

Appendix 1 – Application and Accompanying Information

14th April 2021

Haringey Council
Licensing Team
Level 1 North
River Park House
225 High Road
London
N22 8HQ

Our Ref: EJS/TCR/GA05 – New AGC

By e-mail only:-
licensing@haringey.gov.uk
cc: Daliah.Barrett@haringey.gov.uk

Dear Sirs

**Re: Gambling Act 2005 (“the Act”)
Application for an Adult Gaming Centre Premises Licence (‘AGC’) for
Admiral, 513 Green Lanes, Haringey, London, N4 1AN
Applicant – Luxury Leisure**

I write further to our email exchanges.

As you know Talarius Limited, sister company of Luxury Leisure, has long operated the AGCs at Admiral, 9 High Road, Wood Green, London, N22 6BH, Admiral, 117 High Road, Wood Green, London, N22 6BB and Admiral, 475 and 475A (Gold Room) High Road, Tottenham, London, N17 6QA.

We now wish to apply for a premises licence to operate an AGC at 513 Green Lanes, Haringey, London, N4 1AN (the “Premises”) and enclose an application. As you know, the site was previously operated by Betfred as licensed betting premises. AGCs are different to betting premises – they are low stake venues and, as you appreciate, have never operated Fixed Odds Betting Terminals about which particular concern is expressed in the Authority’s Statement of Principles (“SoP”).

While the planning regime is separate to that of licensing, I confirm that we have been granted planning permission for the change of use of the Premises to AGC.

You have confirmed that you are happy to receive this application by email.

Talarius Limited and Luxury Leisure are the largest operator of AGCs and FECs in the UK. We are long established and now part of the global Novomatic Group of companies. We have an historic record of effective and responsible management throughout Great Britain, including across London. We are founder members of the industry trade association BACTA, where I am past Chairman of the AGC division the current Chairman of its Social Responsibility committee.

We have a particular focus on the importance of protecting the vulnerable and have a good relationship with GambleAware, to whom we make substantial annual contributions towards research, education and the treatment of gambling harm.

We place a high premium on excellent staff training which is refreshed regularly and the grant to Luxury Leisure of its operating licence evidences the Gambling Commission's satisfaction with its integrity, competence, finances and operating model. All required personal management licences (including but not limited to those for every director, regional manager and area manager, as well as for our Head of Compliance) are in place and maintained centrally.

We have been audited by the internationally recognised expert body, Global Gambling Guidance Group (G4) and are proud to have been the first land-based UK operator to have gained its accreditation for Responsible Gambling.

As with all of our other 238 AGCs, the operation of the Premises will be fully compliant with applicable legislation including the relevant mandatory and default conditions set out in the Gambling Act 2005 (Mandatory and Default Conditions) Regulations 2007.

Our operations at the Premises will reinforce the licensing objectives and in particular in the following ways: -

1. Prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
 - a) A Local Risk Assessment (enclosed) has been prepared for the site using local knowledge, the Local Profile prepared by the Authority, the details provided in the Statement of Licensing Principles for Gambling and an additional third party mapping tool.
 - b) The Premises will have a fully up to date CCTV system with records kept for an appropriate length of time and signage to indicate the presence of the system. I refer you to the details of the Local Risk Assessment.
 - c) Our operating model is that staff circulate throughout the venue floor and actively supervise and interact with customers.
 - d) All our staff will be provided with local and emergency contact details for emergency services and these will be displayed clearly in the office areas of the Premises.
 - e) We will as appropriate consult with a Crime Reduction Officer within the local police team and are happy to hold regular security reviews with them.
 - f) Our cash handling processes are detailed, safe and secure and all staff are trained in recognising individuals who might be under the influence of drink or drugs.

- g) We provide a safe system for payment of winnings. The majority of the machines in the Premises will be “ticket in ticket out” (TITO), which is a system that gives tickets on winning, which can be redeemed for cash at the customer’s convenience and time of choosing.
- h) The Premises will have adequate lighting inside and out and fit out will allow clear lines of sight.
- i) Staff will be provided with portable alarm activators.

2. Ensure that gambling is conducted in a fair and open way

As you are aware, adherence to this licensing objective is primarily a matter for the Gambling Commission and the operator. The Gambling Commission granted Luxury Leisure an operating licence for the relevant activities as soon as the regime was implemented in 2007. Nonetheless, I confirm that as above, the layout and lighting will ensure clean lines of sight and trained staff will actively circulate and supervise the venue.

Furthermore, wherever we trade in the country, we operate in an open and transparent way, with hands on management by trained and experienced staff; with high levels of senior management in the form of Area and Regional managers overseen by Operation Directors and our Compliance teams.

3. Protect children and other vulnerable persons from being harmed or exploited by gambling

- a) I refer to the LRA prepared with the data detailed above.
- b) As with all of our national AGC operations we will operate a **Think 25** policy at the Premises. Training on this policy will be given to all members of staff and refreshed regularly.
- c) Plainly, alcohol is forbidden on the premises and we will not allow those under the influence of alcohol or drugs in the venue.
- d) We take issues of vulnerability to problem gambling very seriously and I note the reference in the SoP to the Gamcare annual statistics for 2016/17 (page 11). As you will appreciate, the Gamcare Helpline Annual statistics for 2019/20 record that during that year, the numbers of callers to the helpline who played gaming machines in arcades was 3% - far lower than the percentage for betting shops and vastly less than for online. That is not to suggest any complacency or acceptance of problem gambling on our part and customer interaction remains core to our operations. Our staff will be trained in relation to customer interaction and records of customer interactions will be maintained. Our staff are trained in recognising customers who may be experiencing difficulties or stress and are able to signpost individuals to external support services as part of such an interaction. I deal further with training generally as a separate item below.

- e) As we do at all of our AGC sites in accordance with our operating licence conditions, we will offer self-exclusion to customers who experience difficulties with gambling. We are members of a multi-operator self-exclusion scheme for AGCs administered by BACTA. At the end of any self-exclusion period, the self-exclusion will remain in place for a further 6 months unless the customer takes positive action in order to gamble again. Furthermore, our policies go beyond the requirements of our licence conditions in that following the expiry of the further 6-month period, the customer will be given one day to cool off before being allowed to access gambling facilities, regardless of when they choose to gamble again (ie not just within the 6-month period following the end of the self-exclusion period as set out in the LCCP). In any event, when the customer makes a request to return to gambling, a meeting will first be held with a trained member of staff before re-admittance is agreed and again, this will apply regardless of when the customer seeks to return to gamble.
- f) We retain the services of a recognized third party independent test purchasing organisation, Serve Legal, to conduct unannounced test purchases at all of our age restricted sites and this will apply to the Premises. The results are reported to the relevant local authority and to the Gambling Commission. We have a higher “pass rate” than the industry average (and indeed higher than for other age restricted products) and any issues are investigated promptly and dealt with.
- g) Appropriate amounts of problem gambling leaflets and posters will be available on the Premises, both within the gaming areas and for collection in more discreet locations, such as the toilet areas.
- h) Any promotional material will not encourage the use of the premises by children or young people. This will be an AGC and we have no interest in attracting anyone other than adults to our AGC sites.
- i) We are proud to subscribe to the Gamblewise tool which uses beacon technology to allow the customers to set alerts and reminders if they want to limit their time spent or visits to us. This is made available by us to our customers free of charge.
- j) While no children will be permitted access to the Premises and it is not our experience that children are attracted to AGCs, we will provide training to venue staff that specifically deals with Child Sexual Exploitation.

In terms of training generally, our staff are provided with detailed training on induction and this is refreshed at regular intervals. Training covers a wide range of areas including legislation, the and LCCP and in particular matters of social responsibility (such as categories and numbers of gaming machines; stakes and prizes; age verification procedures; identification of and interaction with vulnerable persons; and signposting). It is provided both face to face and through our bespoke online training academy.

In compliance with applicable Gambling Commission machine technical standards, the details of return to player percentages are provided for each game.

Finally, amongst the notices on the Premises and in compliance with legislation, there will be notices displayed in a prominent place at the entrances to the Premises stating that no persons under the age of 18 will be permitted to enter and that the consumption of alcohol will not be permitted on the Premises at any time.

COVID 19 Secure

In addition to the above details, we are of course in unusual times and are currently not permitted to open AGCs. Nonetheless, we have since the outset of the pandemic had in place a detailed Covid19 risk assessment for each of our individual venues for use when they have been, and will be, permitted to open and those are in accordance with current government guidelines and BACTA Guidance; all staff have undergone bespoke training and each of our venues have been rearranged to enhance social distancing. Hand sanitisers are in place at the entrance and in the venues; customers have their temperature checked on entry and are refused entry if it is above the acceptable level; staff wear face masks and face masks are offered to customers; machines and touch points are cleaned at frequent intervals; portable Perspex screens are placed between machines where appropriate and machines can be put out of use depending on customers' movements; customers' details are obtained before entry; and full signage is displayed. Measures will obviously be updated as regulations and guidance change.

I trust that the above will provide you with the information you require to process the application, but if anything further is required, please let me know.

On the basis of the above, I accordingly enclose:-

- an application form;
- Social Responsibility Policies and Procedure documents;
- a drawing referenced HAR_001. You will see that the drawing is coloured to show the boundary of the premises marked red and the gaming machine area marked green. We draw your attention to the notes on the drawing; and
- a Local Risk Assessment for the site. As you will note, it has been prepared as if we were trading at the Premises.

You have agreed that we can make payment remotely. Would you please contact us on receipt of this application so we can make payment by telephone? Tracey Rose can be contacted on 07778 4999 33.

I confirm that within 7 days of the date on which the application is made the Responsible Authorities (details of which have been kindly confirmed by your licensing officers) will be served with notice of the application in statutory form. The requisite press notice will be published in the Enfield & Haringey Independent within 10 working days, starting on the day after the date the application is made. The requisite site notice will, from the date on which the application is made, be displayed for 28 consecutive days, again in accordance with regulations.

We will contact you in early course to discuss the application in more detail and to answer any outstanding questions. Once the consultation period has run its course we will need to liaise with you with regard to the date of issue of the licence to allow for the relevant internal fit out works.

In the meantime, please acknowledge receipt of the application and confirm that it is in order.

Yours faithfully

Elizabeth Speed
Group General Counsel
Novomatic UK
for Luxury Leisure
Mobile+44 (0) 7808 571 588
espeed@novomatic.co.uk

Enclosures

**Application for a premises licence
under the Gambling Act 2005 (standard form)**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

Part 1 – Type of premises licence applied for

Regional Casino <input type="checkbox"/>	Large Casino <input type="checkbox"/>	Small Casino <input type="checkbox"/>
Bingo <input type="checkbox"/>	Adult Gaming Centre <input checked="" type="checkbox"/>	Family Entertainment Centre <input type="checkbox"/>
Betting (Track) <input type="checkbox"/>	Betting (Other) <input type="checkbox"/>	

Do you hold a provisional statement in respect of the premises? Yes No

If the answer is “yes”, please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual applicant

1. Title: Mr Mrs Miss Ms Dr Other (please specify)

2. Surname: _____ Other name(s): _____

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

3. Applicant's address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant's operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation:

LUXURY LEISURE

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence.]

7. The applicant's registered or principal address:

**FIFTH AVENUE PLAZA
QUEENSWAY
TEAM VALLEY TRADING ESTATE
GATESHEAD
TYNE AND WEAR**

Postcode: **NE11 0BL**

8(a) The number of the applicant's operating licence (as given in the operating licence):

000-001876-N-103087-022

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

9. Tick the box if the application is being made by more than one organisation.

[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known):

ADMIRAL

11. Address of the premises (or, if none, give a description of the premises and their location):

**513 GREEN LANES
HARINGEY
LONDON**

Postcode: **N4 1AN**

12. Telephone number at premises (if known): **N/A**

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

THE PREMISES ARE LOCATED ON THE GROUND FLOOR OF A 3 STOREY TERRACED BUILDING IN A STREET OF MIXED USES WITH SOME RESIDENTIAL ABOVE.

14(a) Are the premises situated in more than one licensing authority area?

NO *[delete as appropriate]*

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, **other than the licensing authority to which this application is made:**

Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? **NO** *[delete as appropriate]*
[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]

15(b). If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon	<i>hh:mm</i>	<i>hh:mm</i>	
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:

Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): **PLEASE SEE COVERING LETTER**

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? **NO** *[delete as appropriate]*

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a). Do you hold any other premises licences that have been issued by this licensing authority?

NO, BUT PLEASE SEE BELOW

19(b). If the answer to question 19(a) is yes, please provide full details:

THE APPLICANT'S SISTER COMPANY, TALARIUS LIMITED, HOLDS PREMISES LICENCES UNDER THE GAMBLING ACT 2005 ISSUED BY THE LICENSING AUTHORITY:

AGC PREMISES LICENCE REFERENCED LN/000008952
ADMIRAL, 9 HIGH ROAD, WOOD GREEN, LONDON, N22 6BH

AGC PREMISES LICENCE REFERENCED LN/000005697
ADMIRAL, 117 HIGH ROAD, WOOD GREEN, LONDON, N22 6BB

AGC PREMISES LICENCE REFERENCED LN/000005700
ADMIRAL, 475 HIGH ROAD, TOTTENHAM, LONDON, N17 6QA

AGC PREMISES LICENCE REFERENCED LN/000005699
ADMIRAL, 475A HIGH ROAD, TOTTENHAM, LONDON, N17 6QA (GOLD ROOM)

20. Please set out any other matters which you consider to be relevant to your application:

WE ARE A LONG-ESTABLISHED NATIONAL OPERATOR WITH VERY HIGH STANDARDS OF OPERATION AND SOCIAL RESPONSIBILITY.

Part 6 – Declarations and Checklist (Please tick)

I/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. I/ We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

I/ We confirm that the applicant(s) have the right to occupy the premises.

Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- I/ we understand that if the above requirements are not complied with the application may be rejected
- I/ we understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

Part 7 – Signatures

21. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: **ELIZABETH JANE SPEED**

Date: **14TH APRIL 2021** Capacity: **GROUP GENERAL COUNSEL**

22. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: _____

Date: (dd/mm/yyyy) Capacity: _____

[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]

[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]

Part 8 – Contact Details

23(a) Please give the name of a person who can be contacted about the application:

ELIZABETH SPEED – GROUP GENERAL COUNSEL

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

07808 571 588

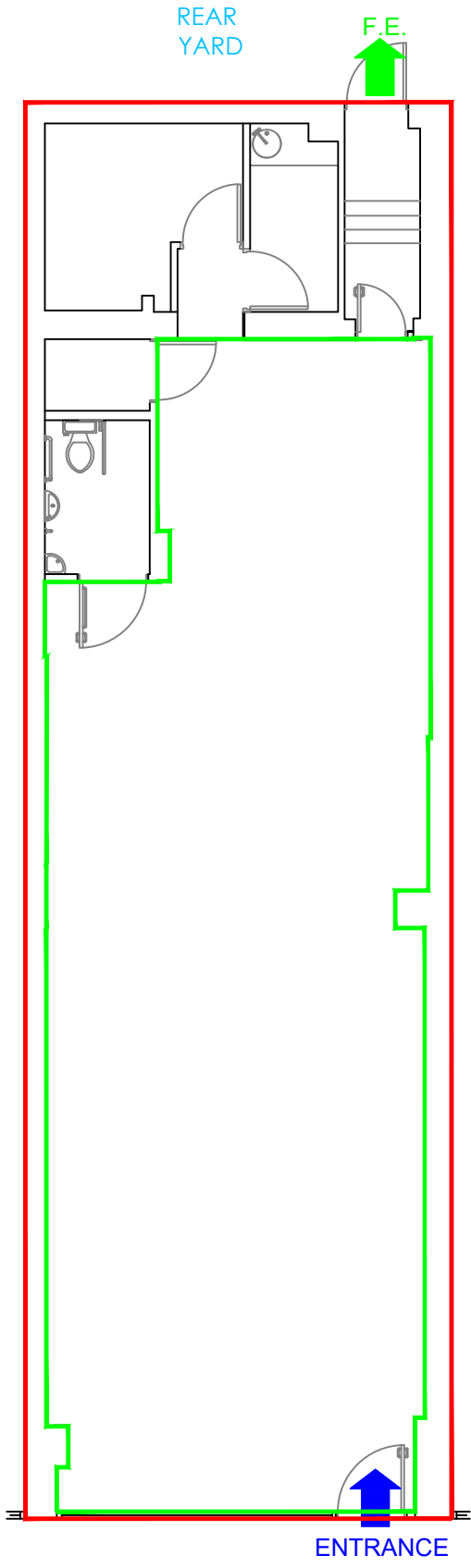
24. Postal address for correspondence associated with this application:

**LUXURY LEISURE
FIFTH AVENUE PLAZA
QUEENSWAY
TEAM VALLEY TRADING ESTATE
GATESHEAD
TYNE AND WEAR**

Postcode: **NE11 0BL**

25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

espeed@novomatic.co.uk



REAR
YARD

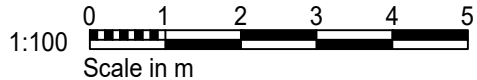
F.E.

- Red line denotes premises boundary
- Green line denotes gaming machine area

Layout of premises within gaming machine areas and layout of ancillary non-gambling areas are indicative only and subject to change according to operational requirements

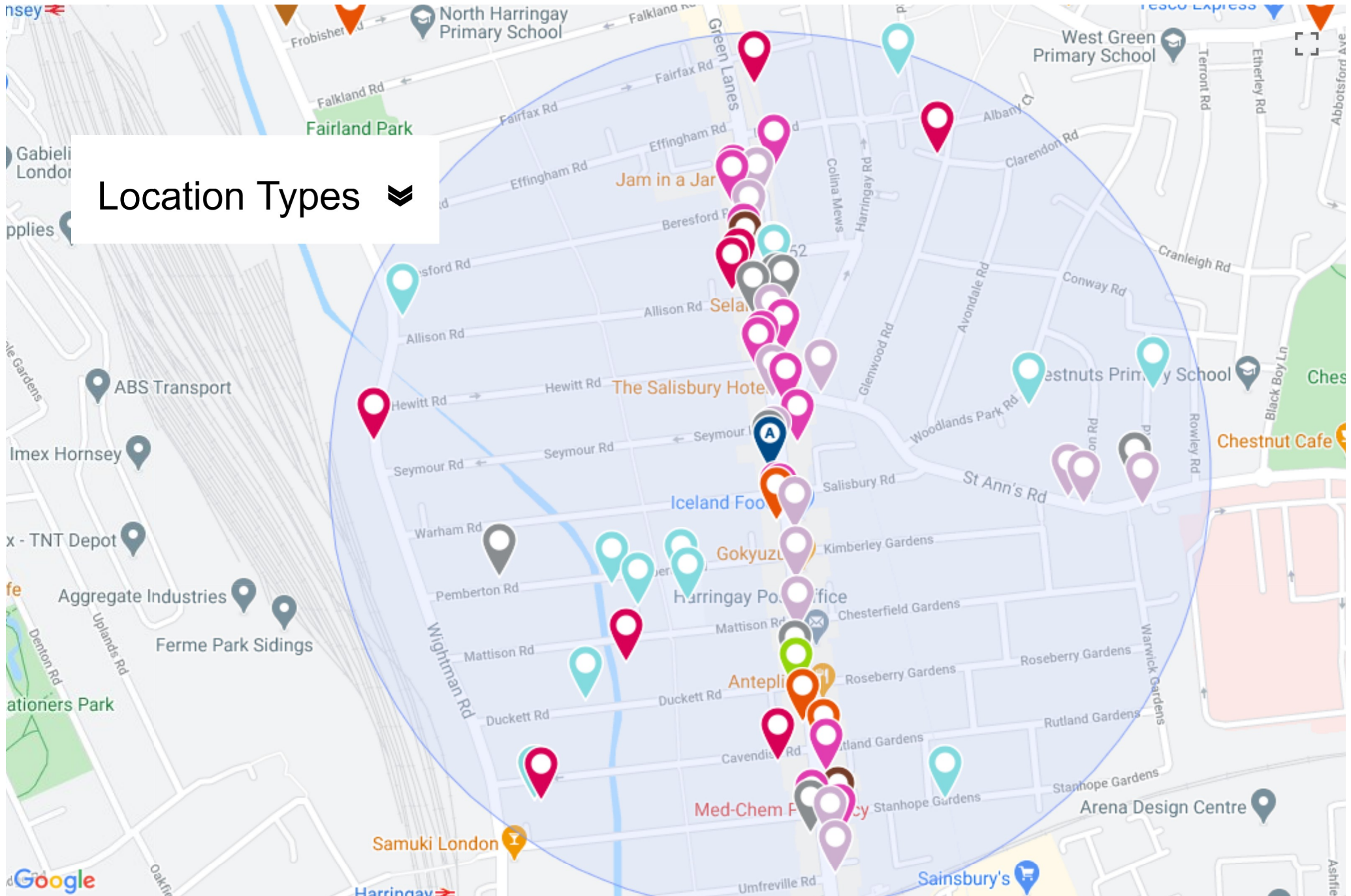
ENTRANCE

GREEN LANES



RECORD

DWG NO: HAR_001 CLIENT: Admiral PROJECT: 513 Green Lanes HARINGEY London N4 1AN	TITLE: LICENSING PLAN GAMBLING ACT 2005 Revision: -- CHECKED: SCALE: 1:100@A4 DATE: 3/9/20	 <small>Luxury Leisure, Talarus & Rat. Ltd. Fifth Avenue Plaza, Queensway Team Valley Trading Estate Gateshead, NE11 0BL</small> <small>+44 (0)191 497 8200 / WWW.ADMIRALSLOTS.CO.UK / WWW.NOVOMATICUK.COM</small>
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Location Types ▾

(https://maps.google.com/maps?ll=51.581746,-0.101303&z=16&t=m&hl=en-GB&gl=US&mapclient=api) https://www.google.com/maps/@51.5817457,-0.1013033,16z/data=!1m1!1e1!1m2!1sPublic+Finance+Map+data+@2021

Selected Location Types

Banks

Name: Barclays Bank

Address: 67 Grand Parade, Green Lanes, London

Name: Turkish Bank (UK) Ltd

Address: 577-579 Green Lanes, London

Betting shops

Name: Ladbrokes

Address: 1 Rutland Gardens, London

Name: Paddy Power

Address: 507 Green Lanes, London

Name: William Hill

Address: Mary Rose Mall, 14 Frobisher Rd, London

Name: William Hill

Address: 435 Green Lanes, London

Name: William Hill

Address: 472, 480 W Green Rd, London

Name: William Hill

Address: 297-301 W Green Rd, London

Casino/AGC

Doctors Surgery

Name: House of Smiles

Address: 517 Green Lanes, London

Name: The Old Surgery

Address: 572 Green Lanes, London

Name: The Jennifer Home

Address: 17 Pemberton Road, London

Name: MEDI-PARK CLINIC

Address: 573 Green Lanes, London

Name: Just Health HGV PCV D4 MEDICALS HARRINGAY

Address: 573 Green Lanes, London

Name: Patel Dr V N D

Address: 572 Green Lanes, London

Name: Dr. Teoman Sirri

Address: Not located at this address, 336 Saint Ann's Road, Haringay, London

Name: Sos Footcare

Address: 401 Green Lanes, London

Drug and Alcohol Treatment facilities

Hostels

Nurseries

Name: Little Jewels Pre-school

Address: St Pauls Church Centre, Cavendish Rd, London

Name: Woodlands Park Nursery School & Children Centre

Address: 74-76 Woodlands Park Rd, London

Name: Brown Bears Nursery - Green Lanes

Address: 582 Green Lanes, London

Name: Busy Bunnies

Address: Wightman Rd, London

Pawn Shops

Name: Cash Converters

Address: Unit 4, Tottenham, 480, W Green Rd, London

Name: Safir Jewellers

Address: 447 Green Lanes, London

Payday Loan Shops

Place of worship

Name: Glenwood Road Kingdom Hall of Jehovah's Witnesses

Address: 5a Glenwood Road, London

Name: Mustard Seed Chapel International, NSG Branch

Address: 628 Green Lanes, London

Name: The Parish Church of St. Paul Haringay

Address: Wightman Road, London

Name: Haringay United Church

Address: Green Lanes, Haringay, London

Name: Eagle Nursery Ltd Within Haringey United Church
Address: Junction of Alison Road & Green Lanes, Corner of, Haringay, London

Name: Saint Augustine's of Canterbury Church (Roman Catholic)
Address: 51 Mattison Road, London

Name: Lighthouse Seventh-day Adventist Church
Address: 88B Cavendish Road, London

Name: Holy Spirit Conference - Freedom - MCL Church
Address: Wightman Road, London

Pubs and Bars

Name: The Salisbury Hotel
Address: 1 Grand Parade, Green Lanes, London

Name: Brouhaha
Address: 501 Green Lanes, London

Name: Bun & Bar
Address: 553 Green Lanes, London

Name: Beans & Barley
Address: Etcetera Workshop, Green Lanes, London

Name: Diyarbakir Restaurant
Address: 69 Grand Parade, Green Lanes, London

Name: Jam in a Jar
Address: 599A Green Lanes, London

Name: The Old Ale Emporium
Address: 405 Green Lanes, London

Name: LimitedLDN
Address: 5 Grand Parade, Green Lanes, London

Name: Brou's Cellar London
Address: 499 Green Lanes, London

Name: Bun & Bar Dalston
Address: 11 Stoke Newington Road, London

Name: Green Lanes Cafe & Bar
Address: 7, Salisbury Promenade, Green Lanes, London

Name: Ora Cafe & Bar
Address: 581 Green Lanes, London

Name: The Langham Club
Address: 600 Green Lanes, London

Name: Abraço
Address: 60 Grand Parade, Green Lanes, London

School

Name: Woodlands Park Nursery School & Children Centre
Address: 74-76 Woodlands Park Road, London

Name: South Haringay Infant School & The Ladder Children's Centre
Address: Pemberton Road, London

Name: South Haringey Infant School
Address: Pemberton Road, London

Name: music teacher
Address: 37 Duckett Road, London

Name: Nat Yelverton Music Tuition

Address: 186B Wightman Road, London

Name: South Haringay Junior School

Address: Mattison Road, London

Name: Saint John Vianney Roman Catholic Primary School

Address: Stanley Road, London

Name: South Haringay Infant & Nursery School

Address: 110 Pemberton Road, London

Name: Brown Bears Nursery - Green Lanes

Address: 582 Green Lanes, London

Name: Demirdöğmez Turkish Clarinet School

Address: 582-584 Green Lanes, London

Name: Firat Altay - Piano Music Tuition

Address: 33 Stanhope Gardens, London

Name: Guitar Lessons Haringey

Address: 34B Ritches Road, London

Name: Little Jewels Pre-school
Address: Saint Pauls Church Centre, Cavendish Road, London

Transport nodes

Name: St Ann's Road
Address: United Kingdom

Name: Mattison Road
Address: United Kingdom

Name: St Ann's Road (Stop HH)
Address: United Kingdom

Name: Mattison Road (Stop HN)
Address: United Kingdom

Name: Haringay Road (Stop HL)
Address: United Kingdom

Name: St Ann's Road (Stop HK)
Address: United Kingdom

Name: Mattison Road (Stop HG)

Address: United Kingdom

Name: Beresford Road

Address: United Kingdom

Name: Beresford Road (Stop HJ)

Address: United Kingdom

Name: Beresford Road (Stop HZ)

Address: United Kingdom

Name: Warwick Gardens (Stop HP)

Address: United Kingdom

Name: Warwick Gardens

Address: United Kingdom

Name: Warwick Gardens (Stop HX)

Address: Saint Ann's Road, London

Name: Harringay Green Lanes Station (Stop HM)

Address: United Kingdom

Name: Harringay Green Lanes Station

Address: United Kingdom

**NOTICE OF APPLICATION FOR A PREMISES LICENCE UNDER THE
GAMBLING ACT 2005**

Notice is hereby given that:

Luxury Leisure

of the following address:

*Fifth Avenue Plaza
Queensway
Team Valley Trading Estate
Gateshead
Tyne and Wear
NE11 0BL*

is applying for an *Adult Gaming Centre* premises licence under Section 159 of the Gambling Act 2005.

The application relates to the following premises:

*Admiral
513 Green Lanes
Haringey
London
N4 1AN*

The application has been made to:

*Haringey Council
Licensing Team
Level 1 North
River Park House
225 High Road
London
N22 8HQ*

Information about the application is available from the licensing authority, including the arrangements for viewing the details of the application.

Any of the following persons may make representations in writing to the licensing authority about the application:

- A person who lives sufficiently close to the premises to be likely to be affected by the authorised activities;
- A person who has business interests that might be affected by the authorised activities
- A person who represents someone in any of the above two categories

Any representations must be made by the following date:

11/05/2021

It is an offence under section 342 of the Gambling Act 2005 if a person, without reasonable excuse, gives to a licensing authority for a purpose connected with that Act information which is false or misleading.



