



Hikvision ColorVu Cameras' powerful ability to capture details in low lighting comes from two specific breakthroughs in hardware technologies: advanced lenses and high-performance sensors.

Coupled with a supplemental light for extremely dark scenarios, ColorVu cameras guarantee video with colourful details when you need them.

We have committed to provide high quality CCTV covering the street from left- and right-hand side perspectives, with additional CCTV covering the main entrance. CCTV Spotter screens will be installed with live streaming of internal and external images. We will use 4k / 8-megapixel cameras inside the premises and 4-megapixel DarkFighter cameras (Hik vision - ColorVu) externally, which means that the external cameras will provide full colour images in any light condition.

The Key Benefits of Full-colour Video

- True Colour Information Helps to clearly identify individuals.
- Accurate colour rendering Helps to determine clear clothing colours.
- Excellent performance in low-light environments
- Captures clear information and richer details compared to black and white imaging. The benefits of Colour over Black and White imagery is truly transformational.
- Better visual recording and playback experience
- Balanced brightness
- Advanced sensors guarantee realistic rendering.
- All the above enhancements help local enforcement clearly identify people or incident that may be of interest.

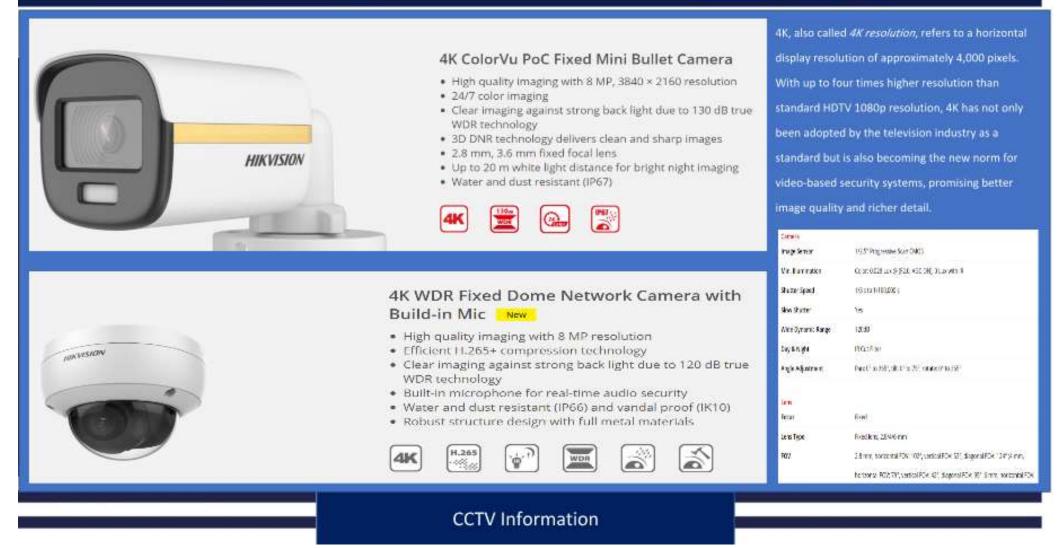
We intend to monitor entrances, along with front elevations as well as dimity-lit exterior areas where people may have lingered without being detected. We now enjoy better illumination with ColorVu cameras while they protect our employees, customers, and our immediate vicinity, helping them to feel safe, around and within our property.

The combination of our sophisticated CCTV system and high-quality spotter screens, located within the entrance, now means people know they are being recorded and are far more likely appropriately.

CCTV Information

GAME NATI





GAME NATION - CUSTOMER CARE

COMPLAINTS & DISPUTES POLICY

We take complaints and comments very seriously at Game Nation. If a customer has a complaint about the outcome of a gambling transaction or quality of service, good or bad, a member of our venue staff will do their very best resolve in venue.

All complaint/comment will be electronically logged on to our **"Customer Care"** portal via the venue IHL tablet, those resolved and those unresolved that need to be escalated to high management, the customer will be sent an email acknowledging their unresolved complaint with a unique reference code, a member of management will then be alerted of complaint/comment and respond within 72 working hours to hopefully fully resolve.

