with photograph, a passport and military identification cards.*
- Where there is still doubt and the person cannot produce proof of age, they are advised that they will not be permitted to enter until such time as they provide such proof.
- They will be shown, have explained to them, and be given a 'proof of age card' application form or offered an explanation on how to apply for a card.
- Should the person then refuse to leave, they are advised that the age restriction is a legal requirement.
- If they still will not leave, the Duty Manager is immediately contacted to take over the situation.

City Gaming Limited

- Any attempts by under-18s to enter the premises or designated adult area(s) and gamble are brought to the attention of the Duty Manager immediately and recorded as an entry on a log retained on the premises for this purpose. *Details of entry to include date, time, identity of the individual if known - or detailed description if unknown – member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence. Log to be countersigned by the Duty Manager.*
- Service is refused in all circumstances where any adult is accompanied by a child or young person.
- All gaming machines, other than category 'D' machines, are inscribed with a notice prohibiting play by persons under the age of 18 years.
- Stakes are returned to under-18s where they have been identified as gambling in AGCs or adult-only areas, and under-18s are not allowed to retain any monetary prize.

Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file. Staff training policy covers all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and refresher training is carried out at appropriate intervals.

I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.

Signed:

.....

Name: (please print)

Date:

Venue:

Position:

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

City Gaming Limited

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

ACCESS TO PREMISES BY THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures:

City Gaming Limited acknowledges its obligation to ensure that staff openly co-operate with the Gambling Commission in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises contained under Part 15 (S.303 to S.326) of the Gambling Act 2005 (refer to page 2 of City Gaming Limited policy document) and that:

- City Gaming Limited must provide the Gambling Commission with any information that the Commission would reasonably need to be aware of in exercising its regulatory functions or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code of practice provision having the effect of a licence condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating Licence.
- City Gaming Limited must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as:
 - (a) the numbers of people making use of the facilities and the frequency of such use;
 - (b) the range of gambling activities provided by the licensee and the number of staff employed in connection with them; and
 - (c) the licensee's policies in relation to, and experience of, problem gambling.
- City Gaming Limited must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time, and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

I have read, understood and agree to implement the provisions of the above City Gaming Limited Policy and Procedures.

Signed:

Name: (please print)

City Gaming Limited

Date:

Venue:

Position:

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

City Gaming Limited

GAMBLING ACT 2005 *Licence Conditions and Codes of Practice* **ADVERTISING STANDARDS AND MARKETING**

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedure

All advertising and marketing by City Gaming Limited complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). We ensure that our marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008), including 'free bet' offers, do not amount to or involve misleading actions or misleading omissions within the meaning of those regulations.

We adopt the general principles that our advertising is:

- legal, decent, honest and truthful;
- prepared with a sense of responsibility to consumers and to society;
- respectful to the principles of fair competition generally accepted in business; and
- not intended to bring advertising into disrepute.

Specifically, we ensure that:

- advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise;
- advertisements and promotions are socially responsible and do not encourage excessive gambling;
- care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable;
- advertising is not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear. No medium is used to advertise gambling if more than 20% of its audience is under 18 years old;
- persons shown gambling are not, nor do they appear to be, under 25 years of age;
- there is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer;
- advertising and promotional material carries a reference for the need to keep gambling under control; and
- it is never suggested or implied that gambling is a means of getting out of financial difficulty.
- Advertising and marketing material should not appear on any primary web page/screen or micro-site that provides advice or information on responsible gambling

Marketing and Promotion

Any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or other advantage (including the discharge in whole or in part of any liability (the benefit)) the scheme is designed to operate, and be operated, in such a way that neither the receipt nor the value or amount of the benefit is:

City Gaming Limited

- (a) dependent on or calculated by reference to the length of time for or the frequency with which the customer gambles or has at any time gambled; or
- (b) dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency.

If the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases. Incentives and rewards are proportional to the type and level of the customer's gambling.

Members of staff, as appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.

Signed:

.....

Name: (please print)

Date:

Venue:

Position:

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

City Gaming Limited

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

CUSTOMER INTERACTION IN RELATION TO IDENTIFYING CUSTOMERS WHO MAY BE SUSCEPTIBLE TO GAMBLING HARM

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

City Gaming Limited makes use of all relevant sources of information to ensure effective customer interaction and decision making in relation to identifying possible gambling disorders; equally to identify at-risk customers who may not be displaying obvious signs of problem gambling, and in respect of customers designated 'high value' or 'VIP'.

Customer activity and behaviour will be monitored for any behaviour that could indicate problem gambling.

If members of staff have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager is to be informed at the earliest available opportunity. Indicative behaviour may include signs of distress, agitation, aggression, intense mood swings, hysteria, remorse and perhaps even damage to property and violence or the threat of violence to staff or other customers. Other indicators may include:

- Increased amount of time spent gambling
- Changes to amount and frequency of spend
- Information or hints from the customer such as complaints about not winning

Notwithstanding any initial urgent action taken to deal with the customer's behaviour, the Duty Manager is required thereafter to observe the individual and make a judgement as to whether it is appropriate to suggest to the customer that they might want to be provided with information regarding where they can seek professional advice about the nature of their gambling activity or have the process of self-exclusion explained for consideration.

If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts the staff or other customers in potential danger, the Duty Manager will implement City Gaming Limited's procedures for dealing with antisocial situations.