NOTICE OF APPLICATION FOR A PREMISES LICENCE UNDER THE GAMBLING ACT 2005

Notice is hereby given that:

Lisuary Leisure
of the following address:

5th Avenue Plaza
Queensway
Team Valley Trading Estate
Walsworth
Tyne and Wear
NE11 6BL

is applying for an Adult Gaming Centre premises licence under Section 159 of the Gambling Act 2005.

The application relates to the following premises:

Admiral
813 Green Lane
Hartley
London
SE4 1AN

The application has been made to:

Hartley Council
Liberty Square
Level 1 North
Silver Park House
228 High Road
London
N22 8WQ

Information about the application is available from the licensing authority, including the arrangements for viewing the details of the application.

Any of the following persons may make representations in writing to the licensing authority about the application:

- A person who lives sufficiently close to the premises to be likely to be affected by the authorised activities;
- A person who has business interests that might be affected by the authorised activities
- A person who represents someone in any of the above two categories

Any representations must be made by the following date:

11/05/2021

It is an offence under section 342 of the Gambling Act 2005 if a person, without reasonable excuse, gives to a licensing authority for a purpose connected with that Act information which is false or misleading.

Local Risk Assessment – Gambling Act 2005 Licensing Objectives

Premises

Premises Name:	Admiral
Premises Address:	513 Green Lanes, Haringey
Premises Post Code:	N4 1AN
Premises Licence Number:	
Category of Premises:	AGC

Company

Operating Company:	Luxury Leisure
Operating Licence Number:	LL – 1876

Assessment Writer

Name of Person Writing this Assessment:	Shaun Hooper
Position within Company or Name of Authorised Agent:	Regional Operations Director
Date of this Assessment	March 2021
Date that Original Assessment was Written	March 2021

Gambling Act 2005 – The Licensing Objectives

The Gambling Act 2005 sets out the three licensing objectives (LO), which are:

- (A) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- (B) Ensuring that gambling is conducted in a fair and open way; and
- (C) Protecting children and other vulnerable people from being harmed or exploited by gambling.

This document seeks to assess the risk to these objectives that our operation may pose and where necessary what measures we have put in place to mitigate that risk.

Independent Accreditation

Luxury Leisure Talarius have attained the prestigious Global Gaming Guidance Group (G4) accreditation. This is only awarded after a rigorous audit of the company's responsible gambling measures. Furthermore, the company have to be reassessed every 2 years in order for it to be maintained.

Local Area and Site Profile

The AGC is located in the town centre on the high street and sits amongst other national high street retailers as well as some local shops. There are high street banks nearby which have ATM facilities. There are a number of other licensed betting offices in the immediate vicinity but spread along the high street and throughout the vicinity, they are not clustered in one part of the town centre. There is another AGC operated by a competitor in the immediate vicinity. There are a number of premises licensed for the sale and consumption of alcohol within the 500 metre radius used in the compilation of this assessment but none in the immediate vicinity of the premises.

Whilst there are no schools for children of secondary school age nearby, there is South Harringay Junior and Infant school nearby and the mapping provided by the local authority in its local area profile shows a number of gambling premises in proximity to the school (8).

There is a bus stop 5 meters from the venue on the same side of the street. Harringay mainline train station is not within the 500 metre radius but is a 15-minute walk from the premises.

There are no addiction support facilities nearby.

The venue has a single entrance/exit at street level to the front, a double doorway leading directly into the gaming area which is rectangular in shape. The meet and greet station is located prominently towards the front of the store giving a clear line of sight and command of the entrance. The Venue will offer machines of category D, C and B3 with stakes ranging from 10p to a maximum £2. The venue does not offer VIP or loyalty schemes.

The Local Area Profile provided by the local authority identifies the borough as being one of the most deprived in the UK, 13th out of 326 and the 4th most deprived in London. The area in which the venue operates has relatively high levels of crime with 1932 crimes recorded in February 2021, the most prevalent being violence against the person 569, vehicle offences 383 and theft (other than robbery and burglary) 353. The venue is not located in the east of the borough, highlighted in its local area profile as its most problematic area with regards to crime. Neither does the local area profile highlight the venue as being in a high betting shop crime area in the maps it provides.

Our regulatory return data in other comparable north London venues does not reflect any specific problems associated with consumer complaints, the need to call police for assistance or attempts by children and young persons to enter the premises.

The venue trades 7 days per week. Mon-Sun 09:00-23.00.

The local authority statement of principles (SOP) in relation to the Gambling Act 2005 has been considered in the completion of this assessment. The statement does not offer specific guidance on the geographic extent to be considered when completing this assessment but does contain a helpful local area profile.

The SOP recognises the significant requirements of the LCCP placed on operators to promote safer gambling and to prevent harm by supporting customers through implementing mandatory measures such as self-exclusion and signposting to sources of help. The local authority explicitly state that it is concerned for the health and well being of its residents and seeks to identify those at risk from gambling related harm. It also sets out its expectations with regards Local Risk Assessments which is detailed and has been considered in the completion of this assessment.

Risk Identification	LO	Level of Risk	Impact	Risk Management	Reviewed
Children entering site unnoticed.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - Layout of premises considered in staff numbers and deployment. A minimum of 2 staff are rostered on duty at any one time. Breaks and shift changes are planned to take account of school closing times to ensure there is always supervision of the gaming area. - Staff deployed to specific zones for which they have responsibility. - Machine layout takes into consideration lines of site to the entrance. - The meet and greet station is positioned to give line of sight to the entrance. - CCTV cameras positioned to cover all parts of the premises but specifically the entrance. - A 'live-monitored' hold-up alarm system has been installed to provide additional security and assist staff manage the premises. - The company operate a 'Think 25' policy in which all staff are trained at induction and they receive regular refresh training. - All staff are trained in social responsibility as part of their induction and are provided with regular refresher training. - Posters and displays of acceptable identification on site for staff. 	March 2021
Children enter site with adult.	C	Low	Severe to business. Moderate to child.		March 2021
Children enter site and play before being noticed.	C	Low	Severe to business. Severe to child.		March 2021
Children enter site and play where age is misjudged.	C	Low	Severe to business. Severe to child.		March 2021
Age verification is not sought.	C	Low	Severe to business. Severe to child.		March 2021
Young person wearing face covering is not challenged for verification of age.	C	Low	Severe to business. Severe to child.		March 2021
Children knowingly allowed to play.	C	Low	Severe to business. Severe to child.		March 2021
Those made vulnerable through abuse of drugs and/or alcohol having access to gambling. Those considered to be vulnerable, having access to gambling. (We adopt a	C	Low	Severe to business. Severe to customer.		March 2021

<p>broad definition of 'vulnerable' to include but not limited to those suffering from mental illness, recently bereaved, suffering from long-term or terminal illness, difficulty communicating, learning disability, substance misuse or addiction, breakdown of close personal relationships etc)</p>				<ul style="list-style-type: none"> - Clear 'Over 18' signage is displayed, visible from outside and also in the entrance to the premises. - Luxury Leisure/Talarius use independent test purchasing operations. All venues are tested at least twice in a rolling 12-month period. - Our staff are trained to look for the signs of CSE using a CSE training module on our Admiral Academy training platform. 	
<p>Child sexual exploitation (CSE) - Sexual abuse where a child or young person is forced or manipulated into inappropriate sexual activities, often in exchange for alcohol, drugs, gifts or attention. Although children and young persons are not permitted into AGC premises, it is possible that a customer could target or be targeted by nearby children or young persons as they enter or leave our venue.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business. Severe to child or young person.</p>	<ul style="list-style-type: none"> - The venue is installed with iBeacon technology able to work with the 'Gamblewise' app which is free for our customers to download and use to assist them manage their time spent gambling. - Stringent disciplinary procedures for failures identified through age verification testing. - Social Responsibility returns data reviewed through submissions from Area Managers to National Compliance Manager. - All social responsibility returns data subject to a quarterly compliance review. - Staff log all attempts to enter by young persons on the appropriate log. - Staff have been trained to ask a customer to lower a face covering if necessary, this has the effect of allowing staff to adjudge the apparent age of all customers and if necessary challenge for verification by the presentation of ID. 	<p>March 2021</p>
<p>Failure to provide information to players on responsible gambling.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business Severe to customer</p>		<p>March 2021</p>

				<ul style="list-style-type: none"> - A responsible Gambling message is displayed at all positions where gaming is possible through posters, leaflets and stickers on machines. - Poster/Leaflet designs to incorporate QR codes for GAMCARE, Playnice.org and Gambleaware contact information. - Responsible Gambling information stickers on all machines. - Compliance Audit function performed by Area Manager and also through regional field auditors and security managers. - Luxury Leisure Talarius have attained the Global Gaming Guidance Group (G4) accreditation for our responsible gambling measures. 	
Failure to provide information in a suitable format.	C	Low	Severe to business. Severe to customer.		March 2021
Failure to recognise signs of problem gambling.	C	Low	Severe to business Severe to customer	<ul style="list-style-type: none"> - Additional aspects to training incorporating guidance on identifying problem gambling, procedure for interaction and sources of help. - Clear policy to detail the procedure for interaction and level of staff that can 'intervene'. 	March 2021
Failure to interact with customer displaying signs of problem gambling.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - New 'Stay in control leaflets' with QR codes to Playnice.org and GAMCARE and Gambleaware. 	March 2021
Screens erected as part of measures to be 'COVID Secure' preventing staff from being able to effectively monitor players in relation to Age Verification, customer interaction and self-exclusion.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - All recorded SR data subject to a quarterly compliance review by senior management. - Staff have been trained to ask a customer to lower a face covering if necessary This has the effect of allowing staff to adjudge the apparent age of all customers and if necessary challenge 	March 2021

Failure to sign-post customer to help and support.	C	Low	Severe to business. Severe to customer.	<p>for verification by the presentation of ID and also to identify if a customer attempting to enter is self-excluded.</p> <ul style="list-style-type: none"> - Screens are available to create a barrier when 2M social distancing is not practicable but are not floor to ceiling and are not deep enough so as to enclose a machine position, they simply divide it from the adjacent machines. Staff can continue to monitor their customers. - The screens are portable, on their own foot, and therefore can be moved by staff so as not to create enclosed machine positions in a venue. 	March 2021
Failure to properly administer self-exclusion.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - Staff training incorporates policy and procedure for self-exclusion. - Since April 2016 Luxury Leisure/Talarius have operated one or both of the AGC national multi-operator self-exclusion schemes (MOSES), offered through BACTA and IHL. - Digital cameras or suitable tablet devices are provided at all sites to take an image of customers wishing to self-exclude so that the exclusion can be effectively enforced. - The location of the site in relation to the customer's home address and any regular routes to work for example will be considered if the customer requests a wider exclusion. - All SR returns data subject to a quarterly compliance review. 	March 2021
Failure to impose exclusion in locality and in same types of establishments.	C	Low	Severe to business. Severe to customer.		March 2021
Customer breaches of self-exclusion.	C	Low	Severe to business. Severe to customer.		March 2021
Customer breaches self-exclusion by using another to gamble on their behalf.	C	Unknown	Moderate to business. Severe to customer.		March 2021

				<ul style="list-style-type: none"> - All staff trained to regularly check the MOSES gallery relating to their venue to ensure information shared from other local operators relating to self-excluded customers is monitored. 	
Money Laundering (Dye stained notes and Criminal spend).	A	Low	Low – Severe	<ul style="list-style-type: none"> - The company have a Money Laundering Reporting Officer (MLRO). - Staff training at induction and refresh training. - Luxury Leisure/Talarius have a corporate AML Risk Assessment and policies and procedures relating to AML. - £1000 limit on automated transactions using TITO. Any greater amounts require the intervention of a staff member. - Technical parameters on note acceptors designed to reject poor quality notes. (Often notes obtained by way of robbery are perished). - Manufacturer activity alerts from machines on independent networks (primarily SG and Inspired). - TITO tickets not transferable between sites. - Change machines set up so that notes cannot be changed 'up'. - Comprehensive CCTV coverage in all sites. - Partnerships with local police where appropriate to identify and discourage criminal spend. 	March 2021
Commission of criminal offences to fund problem gambling	A	Low	Low – Severe	<ul style="list-style-type: none"> - Stringent policy and procedures in place to identify and intervene with customers who may be vulnerable to harm through problem gambling. See above under Information to 	March 2021

				players, Customer Interaction and Self-Exclusion.	
Anti-social behaviour associated with late night operation	A	Low	Low – Severe	<ul style="list-style-type: none"> - Access control measures either through door supervision or physical controls, utilised at night where appropriate. - Policy of non-players refused entry or asked to leave. - Refreshments offered only to players and known customers. 	March 2021
Poor security increasing vulnerability to robbery or theft.	A	Low	Low – Severe	<ul style="list-style-type: none"> - A 'live-monitored' hold-up alarm system is used so that monitoring station staff can communicate with and support shop staff through CCTV and two way audio using mics and speakers mounted in the ceiling. - All staff have personal attack 'hold-up' alarms and there are some strategically placed static alarms also. - The premises are fitted with an intruder alarm which can also be live monitored from the monitoring station, meaning alarm activations are verified, using sight and sound, by the monitoring station thus reducing the number of false alarms to police. - Extensive CCTV coverage with recording of approx. 30 days of footage. - Strict key storage procedure. - Time lock and/or time delay safes utilised. - Drop safe used for banking. - Staff personal floats limited to £200. 	March 2021

<p>Advertising Standards and Marketing</p>	<p>A</p>	<p>Low</p>	<p>Low – Moderate</p>	<ul style="list-style-type: none"> - All advertising and marketing by the Company 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: <ul style="list-style-type: none"> - 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 - Not intended to bring advertising into disrepute. Specifically we ensure that: <ul style="list-style-type: none"> - 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 	<p>March 2021</p>
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				<ul style="list-style-type: none"> - 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 decisions are controlled by the central marketing department and a system is in place for local managers to apply for marketing initiatives that are approved by the Head of Marketing to ensure they are legal, honest and compliant with the Gambling Act/License Conditions & Codes of Practice. 	
Failure to display Terms and Conditions	B	Low	Low – Moderate	<ul style="list-style-type: none"> - Terms and Conditions displayed prominently within the premises. 	March 2021
Failure to deal with customers making complaints about the outcome of gambling	B	Low	Low – Moderate	<ul style="list-style-type: none"> - Machines only acquired from licensed suppliers. - Additional machine compliance checks completed by a technician when installing new machines. - Machine maintenance carried out by qualified technician. - Clear service complaint protocol to deal with machine or game performance related customer complaints. 	March 2021

				<ul style="list-style-type: none"> - Customer complaints policy and procedure. - Complaints policy and procedure displayed prominently in each site. - Complaint forms available at each site. - Luxury Leisure head office complaints telephone line. - Novomatic UK group complaints channel. - Registered with an ADR entity – BACTA. 	