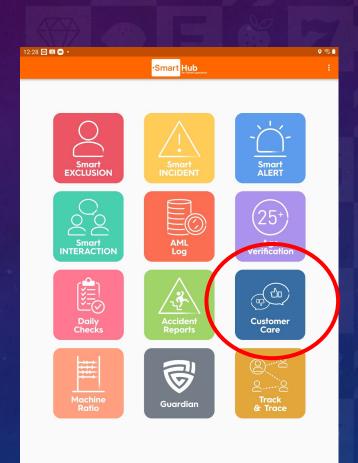
The customer can make a complaint or comments via several mediums, but all will be logged onto out Customer Care system, this will ensure we capture information for means of reportage, service improvements and training requirement

- In venue reporting via our IHL tablets, assisted by venue staff
- From our website, link will take customer to our Customer Care Portal, same interface as the IHL tablet.
- Writing direct to head office, this would the be manually entered on to portal.



GAME NATION CUSTOMER CARE

- Selecting the **Customer Care** icon on the venue IHL tablet will open the facility to add and issue or view issues, specific to that venue.
- The venue staff member is then prompted to select from several common categories that best describes the issue, complaint or comments
- The customer can raise an issue of concern, but also highlight excellent service from our team.
- Each category then has a series of sub-categories to best identify the issue.
- Many issues are resolved in venue by listening to the customer, receiving feedback and following company procedures, this facility ensures that all issues are recorded, and we learn from the feedback.



GAME NATION CUSTOMER CARE TABLET INTERFACE

- Selecting a category and subcategory until their issue is hopefully resolved and logged.
- Should the customer feel that their issue was not resolved in venue, they can
 provide their contact details, the complaint is then logged as unresolved and
 escalated to the venues Area Manager
- Once the issue is submitted, the customer will receive an acknowledgment email with unique ticket number.
- The issue is then escalated to the venue's Area Manager who receives an email alert, the Area Manager then has 72 working hours to log into portal and respond to customer with acknowledgment email and hopefully resolve the issue.
- The issue is automatically escalated to the Regional Director if the Area Manager does not respond in a timely manner, or is the AM feels that the RD needs to be involved. The RD does have full visibility of their region's tickets via portal
- All correspondents is completed within the Customer Care service, ensuring no loss of data and full traceability.

ICA New Customer Care Issue	2 C C C C C C C C C C C C C C C C C C C	28 8 ⊠ № ← New Customer Care Issue	:
Which category best describes the customer's issue		Which best describes the issue relating to 'Product (Game Nation)'	
Product (Game Nation)		The machine did not pay out when I had a win	
Venue Service (Game Nation)		I have been unable to cash out my ticket	
Website - App and Online Services (Game Nation)		Issues with promo offer	
Health and Safety - Maintenance (Game Nation)		Machine fault or out of order	
Membership (Game Nation)		Game was unavailable	
Gambling related help (Game Nation)		Issue with the change machine	
Report another customer (Game Nation)		Issue with the ATM	
Feedback and suggestions (Game Nation)			
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GAME NATION CUSTOMER CARE WEBSITE

- Our customers can make a complaint, comments via our website.
- Selecting the venue, taking the customer through the same series of simple selections that best the represents the issue.



CAME NATION ANUSEMENTS ANUSEMENTS PLAY 2 WIN BEEL TIME

Let's get things started by selecting where your issue relates to

GAME	

Select Venue	~
Select Venue	
Barking - Game Nation	
Bournemouth - Game Nation	
Brixton - Game Nation	
Camberwell - Game Nation	
Camden - Game Nation	
Deptford - Game Nation	
Dover - 60 Biggin St - Game Nation	
Dover - 9 Biggin St - Game Nation	
Folkestone - Game Nation	
Ilford - Game Nation	
Ipswich - Game Nation Kilburn - Game Nation	
Kilburn - Game Nation Maidstone - Game Nation	
Margate - Game Nation	
Portsmouth - Game Nation	
Ramsgate - 6 High St - Game Nation	
Ramsgate - 9 Oueen St - Game Nation	
Romford - Game Nation	
Slough - Game Nation	