The Duty Manager may give consideration to refusing service or barring the customer from the premises and, in extreme situations, contacting police for assistance. *Whenever police are called to the premises for assistance in handling any incident, a log entry will be made whether police attend or not.*

Notwithstanding any other action that may have to be taken immediately to prevent an incident from worsening, the Duty Manager will log all such reports which may result in future customer interaction or where it has been ruled out where otherwise it would have taken place. The interaction is conducted between the appointed manager and the customer in a confidential and meaningful manner.

Members of staff are aware of the appointed Manager who is specifically designated to deal with requests for self-exclusion, and are aware of where customers can be directed for confidential advice should they be directly approached for assistance.

City Gaming Limited

Interactions will be evaluated to understand the impact of the interactions on a consumer's behaviour and whether any further action is needed. An evaluation of the effectiveness of the approach will be undertaken to determine which types of interactions and tools work best to help consumers manage their gambling in a way that works for them. City Gaming Limited recognises its responsibilities detailed within the Gambling Commission Formal Guidance for Premises Based Operators.

This policy and procedure is consistent with, and implemented with due regard to City Gaming Limited's duty in respect of the health and safety of members of staff.

Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.

Signed:

Name: (please print)

Date:

Venue:

Position:

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

City Gaming Limited

GAMBLING ACT 2005 *Licence Conditions and Codes of Practice*

EMPLOYMENT OF CHILDREN AND YOUNG PERSONS

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

It is an offence for children (under-16s) and young persons (those aged 16 and 17) to be engaged, or permitted to be engaged in:

- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on Adult Gaming Centre licensed premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence.

All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.

It is strict Company policy that:

- Children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place.
- Gaming machines sited in Adult Gaming Centres or adult gaming areas are turned off if children and/or young persons are working on the premises outside the hours when the premises are open for business.
- Due diligence is given to verifying the age of all new members of staff where there is reason to doubt authenticity of birth dates supplied.
- The movement of children and young persons employed on the premises are carefully monitored and supervised so as to ensure compliance.

Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

I have read, understood and agree to implement the provisions of the above City Gaming Limited Policy and Procedures.

Signed:

Name: (please print)

Date:

Venue:

Position:

City Gaming Limited

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

City Gaming Limited

GAMBLING ACT 2005 *Licence Conditions and Codes of Practice*

FAIR AND OPEN PRACTICE ~ COMPLAINT AND DISPUTE RESOLUTION

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Complaints Procedure

City Gaming Limited is committed to providing a high quality, accessible and responsive service to customers and the local community. However, dissatisfied customers may communicate a complaint to us either verbally or in writing. All complaints are taken seriously, investigated thoroughly and handled in a confidential manner. If the complaint cannot be resolved to the satisfaction of both parties on site, a copy of our written procedure for dealing with complaints, together with a complaint form is supplied to the complainant at the earliest opportunity together with the name and status of City Gaming Limited representative delegated to deal with the complaint.

Complainants should provide us with a comprehensive description and nature of the complaint; whether it is an original complaint, or where the outcome of a previous complaint was found unacceptable, and their name and postal address including a contact telephone number.

A 'complaint' means a complaint about any aspect of City Gaming Limited's conduct of the licensed activities, and a 'dispute' is any complaint which:

- is not resolved at the first stage of the complaints procedure; and
- relates to the outcome of the complainant's gambling transaction.

In the first instance, City Gaming Limited will endeavour to resolve the complaint to the satisfaction of both parties within fifteen working days. Should this not be possible we will explain why and provide a date by which the complainant can expect a full response.

In the event of a complaint relating to the outcome of a customer's gambling is unable to be satisfactorily resolved between City Gaming Limited and the complainant, the complainant will be given contact details of an Alternative Dispute Resolution (ADR) entity.

- Complainants have the means and opportunity of submitting their own version of events.
- The dispute is reviewed in full by the ADR entity.
- Both parties are notified in writing of the review outcome with suggestions of a resolution if appropriate.
- This procedure may, but need not, provide for the ADR entity's resolution of the dispute to be binding on both parties.

City Gaming Limited is obliged to keep a record of all complaints and disputes, other than those considered to be trivial, including all disputes referred to the ADR entity that are not resolved at the initial stages of the complaints procedure. There is a requirement to submit reports of the outcome of disputes referred to the ADR entity to the Gambling Commission at intervals determined by the Commission either by the ADR entity or by City Gaming Limited.

City Gaming Limited is satisfied that the terms on which gambling is offered are not unfair within the meaning of the Consumer Rights Act 2015 and is compliant with those terms

An accurate summary of the contractual terms on which gambling is offered is available to customers who are notified of material changes to terms before they come into effect.

I have read, understood and agree to implement the provisions of the above City Gaming Limited Policy and Procedures.

City Gaming Limited

Signed:

Name: (please print)

Date:

Venue:

Position:

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

City Gaming Limited

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

INFORMATION ON HOW TO GAMBLE RESPONSIBLY AND HELP FOR GAMBLERS WITH PROBLEMS

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Stay in control advice

Without breaching the principle that customers are responsible for their own gambling, the nature of the activity suggests that they should be reminded of the need to exercise caution. Accordingly, signage in the form of an appropriate number of posters or other appropriate means is displayed on our premises:

- Giving clear guidance that in order to keep gambling a fun social activity the customer needs to 'stay in control'.
- Drawing attention to further information, such as leaflets that are available on the premises.
- Indicating sources of help such as the National Gambling Helpline operated by GamCare.
- Large enough and written in language so as to be easily seen and understood.
- Prominently displayed.
- Maintained in a clean and tidy condition, preferably within a glass fronted frame.

