

APPENDIX 1

APPLICATION FORM

Our Ref: RGE/lcs
21st September 2007

The Licensing Section
Haringey Council
Civic Centre
High Road
Wood Green
N22 8LE

Dear Sirs

**RE: GAMBLING ACT 2005 - APPLICATION FOR AN AGC PREMISES LICENCE
48 GRAND PARADE, GREEN LANES, HARINGEY**

We act on behalf of Frankice (Golders Green) Limited who have instructed us to make an application for a Premises Licence for an AGC to be opened at the above premises.

We attach the following:-

1. The application form.
2. A plan of the premises.
3. A cheque in the sum of £1800 by way of the fee.
4. A copy of the notice served on the Responsible Authorities.

I would advise that we have arranged for the site notice to be erected on the property and for the relevant notice to be published in a local newspaper.

Please acknowledge receipt.

Yours faithfully.

Roger Etchells
Email: roger@rogeretchells.co.uk

Enc:



V32400 60500

**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

Large Casino

Small Casino

Bingo

Adult Gaming Centre

Family Entertainment Centre

Betting (Track)

Betting (Other)

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):

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.

GROUND FLOOR FORMER SHOP PREMISES IN A 3/4 STOREY BUILDING

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.

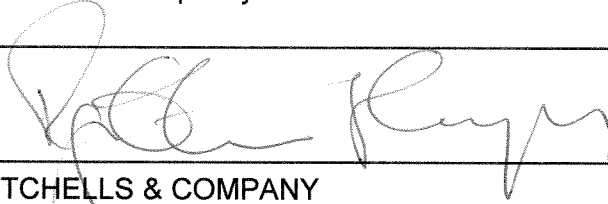
	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon	<i>hh:mm</i>	<i>hh:mm</i>	
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

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 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: ROGER ETCHELLS & COMPANY

Date: 21.09.2007 (dd/mm/yyyy) Capacity: DULY AUTHORISED AGENT

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:

ROGER ETCHELLS

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

01530 417554

24. Postal address for correspondence associated with this application:

ROGER ETCHELLS & CO, THE OLD BANK, KILWARDBY STREET, ASHBY DE LA ZOUCH

Postcode: LE65 2FR

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:

NOTICE OF APPLICATION FOR A PREMISES LICENCE

This notice is issued in accordance with regulations made under section 160 of the Gambling Act 2005

Notice is hereby given that FRANKICE (GOLDERS GREEN) LIMITED
of the following address: UNIT 3, OTTERSPOOL WAY, WATFORD, WD25 8HL
who made an application for an operating licence on 27/04/2007
has made an application for an ADULT GAMING CENTRE premises licence.

The application relates to the following premises: 48 GRAND PARADE, GREEN LANES,
HARRINGAY, N4 1AG

The application for a premises licence has been made to the following licensing authority:
LONDON BOROUGH OF HARINGEY, CIVIC CENTRE, HIGH ROAD, WOOD GREEN, N22
8LE

Website: www.haringey.gov.uk

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

The following person connected with the applicant is able to give further information about
the application: Roger Etchells – 01530 417554 – roger@rogeretchells.co.uk

**Any representations under section 161 of the Gambling Act 2005 must be made no
later than the following date: 25.10.07**

APPENDIX 2

CODE OF PRACTICE FOR ADULT GAMING CENTRES

GAMBLING COMMISSION

Typical Licence Conditions and Codes of Practice for:

Adult Gaming Centre Operators

August 2007

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Introduction

The Gambling Act 2005 (the Act) creates new arrangements that govern the way organisations and individuals involved in gambling can operate. From September 2007, most operators who wish to run a gambling business in Britain, and certain key individuals, need to be licensed by the Commission. There are some [exemptions](#). The Commission has developed general licence conditions and codes of practice that govern how gambling facilities are provided and managed and gambling conducted.

This document sets out an example of the relevant conditions and code provisions for holders of an *Adult Gaming Centre* operating licence. It does not include statutory conditions, any licence conditions imposed by the Secretary of State or any conditions the Commission might attach solely to an individual licence.

This document is intended to be a general example only and does not replace the conditions and codes which will be attached to the operating and personal licences when these are issued. It should not be considered a definitive guide. However, this licensee-specific example will, we hope, aid operators' and stakeholders' understanding about the requirements on licensees.

Individual licence holders will receive copies of the conditions and codes which apply to their particular licence when their licence is issued to them. In some cases, the licence will set out individual conditions that are specific to that operator, based on the assessment of their licence application.