Requirement to Comply

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

Effective as at 6 April 2016

Social responsibility code provision 10.1.1

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at **each of their premises**, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority’s statement of licensing policy.

2. Licensees must review (and update as necessary) their local risk assessments.
 - a. to take account of significant changes in local circumstances, including those identified in a licensing authority’s statement of licensing policy;
 - b. when there are significant changes at a licensee’s premises that may affect their mitigation of local risks;
 - c. when applying for a variation of a premises licence; and
 - d. in any case, undertake a local risk assessment when applying for a new premises licence.

Ordinary code provision 10.1.2

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

Social Responsibility Policies and Procedure Documents

Gambling Act 2005
Licence Conditions and Codes of Practice

Luxury Leisure / Talarius Version 3
Effective from March 2020

THE LICENSING OBJECTIVES

This white Social Responsibility Folder and its contents are provided to make sure that we all strive to meet the 3 Licensing Objectives of the Gambling Act 2005.

- 1. Prevent gambling from becoming 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 from gambling**

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

Index of Policy and Procedure Documents

Section No	Section Title	Version Number
Section 1	Principal Concepts	V2 October 2019
Section 2	Access to Gambling by Children and Young Persons	V2 October 2019
	Access to Gambling by Children and Young Persons Log	V1 June 2019
Section 3	Customer Interaction	V2 October 2019
	Customer Interaction Log Level One Log	V2 October 2019
Section 4	Information on how to Gamble Responsibly and Help for Problem Gamblers	V1 June 2019
Section 5	Stay in Control leaflet	V2 October 2019
	Stay in Control Multilingual Leaflet	V2 October 2019
Section 6	Self-Exclusion	V3 March 2020
	Self-Exclusion Log	V2 October 2019
	Self-Exclusion IPSOS MORI Evaluation Information Sheet and FAQs	V1 October 2019
Section 7	Fair and Open Practice & Complaint and Dispute Resolution	V2 October 2019
	Fair and Open Practice & Complaint and Dispute Resolution Log	V2 October 2019
	Fair and Open Practice & Complaint and Dispute Resolution Complaint Form	V1 June 2019
	Fair and Open Practice & Complaint and Dispute Resolution Terms & Conditions	V2 October 2019
Section 8	Customer Incidents Requiring Police Assistance Log	V1 June 2019
Section 9	Money Laundering	V1 June 2019
	Money Laundering Log	V1 June 2019
Section 10	Local Gambling Risk Assessments	V1 June 2019
Section 11	Access to Premises by the Gambling Commission's Enforcement Officers	V2 October 2019
Section 12	Employment of Children and Young Persons	V1 June 2019
Section 13	Advertising Standards and Marketing	V1 June 2019
Section 14	Staff Training Summary	V1 June 2019
Section 15	Memo's and Amendments	

The contents of this folder must not be edited, modified or altered in any way, unless authorised by Head Office. Failure to follow this instruction, will lead to disciplinary proceedings.

Section 1

Principal Concepts

Statement

Whilst Gaming in an Admiral venue is intended to be a fun and enjoyable leisure experience, we believe it is our responsibility to our customers to ensure that they are protected from the harms associated with problem gambling. To this end we employ a range of measures to prevent our customers suffering from gambling related harms and also signpost those whose gambling is having an adverse impact on other aspects of their life, to the best sources of help.

The Company also 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) Customer Interaction
- (c) Self-Exclusion
- (d) Fair and Open Practice and Dispute Resolution
- (e) Money Laundering Suspicious Monetary Transactions and Cash Handling
- (f) Local Risk Assessments
- (g) Information on how to Gamble Responsibly and Help for Problem Gamblers
- (h) Access to Premises by the Gambling Commission's Enforcement Officers
- (i) Employment of Children and Young Persons
- (j) Advertising Standards and Marketing

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.

Customer complaints 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.



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Gaming machines comply with the Gambling Commission's technical standards by displaying 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.

Section 2

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

The Company 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 assessment of risk.

How

We operate a stringent '**THINK 25**' policy. Any visitor entering our AGCs, where a member of staff believes their age to be 25 or under, must be challenged and asked to provide ID as verification of their age. This policy is supported by our employment of an independent third party who conducts test purchasing visits to our venues in order to ensure that the policy is being implemented and therefore compliance with our license conditions. These tests are conducted twice in a 12 month rolling period and can take place at any time and with NO prior notice. (Testing process on page 3).

Policy and Procedures

- ✓ Clear and prominent signage is placed at the entrance(s) to our Adult Gaming Centre(s) and adult area(s) stating that persons under the age of 18 years are prohibited from entering and that the Company will not permit entry.
- ✓ The structure and layout of our gambling premises take account of our obligations to prevent access to gambling by children and young persons.
- ✓ Our policies and procedures also seek to ensure that our facilities do not appeal to children and young persons through marketing and advertising material in the windows.
- ✓ Any person known to be under 18 years of age or who is unable to verify that they are over 18 years of age is refused entry.
- ✓ Any person who admits to being under the age of 18 is refused entry.
- ✓ Any person who appears to be under 25 years old and has not previously provided satisfactory proof that they are over 18 years old, is asked to provide appropriate identification as soon as they come to the attention of staff. *Members of staff are trained to '**THINK 25**',* engage with all customers as soon as they enter a venue and require valid ID from those who appear to be under the age of 25.
- ✓ It is a matter of **gross misconduct** to allow entry to our Adult Gaming Centre(s) or Adult gaming Area(s) (knowingly or otherwise) to a person who appears to be under 25 and who cannot provide satisfactory proof of age, **which may lead to dismissal**. This includes test purchase operatives.
- ✓ It is a matter of **gross misconduct** for a member of staff to knowingly allow entry by any person who is under the age of 18 years to our Adult Gaming Centre(s) or Adult Gaming Area(s), **which may lead to dismissal**. This includes children in the company of an adult such as babies in prams or buggies etc.

- ✓ 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 (these must be carefully checked, **under 18's** can carry military ID). European ID cards. Incidents involving suspected forged documents will be recorded and reported.*
- ✓ Where there is doubt about a person's age and they cannot produce an acceptable form of ID to prove they are 18 years or over, they are advised that they will not be permitted to enter until such time as they provide such proof.
- ✓ They will 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, the Manager or most senior member of staff on duty is informed and the person asked to leave. If the person still refuses to leave, then a non-emergency call to the police is made explaining the circumstances (person believed to be under age, refusing to leave licensed premises)
- ✓ Any attempts by those known to be under 18 or who cannot provide satisfactory proof age to enter the premises or designated adult area(s) and gamble are brought to the attention of the 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 Manager.*
- ✓ Service is refused in all circumstances where any adult is accompanied by a child or young person.
- ✓ The Company will consider a permanent ban from the premises of an adult who on more than one occasion or who knowingly or recklessly brings a child into an AGC.
- ✓ All gaming machines, other than category 'D' machines, are inscribed with a notice prohibiting play by persons under the age of 18 years.
- ✓ If someone believed to be under 18 or who upon challenge cannot provide acceptable proof of age, must have their stake only returned to them and be refused any prize they may have won, if in any doubt retain all monies.
- ✓ 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.

Test Purchase Process Chart

The Company employs an independent company to conduct Test Purchasing Operations as a means of ensuring that its policies and procedures are effective at preventing under age gambling. One of those policies is to ask for ID to verify the age of all those who appear to be 25 or under. This process tests the effectiveness of that policy. The results of these test purchases must be disclosed to the Gambling Commission and local authorities by our legal department at Head Office.

Venues will have a minimum of two (2) test purchase visits in a rolling 12-month period. The visits are not announced in advance. The test purchase can be on any day a venue is open and at any time during its opening hours.

The visitor will be aged between 18 and 20 and will not make themselves known to the venue, Remember we are testing our Think 25 policy.

The visitor must be challenged before they put any money into a machine. There are two opportunities to challenge for ID in order to pass the test:

1. On **Entry** – ID requested at point of entry.
2. Whilst **Browsing** – ID requested before a coin is entered into a machine in order to commence play. **To achieve this you must stop what you are doing when someone enters a venue and approach that person to greet them and judge whether they appear to be 25 or under. If you are serving a customer, you must politely explain that you will return in a moment.**
3. If the visitor plays a machine or if no challenge is made within a very short period, the test purchase is considered to have been a **FAILED VISIT**.

PASS – Well done

The conduct of the visit is still verified by the Area Manager (or can be delegated to a venue Manager in some circumstances) who will review the CCTV footage. This allows us to ensure the visits are conducted properly and fairly and to ensure the pass is correct.

FAIL

AM to conduct an investigation into potential **misconduct**. CCTV footage to be reviewed by Area Manager to identify staff members on duty and to ensure the test was conducted fairly. The CCTV will also form the basis for an investigation meeting with staff responsible for failing to challenge the visitor.

Investigation Meeting

The Investigating Manager will seek to establish the circumstances of the visit and identify any aggravating or mitigating factors that contributed to the failed test purchase. If the staff member(s) involved challenge the fail on the basis that the visitor's appearance was of someone over 25, the investigating manager will inform the Compliance team who will request the image of the visitor from Serve Legal. The image is then viewed by a panel of at least 5 senior managers who individually judge whether a challenge should have been made on the basis of the visitor's appearance. The majority decision of the panel is taken as a final judgement as to whether staff should have challenged the visitor for ID to verify their age.

Investigating Manager reports findings to HR and **Disciplinary** Manager who makes a decision about disciplinary action on the basis of the evidence. Such action may involve dismissal.



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Qtr No: _____
 Year: _____
 Sheet No: _____



GAMBLING ACT 2005
 Licence Conditions and Codes of Practice

SITE LOCATION: _____

Section 2 - Attempts by Children and Young Persons to enter an Adult Gaming Centre or Adult Gaming Area to Gamble
 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 or adult gaming area, and attempts to gamble therein. Instances where age verification 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	Description	Action and Outcome	Member of Staff requesting ID	Duty Manager Checked
				Person allowed into Premises? Yes <input type="checkbox"/> No <input type="checkbox"/> Type of Identification shown..... Date of Birth..... Customer Initials from ID..... Explain Outcome:		
				Person allowed into Premises? Yes <input type="checkbox"/> No <input type="checkbox"/> Type of Identification shown..... Date of Birth..... Customer Initials from ID..... Explain Outcome:		
				Person allowed into Premises? Yes <input type="checkbox"/> No <input type="checkbox"/> Type of Identification shown..... Date of Birth..... Customer Initials from ID..... Explain Outcome:		
				Person allowed into Premises? Yes <input type="checkbox"/> No <input type="checkbox"/> Type of Identification shown..... Date of Birth..... Customer Initials from ID..... Explain Outcome:		

Section 3

Customer Interaction in Relation to Identifying Customers who may be Susceptible to Gambling Harm

Statement

The Company recognises its responsibility and obligation to uphold the Licensing Objectives of the Gambling Act 2005 and to comply with the Licence Conditions and Codes of Practice. Social responsibility is an important aspect of our day-to-day operating practice and our policies and procedures are regularly reviewed to ensure we comply with our regulatory obligations. We work together with other operators to share experience and good practice through membership of our trade association, BACTA.

Policy and Procedures

The Company makes use of all reasonable sources of information to ensure effective customer interaction and decision-making in relation to identifying those at risk of or suffering from gambling related harm and recognises the key role our staff play in the protections we offer to our customers.

The Gambling Commission formal guidance note under SR code 3.4.1 provides a framework, through outlining its expectations of operators, so that they may fulfil their obligations with regards to customer interactions. The company's procedures relating to customer interactions are designed to be in keeping with the regulator's guidance.

Identify

In the AGC sector, where no membership or customer details (other than verification of age where it is not clear) are required by the operator in order to play, the primary indicator likely to alert staff to customers potentially suffering or at risk from suffering gambling related harm, is their behaviour and changes in it. This can be used with observations about the amount of or changes in the amount of time they spend gambling. Such observations may be used by staff in conjunction with knowledge of the machine category being played or any anecdotal information known to staff about the habits of a customer in order to inform a judgement about whether they should interact with that customer. We do not and cannot currently monitor a customer's spend through our data management system primarily because the data is anonymous.

If a member of staff has concerns that a customer's behaviour may indicate problems related to their gambling, the venue manager is to be informed at the earliest available opportunity. Indicative behaviour may include signs of distress, agitation, aggression, intense mood swings, hysteria or remorse. All staff are trained to recognise such behavioural indicators which may further manifest themselves in the following ways:

- Chasing losses
- Paranoia that games are fixed
- Complaining of money difficulties
- Arguing with staff over losses or repeatedly asking for promotions
- Rude or aggressive behaviour
- Frequently spends all the money they have brought with them
- Tries to borrow money from staff or customers
- Repeated trips to ATMs either in the venue or externally

- Repeated requests to withdraw cash via the venue PDQ
- Assaults on staff
- Damage to machines or other property

As a minimum such behaviours should be recorded as observations in the interaction log and the most senior person on duty informed.

The Gambling Act requires that we safeguard the interests of the vulnerable as well as the young from being harmed by gambling.

The vulnerable are not defined by the Act or the LCCP and the term must be interpreted in its widest everyday meaning.

For example, someone could be considered to be vulnerable in the following ways:

- Suffered a recent bereavement
- Mental health problems
- Long-term or terminal illness
- Dementia or brain injury
- Difficulty in communicating, for example reading or speaking on the phone
- Learning disability
- Relationship breakdown
- Addiction

This list is **not** exhaustive, and there are many other reasons why someone could be considered to be vulnerable. Vulnerability may also be temporary.

All initial interactions must be recorded in the Customer Interaction Level One Log “NPGA05B”.

Interact

An initial interaction could well be the **Observation** of behaviour over time. For instance, a member of staff identifies a change in the behaviour of a regular customer. Having made this identification, they then make a first entry on the Customer Interaction Level One Log “NPGA05B”. If the behaviour continues then a second entry may be required to record that the change in behaviour was more than fleeting. The venue manager should then consider whether to speak with the customer. A Customer Interaction & Self Exclusion file “NPGA05C”, is then opened and the initial entry copied across before the second observation is recorded.