Advertising sources of help

At the core of exercising a duty of care is the principle of assisting customers who may wish to express concern about their gambling. This tenet is drawn to the attention of customers on our premises in the following ways:

- The prominent display of 'Responsible Gambling' or 'Stay in Control' information.
- There are holders or racks containing leaflets in appropriate places that emphasise the need to keep gambling under control and where to seek help should anyone be concerned about their own or a family member's gambling. These leaflets are available to be taken away from the premises without the necessity of having to ask for them.
- The leaflets are available at all times for customers to take discreetly without having to ask a member of staff, and are located in the gambling area either near to exit doors, ATMs or toilets. We endeavour to maintain an effective stock control system to ensure that such leaflets are always available to supply. Signposting Information may also be made available through the use of links for online or smart technology.
- Details of GamCare, giving the National Helpline telephone number is inscribed on all appropriate categories of gaming machines.

Protecting those who seek assistance

Responding to someone who admits to having a problem with their gambling is a delicate matter that has to be timely and needs to be approached sensitively. It is our policy that:

- rules and procedures relating to a policy of responding to problem gamblers are clearly formulated and incorporated into our day-to-day operation;
- at least one member of staff who has been trained to deal with situations that might require a response is on duty at any one time, or available without undue delay;

City Gaming Limited

- a positive response including communicating sources of help and the possibility of self-exclusion is offered to any customer who admits to having lost control of their gambling;
- the facility of a self-exclusion policy for customers who wish to voluntarily self-exclude themselves from these premises, and other premises offering the same style of gambling in the locality, that stipulates a minimum exclusion period of six months - with a further 24-hour 'cooling off' period thereafter;
- we draw to the attention of relatives who express concern about a family member's gambling the options available to that person should they wish to address the extent of their gambling;
- members of staff do not collude with customers when asked to lie on their behalf, and
- where services are marketed in one or more foreign languages, we make available information on how to gamble responsibly, access to help, guides to the playing of any game, and a summary of the contractual terms on which gambling is offered in that, or those, foreign languages.

I have read, understood and agree to implement the provisions of the City Gaming Limited Policy and Procedures.

Signed:

Name: (please print)

Date:

Venue:

Position:

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

City Gaming Limited

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

MONEY LAUNDERING, CASH HANDLING AND SUSPICIOUS TRANSACTIONS

Introduction

As part of its procedures for compliance with the requirements in respect of the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, City Gaming Limited takes into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the proceeds of Crime Act 2002 – Advice for operators (excluding Casino operators)*.

Money Laundering Definition

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. This definition of money laundering means that potentially any employee could contravene the Regulations if they were to become aware of or suspect the existence of criminal property and continue to be involved in a matter which relates to that property without reporting their concerns.

Policy

- City Gaming Limited is committed to ensuring that all necessary safeguards are in place with regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.
- City Gaming Limited has appointed a Designated Money Laundering Officer (MLO)
- All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions to the MLO for the purpose of informing the relevant authorities.

Disclosure Procedure

- Where it is suspected by a member of staff that money laundering activity is taking/has taken place, a disclosure must be made to the MLO as soon as possible. Because of the importance attached to the process, notification should normally take place immediately by telephone or, where that is not possible, by any other expedient means.
- No discussion will take place with colleagues as confidentiality is paramount.
- The MLO will determine whether or not to submit - online or otherwise - a suspicious activity report (SAR) to the National Crime Agency (NCA) and will maintain records of all notifications received detailing the method of verification used to identify the suspected person.

Cash Handling

Operating policies and procedures are in place with regard to accounting practices and record keeping in respect of:

- Monetary stakes introduced to machines (gross takings),
- Money introduced to refloat machines
- Token transactions
- Customer refunds due to machine malfunctions.
- Money removed from machines (net takings)

Members of staff, where appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

I have read, understood and agree to implement the provisions of the above City Gaming Limited Policy and Procedures.

City Gaming Limited

Signed:

Name: (please print)

Date:

Venue:

Position:

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

City Gaming Limited

GAMBLING ACT 2005 *Licence Conditions and Codes of Practice* SELF-EXCLUSION

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

Whilst most customers are able to enjoy and control their gambling, this Company recognises its duty of care to those who cannot. Accordingly, we provide a self-exclusion process for those customers who seek to prevent their own access to our premises and others in the locality offering a similar style of gambling as defined by the premises licence.