GAME NATION CUSTOMER CARE WEBSITE

0 x 8 7 x 1 0

→ C # game

Venue selection and date stamping

GAME NATI

Please select the venue your issue relates to

Please tell us when this issue occured

Privacy Policy | Cookie Policy

28

Barking - Game Nation

May-13, 2022 10:50

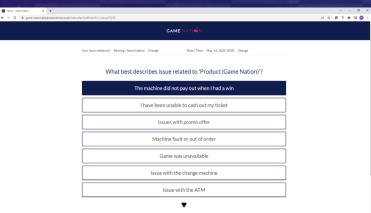
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First category selection

CAME : Inf T @ N CAME : Inf T @ N CAME : Inf T @ N What area best describes your issue? Product (Game Nation) Venue Service (Game Nation) Website - App and Online Services (Game Nation) Membership (Game Nation) Membership (Game Nation) Membership (Game Nation) Game Nation)

Sub-category selection

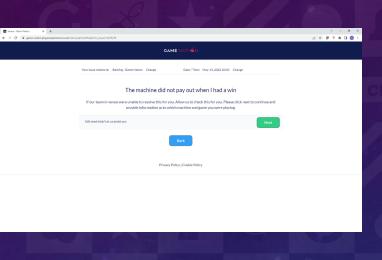


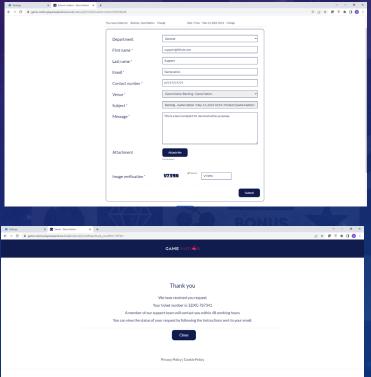
Report another customer (Game Nation)

Feedback and suggestions (Game Nation)

GAME NATION CUSTOMER CARE WEBSITE

- The issue acknowledgment process is the same as with the tablet, summitting your issue then corresponding by secure email.
 - Category and subcategory selection
 - Input customers contact details,, mobile number is optional
 - Submit ticket
- The email chain with full details is visible to customer and responding team.





GAME NATION CUSTOMER CARE

- The Area Managers and Senior Management have access to the Customer Care portal, giving them full visibility of complaints relevant to their area, showing all reported complaints/comments, their current status (open/in progress/resolved) and response times.
- Area Managers can only view their venues, Regional Directors can only view their regions, this ensures focus in dealing with issues appertaining to their venues.
- Senior Management/Admin have full visibility of all venues.
- Reports can be run by region, nationally, by entity or category, the reportage suit is quite extensive with graphical presentations

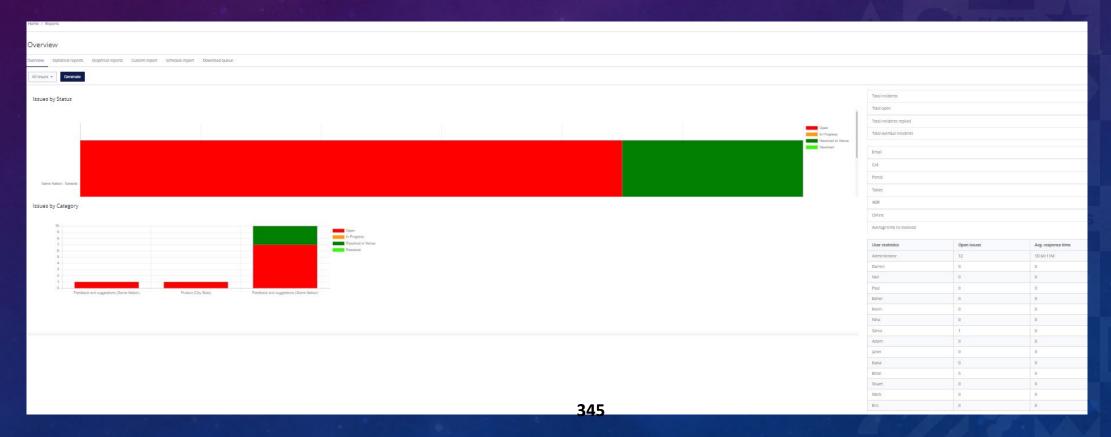
GAME NATION CUSTOMER CARE PC PORTAL

- Portal Incident page showing current (test) incidents, modes of entry, brief subject details and current status
- Selecting an incident line will open more details showing full conversation history and allow responses