Venue managers are designated persons for the purpose of customer interaction, and it is their responsibility for making the decision as to whether further **Action** is needed, and it is appropriate or necessary to speak with a customer. If there is any doubt, then an area manager or a member of staff from the compliance department should be consulted on the telephone. All interactions should be conducted in a timely fashion but with tact and in confidence where possible.

Notwithstanding any initial urgent action taken to deal with the customer’s behaviour by any member of staff, the venue manager (or most senior member of staff on duty) is required to observe the individual and make a

judgement as to what the **Outcome** of the observation should be. If it is that a verbal interaction should take place then this interaction should be curious, asking questions to understand the behaviour and whether it is linked to gambling. If warranted, the staff member will offer the customer advice about the gambling management tools that we can offer to assist them manage their time spent gambling. The staff member will explain how Gamblewise works and offer them this service. This intervention is always accompanied by the offer of information further signposting the customer to sources of help such as with the offer of a 'Stay in Control' leaflet containing details of sources of help and support. Furthermore, the duty manager may judge that it is appropriate to explain the option of self-exclusion to the customer.

If the customer refuses such information and their behaviour is such that it could be considered disruptive, the duty manager can refuse service and ask the customer to leave the venue or in more extreme circumstances will deal with the situation as an incident of anti-social behaviour, using staff guard to support them or alternatively calling the police.

Staff should not tolerate any form of abusive or anti-social behaviour during an interaction with a customer. If a customer demands to self-exclude with immediate effect, then staff should always seek to facilitate this but need to be cautious if dealing with someone whose behaviour has been hostile or aggressive. The staff member should not put themselves at risk and should not therefore conduct a self-exclusion alone with an aggressive customer.

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

Notwithstanding any other action that may have to be taken immediately to prevent an incident from worsening, the duty manager will log all interactions in either the Level 1 or Level 2 log.

Evaluate

By maintaining individual logs for customers whose behaviour on more than one occasion has indicated to staff that they may be displaying signs that their gambling is having an adverse effect on them, we are able to monitor and evaluate the effectiveness of our controls. Each log is specific to the customer, meaning that all future interactions at a venue relating to that customer are stored in a single record allowing us to understand the impact of an interaction. This is further underpinned by the company's compliance review framework whereby all compliance returns data, including interactions are reviewed by a committee which includes the CEO and COO as well as the regional directors and other stakeholders from the senior management team. The installation of Gamblewise in November 2019 will provide further data with which to measure the effectiveness of, not only this tool, but also the effectiveness of all the gambling management tools we offer.

Gamblewise

Gamblewise is a gambling management tool that we offer our customers for free. It is an app available for customers to download onto their mobile phone and use to manage their time spent gambling. They can set themselves limits as to where and when they wish to gamble. The app and the location of the phone will then be used to remind them of their chosen limits and encourage them to plan and reflect on their time spent gambling in our venues.

The Gamblewise system will also notify staff via a manager's app on the venue tablet if someone enters a venue at a time when they have previously chosen not to. This will then instigate an interaction. Customers will not be asked to leave the venue but will be simply reminded by staff that they have set a limit on the app that they are not adhering to. This verbal interaction should always be conducted tactfully and in private so as not to

embarrass the customer. It should also be accompanied by the offer of a Stay in Control leaflet or a reminder of where they are located in the venue. Such interactions are to be recorded in the appropriate interaction log.

Staff/Training

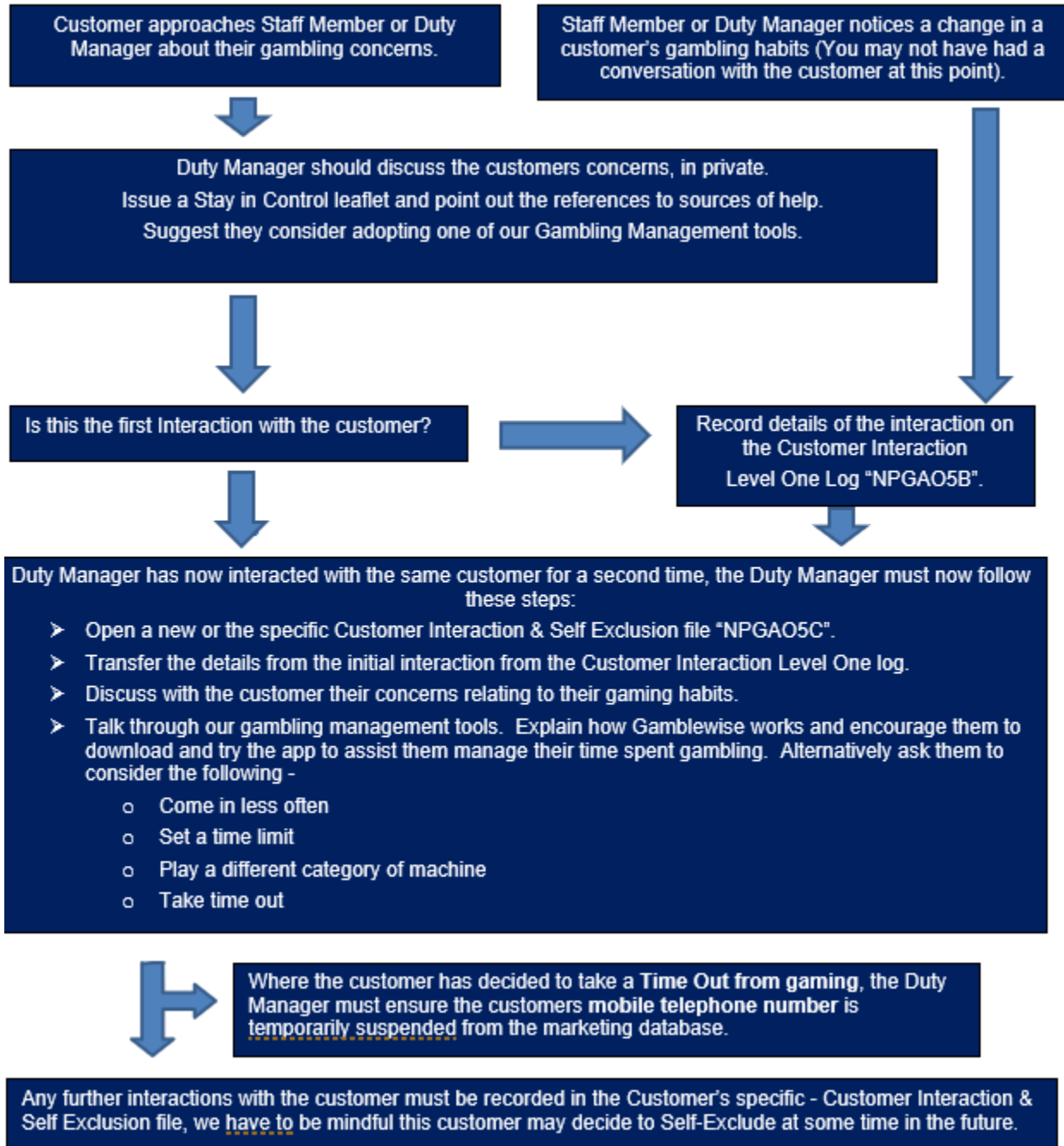
All staff are trained at induction and then through regular refresh training modules and the completion of staff training is recorded and monitored.

Staff members are not permitted to gamble (play machines) on our premises. If a member of staff is believed to be suffering from gambling related harm, we must be supportive and offer the same advice as we would to a customer. This should involve providing the staff colleague with contact details for recognised problem gambling organisations and given a copy of the Stay in Control leaflet.

Colleagues should be encouraged to use the Company Health Assured scheme, they can be contacted by Freephone 0800 0305182 or www.healthassuredeap.co.uk .

Customer Interaction Process

We must ensure we log all customer interactions, follow the simple steps below to ensure all interactions are recorded.



Examples of the logs below:

The venue colleague interacts with a customer, this interaction must be recorded in the following log:

- Customer Interaction Level one log "NPGA05B" - This log must be used to record all initial customer interactions.

Section 3 – Customer Interaction in Relation to Identifying Customers who may be Susceptible to Gambling Harm

Note: This log is used for all **LEVEL ONE** interactions. To be completed when either a customer directly asks for help with their gambling or when through observation or direct communication with a customer, a member of staff believes that the customer is potentially displaying some sign or signs of suffering from gambling related harm. A Level One interaction may be an observation about a change in a customer's normal behaviour. An entry should also be made where a relative or friend of a customer has expressed concern for the gambling behaviour of that customer.

In keeping with the Gambling Commissions formal guidance on customer interaction, SR Code 3.4.1, staff should seek to identify customer who may be displaying signs of suffering from gambling related harm. They should interact with the customer in a way appropriate to the identified behaviour and the customer themselves, offering support and signposting them to sources of help. Staff should then evaluate the effect of what they have done. This should be done through liaising with your Compliance department.

If you have a **Second Interaction with the same customer** then you must move to the **Level Two – Customer Interaction & Self Exclusion File Pack** and record that on this log.

Date	Time	Identify Overt signs of distress, anger, frustration etc. Changes in behaviour, playing for significantly longer, spending more money etc	Interact May range from just recording the behaviour and then monitoring to speaking to a customer and signposting them to sources of help.	Evaluate Record the outcome of interaction. How was it received by the customer? What did they say? How did they behave afterwards?	Stay In Control Leaflet offered Yes, or No	Duty Manager Informed (signature)

Section 3 – Customer Interaction in relation to identifying customers who may be susceptible to Gambling Harm – Level One Log (NPGA05B) / LL / TAL V2 September 2019
This log is used in conjunction with the Company's policy and procedure concerning 'Customer Interaction'.

If the venue colleague / manager interacts with the same customer for a second time, then the Customer Interaction & Self Exclusion file "NPGA05C" must be opened for a specific customer following a second interaction.



Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8

NPGA05C Customer Interaction & Self Exclusion File



BeGambleAware.org®



GAMBLING ACT 2005
Licence Conditions and Codes of Practice

QTR NO:.....
YEAR:.....
SHEET NO:.....

SITE LOCATION: _____

Section 3 – Customer Interaction in Relation to Identifying Customers who may be Susceptible to Gambling Harm

Note: This log is used for all **LEVEL ONE** Interactions. To be completed when either a customer directly asks for help with their gambling or when through observation or direct communication with a customer, a member of staff believes that the customer is potentially displaying some sign or signs of suffering from gambling related harm. A Level One interaction may be an observation about a change in a customer's normal behaviour.

An entry should also be made where a relative or friend of a customer has expressed concern for the gambling behaviour of that customer.

In keeping with the Gambling Commissions formal guidance on customer interaction, SR Code 3.4.1, staff should seek to identify customer who may be displaying signs of suffering from gambling related harm. They should interact with the customer in a way appropriate to the identified behaviour and the customer themselves, offering support and signposting them to sources of help. Staff should then evaluate the effect of what they have done. This should be done through liaising with your Compliance department.

If you have a **Second Interaction** with the same customer then you must move to the **Level Two – Customer Interaction & Self Exclusion File Pack** and record that on this log

Date	Time	Identify	Interact	Evaluate	Stay In Control	Duty Manager Informed (signature)
		Overt signs of distress, anger, frustration etc. Changes in behaviour, playing for significantly longer, spending more money etc	May range from just recording the behaviour and then monitoring to speaking to a customer and signposting them to sources of help.	Record the outcome of interaction. How was it received by the customer? What did they say? How did they behave afterwards?	Leaflet offered Yes, or No	

Section 3 – Customer Interaction in relation to identifying customers who may be susceptible to Gambling Harm – Level One Log (NPGA05B) LL / TAL V2 October 2019
This log is used in conjunction with the Company's policy and procedure concerning 'Customer Interaction'.

Customer Interaction and Self Exclusion File:



GAMBLING ACT 2005

Licence Conditions and Codes of Practice

Customer Interaction in Relation to Identifying Customers who 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.

Site Location: Biggin Street, Dover Name or Description of Customer: Paul Robert's

1	2	3	4	5	6	7	8
Date & Time	Circumstances including signs of distress, or where it is suspected that a customer's gambling is no longer in control	Refer to GamCare (Y/N)	Gambling Management Options Discussed (Y/N)	Option Selected 1,2,3,4	Self-Exclusion (option 5) Explained (Y/N)	Notes including outcome	Senior Manager Print
16.07.17 11.20	Paul appeared to be very frustrated he was banging & swearing at m/c	Leaflet given And discussed	Yes	Wants to think on it	Yes	Nothing further at this time, told Paul he can talk to us any time if needed	Charlotte Ellinger
02.08.17 16.45	Paul told me his spending is getting out of control and needs to do something about it	I gave another leaflet & discussed	Explained all options	4	Yes	Paul has decided to take a break for 4 weeks. We will talk again before he starts to play again.	Patricia Cole
NOTIFY YOUR AREA MANAGER							
AREA MANAGER – ACTION TAKEN: I was notified by Patricia of Pauls 2 nd interaction. I was on site today (4 th Sep) and I spoke to Paul following his break, he said he feels much better now. I told him to speak to any of us if he feels things are getting on top of him and we will do our best to help or direct him to professional guidance. <i>R Capener Area Manager</i>							

Guidance Notes

- Column 1:** Date and time of the interaction
- Column 2:** Circumstances ie. Who approached whom and why?
Did you witness any signs of distress or have any cause for concern?
- Column 3:** Did you strongly recommend your customer contact GamCare (or similar) for professional guidance?
Did you issue and discuss the content of the Stay In Control leaflet?
- Column 4:** Gambling Management Options - Did you discuss options with the customer i.e.
1. Come in less often
 2. Set yourself a time limit
 3. Play a different type of machine ie. B3 player, change to CAT C m/c
 4. Take time out
- Column 5:** Which option (if any) did the customer select (1, 2, 3 or 4)?
- Column 6:** Option 5. Did you explain the Self-Exclusion process?
- Column 7:** Record details of the interaction for reference (use additional paper if required & attach to back of this form)
- Column 8:** Upon completion - print your name

Notes for reference:

If you have had **more than 2 interactions** with a customer about their gambling, then **you must notify the Area Manager**, they will monitor the situation and if necessary move to speak with the customer during their next visit to site. They too will note any action they have taken.