- When a customer has requested that they be refused entry to our premises, the customer and the appointed manager will formally acknowledge and document the request on a self-exclusion request form, or directly on the web-based AGC national self-exclusion scheme. This will be preceded by a meaningful discussion about the terms and conditions applicable to the scheme and will include other options available to assist a person having a gambling disorder, including being signposted to counselling and support services. A copy of the terms and conditions will be signed by the excluder as acknowledgement of understanding and consent. Customers are given the opportunity of discussing self-exclusion in private where possible.
- Photo identification and signature of the excluder is required for self-exclusion agreements except where an alternative means of identification is at least as effective. Photographs, preferably of the passport style, should be full-faced and a good likeness both initially and throughout the duration of the self-exclusion agreement.
- The Duty Manager will offer the exclusion for a minimum duration of not less than six months, nor more than twelve months; the customer thereafter may request to extend the length of the self-exclusion for one or more further periods of at least six months, reliant on City Gaming Limited's ability to manage longer agreements. City Gaming Limited will not allow the excluder admittance to the premises during the term of the self-exclusion agreement, and will have in place procedures for preventing self-excluded individuals from gambling during the period of the self-exclusion agreement including taking into account the internal structure and layout of the premises.
- It is made clear to the customer that they may not revoke the self-exclusion during the agreed period and that if found either in the gambling area or attempting to gamble they will be asked to leave. Members of staff are trained to be alert to self-excluded individuals attempting to breach agreements and instances of them getting another person to gamble on their behalf. It is a requirement that staff regularly pay heed to self-exclusion agreement records that are currently active (particularly photographs) in order to stay alert to the identity of those excluded in the locality of the premises.
- Self-excluders have the opportunity of also excluding from other premises owned by City Gaming Limited without necessarily having to enter areas licenced for gambling. Where the self-exclusion agreement is extended to other Company's premises we will consider any specific requests made by a customer in setting the bounds of the exclusion area.
- City Gaming Limited will offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling we offer, the ability to exclude from facilities for the same kind of gambling offered in our locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes. In addition, City Gaming Limited is participating in the possible development of a multi-operator self-exclusion scheme that will apply to all styles of gambling.

City Gaming Limited

- A self-exclusion log is maintained on the premises for recording detail of those currently excluded in addition to records stored digitally.
- Those self-excluded will be removed from any marketing databases held by this Company within two days of receiving the completed self-exclusion form, but we will take all reasonable steps to prevent details being knowingly sent as soon as practicable.
- At the end of the self-exclusion period, the exclusion will remain in place for a further six months, unless the customer takes positive action in order to gamble again.
- At the end of the exclusion period, the Duty Manager and customer will, together, review the terms of agreement either by telephone or in person. The review process is recorded on a self-exclusion review form.
- Where a customer chooses not to extend the self-exclusion and makes a positive request to begin gambling again, the customer is offered a 24-hour 'cooling off' period before being allowed access to the gambling facilities.
- Customers are given the opportunity to discuss self-exclusion in private where possible.
- City Gaming Limited retains self-exclusion records for the length of the agreement plus a further 6 months.
- Members of staff are trained both on induction and refresher sessions thereafter in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.

Signed:

Name: (please print)

Date:.....

Venue:

Position:

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

City Gaming Limited

GAMBLING ACT 2005

The Licensing Objectives

- To prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
- To ensure that gambling is conducted in a fair and open way.
- To protect children and other vulnerable persons from being harmed or exploited by gambling.

City Gaming Limited

GAMBLING ACT 2005 *Licence Conditions and Codes of Practice*

PRINCIPAL CONCEPTS

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Licensing Objectives

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
2. Ensuring that gambling is conducted in a fair and open way.
3. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

Policy and Procedures

We put into effect policies and procedures intended to promote socially responsible gambling that includes making an annual financial contribution for education and research into the prevention and treatment of gambling-related harm, the development of harm prevention measures and the treatment of those with gambling related disorders.

- We operate an on-going training program for staff to ensure awareness and compliance of our social responsibility and other statutory requirements. Individual written policies and procedures are in place and adhered to in respect of:
 - (a) Access to Gambling by Children and Young Persons
 - (b) Access to Premises by the Gambling Commission's Enforcement Officers
 - (c) Advertising Standards and Marketing
 - (d) Customer Interaction
 - (e) Employment of Children and Young Persons
 - (f) Fair and Open Practice and Dispute Resolution
 - (g) Information on how to Gamble Responsibly and Help for Problem Gamblers
 - (h) Suspicious Monetary Transactions and Cash Handling
 - (i) Self-Exclusion
- We operate our business with integrity, due care and diligence with necessary systems in place to combat crime and disorder. Written policies and procedures are in place concerning the handling of cash and cash equivalents designed to minimise the risk of crime, such as money laundering and the avoidance of illicit credit.
- Conflicts of interest between City Gaming Limited and our customers are managed transparently and fairly, and, where complaints related to the outcome of gambling are not resolved to the satisfaction of both parties, we will refer the complainant to an approved alternative dispute resolution (ADR) entity.
- Gaming machines comply with the Gambling Commission's technical standards; exhibit the applicable maximum stake and monetary prize levels, and the chances of winning. Gambling general terms and conditions are displayed.
- We do not provide credit in connection with gambling nor participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.
- We seek to prevent systematic or organised money lending between customers on the premises, and staff are trained to be alert to such practice, and to report any instances of substantial money lending to the Duty Manager should they become aware of such instances.
- It is prohibited to consume alcohol on our premises.

City Gaming Limited

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

Customer Complaints

Terms & Conditions

Policy & Procedure

These are City Gaming Limited's Terms and Conditions by which customer complaints are dealt with. Also included is City Gaming Limited's policy and procedure document and complaint form. Copies of the complaint procedure and form are available on site for the benefit of customers making a complaint about the outcome of their gambling where the complaint has not been resolved on-site in the initial stages.