T A R	0	Home / Incidents							
Riters									
All incidents	0	Incidents (9)							
Open Incidents	0								
New incidenes	Θ		Incident hash	Subject	Email	Department	Priority	Status	
Overdue incidents			MSIP-635367	Banking - Game Nation : jul-29, 2022 08:00 : Membership (Gam	hgt @ihihidb.com	General	Hgn	Open	
Assigned incidents									
Schedule Incidents	0		FCY/K-504143	Game Nation - Brian Hunt : 26-07-2022 16:18 : Product (Game	brian.hunt@sky.com	General	Hgt	Open	
All service requests			MWQT-913653	ZZZ - Test Venue - Do not select : Aug 1, 2022 10:96 : Produ	paulnewtonhams@gmail.com	General	High	Open	
Favorise	0		OCDU-834135	Game Nation - Brian Hunt : 01-08-2022 12:25 : Product (Game	paul@ihlihub.com	General	High	Open	
Spam	0		PHMD-172340	ZZZ - Test Venue - Do not select : Aug.1, 2022 12:06 : Produ	paulnewtonharris@gmail.com	General	High	Open	
Trash	0		BUXD-565424	Game Nation - Brian Hunt : 29-07-2022 08:29 : Venue Service	brian hunogsky.com	General	High	Open	
Archive			VBIR-658313	City Slots-Bromley - City Slots : Jul-29, 2022 07:21 : Produ	itee.toixik@gmail.com	General	High	Open	
Sent email			OVEC-266241	ZZZ - Test Venue - Do not select : jul-25, 2022 15:33 : Prod	itee.co.uk@gmail.com	General	High	Open	
			XBQK-769581	Game Nation - Brian Hunt: 26-07-2022 15:51 : Product (Game	brian.hunt@sky.com	General	High	Open	

GAME NATION CUSTOMER CARE PC PORTAL

- Reports pages, graphically presenting open and closed status and issues by category.
- Example below details report of open and closed (test) issues, break down by category and issue count, Avg response time by Area Manager, restricted visibility
- Full editing capability for reports and facility to auto generate specific reports





Licence Conditions & Codes of Practice

As a business we are required to interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling, as set out in Social Responsibility Code of the Licence Conditions and Codes of Practice (LCCP). This must include:

- Identifying customers who may be at risk of or experiencing harms associated with gambling.
- Interacting with customers who may be at risk of or experiencing harms associated with gambling.
- Understanding the impact of the interaction on the customer, and the effectiveness of our actions and approach.

A requirement to LCCP requires us to take into account the Commission's guidance on customer interaction. This guidance is structured along the three key outcomes we will be expected to meet:

- Identify
- Interact
- Evaluate

This guidance sets out why customer interaction is a requirement, makes the expectations clear and suggests ways we meet them. It also sets out why customer interaction is important. The gambling commission will expect us to demonstrate how our policies, procedures and practices meet the required outcomes.

What we need to know

The gambling commissions understanding of gambling harms and how they manifest is constantly evolving, so for the purposes of raising standards, protecting consumer interests, and preventing harm to consumers, they will update and re-issue guidance where new evidence or risks emerge. We need to know:

- The types of markers and behaviours that could indicate harm relevant to the type of gambling we offer, the product and the place
- How to spot when those indicators should trigger an interaction.

We need to ensure our teams are equipped to identify the relevant indicators of harm, to decide whether you need to interact and have effective processes for monitoring customer behaviour, so we can make quicker and better-informed decisions.



Gambling Harms

Gambling harms cannot be solely measured in terms of finance and resources. Therefore, we use a range of indicators in order to identify customers who may be experiencing harms.

What we are expected to do

- Use a range of indicators relevant to our business that we can observe and monitor. This should not rely on financial indicators alone. Where trigger points or thresholds are used, they should be realistic, and remember that not every customer who is experiencing or at risk of harm will trigger every indicator.
- Monitor customer activity and behaviour so that we are able to interact early and quickly. Invest in the development of our teams to manage our customer interaction process effectively.
- Make sure our process keep pace with any increase in demand through general growth or seasonal, promotional or other variations which might mean you are busier than usual.
- Train our teams to know their roles and responsibilities, and ensure they are supported and given the tools and skills they need to be able to act promptly when they spot or are alerted to indicators of harm.
- Ensure that our customers are not put at any greater risk of harm as a result of our premises being busier or quieter than usual.
- Think about the protection of our new customers we know less about them, so we may not know what their regular gambling pattern looks like. This means that alternative measures should be applied.
- Make meaningful records of all interactions with customers. Make these records available to the teams and use them to aid decision-making.
- All forms of gambling present risks and we should understand the prevalence of gambling harms for the type of gambling products we offer and implement appropriate processes.
- Actively ensure all our customers have access to information about safer gambling and the support available.