Self-Exclusion Procedure - Checklist

- | | | |
|---|---|---------------------------|
| ✓ | Customer provided a recent 'passport' style/size photograph
If NO – take a photograph of the customer (legal requirement) and attach to form | YES/NO |
| ✓ | Confirm customer has received and read a 'Stay In Control' leaflet
If NO – address this now. | YES/NO |
| ✓ | Confirm customer was referred to GamCare
If NO – address this now. | YES/NO |
| ✓ | Identify the customers concerns (i.e. – spending too much money.) | YES/NO |
| ✓ | Discuss options available to customer
1. Come in less often
2. Set yourself a time limit
3. Play a different type of machine ie. B3 player, change to CAT C m/c
4. Take time out
5. Self-Exclusion | |
| ✓ | Customers preferred option
If the option is 1 – 4 record on Customer Interaction log – end meeting
If the option is Self-Exclusion – complete Self-Exclusion form | _____
YES/NO
YES/NO |
| ✓ | For *a period of _____ please enter either 6 or (up to) 12 months | YES/NO |
| ✓ | Explain about exclusion from other operators in a radius of up to 1k | YES/NO |
| ✓ | Issue customer with the 'Self-Exclusion' – Information for Customers (leaflet overleaf) | YES/NO |
| ✓ | Inform customer to contact BACTA if required, to Exclude from other areas | YES/NO |
| ✓ | If this is an IMMEDIATE EXCLUSION (if applicable) you must note at the foot of the page which Senior Manager authorised it | YES/NO |
| ✓ | Upon completion of form, both parties sign the Self-Exclusion Agreement form | YES/NO |
| ✓ | Please note at foot of page the machine category(s) | YES/NO |
| ✓ | Issue customer with a copy of the Self-Exclusion Agreement form | YES/NO |
| ✓ | Escort customer off the premises | YES/NO |
| ✓ | Ensure the customer is marked as 'self-excluded' on the Admiral Text Rewards software | YES/NO |
| ✓ | Upload all details onto BACTA system | YES/NO |
| ✓ | Notify relevant personnel and file all documents – in specified folders | YES/NO |



Customer Information Leaflet

Please tear along perforated edge and hand to your customer



Self-Exclusion - Information for Customers

Casinos

SENSE is the casino self-exclusion scheme. You can find out more about SENSE and how to enrol in SENSE via the Playing Safe website www.playingsafe.org.uk.

Betting Shops

To self-exclude from more than one shop or a number of different companies in your area, call 0800 294 2060.

Bingo

For more information on self-excluding from bingo venues in the UK, please visit the Bingo Association website www.bingo-association.co.uk and select the self-exclusion tab.



Self-Exclusion Review Procedure - Checklist

- ✓ Obtain a copy of the customers Self-Exclusion Agreement form, and check the start date and Exclusion period to ensure the customer has concluded their period of Self-Exclusion YES/NO
- ✓ **If NO** – advise the customer when their Self-Exclusion period is scheduled to conclude then discreetly escort the customer from the premises
- ✓ If the customers Self-Exclusion period has concluded ask the customer what it is they wish to do YES/NO
- ✓ If the customer wishes to 'Resume Business with Luxury Leisure' you must establish that the Customer has got their gambling concerns under control, and you are satisfied with their reply YES/NO
- ✓ Complete the top half of the Self-Exclusion Review form together YES/NO
- ✓ **Review of Self-Exclusion agreement of** – enter the date when the Self-Exclusion commenced Details will be found on the enclosed Self-Exclusion Agreement form YES/NO
- ✓ In the box – enter the customers decision i.e. – Return to Gaming YES/NO
- ✓ The customer is required to complete this section of the form by signing and dating just below The box. The Senior Manager will witness this (print their name) YES/NO
- ✓ You must explain to the customer they must leave the premises now to reflect on their decision to resume gaming for a minimum of 24 hours before being permitted to return to the premises YES/NO
- ✓ After a minimum of 24 hours has past the customer may return to the premises to conclude their Self-Exclusion Review procedure YES/NO
- ✓ To enable you to conclude the Self-Exclusion review procedure you must establish with the customer if they still wish to resume access/gaming with us YES/NO
- ✓ **If NO** – ask if the customer wishes to extend their Self-Exclusion period and document YES/NO
- ✓ If the customer wishes to Resume Access to the premises, and no longer wishes to be self-excluded from the site and other similar venues locally to which the agreement applies; they must now read the final paragraph, and if they agree the must sign and date the final section with the correct date YES/NO
- ✓ Ask the customer if they wish for their email/texting account to be reinstated YES/NO
- ✓ Inform the customer that we may discreetly ask if everything is ok during the next few weeks YES/NO
- ✓ Issue the customer with a copy of the completed Self-Exclusion Review form and permit them entry to the premises YES/NO
- ✓ Enter details onto Self-Exclusion log YES/NO
- ✓ Discreetly inform all personnel YES/NO
- ✓ If Self-Exclusion is for more than one site – enter details onto BACTA system YES/NO
- ✓ File all documents – in specified folder YES/NO

Customer Interaction Log

Site Location:

Name or Description of Customer:

1	2	3	4	5	6	7	8
Date & Time	Circumstances including signs of distress, or where it is suspected that a customer's gambling is no longer in control	Refer to GamCare (Y/N)	Gambling Management Options Discussed (Y/N)	Option Selected 1.2,3,4	Self-Exclusion (option 5) Explained (Y/N)	Notes including outcome	Senior Manager Print
NOTIFY YOUR AREA MANAGER							
AREA MANAGER – ACTION TAKEN:							
NOTIFY YOUR AREA MANAGER							
AREA MANAGER – ACTION TAKEN:							



Adult Gaming Centre ("AGC") Local Area Self-Exclusion Agreement

This is a legal agreement. Please read it carefully.

To: (the "Operator" or "you")

I wish to self-exclude with immediate effect from gambling at:

- The AGC situated at
- All AGC's owned by the Operator within a radius of 250/500/750/1000 metres *[delete as appropriate]* of the AGC.
- All AGC's within the Scheme situated within a radius of 250/500/750/1000 metres *[delete as appropriate]* of the AGC.

The Scheme means a self-exclusion notification scheme administered by bacta Self Exclusion Services Limited ("BSESL") in co-operation with the Operator and other AGC's that have joined the Scheme. When we refer to "we" or "our" we mean BSESL and the Operator.

Terms of the Scheme and Data Protection Notice

My self-exclusion will last for months [minimum 6 months, maximum 12 months] (the "Exclusion Period", or as subsequently extended by me).

I cannot cancel or change my self-exclusion request before the expiry of the Exclusion Period. At the expiry of the Exclusion Period my self-exclusion will automatically renew for a further six month period unless I notify you that I no longer wish to be excluded by filling in and returning to the Operator a reinstatement form. I agree that a reinstatement will only take effect at the end of the current Exclusion Period, not before, and then only after the expiry of a 24 hour cooling off period starting from when I make a positive decision to gamble again.

While you generally have the right to be "forgotten" under data protection and privacy laws, you agree that you will not exercise your right to have your personal data deleted by the participating AGC's and BSESL during the Exclusion Period as this would defeat the purpose of the Scheme. At the end of the Exclusion Period you have the right to require us to delete your personal data.

I acknowledge that for the Scheme to be effective you have to be able to identify me and have to notify all the participating AGC's in the above mentioned area of my self-exclusion. To do this I agree that:

- I will provide you with a clear recent photograph of me, and such other forms of identification that you may require including a recent utility bill bearing my name and address and that if my appearance changes significantly during the Exclusion Period I will provide an updated photograph.
- You will submit details of my self-exclusion agreement and any personal data that I provide to a database maintained by BSESL (which will include allowing BSESL to share this with other operators of similar schemes in my area).
- My personal details and photograph will be kept, shared and used by BSESL (and other scheme operators) and participating local AGC's, not just you, to enforce the Scheme. You will share this information between BSESL (and other scheme operators) and local AGC's to manage and implement the Scheme.
- To operate the Scheme effectively my photograph will be displayed and communicated discreetly among the relevant staff members of each AGC.

I acknowledge that you and other AGC's in the Scheme will try to identify me but that you cannot guarantee that you would always be able to do so. That means if I do gain access to AGC premises neither you nor your employees nor agents will be responsible for anything I do while on those premises. I agree that, if I enter an AGC during the Exclusion Period, I will be required to leave the premises and that I will be removed by the use of reasonable force if necessary if I refuse to leave. I agree that you may refuse entry by me to the AGC premises.

I have been directed to the following counselling and support services

We would like to assess the effectiveness of this Scheme therefore, with your permission only (which you can withdraw at any time), may we pass on your contact details to an agency Instructed by us to do so :

- I agree to being contacted
- I Do Not wish to be contacted



We will be responsible for ensuring that your personal data is processed lawfully. You agree that your personal data (which may also include health details, namely potential gambling issues) may be used by BSESL, the Operator and participating AGC's for the purposes of administering the Scheme for the period stated below. You can contact us as follows:

BSESL: bacta, 29-30 Ely Place, London. EC1N 6TD
E mail: theresa@bacta.org.uk
Telephone: 02077306444

Operator: Luxury leisure / Talarius Data Protection Officer and can be contacted as follows:
Fifth Avenue Plaza, Team Valley Trading Estate, Gateshead, NE11 0BL
e-mail: gdpr@luxuryleisure.co.uk and
telephone: 0191 497 8200

We may retain a reference copy of the details of your self-exclusion for up to two years after the end of the Exclusion Period, though you may at any time after the end of that Exclusion Period ask for your personal data to be deleted. We will also keep a record of any complaints and attempts by you to access any AGC's while your self-exclusion is in force; and will share this with other AGC's and the Gambling Commission upon request. If you agreed to be contacted by our research agency then we may also keep any information that you provided for up to two years and will not share that information with anyone else in a way which can identify you.

If there are any errors in the information we have please let us know and we will correct it.

You have the right to refer any concerns or complaints about our handling of your personal data to the Information Commissioner's Office in the United Kingdom.

I recognise and agree that during the Exclusion Period, whilst you will take all reasonable steps to refuse admittance or otherwise prevent me from gambling on the premises, it is my responsibility to ensure that I do not enter any of the relevant AGCs, or gamble on the premises, or ask anyone to gamble on my behalf.

By signing this Form I agree to the above.

Name: D.O.B:
(print)
Address: Phone:
..... Email:
Signed by customer: Dated:
Duty Manager's name: Auth. by:
(print) (print)
Signed: Dated:
Acc. Suspended: YES / NO / Non Applicable M/C Type:

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**.





BeGambleAware.org®



SELF-EXCLUSION REVIEW

Company:

Site Name:

Site Address:

..... Post Code:.....

Customer Name (print):

Customer Date of Birth:

Customer Address:

.....

..... Post Code:.....

Review the self-exclusion agreement of:(Confirm start date of Self-Exclusion)

Customer Decision:
.....

Signed:(Customer) Date of review:

Witnessed:(Senior Manager) Date of review:
(print)

Request to resume access to premises following a Self-Exclusion.

I confirm that I voluntarily no longer wish to be self-excluded from this site and other venues in the locality to which the agreement applies; that all options have been explained to me by the Company, and that I have experienced a cooling off period of at least 24 hours.

Signed:(Customer) Date resumed:

Witnessed:(Senior Manager) Date resumed:
(print)

CUSTOMER WISHES FOR THEIR EMAIL/TEXTING ACCOUNT TO BE RE-INSTATED: **YES / NO** (delete as required)

Section 4

Information on how to Gamble Responsibly and help for Gamblers with problems

Statement

The Company 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 stipulates a minimum exclusion period of six months and a maximum of 12 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.

Section 5 Stay in Control



WHENEVER YOU PLAY MACHINES
IT IS ALWAYS WISE TO REMEMBER THAT :

Gambling is a fun and exciting form of entertainment which provides an enjoyable experience.

Playing slot machines is an attractive way of taking a risk as long as the risk taking is kept under control.

The great majority of people who play slot machines or gamble in other ways enjoy the experience without any problems but a very small number lose control of what they are doing.

For these players gambling ceases to be fun.

Their life can be dominated by gambling.

Problem gamblers will continue playing whether winning or losing. They will use their own and other people's money in order to keep playing. As gambling takes over their life. Many other things can suffer; family life, their job and other interests.

GAMBLING BECOMES A PROBLEM WHEN YOU :

Gamble until all your money has gone.

Borrow or steal money to continue gambling.

Gamble to change your losses.

Neglect other interests. Family and friends to gamble.

WHENEVER YOU PLAY MACHINES
IT IS ALWAYS WISE TO REMEMBER THAT :

You are buying entertainment, not investing your money.

You should only spend money you can afford to lose.

In advance of playing you should set strict limits on how much you will spend.

Problems will arise if playing machines becomes the most important part of your life.

Playing should take up only a relatively small amount of your life and interest.

Playing within your means is likely to be fun and exciting.

Spending outside your means is likely to create problems for you and others.

You shouldn't play to escape from worries or pressure.

SOMEONE WHO THINKS THEY MIGHT HAVE A GAMBLING PROBLEM SHOULD ASK THEMSELVES IF :

They lose time from education or work or other commitments because of gambling.

They gamble to get money to pay debts or solve financial difficulties.

After losing they feel they must return as soon as possible to win back losses.

They gamble until their last pound has gone.

They borrow to finance their gambling.

They are reluctant to use 'gambling money' for normal expenditure.

They have ever committed or considered committing an illegal act in order to finance their gambling.

They have ever considered self-destructive behaviour as a result of their gambling.

For free support, counselling, live chat and to learn more about problem gambling please visit:

gamcare.org.uk

To learn more about the social responsibility code of this arcade and our group of companies visit:

playnice.org.uk



IF YOU ARE IN DIFFICULTY WITH YOUR GAMBLING OR KNOW SOMEONE WHO IS AND WOULD LIKE TO HELP. CALL THE GAMCARE HELPLINE ON :

0808 8020 133

GamCare is the national centre for information, advice and practical help regarding the social impact of gambling.

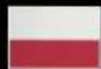
The national helpline is answered by trained staff. They can offer counselling, information and advice to problem gamblers, family members and to friends of a gambler. Information regarding counselling for problem gamblers is available on request.

STAY IN CONTROL

IS PROBLEM GAMBLING AFFECTING YOU,
OR THOSE CLOSE TO YOU?



掌控自我 问题赌博是否正在影响您或与您关系密切的其他人的生活?



ZACHOWAJ KONTROLĘ

Czy problematyczne zachowania hazardowe dotyczą Ciebie lub Twoich najbliższych?



GARDEZ LE CONTRÔLE

Le jeu compulsif vous affecte-t-il, vous-même ou vos proches ?



BLEIBEN SIE IN KONTROLLE

Haben sie oder ein angehöriger ein Spielproblem?



MANTENGA EL CONTROL

¿La ludopatía le afecta a usted o a quienes le rodean?



НЕ ТЕРЯЙТЕ САМОКОНТРОЛЯ

Вы или близкие вам люди подвержены игровой зависимости?



OVLÁDNĚTE TO

Je ve vašem případě hrani problémem, který má vliv na váš život nebo ovlivňuje vaše nejbližší?



PĂSTRĂȚI CONTROLUL

Dependența de jocuri de noroc vă afectează pe dumneavoastră sau pe cei apropiați?



NEZAUDĒJIET KONTROLI

Vai jūs vai jūsu tuviniekus ir skārusi atkarība no azartspēlēm?



ÖN IRÁNYÍTSON!

Problémát okoz önnek vagy az önhez közelieknek a szerencsejáték?



ЗАПАЗЕТЕ КОНТРОЛ

проблемният казарт засяга ли вас или близките ви?

National Gambling Helpline

0808 8020 133

www.admiralslots.co.uk/support

Section 6 Self-Exclusion

Statement

The Company 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 duty 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 potentially suffering from gambling related harm, 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.
- ✓ Has the customer considered any of the gambling management tool options we offer in the first instance rather than move straight to Self-Exclusion.
- ✓ It is our policy for area managers (appointed person), as a suitably trained and experienced member of staff, to conduct the self-exclusion meeting as long as the customer is willing to have a meeting with them. This is designed to ensure the process is robustly exercised and that the customer is signposted to sources of help and so that we can understand whether we could have helped earlier. It is not designed to delay the process and it is clearly within our policy that a customer can self-exclude immediately.
- ✓ 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 should be taken using the tablet device. The image of the person should be of the shoulders upwards to include a clear picture of the face with a plain background where possible.
- ✓ If the customer is not known to staff in any way or there is any doubt about the identity of someone requesting to self-exclude, suitable photographic identification is required before the self-exclusion can be processed.
- ✓ The Appointed Person 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 the Company's ability to manage longer agreements. The Company 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 enlisting another person to gamble on their behalf. It is a requirement that staff

regularly pay heed to self-exclusion agreement forms 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 the Company 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.
- ✓ The Company will offer customers with whom it enters into a self-exclusion agreement in respect of facilities for any kind of gambling it offers at our licensed gambling premises, the ability to exclude from facilities for the same kind of gambling offered in the locality by any other holder of an operating license to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes. In addition, the Company is participating in the possible development of a multi-operator self-exclusion scheme that will apply to all styles of gambling.
- ✓ 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.
- ✓ Does the customer gamble in other establishments such as Bingo or Betting Shops? – you should sign post the customer to self-exclude in those gambling sectors as well.
- ✓ 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.
- ✓ The Company retains self-exclusion records for the length of the agreement plus a further 6 months, after this point the exclusion details and customers image are removed from the MOSES system and all manual records destroyed. However, where we have banned a customer for three or more self-exclusions or otherwise because we believe it to be in their best interests for up to 10 years.
- ✓ 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.

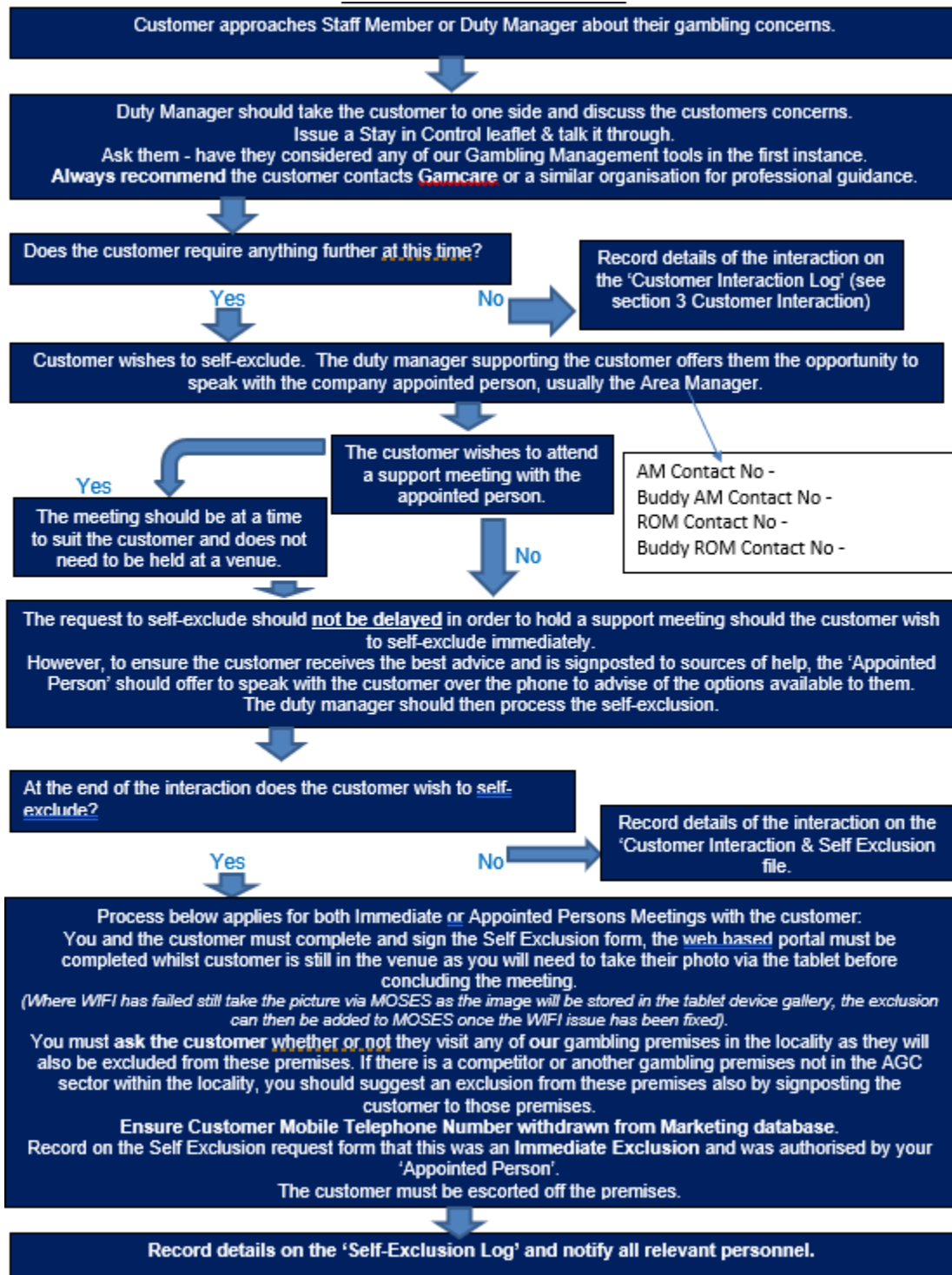
- ✓ Members of staff are trained both on induction and refresher sessions thereafter in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.
- ✓ We should not tolerate any form of anti-social behaviour during an interaction/exclusion conversation with a customer. If a customer wishes to self-exclude with immediate effect but is displaying outwardly aggressive behaviour this could conclude with a staff member alone with them in a room, potentially placing them in a vulnerable position. Under these circumstances it is acceptable to advise the customer that we are happy to comply with their request but are unable to do so if they continue to be aggressive. Advise that they would need to return for a meeting at a later stage which we would be happy to book for them. This then gives the option for 2 members of staff to be present if concerns are that the individual was not just having an "isolated bad day" and could be a risk to their safety.
- ✓ Where a customer has excluded for a third time we will issue a lifetime exclusion ban on Social Responsibility grounds.

A self-exclusion log is maintained on the premises for recording detail of those currently excluded in addition to records stored digitally.

Venue to record MOSES details in the table below:

MOSES User Name :	
MOSES Password:	

Self-Exclusion Process Chart

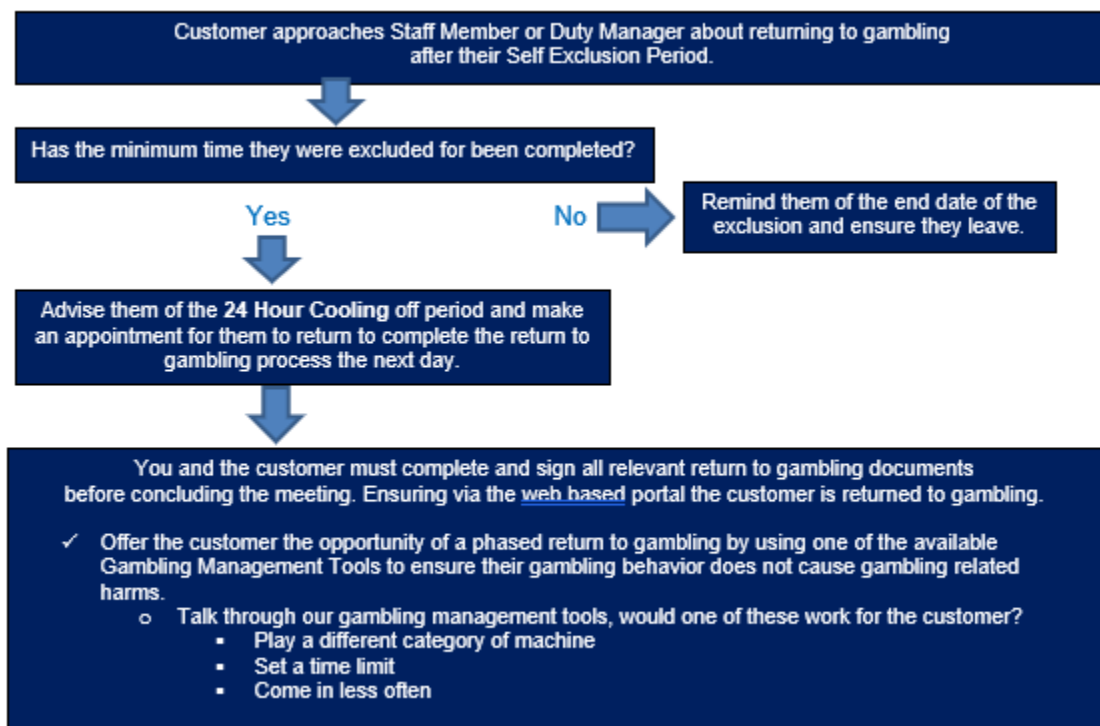


Duty Manager Please Note:

You are authorised (having confirmed with the Appointed Person) to offer an immediate exclusion period of six to twelve months unless your customer specifies otherwise. Once the meeting has concluded, notify your Area Manager.

If the customer wishes to self-exclude for from a greater radius than the system allows or has any requests that the current system cannot cater for then you should seek advice from the Compliance team.

Return from Self-Exclusion Process Chart



QTR NO:.....
YEAR:.....
SHEET NO:.....

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

SITE LOCATION: _____

Section 6 Self-Exclusion Log

Note: This log to be used to manually record all Self Exclusion Requests, the exclusion must be immediately recorded on the tablet device.

Customer Name	SE Ref Number from MOSES	Exclusion Meeting Conducted By	Exclusion Meeting Authorised By	Exclusion Start Date	SE Breach: Attempts to Enter Date(s)	SE Breach: Attempts to Gamble Date(s)	Preventative Measures Deployed	Exclusion End Date	Date of 24hr 'Cooling Off'	Resume Gaming Date

This log is used in conjunction with the Company's policy and procedure concerning 'Self-Exclusion'.

Section 7

Fair and Open Practice & Complaint and Dispute Resolution

Statement

The Company strives to provide a best in class experience for our customers, underpinned by the highest standards of environment, product and customer service. When this occasionally is not to the satisfaction of our customers we then make every effort to resolve any issue in a fair, transparent and timely fashion. In line with ordinary code provision 6.1.1 of the License Conditions and Codes of Practice the Company has a thorough and robust policy and procedure for dealing with complaints and disputes.

Definition

A complaint is defined as ‘an expression of dissatisfaction, whether spoken or written, about any aspect of the way the licensee conducts their licensed activities. For example, a complaint:

- About the outcome of a gambling transaction
- About the way a gambling transaction has been managed
- That concerns the way the license holder carries out its business in relation to the three licensing objectives

Customers may also complain about commercial matters, such as the quality of our facilities but these are not overseen by the Gambling Commission nor covered by the LCCP.

Complaints Procedure

Despite our efforts to provide a high quality experience, 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 at the venue, a copy of our written procedure for dealing with complaints, together with a complaint form, is supplied to the complainant together with the name and status of the Area Manager designated to deal with the next part of the complaint.

We operate a 2 stage complaints procedure.

Stage 1 of the process has 3 parts (each of which must be documented in the log):

Part 1 (VM) – Venue manager is able to deal with customer complaint in venue.

Part 2 (AM) – Venue manager unable to deal with the complaint to the satisfaction of the customer, so passes to the Area Manager.

Part 3 (ROM) – If the Area Manager is unable to resolve the complaint, it is passed to the Regional Operations Manager. The decision made at this point will be the company’s final position with regards to the complaint. If at this stage the customer is still unhappy with the decision, they should be advised that their next course of action is to request Alternative Dispute Resolution (ADR). This now becomes a Dispute. The customer should then be supplied with the ADR entity details who deal with such disputes in the arcade sector.

Stage 2

If a complaint cannot be resolved to the satisfaction of both the company and the complainant, then it becomes a dispute. Disputes can be raised by the complainant with the ADR entity. The current ADR entity who deal with complaints that reach dispute is BACTA. The contact details are as follows:



BeGambleAware.org[®]



Name of ADR Entity: Bacta ADR Service,
Email Address: enqs@bactaadrservice.org.uk
Website: www.bactaadrservice.org.uk
Postal Address: 29-30 Ely Place, London EC1N 6TD.

Where a customer calls the complaints telephone line or emails into the Admiral Customer service email address, this complaint will be logged at Head Office and the details emailed out direct to the Area Manager (Part 2) to deal with the complaint. The AM may delegate some of the investigation tasks to the VM.

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.

Timings

In the first instance, the Company 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.

The Company 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 the Company.

[The Company 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.](#)

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

QTR NO:.....
YEAR:.....
SHEET NO:.....

GAMBLING ACT 2005

SITE LOCATION: _____

Section 7 – Fair and Open Practice & Complaint and Dispute Log

Licence Conditions and Codes of Practice

Date of Complaint	Name of Complainant	Description of the complaint	Stage Complaint resolved: Part 1 by VM Part 2 by AM Part 3 by ROM	Date and Solution to the Complaint resolved to the satisfaction of both parties	Date Referred to BACTA ADR Service (if not resolved)

Section 7 - 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):

Company:

Name of Premises:

Address:

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

.....

Date of Incident: Time of Incident:

Names & Addresses or contact telephone numbers of any independent witnesses.

.....

.....