A 'complaint' means a grievance about any aspect of the licensee's conduct of the licensed gambling activities, and should be raised with City Gaming Limited as follows:

- The complaint should initially be raised with an available member of staff at the venue at the time of the incident giving cause for complaint. **Stage 1**
- If the member of staff approached is unable to deal with the complaint or the matter is not resolved to the customer's satisfaction, then it should be directed to the duty manager at the venue at the earliest opportunity. **Stage 2**
- Should the matter still not be resolved, the customer will be provided with a copy of the policy & procedure document, together with a complaint form that should be completed by the customer and submitted to City Gaming Limited for consideration by a director or appointed senior manager. **Stage 3**
- If the matter remains unresolved, the customer should be referred to an alternative dispute resolution (ADR) entity with whom City Gaming Limited has registered. The complaint will not be considered by the ADR entity unless:
 - the matter relates to the outcome of the complainant's gambling transaction; and
 - it is not resolved during the three-stage complaint procedure as outlined above.

It is permissible for an ADR entity to have terms enabling it to reject complaints referred for dispute resolution if the complaint is frivolous or vexatious, but City Gaming Limited will not refuse to refer disputes on those grounds.

City Gaming Limited will ensure that:

1. information about the complaint procedure is set out in these terms and conditions;
2. such information is readily accessible on our gambling premises to be taken away;
3. information includes details of how to make a complaint to City Gaming Limited and the identity and contact details of the person deputed to handle the complaint;
4. the information names the ADR entity to whom disputes can normally be referred and, where necessary, details of any limitation on the nature and subject matter of disputes with which a particular ADR entity deals.
5. customers are given a copy of the complaint policy and procedure document on request or on making a complaint; and

City Gaming Limited

6. all complaints are handled in accordance with the procedure.

Should City Gaming Limited refer a complaint to ADR entity other than one in respect of which contact details were given in accordance with 1 to 6 above it will, at the same time as making the reference, inform the Commission of the reference and reason for selection of the ADR entity concerned.

City Gaming Limited keeps a record of all complaints that are not resolved at the initial three-stage complaint procedure.

City Gaming Limited arranges for a copy of the decision on, or a note of the outcome of, each dispute referred to an ADR entity to be provided to the Commission, either by the ADR entity or by City Gaming Limited. This information is provided in such format and within such timescale as the Commission may from time to time specify.

City Gaming Limited also arranges for any outcome adverse to City Gaming Limited of any proceedings taken against the licensee (in whatever jurisdiction) by a customer in relation to a gambling transaction to be notified to the Commission as a key event; but excluding proceedings allocated to the County Court small claims track or equivalent in jurisdictions outside England and Wales.

Under no circumstances are members of staff put in physical danger nor will they be subjected to abuse. If a customer is threatening, then that person will be offered the complaint policy & procedure document together with a complaint form, and be referred to City Gaming Limited's strict policy of 'No Abuse'. If the customer continues to be threatening the circumstances will be treated in accordance with a disturbance on the premises, and the person will be asked to leave, and the police contacted to assist if necessary.

Which complaints are covered?

A complaint, in the context of the LCCP, means a complaint solely about the conduct of City Gaming Limited's activities. A dispute means a complaint which has not been resolved by the operator's complaints procedure to the satisfaction of both parties, and relates to the outcome of a gambling transaction.

Responsibility of the Employer.

City Gaming Limited has a written procedure in place to:

- advise employees of the name of the appointed person who is to be contacted about complaints;
- ensure that all complaints are handled in accordance with the procedure throughout the investigative process;
- have arrangements in place for reference by a customer of a dispute to an alternative dispute resolution service for disputes (an 'ADR entity'); and
- maintain a record of all complaints, and those that evolve into disputes. All instances where the complaint is referred to an ADR entity will also be recorded together with the outcome.

Responsibility of the Employee

Members of staff not authorised to deal with complaints, or where the customer is not satisfied with the initial outcome, will ensure that:

- the complainant is informed of the name of the appointed Company representative who will deal with the complaint, together with the appropriate contact details of that person;
- the complainant is issued with City Gaming Limited's complaint policy & procedure document and complaint form;

City Gaming Limited

- the circumstances are recorded as contemporaneous notes as soon as possible following the incident and the notes are signed, dated and timed by the member of staff dealing. The notes are to be comprehensive and a true record of events, and
- members of staff, unless properly authorised by City Gaming Limited, are not allowed to voice their own opinion as to the merits or otherwise of a complaint. Procedure is strictly adhered to.

City Gaming Limited

Complaint Procedure

City Gaming Limited endeavours to provide a high quality service to its customers and members of staff are trained how to deal with complaints at the initial stage. However, if you believe that things have gone wrong and your complaint was not resolved to your satisfaction at our premises, then please inform us as we take such reports seriously.

City Gaming Limited will review your complaint and will be dealt with by:

(name).....

who is (job title)

at (address).....

.....

Email Address:

How to make a complaint

- Complaints, which we will deal with confidentially, should be submitted in writing, by letter or e-mail.
- The attached form should be used to record and submit complaints.
- Give as much detail as possible including details of independent witnesses and any other relevant information in order to assist City Gaming Limited in the investigative process.

What happens next?

City Gaming Limited will investigate and provide a full explanation of what we have done within **15 working days** of receiving a complaint. If this is not possible we will explain why and give a date by which a full response can be expected.

If you are not satisfied with our response

If you are still not satisfied with our response to the complaint, you may consider writing to an alternative dispute resolution (ADR) entity requesting that the matter be reviewed, enclosing all previous correspondence relating to the complaint including the original complaint form. The ADR entity will acknowledge receipt of your correspondence without undue delay and, after review, inform you of its findings and recommendations, usually within **60 days**. The review process is thorough and based upon the information that both parties and other independent sources provide.