Using the right indicators

Change compared with previous gambling activity is a general trigger for customer interaction. Building up our knowledge of our regular customers is key to helping us spot changes in their behaviour.

We should use a range of indicators. This is not an exhaustive list, but your indicators should include:

- Amount of time spent gambling, visit frequency or length of stay on the premises, leaving and then returning to the premises.
- Amount and frequency of deposits, large losses, using multiple or more expensive payment methods, declined payments, appearing to spend more than they originally intended.
- Signs of distress, agitation, or changes which could be an indication that gambling is having a negative impact on a customer's wellbeing.
- Previous self-exclusions or previous customer interactions or playing through machine alerts.
- Information or hints from the customer, frequent complaints about not winning, or talking about the negative impacts of their gambling.
- Chasing losses, erratic betting patterns and gambling on higher risk products
- High staking following a win could hide or even lead to harmful behaviour. Suddenly having more money than usual can lead to increasing staking, which can lead to harms not associated with wealth or resources.



Affordability and a customer's personal circumstances

Historically, gambling operators have not systematically considered customer affordability when developing their customer interaction policies. We should aim to identify those experiencing or at risk of harm and intervene to try to reduce harm at the earliest opportunity. We should be aware of the difference between 'disposable income' and 'discretionary income' which refers to the amount left after living costs are taken into account, but it does still include many other unavoidable costs. Most people would consider it harmful if they were spending a significant amount of their discretionary income on gambling.

Vulnerability

Life events or changes to an individual customer's circumstances may mean that a person becomes more or less vulnerable to experiencing gambling harms. Those circumstances could include bereavement, loss of income or other factors. It will not always be obvious or clear to an operator when such events have occurred, but knowing our customers, and ensuring staff ask questions when there are potential signs of vulnerability, will help to determine whether those individual circumstances present an increased risk. As part of 'know your customer' we should consider the factors that might make an individual more vulnerable to experiencing gambling related harms. Factors include:

- If the individual is experiencing poor physical or mental health, physical or cognitive impairment, suffering side effects from a brain injury or medication, or has an addiction.
- If the individual is experiencing financial difficulties, is homeless, is suffering from domestic or financial abuse, has caring responsibilities, experiences a life change or sudden change in circumstances.
- If an individual has a higher than standard level of trust or high appetite for risk.
- If an individual is engaged in an activity which is highly complex; that they have a lack of knowledge and/or experience of the market.
- If an individual has difficulty accessing information because of poor literacy or numeracy skills, knowledge, dyslexia.

Spotting harmful gambling

We should draw on all available sources of data to give a comprehensive picture of the customer's gambling. Options for spotting harmful gambling include:

- Sharing of information by staff about concerns.
- Customer interaction forms, day diary with flags.
- Utilising back office systems and alerts where they exist.

The right information can mean better and quicker decisions. The customer interaction records we keep should give staff a more complete picture of the customer's previous activity, which will help to inform decisions. Our customers should not be at more risk because our premises are either busier or quieter than usual. You should ensure you have appropriate levels of well-trained staff on duty to meet the licensing objectives.

The role of teams

It is important that all the team receive training so that they are aware of the signs that could indicate that a customer may be experiencing harms associated with gambling. This is not an exhaustive list, but you should ensure that:

- Teams are trained to identify the signs of harm and refer back to documents that include the types of behaviour that may trigger customer interaction at an appropriate moment. Teams should know how to escalate a situation if they are unsure or require support.
- customers and know how to spot the signs.
- As a minimum, teams receive training at induction as well as refresher training.



Interact

Customer Interaction

When you are concerned that a customer may be experiencing harm, acting early and quickly could help stop or prevent the harm worsening. It is important in a premises environment that you interact with the customer in a timely manner whilst the opportunity presents itself.