The Commission has powers to prosecute operators and can impose fines on operators who breach their licence conditions or social responsibility code of practice provisions, and can take breaches of the ordinary codes of practice into account as part of a prosecution. Licence conditions and social responsibility codes of practice detail the legal obligations attached to holding an operating licence. Ordinary codes of practice detail the manner in which facilities for gambling should be provided.

Part I of this documents sets out the Licence Conditions.

Part II of this document sets out the relevant provisions of the code of practice. The text in shaded boxes comprises the 'social responsibility provisions' and covers issues including the promotion of responsible gambling and marketing. The text that is not shaded which is titled 'ordinary code provisions' covers issues including the employment of children and young people and age verification.

Where a Condition or Code provision appears in the full [Licence Conditions and Codes of Practice](#) but does not apply for this type of licence, it has not been reproduced here. Where this is the case, there may gaps in the sequential numbering of the individual conditions.

You can obtain copies of this document and the other documents mentioned above from the Commission's website, www.gamblingcommission.gov.uk or by writing to:

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP

T 0121 230 6666

F 0121 230 6720

E info@gamblingcommission.gov.uk

Part I: Gambling Commission General Licence Conditions

Licence Conditions applicable to making gaming machines available for use in an adult gaming centre

1 Personal licences and qualified persons

1.1 Qualified persons

Operating licences issued to small-scale operators

In this condition the terms 'small-scale operator', 'qualifying position' and 'qualified person' have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

Schedule X¹ lists those individuals notified to the Commission as qualified persons.

If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under s104(1)(b) for amendment of the details of the licence set out in Schedule X¹.

An application for amendment under s104(1)(b) may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.

1.2 Personal licences

(a) Subject to (e) and (f) below licensees must ensure:

(i) that each individual who occupies one of the management offices specified in (b) below in or in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter 'a personal management licence'); and

(ii) that at least one person occupies at least one of those offices.

(b) The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:

- the overall management and direction of the licensee's business or affairs;
- the licensee's finance function as head of that function;
- the licensee's gambling regulatory compliance function as head of that function;
- the licensee's marketing function as head of that function;
- the licensee's information technology function as head of that function in so far as it relates to gambling-related information technology and software; or
- oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area.

(c) Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder's personal management licence.

¹ The schedules mentioned here will be attached to individual licences.

(d) Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual's work and any requirements of the Commission in respect of such matters applicable during the period of the review.

(e) Paragraphs (a) to (d) above shall not apply to a licensee for so long as the licensee is a 'small-scale operator' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 ('the Regulations').

(f) During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs (a) to (e) above shall apply subject to the proviso that the phrase 'each individual' in paragraph (a)(i) shall not include any individual who was a 'qualified person' (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

3 Financial robustness

All company licensees must notify the Commission of the name and address of any person who becomes a shareholder in the company or its holding company holding 3% or more of the issued share capital of the company or its holding company; or any existing shareholder who acquires a holding of 3% or more of the issued share capital of the company or its holding company.

In this condition 'holding company' has the meaning ascribed to that term by section 736 of the Companies Act 1985 (as amended).

4 Protection of customer funds

Licensees who hold customer funds for use in future gambling must set out clearly, in information made available to customers in writing, whether they protect customers funds in the event of insolvency and the method by which this is achieved.

5 Cash handling

Licensees, as part of their internal controls and financial accounting systems, must have in place and follow written policies and procedures concerning the handling of cash, and cash equivalents (ie bankers drafts, cheques and debit cards), designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit and to provide assurance that gambling activities are being conducted fairly.

6 Provision of credit by licensees and the use of credit cards

Licensees must not:

- themselves provide credit in connection with gambling; nor
- participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

7 General fair and open provisions

Licensees must satisfy themselves 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.

An accurate summary of the contractual terms on which gambling is offered must be made available to customers and set out in plain and intelligible language.

Customers must be notified of changes to terms before they come into effect.

14 Access to premises

Licencees must have in place and implement written policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

15 Information requirements

15.1 Reporting suspicion of offences etc

Licencees must provide the Commission with any information that they 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 provision having the effect of a licence condition.

15.2 Reporting 'Key Events'

Licencees must notify the Commission of the occurrence of any of the following key events as soon as reasonably practicable and in any event within 5 working days of its occurrence:

- in the case of licencees which are companies, their (or any group company of theirs) being placed in liquidation, administration or receivership: in this condition a 'group company' is any subsidiary or holding company of the licensee – as those terms are defined in s736 Companies Act 1985 or any statutory modification or re-enactment thereof – and any subsidiary of such holding company;
- in the case of a licensee who is an individual (or a partner in a partnership licensee) their becoming bankrupt within the meaning of section 381 of the Insolvency Act 1986 or sequestration of their estate under section 12(1) of the Bankruptcy (Scotland) Act 1985;
- where the licensee is required to have its accounts independently audited, any unplanned change of auditor including a change prompted by a dispute or resulting from auditors being unable or unwilling to sign an audit certificate;
- the departure from the licensee's business of any holder of a personal management licence, other than those with oversight of the day to day management of licensed premises of a licensee operating more than 4 licensed premises;
- any reduction in the licensee's employed staff by more than 10% provided that represents at least 3 individuals;
- the acquisition or disposal of gambling premises or pitches;
- in the case of corporate licencees, the disposal or acquisition of any group company;
- the disposal of assets to the value of 10% or more of the licensee's total net assets;
- any breach of a covenant given to a bank or other lender;
- any default in making repayment of the whole or any part of a loan on its due date;
- any court judgments remaining unpaid 14 days after the date of judgment;
- the commencement of any material litigation against the licensee;
- any instance of internal or external fraud or theft involving a sum in excess of £10,000; and
- the commencement of disciplinary action against the holder of a personal licence where the licence holder is suspended or serious misconduct is alleged.

15.3 General and Regulatory Returns

On request, licencees must provide the Commission with such information as the Commission may require about the use made of facilities provided in accordance with this licence, and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on, including in particular information about:

- the numbers of people making use of the facilities and the frequency of such use;
- the range of gambling activities provided by the licensee and the numbers of staff employed in connection with them; and
- the licensee's policies in relation to, and experiences of, problem gambling.

In particular, within 28 days of the end of each quarterly or annual period as the case may be, licensees must submit a Regulatory Return to the Commission containing such information as the Commission may from time to time require².

Part II: Gambling Commission Codes of Practice

Codes of Practice applicable to making gaming machines available for use in an adult gaming centre

2 Protection of children and other vulnerable persons

2.1 Combating problem gambling

Social responsibility code provision

Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling.

Licensees' policies and procedures for socially responsible gambling must include but need not be confined to:

- the specific policies and procedures required by the following provisions of section 2 of this code;
- a commitment to and how they will contribute to research into the prevention and treatment of problem gambling;
- a commitment to and how they will contribute to public education on the risks of gambling and how to gamble safely; and
- a commitment to and how they will contribute to the identification of and treatment of problem gamblers.

2.2 Access to gambling by children and young persons

Social responsibility code provision

Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.

This must include procedures for:

- checking the age of apparently underage customers;
- removing anyone who appears to be under age who tries to access the gambling facilities and cannot produce an acceptable form of identification; and
- taking action when there are attempts by under-18s to enter the premises.

Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.

² The current forms of the sector specific returns and guidance notes for their completion are available on the Commission's website www.gamblingcommission.gov.uk and can also be obtained by writing to the Commission at Victoria Square House, Victoria Square, Birmingham B2 4BP.

In premises restricted to adults, service should be refused in any circumstances where any adult is accompanied by a child or young person.

Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This should include appropriate training which must cover the legal requirements on returning stakes and not paying prizes to underage customers.

Licensees must only accept identification which:

- contains a photograph from which the individual can be identified;
- states the individual's date of birth;
- is valid; and
- is legible and has no visible signs of tampering or reproduction.

Ordinary code provision

The Commission considers acceptable forms of identification to include any identification carrying the PASS logo (eg Citizencard, Validate and the Government's own Connexions card); a driving licence (including a provisional licence) with photocard; and a passport.

Licensees should implement procedures that require their staff to check the age of any customer who appears to them to be under 21.

Licensees should consider permanent exclusion from premises for any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.

Procedures should be in place for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission and the police, and making available information on problem gambling.

2.3 Information on how to gamble responsibly and help for problem gamblers

Social responsibility code provision

Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about and help in respect of problem gambling.

Licensees must take all reasonable steps to ensure that this information is readily accessible including in locations which enable the customer to obtain it discreetly.

For gambling premises this should include:

- information in the gambling area, near gaming machines and near to where ATMs are located; and
- posters, or leaflets that may be collected discreetly and taken away, in other areas (eg toilets and near to exit doors).

The information must be prominent, and appropriate to the size and layout of the premises.

The information must cover where relevant:

- the availability of measures that are accessible to help an individual monitor or control their gambling, such as to restrict the duration of a gambling session or the amount of money they can spend;

- the availability of timers or any other forms of reminders or 'reality checks' that may be available;
- self-exclusion options; and
- information about the availability of further help or advice.

The information must be directed to all customers who wish to enjoy gambling as entertainment and not be targeted only at those the operator perceives to be 'problem gamblers'.

Ordinary code provision

Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:

- the information on how to gamble responsibly and access to help referred to above;
- the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code; and
- the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

2.4 Customer interaction

Social responsibility code provision

Licensees must implement policies and procedures for customer interaction where they have concerns that a customer's behaviour may indicate problem gambling. The policies must include:

- identification of the appropriate level of management who may initiate customer interaction and the procedures for doing so;
- the types of behaviour that will be logged/reported to the appropriate level of staff and which may trigger customer interaction at an appropriate moment;
- the circumstances in which consideration should be given to refusing service to customers and/or barring them from the operator's gambling premises; and
- training for all staff on their respective responsibilities, in particular so that they know who is designated to deal with problem gambling issues.

But such policies and procedures should be consistent with, and implemented with due regard to, licensees' duties in respect of the health and safety of their staff.

2.5 Self-exclusion

Social responsibility code provision

Licensees must put in place procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.

Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.

Licensees must take all reasonable steps to prevent any marketing material being sent to a self-excluded customer as soon as practicable. This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.

Licensees must close any customer accounts of an individual who has entered a self exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.

Licensees must implement procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling; and which include:

- a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
- photo identification (where available and in particular where enforcement of the system may depend on photographic ID), and a signature;
- staff training to ensure that staff are able to enforce the systems; and
- the removal of those persons found in the gambling area or attempting to gamble from the premises.

Ordinary code provision

Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.

Wherever practicable, individuals should be able to self-exclude without having to enter gambling premises.

Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.

Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.

Licensees should encourage the customer to consider extending their self exclusion to other licensees' gambling premises in the customer's local area.

Customers should be given the opportunity to discuss self-exclusion in private, where possible.

Licensees should take all reasonable steps to ensure that:

- the self-exclusion period is a minimum of six months and give customers the option of extending this to a total of at least five years;
- a customer who has decided to enter a self-exclusion agreement is given the opportunity to so do immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
- at the end of the period chosen by the customer (and at least six months later), maintain the self-exclusion in place, unless the customer takes positive action in order to gamble again. No marketing material may be sent to the individual unless the individual has taken positive action in order to gamble again, and has agreed to accept such material; and

- where a customer chooses not to renew, and makes a positive request to begin gambling again, give the customer one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person.

(Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.)

2.6 Employment of children and young persons

Ordinary code provision

Licensees who employ children (under-16s) and young persons (those aged 16 and 17) should be aware that it is an offence:

- a) to employ them to provide facilities for gambling;
- b) if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
- c) to employ them to carry out any other function on adult gaming centre licensed premises while any gambling activity is being carried on in reliance on the premises licence;

As to (b) it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.

Accordingly, licensees should have policies and procedures designed to ensure that:

- children and young persons are never asked to perform tasks within (a) or (b) above;
 - all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons;
- and should consider adopting a policy that:
- children and young persons are not employed to work on adult gaming centre licensed premises at any time when the premises are open for business; and
 - gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

2.8 Money lending between customers

Ordinary code provision

Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

3 Fair and open provisions

Social responsibility code provision

Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

4 Marketing

Social responsibility code provision

If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:

- a) the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to customers;
- b) neither the receipt nor the value or amount of the benefit is:
 - (i) dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - (ii) dependent on the amount the customer spends on gambling within a predetermined length of time which is shorter than the whole of the period during which the particular benefit is made available;
- c) 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; and further that:
- d) if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.

Ordinary code provision

Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

Ordinary code provision

Licensees should comply with the advertising codes of practice which apply to the form and media in which they advertise their gambling facilities or services.

5 Complaints and disputes

Social responsibility code provision

Licensees must put in place a written procedure for handling customer complaints and disputes.

In this code a 'complaint' means a complaint about any aspect of the licensee's conduct of the licensed activities, and a 'dispute' is any complaint which:

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

Licensees must ensure that:

- customers are told the name and status of the person to contact about their complaint;
- customers are given a copy of the complaints procedure on request or on making a complaint; and
- all complaints are handled in accordance with the procedure.

Licensees must also ensure that customers whose disputes are not resolved to their satisfaction by use of the complaints procedure may refer them to an independent third party. The arrangements under which such complaints are referred may, but need not, provide for the third party's decision be binding on the licensee and the customer.

Licensees must keep a record of all complaints that are not resolved at the first stage of the complaints procedure.

Licensees must arrange for a copy of the decision on, or a note of the outcome of, each dispute referred to the independent party to be provided to the Commission quarterly, either by the independent party or by the licensee.

6 Gambling licensees' staff

Social responsibility code provision

Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

Gambling Commission August 2007

The Gambling Commission regulates gambling in the public interest. It does so by keeping crime out of gambling, by ensuring that gambling is conducted fairly and openly, and by protecting children and vulnerable people from being harmed or exploited by gambling. The Commission also provides independent advice to government on gambling in Britain.

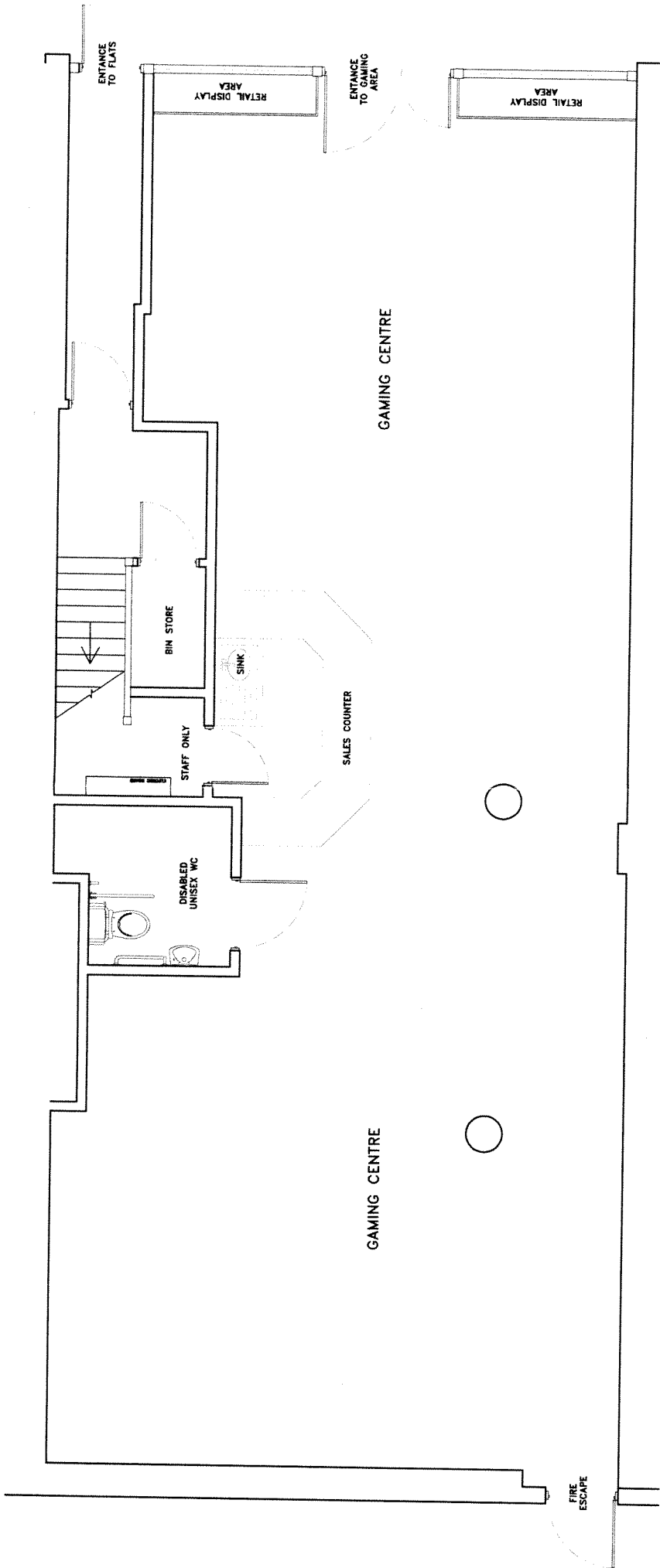
For further information or to register your interest in the Commission please visit our website at: www.gamblingcommission.gov.uk

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APPENDIX 3

POLICE REPRESENTATIONS



GROUND FLOOR PLAN

NOTE : THIS DRAWING IS TO BE USED FOR IDENTIFYING LICENSED GAMING AREAS ONLY AND IS NOT TO BE USED FOR RENOVATION WORKS OR PLANNING OF GAMING MACHINE LOCATIONS. DO NOT SCALE - DIMENSIONS TO BE CHECKED ON SITE

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