This Company is registered with the following ADR entity:

Name of ADR Entity: Centre for Effective Dispute Resolution (CEDR)

Email Address: XXXXXXXX

Website: <https://www.cedr.com/>

Postal Address: 70 Fleet Street, London, EC4Y 1EU, United Kingdom

It is highly recommended that you visit the ADR entity's website (as above) so that you are fully aware of the procedural rules and other related information.

City Gaming Limited

Complaint Form

CUSTOMER

Name:

.....

Address:

.....

.....

Postcode

Daytime Telephone No .:

.....

E-mail address:

.....

Signature:

Date:

Is this an initial complaint or a follow up to a previous incident?

.....

.....

VENUE WHERE COMPLAINT OCCURRED

Reference (if known):.....

Name of Premises:

.....

Address:

.....

.....

Name(s) of staff member(s) that you initially raised your complaint with:

.....

City Gaming Limited

Complaint Acknowledged (Y/N):

(date)

Details of action to resolve taken by Company:

.....
.....
.....

If complaint still unresolved by Company

Complainant referred to ADR Entity (Y/N);

(date).....

Name of ADR Entity:

.....

Company Complaint Policy & Procedure Document given to Complainant(Y/N):

(date).....

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SELF-EXCLUSION REQUEST FORM FOR RECORDING DETAIL IF NO IMMEDIATE ACCESS TO WEB-BASED CEDR SCHEME

Site Name:

Site Address:

Customer Name:

Customer Date of Birth:

Customer Address:

Customer Postcode:

Customer Email Address:

Customer Mobile Number:

PHOTOGRAPH

I request that I be refused entry to
for ***an initial period of 6 months (minimum) or *a period of *..... months (no more than 12 months)** from the date of signing, and acknowledge that I am not allowed to rescind my self-exclusion during this period. The arrangement will be reviewed by both parties thereafter. **Delete as applicable*

If I attend the premises set out in this agreement during the term of this exclusion and am identified by staff, I will be requested to leave the premises forthwith.

I acknowledge my responsibility in ensuring adherence to this agreement and hereby sign to the effect that I have read, understood and agree to City Gaming Limited's Terms & Conditions.

I acknowledge City Gaming Limited, its employees and agents have no liability or claims arising from my voluntary use of the gambling facilities provided.

I have provided a photograph of myself to assist in the application of this request.

Signed: (Customer)

Witnessed: (Appointed Manager)

Date:.....

SELF-EXCLUSION	LOG	REFERENCE	No.
.....			

Note for Customer: If you would like further advice or assistance, you may like to consider contacting the confidential National Gambling Helpline, operated by GamCare on **0808 8020 133**.

This form must be retained on site for the duration of the self-exclusion period and a copy given to the customer. Members of staff interfacing with customers should reacquaint themselves with the details of this self-exclusion, especially the photograph, on a regular and frequent basis.

City Gaming Limited

APPENDIX A

Customer Notice

Gaming General Terms & Conditions

These Terms and Conditions (the “Generic Terms”) apply to all gaming transactions entered into on these premises (the “Premises”) *except for Promotions which are covered by separate terms and conditions available on the premises.*

Any gaming transactions entered into on the premises shall be between the customer taking part in the particular transaction (the “Customer”) (1) and City Gaming Limited (the “Company”) (2)

In these General Terms, the terms/conditions/rules displayed on the particular gaming machine are referred to as the “Specific Terms”.

Customers are strongly advised to read the Specific Terms. By entering into any gaming transaction by use of the particular gaming machine, the Customer shall be deemed to have read and accepted the Specific Terms applying.

Minimum and maximum stakes and maximum prizes/wins are those displayed on the gaming machine in the Specific Terms.

Members of staff have no authority to vary or amend the General Terms or the Specific Terms and any assistance or advice offered by them in relation to any gaming transaction shall be without prejudice to that position.

In the event of a disputed outcome to any game, City Gaming Limited complaint procedure will apply, a copy of which is available from a member of staff or from City Gaming Limited at the address below:

.....
.....
.....
.....

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APPENDIX B – GUIDE TO THE BACTA SELF-EXCLUSION SERVICES SCHEME

INTRODUCTION

In 2015, the Gambling Commission revised the Licence Conditions and Codes of Practice. As part of that revision, the way in which the gambling industry is expected to handle those customers who wished to self-exclude was changed.

Whereas previously operators simply self-excluded a customer in ways dependent upon the gambling premises, the change requires operators to offer self-excluders the opportunity to self-exclude from other premises offering similar gambling facilities in the locality. Self-exclusion lasts between six and twelve months but can be extended by the self-excluder.

The relevant section of the LCCP can be found at: <http://www.gamblingcommission.gov.uk/pdf/Latest-LCCP-and-Extracts/Licence-conditions-and-codes-of-practice.pdf>

What this means in practice is that an AGC has to allow someone to also self-exclude from other AGCs nearby without the excluder having to visit them.

Bacta has worked with a software company to build a web-based application that will allow this process to be automated. The scheme is administered via a separate company called Bacta Self-Exclusion Services Ltd (BSESL).

This software allows operators to input details of a self-excluder and then tell other operators nearby that a particular person has self-excluded and that they will need to stop them entering the premises should they try. Attempted breaches of a self-exclusion can also be recorded on the system. The system uses a radius from the post code of the AGC to determine which other AGCs are notified.