For some customers, making them aware of why you are concerned may be enough to prompt them to think and make a change. Some customers will need more support or advice.

Our interactions should have an outcome. Knowing what impact our interaction has had will help you support the customer and help to keep improving our approach. To achieve this, it is vital to keep good records and make them available to teams to inform decisions.

What we expect

- We expect our teams to be curious, and if we spot behaviour that could indicate harm, act on it.
- Ensure your teams have access to the information and support they need, such as customer interaction records, so that they are able to make decisions about how to interact and can do so discreetly.
- Interact in a way that is appropriate to the severity of the potential harm.
- Think about what information we should give the customer to help them understand why you are interacting with them, such as describing the type of behaviour they display or practical help or support where appropriate.

Interacting with a customer

Many of our interactions are likely to be face-to-face, so it is important for teams to be prepared in advance of carrying out a customer interaction. You should consider:

- What do you need to know from the customer and what do you already know about them?
- What information do we want to give them?
- How many times have we already interacted with the customer?
- What outcome do we want to achieve?
- Is the customer behaving in a way which might inhibit an interaction at this point?

Offering help & support

Encourage customers to think about their gambling. Their responses will help us work out the right kind of help and support to offer.

We will need to direct some customers to information about safer gambling and/or suggest appropriate gambling management tools. We might need to signpost them to sources of help and specialist support from organisations which deal with advice and treatment for problem gambling.

We must also make information about safer gambling readily available to customers, as well as information about problem gambling.

We will need to interact with some customers a number of times. Our records of previous interactions with customers will help us decide how to provide the right help and support.

Customers often respond better to being informed about their behaviour and why, rather than being "told" what to do. But for some customers, and particularly if the behaviour continues to cause concern, you may need to take a more proactive approach. In some cases, you may need to take action for the customer, which could mean refusing service.



The role of the team

We should ensure that our teams:

- Understand the types of interaction that could take place and how to interact appropriately e.g. they may only need a brief intervention.
- Know the type of help or support to offer, such as information, signposting customers to specialist support.
- Know the circumstances and process for refusing service to customers, such as requesting a customer to leave or barring a customer.
- Understand their respective responsibilities and who is designated to carry out customer interactions, if only certain team members are authorised to interact.
- Are advised how to deal with situations where customers demonstrate signs of agitation, distress, intimidation, aggression or other behaviours that may inhibit customer interaction, and what to do if the interaction does not take place at that time.

Whilst training on the legislative framework is important, teams also need to be trained on the skills and techniques they need to help them carry out customer interactions.

Keeping Records

Good record keeping allows us to demonstrate when and why we have interacted with customers and helps with ongoing monitoring of customers. We should:

- Keep records of all customer interactions and, where an interaction has been ruled out, the reasons for this. Where an interaction has taken place at a later date, this should also be recorded.
- Make use of all relevant sources of information to guide and deliver effective customer interactions, including our records of previous interactions.

Good records should include:

- The behaviour or activity before the interaction.
- The change in behaviour or prompt for the interaction.
- How we interacted and what was said or done, for example advice or suggestions to help the customer manage their gambling, or to take a break from their gambling
- What happened next.

We should also record situations where an interaction was prompted but did not take place, and how you followed that up. In some cases, you will need to monitor the customer's gambling to spot behaviours which could indicate further harm.

All interactions should be entered on the IHL hub



Evaluate

What is expected

- Understand the impact of individual interactions on a consumer's behaviour and whether/ what further action is needed.
 - Evaluate the effectiveness of your approach by trialling and measuring impact.
- Embed lessons learned and best practice across the business and collaborate to share across the industry.

Understanding the impact of individual interactions

In this context, by impact we mean a change in the customer's gambling activity which could be attributed to the interaction. An important part of this is whether the customer has understood the information or advice given.

Not every customer who receives an interaction will require active follow up, but many will. In these cases, follow up activity should be proportionate to the severity or extent of the harm being displayed. This approach will help you target your resources where they are most needed.

Understanding the impact of the interaction on the customer includes being able to look at and compare:

- The behaviour before the interaction.
- The change in behaviour or prompt for the interaction.
- How you interacted what was said or done
- What happened next.

Some ways to work out impact include:

- Was there a positive change in behaviour? Did the customer's gambling seem to change after the interaction?
- We could also follow up and ask the customer whether they found the interaction helpful or not.
- Is there a need for further or follow up action?

Evaluating the effectiveness of the approach

Good evaluation helps us to understand which aspects of our approach are the most effective at identifying the right customers, and the types of tools or support that work well to help customers manage their gambling in a way that works for them. The following measures could help to work out whether your approach is working well:

- Customer retention.
- Reduction in complaints.
- The appropriate number of customer interactions in relation to the size of your customer base or footfall

Keeping your policies and procedures under review and up to date by taking into account research and industry best practice will help us to identify customers you should be interacting with, which will help us target our resources where they are most needed, in ways which may lead to better outcomes. We should also review our internal controls following the publication of a regulatory settlement, to address any similar weaknesses which could exist in our own processes.



The role of our teams

Our teams have an important role to play to understand whether our approach works, and as a minimum, We should:

Records

Ensure that records of all customer interactions are made by teams and used to aid decision making. Such records should be used for evaluation purposes e.g. dip sampling for quality assurance purposes or to assess whether a customer changed their behaviour as the result of an interaction.

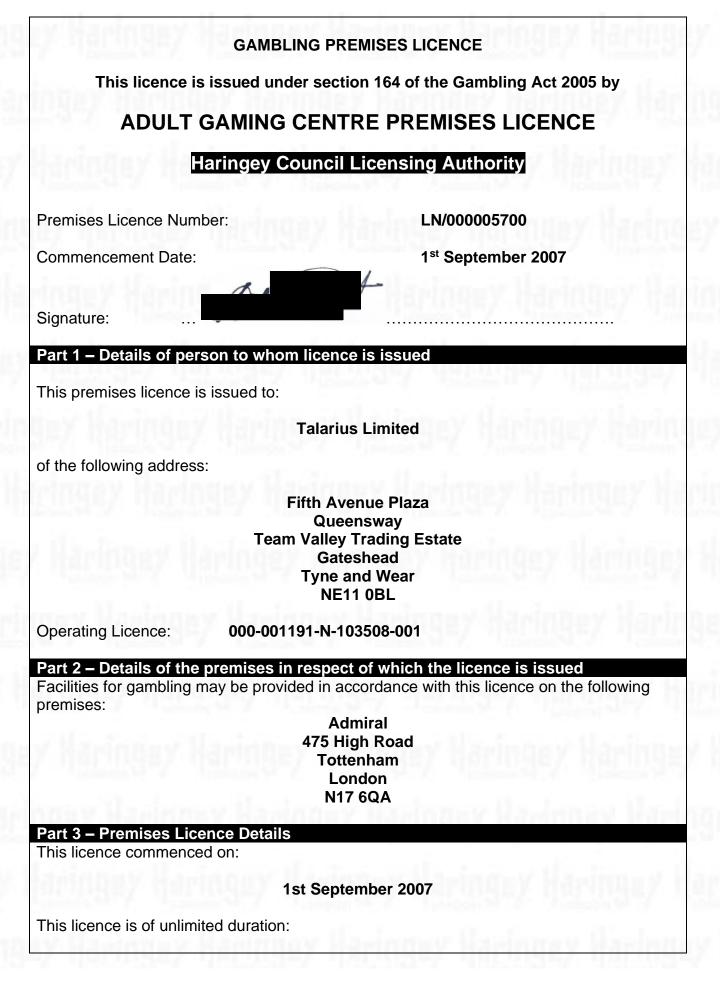
Training

Ensure that records of all customer interactions are made by teams and used to aid decision making. Such records should be used for evaluation purposes e.g. dip sampling for quality assurance purposes or to assess whether a customer changed their behaviour as the result of an interaction.

Support

Ensure that teams are properly supported in carrying out effective interventions.





The following conditions have been attached to the licence by the issuing authority under section 169(1)(a) of the Gambling Act 2005:

N/A

The following conditions, which would otherwise attach to the licence by virtue of regulations made under section 168 of the Gambling Act 2005, have been excluded by the issuing authority under section 169(1)(b) of that Act:

N/A

A scale plan is attached as an annex to this licence

Lodged with Licensing Authority