Name and Category of Gambling Machine subject of complaint:

A clear and comprehensive account of the complaint and what you are seeking as redress to resolve the matter.

.....

.....

.....

.....

.....

..... *Please use continuation sheet(s) if required.*

Signed..... (Complainant) (date)

Section 7 Fair and Open Complaints Form (NPGA07C) – V1 June 2019.

For Office Use Only

Appointed Manager dealing:(Mobile Number)

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 & Procedure Document given to Complainant (Y/N): (Date)

Section 7 - Customer Complaints Terms & Conditions

Policy & Procedure

These are the Company's Terms and Conditions by which customer complaints are dealt with. Also included is the Company'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 the company as follows:

- ✓ The complaint should initially be raised with the venue manager at the venue at the time of the incident giving cause for complaint. **Stage 1, Part 1.**
- ✓ If the manager 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 Area Manager at the earliest opportunity. **Stage 1, Part 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 the Company for consideration by the Regional Operations Manager. **Stage 1, Part 3.**
- ✓ If the matter remains unresolved, the customer should be referred to an alternative dispute resolution (ADR) entity with whom the Company has registered. The complaint will not be considered by the ADR unless:
 - The matter relates to the outcome of the complainant's gambling transaction; and
 - It is not resolved during the two stage complaint procedure as outlined above.

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

The Company will ensure that:

1. information about our complaints 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 the Company 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
6. all complaints are handled in accordance with the procedure.

Should the Company 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.

The Company keeps a record of all complaints that are not resolved at the initial three-stage complaint procedure.

The Company 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 the Company. This information is provided in such format and within such timescale as the Commission may from time to time specify.

The Company also arranges for any outcome adverse to the Company 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 the Company'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 or disputes are covered?

A complaint, in the context of the LCCP, means a complaint solely about the conduct of the Company'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

The Company 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 the Company's complaint policy and procedure document and complaint form;
- ✓ 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 the Company, are not allowed to voice their own opinion as to the merits or otherwise of a complaint. Procedure is strictly adhered to.

Complaint Procedure

The Company 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.

The Company 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 the Company in the investigative process.

What happens next?

The Company 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 the 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: **Bacta ADR Service,**

Email Address: enqs@bactaadrservice.org.uk

Website: www.bactaadrservice.org.uk

Postal Address: **29-30 Ely Place, London EC1N 6TD.**

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.



Sheet No:



Site Loc. No:



Site Location:

**Section 8
Customer Incidents Requiring Police Assistance Log**

Ref	Date	Time	Nature of Incident	Time Police Called	Time Police Arrived	Outcome	Duty Manager
1							
2							
3							
4							
5							
6							
7							
8							

To be Retained on the Premises – To be used when Police are Called to the Premises to assist the Licensee whether they attend or Not.

Section 9

Money Laundering, Cash Handling and Suspicious Transactions

Introduction

The company has policies and procedures in place to identify and prevent Money Laundering and Terrorist Financing which are designed to fulfil its legislative and regulatory obligations under the Proceeds of Crime Act 2002 and the Terrorism Act 2000. The Company also 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. There is a responsibility for everyone employed in the regulated sector to report suspicious activity that they know or suspect to be money laundering. There is a specific offence under the legislation for failing to report.

Policy

- ✓ The Company has a corporate Money Laundering Risk Assessment as required by the LCCP.
- ✓ The AML Risk Assessment also contains a policy relating to the handling of cash and cash equivalents as required by the LCCP.
- ✓ The Company has an appointed Money Laundering Reporting Officer (MLRO).
- ✓ All relevant staff are trained on the requirements of the Regulations and informed of the need to report any suspicious transactions to the MLRO. Such reports to the MLRO are called 'Disclosures'.
- ✓ It is the responsibility of the MLRO to assess all disclosures from staff and make a decision as to whether a Suspicious Activity Report (SAR) needs to be submitted to the National Crime Agency (NCA).
- ✓ All SARs are key events and require the MLRO or another designated within the company to report the key event to the Gambling Commission.

Disclosure Procedure

- ✓ All members of staff are required by legislation to inform the MLRO if they know or suspect money laundering or terrorist financing. The MLRO is required to complete a SAR within 7 days of the disclosure and so notification should normally take place immediately by telephone or email and followed by the submission of a company AML disclosure form.
- ✓ No discussion will take place with colleagues as confidentiality is paramount.
- ✓ The MLRO will determine whether or not to submit a SAR to the NCA and will maintain a register of all disclosures and whether a SAR was completed or not.

Cash Handling

As part of its AML Risk Assessment the company has a policy relating to the handling of cash and cash equivalents. It also maintains records of the following:

- 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)
- vi. TRM machines have a pre-set tolerance that instigate an investigation process where money is simply swapped out (supplier led investigation by security).



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Members of staff, where appropriate, receive induction and refresh training 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.

**Section 9
Record of Suspicious Monetary Transactions Log**

TIME	LOCATION	CIRCUMSTANCES	REPORTED TO MLO	SAR SENT TO NCA	OUTCOME
Day: Date: Time:	Site: Address: Ref:	Notes: Photographs/CCTV Y/N Identity, if known, or description:	Day: Date: Time:	Day: Date: Time:	Notes:
Day: Date: Time:	Site: Address: Ref:	Notes: Photographs/CCTV Y/N Identity, if known or description:	Day: Date: Time:	Day: Date: Time:	Notes:

To be retained on Site

Company:

Site Reference:

Serial No: /

Section 10 Local Gambling Risk Assessments

Policy and Procedures:

It is a requirement of the License Conditions and Codes of Practice for operators to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises and have policies and procedures in place to mitigate those risks. In conducting the assessments of risk Operators must take into account relevant matters identified in the licensing authority's statement of licensing policy.

The company have conducted an assessment of local risk to the licensing objectives at each of their AGC premises. A copy of the risk assessment is retained at each premises.

In compiling the risk assessment, the company has where possible consulted the licensing authority's statement of principles and a copy of that document is kept at the premises. The company will consult other sources of relevant data such as local police and crime statistics where available.

It is an ordinary code provision that the company must share our local gambling risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request. (This may include during the course of a local authority or Gambling Commission visit).

We will review (and update as necessary) our local risk assessments:

- to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
- when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
- when applying for a variation of a premises licence; and
- in any case, undertake a local risk assessment when applying for a new premises licence.

Updating the LRA

The Venue Manager / Area Manager must notify the compliance department immediately if any significant Changes occur in the locality or when venue trading hours change to allow for the LRA to be updated and Reissued to the venue.

Your venue **Local Gambling Risk Assessment** must be placed within the white A4 folder and kept within the day safe along with the premises license and be available at any time for either Gambling Commission or Local Authority officers to read on request.

Section 11

Access to Premises by the Gambling Commission's & Local Authority Enforcement Officers

Statement

The Company 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:

The Company 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:

The Company 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.

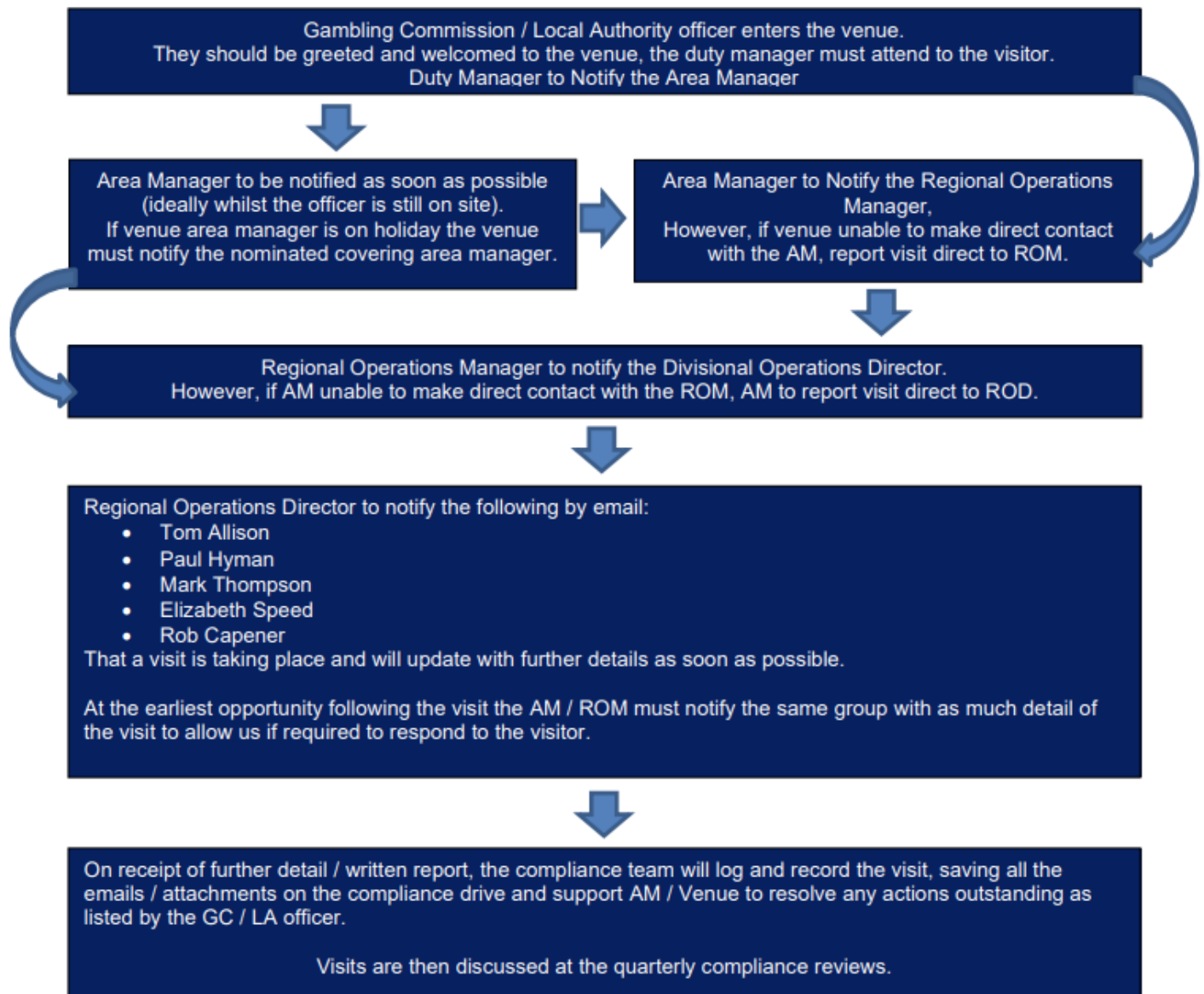
- ✓ The Company must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as:
 1. the numbers of people making use of the facilities and the frequency of such use;
 2. the range of gambling activities provided by the licensee and the number of staff employed in connection with them; and
 3. the licensee's policies in relation to, and experience of, problem gambling.
- ✓ The Company 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.

Local Authority visits:

It should be noted that local authorities also conduct compliance visits in our premises, whilst these can be lighter touch than an GC visit they are just as important to us to enable our demonstration of all our aspects of Social Responsibility.

Gambling Commission / Local Authority Officer – Venue Notification Process

We must ensure the compliance team log all visits conducted by either the Gambling Commission or the Local Authorities, venue teams must ensure they follow the notification process below:



Useful Hints and Tips:

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.

Where will I find documents that may be requested?

1. Full Premises Licence & Floor Plan – Should be kept in your day safe
2. Local Risk Assessment – Should be kept in your day safe
3. Local Area Map – Should be kept in your day safe
4. Local Council Statement of Principles – Should be kept in your day safe
5. Licence Summary – Should be 2 pages in separate frames on the venue floor
6. SR White Gambling Act Folder – Should be kept in the cash office
7. Staff Training Records – Should be kept in personnel files & on Admiral Academy
8. Stay in Control Leaflets – Should be near entrances / exits & near ATM's / Customer Toilets
9. Attempts to enter logs – Should be kept on the cash desk
10. Customer Interaction logs – Should be kept on the cash desk
11. Customer Interaction & Self Exclusion files – Should be kept in the cash office
12. Customer Complaints and Disputes Procedure – Print from Venue Intranet

What else might I be asked?

1. 20% Rule – The total machines on site 20% of them can be B3 (£500 Jackpot machines) e.g. 55 machines in total = 11 B3's
2. How many machines in your venue _____
3. How many B3's in your venue _____
4. Do we sell Lottery Tickets – No

What else might they look for?

1. Category Stickers – All machines should have a clear & visible category sticker
2. Gamcare Sticker – All machines should have a clear & visible Gamcare helpline sticker
3. No under 18's – All machines should have a clear & visible No under 18's sticker and at venue entrance.
4. Price of Play & Jackpot's – All machines should display the price of play & maximum jackpot amount
5. T&C's – These should be on display for all current promotions running
6. Challenge 25 – Poster should be displayed near entrances & exits & around the venue
7. No Alcohol – Sign should be displayed near entrances & exits
8. Opening Times – Poster should be displayed near entrances & exits or in windows

GAMBLING ACT 2005

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 breach 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.

Section 12

Employment of Children and Young Persons

Statement

The Company 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.

Section 13

Advertising Standards and Marketing

Statement

The Company 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 the Company 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 decisions are controlled by the central marketing department and a system is in place for local managers to apply for marketing initiatives that are approved by the Head of Marketing to ensure they are legal, honest and compliant with the Gambling Act/License Conditions & Codes of Practice

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.

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.

Site Location: _____ Sheet No: _____

XXXXXXXXXXXXXX

Section 14 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:

- | | |
|---|---|
| <ol style="list-style-type: none"> 1. Principle Concepts 2. Access to Gambling by Children and Young Persons 3. Customer Interaction 4. Information on how to Gamble Responsibly and Help for Gamblers with problems 5. Stay In Control 6. Self-Exclusion 7. Fair and Open Practice and Dispute Resolution (read only) | <ol style="list-style-type: none"> 8. Customer Incidents requiring Police Assistance Log 9. Money Laundering, Cash handling & Suspicious Transactions 10. Local Gambling Risk Assessments 11. Access to Premises by the Gambling Commission's Enforcement Officers 12. Employment of Children and Young Persons 13. Advertising Standards and Marketing |
|---|---|

Employee's Name (print)	Position in Company	Interval not to exceed 7 days			Tick against relevant Policies															
		Joining Date	Training Date	Leaving Date	1	2	3	4	5	6	7	8	9	10	11	12	13			

To be used for recording staff training carried out by the Company

Section 14 Summary Staff Training (NPGA138) – V1 June 2019. TO BE RETAINED ON THE PREMISES