The scheme is for use by those operators who possess an Adult Gaming Centre premises licence. A separate scheme is available for those using a bingo licence. Details of that scheme are available from the Bingo Association.

Motorway Service Areas (MSAs) that operate AGCs use this scheme but self-excluders will be able to select individual service areas or multiple service areas on particular motorways or A roads, rather than using a radius from a postcode.

A self-excluder wishing to exclude themselves from High Street AGCs and from AGCs on Motorway Service Areas, need to do so separately.

A separate guide to the software package has been produced and is available from BACTA.

It is important to emphasise that self-exclusion is a last resort for an individual who wishes to stop gambling. It is one of the tools available to them to help. Operators have a duty of care towards those who wish to self-exclude and should seek to point those individuals to other self-exclusion schemes operated by other gambling sectors, as well as to care agencies and helplines such as GamCare or GambleAware.

BRIEF DESCRIPTION OF THE SCHEME

- a. In order to offer the scheme to customers, operators need to register with BSESL by signing a contract that sets out the nature of the service BSESL is providing and the obligations BSESL and operators must fulfil.

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- b. ~~A login and password to the system is provided and operators need to upload details of their company and their sites onto the system.~~
- c. ~~Operators need to give relevant members of staff their own login and password.~~
- d. ~~Operators are able to customize the software to suit their businesses.~~
- e. ~~Once the registration process is complete the operator is able to upload details of any self-excluder using a screen for that purpose.~~
- f. ~~The screen requires key information to be provided.~~
- g. ~~It is necessary to upload a copy of a photograph of the self-excluder.~~
- h. ~~It is also necessary to obtain consent from the self-excluder to their details being used for the purposes of ensuring they are self-excluded from the premises from which they choose to be excluded.⁴~~
- i. ~~Once the details of the self-excluder have been uploaded, namely their photograph and details of from where they wish to be excluded (either using a radius from a post code in the case of AGCs or individually in the case of MSAs), the system alerts the operators of those other premises that someone has excluded themselves from the source premises.~~
- j. ~~Those operators then have to access the system and implement whatever procedures they have in place to ensure that person cannot enter the premises. For example, at an MSA vehicle number plate recognition can in some circumstances alert staff that a person who has self-excluded is coming on site. AGCs may simply use staff recognition.~~
- k. ~~For people who do not wish to visit an AGC or MSA operators should provide a contact telephone number to the relevant person within their organization who can then fill in the details of the self-excluder remotely. Acceptance of the Terms and Conditions needs to be given by the self-excluder in writing, either by post or by hand.~~
- l. ~~All records can be printed off and stored securely by the operator.~~
- m. ~~When a self-exclusion period comes to an end, the person who has self-excluded has to visit the AGC from which they originally excluded themselves either to extend their self-exclusion or to notify the operator that they wish to start gambling again. A screen needs to be completed and an alert to other operators is generated so everyone is aware that the self-exclusion agreement has come to an end. There is a 24-hour cooling-off period before this can become active.~~
- n. ~~A self-excluder that does not notify the operator that they either wish to gamble again or that they wish to extend their self-exclusion period will automatically be deleted from the system after six months from the end of the self-exclusion period they originally selected. Again, an alert is generated at that time by the system to all relevant operators advising that the particular self-excluder is no longer on the database and staff no longer need to be aware of their potential to enter the premises.~~

¹ The information about a self-excluder is likely to be regarded as “sensitive personal data” under the Data Protection Act. As a result the Act requires additional safeguards in the processing and securing of that data, which would extend to a person’s photograph. Policies and procedures within City Gaming Limited to do this should be written down and understood by members of staff. Further advice is given under the FAQ Section of this Guide but please note that it is ultimately your responsibility to ensure that you are complying with the Data Protection Act.

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THE ROLE OF STAFF

The role of members of staff interfacing with customers is crucial in the successful implementation of the self-exclusion scheme. It is expected therefore that staff will be well versed in the necessary conversations that need to be had with those wishing to exclude and the way to have them.

It is nevertheless important to remember that in all cases a safety-first policy must be adopted; staff members should never put themselves, customers or colleagues at risk.

This might be when a particular customer has become agitated or potentially violent. Staff members should not put themselves in a position where they are alone with an individual whether on site or off site. If necessary, they should ensure another member of staff is present to witness that no inappropriate behaviour occurs.

Staff must be told that it is imperative that they behave at all times in a way that does not jeopardize the confidentiality of the information about an individual that they have been given either as the member of staff handling the self-exclusion or as a member of staff policing the system.

Here are some do's and don'ts around sensitive personal information of this kind:

- Limit staff access to the data to those who need to enforce the self-exclusion scheme.
- Do not allow anyone to remove self-exclusion data from the premises or to refer to any individuals opting into the scheme outside of an immediate and necessary work context.
- If staff members attach a photograph of a self-excluder to the wall in the office, make sure it cannot be seen by any members of the public (e.g. if the door is opened).
- Treat as gross misconduct the sharing of any personal data with any third party.
- Obtain independent verification that your business is operating in compliance with data protection and privacy laws.
- Members of staff should never use their own mobile devices to take photographs of self-excluders.

TERMS AND CONDITIONS

The terms and conditions, to which every self-excluder needs to understand and agree to, is provided to operators separately. These T&Cs are designed to minimise liability in the event that someone who has self-excluded successfully enters your premises undetected and gambles, and claims damages from you for not properly exercising your duty of care to keep them from the premises and any damages they may be seeking as a result.

This does not mean that operators can ignore the need for robust and proper policies and procedures to enforce a self-exclusion. That is a key requirement of the LCCP and is contained in the terms and conditions BSESL has with operators. If policies and procedures are not sufficiently robust, an excluder could be successful in an action irrespective of the fact they have signed a copy of the standard terms and conditions.

Some scheme members may wish to amend the self-excluder terms and conditions. They do so at their own risk. Whatever BSESL's contract with you requires, should you amend the standard terms then you must include what we regard as certain minimum or mandatory conditions. BSESL cannot warrant that the

City Gaming Limited

~~self-excluder terms and conditions will meet the Gambling Commission's requirements nor that they will protect you from all claims. You need to obtain your own legal advice before using the self-excluder terms and conditions.~~

~~Operators are recommended to keep and store signed copies of the terms and conditions.~~

~~FREQUENTLY ASKED QUESTIONS~~

~~Do High Street bingo operators have to join the BSESL scheme?~~

~~Operators that have a bingo licence have to use the Bingo Association self-exclusion scheme. That scheme does not exclude someone from AGCs. To do that they will need to initiate a separate self-exclusion using the BSESL self-exclusion scheme for AGCs~~

~~Why are the details of people deemed sensitive information?~~

~~The processing of personal data is both defined and regulated by the Data Protection Act. You will need a registration in any case with the Information Commissioner (www.ico.org.uk) if you process any personal data. Most companies will be registered already.~~

~~In addition there is another category of personal data which is called sensitive personal data and is defined as any data fulfilling certain requirements, such as data relating to medical conditions. Given that self-exclusion potentially relates to problem gambling it should be treated as sensitive data. This means operators must ensure that they have robust policies and procedures in place to ensure that data relating to self-excluders is not used for any other purpose than ensuring the self-exclusion is effective. Also, the data must not be disclosed to those that are not involved in making the self-exclusion effective. All members of staff must understand this.~~

~~Operators must make sure that they remove access to the system by any member of staff that leaves their employ.~~

~~How do Holiday Parks deal with self-exclusions?~~

~~If a self-excluder is going on holiday to a holiday park and wishes to self-exclude from the AGC(s) on the Holiday Park whilst there, they should contact the Park direct to ensure that for the duration of their holiday they are prevented from entering the AGC. Each Holiday Park will have to devise appropriate arrangements to give effect to the self-exclusion in light of their unique circumstances.~~

~~I am having trouble registering a self-exclusion. Is there anyone I can call?~~

~~In the first instance please call 0207 730 6444.~~

~~What should I do if I notice someone attempting to breach their self-exclusion?~~

~~Firstly, the person attempting to breach should be approached to remind them that they have self-excluded from the premises and you are bound to ask them to leave the premises. Again, safety must come first and if a situation escalates then company procedures should be followed.~~

~~All attempted breaches should be recorded on the BSESL system. A form is available on the system for this purpose. You will also need to record this on your self-exclusion incident log.~~

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~~What if someone won't agree to sign the terms and conditions or have their photograph taken?~~

~~Simply put, the system cannot be used and they cannot be self-excluded from premises in the locality. You can continue to self-exclude them from your premises in the usual way if that can be arranged under your existing system.~~

~~What if someone comes to an MSA in a friend's car~~

~~Whilst number plate recognition can be used by MSA's to identify a self-excluder's car if that information has been provided, it clearly will not identify a friend's car. The use of number plate recognition technology is not part of the BSESL scheme but provides a potential tool MSA operators can use to help them, alongside other procedures, to prevent a self-excluder from entering the AGC located at the MSA.~~

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APPENDIX C – SYSTEM CHECKLIST

Premises Signage

	Yes (tick)	No (tick)	N/A (tick)	Notes
No Under 18s				
No Alcohol				
No Smoking				
BACTA Membership				

Machine Signage				
Under 18s				
GamCare				
Category Labels				
Legacy Labels				

Posters (P) & Leaflets (L)

Stay in Control (P)				
Stay in Control (L)				
Proof of Age Scheme				
Think 21/25 Material				

Licences

Premises Licence				
Operating Licence				
Personal Licence				
Link Licence				

Forms

Self-Exclusion				
Complaints & Dispute				

Policy & Procedure Documents

Access by C & YP				
Access by G C				
Advertising				
Employment of C & YP				
Customer Interaction				

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Fair & Open				
Signposting Information				
Money Laundering				
Self-Exclusion				

Logs

	Yes (tick)	No (tick)	N/A (tick)	Notes
Attempts to Gamble C & YP				
Customer Interaction				
Police Assistance				
Self-Exclusion				
Staff Training				

Entitlement

B3 Numbers				
Stakes & Prizes				

Misc.

Age Verification Tests				
Contribution to RET				
Notifying Key Events				
Regulatory Return				
Knowledge of MLO				
Advertising Practice				
Payment of MGD				
ADR Entity				
Licensing Objectives				
Attractive to Children				
Supervision				
Self-Exclusion Scheme				
Return to Player (%)				
Responsibility for 3 rd Parties				
Register of Machines				

Risk Assessment Documents

Local Risk				
Money Laundering				

City Gaming Limited

Guide to CEDR SE Scheme				
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Registrations

ADR Entity				
Self-Exclusion Scheme				
Age Verification Testing				
Primary Authority				

OPERATOR NOTES: