

## **SECTION 3**

## Local Risk Assessment – Gambling Act 2005 Licensing Objectives

### Premises

Premises Name:	<b>Admiral Casino</b>
Premises Address:	<b>Newport Road, Middlesbrough</b>
Premises Post Code:	<b>TS1 5AE</b>
Premises Licence Number:	<b>TBC on issue</b>
Category of Premises:	<b>Casino</b>

### Company

Operating Company:	<b>Luxury Leisure</b>
Operating Licence Number:	

### Assessment Writer

Name of Person Writing this Assessment:	<b>Charles Churchill</b>
Position within Company or Name of Authorised Agent:	<b>Casino General Manager</b>
Date of this Assessment	<b>June 2023</b>
Assessment Reviewed:	<b>June 2022</b>
Date of Original Assessment	<b>April 2022</b>

## **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 must be reassessed every 2 years for the accreditation to be maintained.

## **Local Area and Site Profile**

\*For the purpose of this risk assessment 'local area' has been considered as a 1.5km radius of the casino site, with assessments taking place in 500m, 1,000m & 1,500m radius.

The venue has a single entrance/exit at street level on Newport Rd, leading to a shared foyer giving separate access and separate entrances to the Admiral Slots AGC and the Casino. There is no direct public access between the adjoining AGC and the Casino with both licensed premises being operated completely independently of each other. The Casino Reception is located directly at the front entrance of the casino giving a clear line of sight and command of the entrance. This Reception desk is always manned during opening hours.

The Casino offers 20 Electronic Roulette Terminals and 20 Category B1 machines. The casino offers food and licensed beverage facility served from a bar and kitchen located centrally within the casino. Food and beverage is served as directed by the conditions of the premises license.

The venue trades 24hrs per day, 7 days per week. Night trading has the additional support of an access control system fitted to the casino door. This is a CCTV monitored 2-way audio system where the Receptionist can view the foyer area, communicate with anyone in the foyer and assess suitability before allowing entry. This foyer area system allows full control over entry and the current proposal is to operate this system from 10pm every evening however this may change in line with business needs. In addition, SIA badge holding security staff will be working within the premises at peak business times and as directed by the conditions of the premises license conditions. Security staff standard position will be at the casino door entrance however they will also patrol the venue periodically. The casino will employ approximately 40 members of staff, all of which will complete a thorough induction and onboarding program. All employees will be fully trained and as a condition of the operating license, hold the necessary Personal Management Licence or Personal Functional Licence (PML's & PFL's) in line with their roles. There will usually be a team of 4 staff on duty (A PML holding Duty Manager, a PFL holding gaming host, a receptionist, and a food & beverage host). Staffing numbers will increase where business demands and may also decrease to a minimum of 3 where food and beverage is not served. There will always be a PML holder and a PFL holder on site. All staff are trained in the relevant legislation and procedures pertaining to their roles including all LCCP, Player Protection and AML considerations.

The Casino is located on Newport Road in Middlesbrough. Newport Road is a relatively busy road in the town centre with several businesses in the immediate vicinity, these include retail businesses associated with any town centre: opticians, hair & beauty salons, café's, charity shops, jewellers and several national and local retailers. The Casino is situated almost opposite the entrance to the Hill Street Shopping Centre and 100m from the main Town Centre Bus Terminal. There are also several bars and licensed premises (alcohol) in the immediate vicinity of the Casino. The venue is located near a main bus route and is within 100m of the entrance to the central bus station. There are no bus stops allocated on either side of the road or near the casino which would attract congregation outside the premises. There is a taxi rank (Hackney carriages & Private Hire pick up/drop off) around 50m away on Newport Rd, providing 24hr transport options to and from the Town Centre without causing any congestion near the casino entrance. Middlesbrough train station which is 500m away (as the crow flies) and is around a 10-minute walk from the venue. Overall, it could be considered that the 'town centre' is located within a 500m radius of the Casino site and certainly within 1,000m of the Casino.

#### **Local Area Profile - Premises License (Gaming & Alcohol)**

There are 6 Adult Gaming Centres (AGCs) in the town centre. 3 are Admiral Slots branded, 1 Royals AGC, 1 Dunes AGC and a new Merkur venue which opened in 2023 (license granted on 11th May 2022 according to the Middlesbrough Council website) at 58 Linthorpe Rd, Middlesbrough. All are within a 500m radius of the casino and can be considered High Street venues. In addition, there are 9 active betting shops within a 1.5km radius; 4 are within a 500m radius of the casino, 3 within 1,000m and 2 within 1,500m. Of the active betting shops; 4 are 'Ladbrokes', 3 are 'William Hill', 1 'Paddy Power' and 1 'Betfred'. All venues have been visited during opening hours in the production of this risk assessment. There are 2 additional betting shops within a 1,500m radius detailed on the Gambling Commission premises register however visits to these sites show these are not operational (namely: Done Brothers (Cash Betting) Limited, Betfred, 63 Grange Rd, TS1 5AS & Ladbrokes Betting & Gaming Limited, Ladbrokes, 15 Captain Cook Square, TS1 5UB)\*.

\*Premises details have been taken from the Gambling Commission premises register and Middlesbrough Council Records with operations confirmed via a visit to each premises.

\*\* All active AGC venues and active betting shops are detailed on the attached map.

In the immediate vicinity of the Casino is the 'Discovery' Public house (formally a Yates Wine Lodge) open daily 9am to 11pm with the exception of Fridays & Saturdays where a 12-midnight closing is applied; Sapphires late bar, opening between 8pm-9pm every day and closing at 2am except on Fridays & Saturdays where a 3am closing time is applied; 'Resolution Bar' (J. D. Wetherspoon), open from 8am daily and closing at 12-midnight except on Friday & Saturday nights where a 1am closing is applied.

Visits to these sites and observations show they employ Door Security where later licences are applied and on weekends although exact timings of Door Supervision at these venues could not be fully established.

A recent addition to the vicinity (within 500m) is the 'Level X' venue. Visits to this new venue show that it is an arcade, bowling and 'crazy' golf-based venue holding an alcohol license and serving bar snacks. The venue does not have any gaming machines. The venue is well staffed/supervised. Children under the age of 12 must be accompanied by an 18+ adult. Children aged 12-17 can visit unaccompanied until 7pm; if accompanied by an adult, they can stay until 9pm. While this venue does serve alcohol and allow children on the premises, it is not seen as presenting any additional risk to the casino upholding the 3 licensing objectives.

It is difficult to ascertain the exact number of alcohol licences currently active within the 1.5km radius (due to the ever-changing picture of pubs/clubs opening and closing) however extensive visits to the area, observations and open-source research suggest 2 main pockets of alcohol licence distribution and night-time economy present within the town. These are: The junction of Albert Rd and Corporation Rd (within 500m of the casino) & the junction of Linthorpe Rd and Southfield Rd (within 1,000m of the casino). Both areas have a relatively high density of premises selling alcohol with evening closing time between 10pm – 3am. Both areas have gaming premises licences granted in direct vicinity (betting shops) on Corporation Rd and Linthorpe Rd respectively. There are no additional or unusual risks in terms of the 3-licensing objectives presented by these areas.

Whilst not impacting the production of this risk assessment or having any impact on risk associated with complying with the 3 licensing objectives, it is noted that:

- Additional planning permission has been granted for a leisure complex which includes plans for a cinema, bowling alley and more bars and restaurants accessible to the rear of the venue in Captain Cook Square (within 500m of the casino). Visits to this area show that while the retail landscape has changed, the only addition to the licensed/night time economy of Captain Cooke's Square in the 'Level X' entertainment venue.
- A Large Casino Provisional Statement has been granted to Jomast Development Ltd on Gurney St however this approval has never been active as it needs to be converted into a premises licence before it can operate; this is located within 500m of the casino).

In addition to the Casino Premises, Luxury Leisure Talarius operate 3 AGC's in Middlesbrough (Newport Report, Linthorpe Road and Dundas Arcade) and as a result has extensive historical Gambling Commission regulatory returns data to analyse. Our regulatory returns data for Middlesbrough town centre AGCs 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.

### **Local Area profile - Education Providers**

\*In forming this part of the risk assessment, data from Middlesbrough Council School register has been used along with area tours and site visits to support open-source research.

Open-source research and tours of the area show the following sites education provision (for those up to the age of 18) within a 1,500m radius of the casino.

There are 4 Pre-school nurseries: Montessori (within 500m of the casino) and Newport Children's Centre, Dimples and Little Sunbeams within a 1,500 radius of the casino.

There are also 5 Primary Schools within a 1,500m radius: Newport Primary School (within 500m of the casino), Abingdon Primary School (within 1,000m of the casino), Archibald Primary School, Sacred Heart Primary School and Beckon Hill Primary School (within 1,500m of the casino).

All of the above schools and nurseries are considered to be outside of the main retail town centre and any Children/Parents walking or travelling by road, to and from these education sites would not pass by (or be in the vicinity of) our casino site.

There are no special schools registered to Middlesbrough Council which are within the 1,500m radius of the casino assessment area.

Whilst there are no Secondary education schools within the 1,500m assessment area, there are 2 college campus; Middlesbrough College (College for 16+ aged students with the main campus situated in the dock area of Middlesbrough, TS2) is within 1,000m of the casino and The Northern School of Art (College for 16+ aged students) is within the 500m radius, located on Newport Road, approximately 5 minutes' walk away. Whilst it is unlikely students attending either institution would pass the casino while travelling to and from college (by walking, bus, train or car), the proximity of the casino to The Northern School of Art is noted with risk controls developed accordingly.

In addition to the education facilities described above, the Teesside University campus (Students aged 18+) is within a 1,000m of the casino. (Situated on Southfield Road in Middlesbrough town centre, TS1). The University has over 21,000 students (according to the 2020/21 HESA student record) with many living in the local area.

### **Local Area profile – Financial institution sites**

Middlesbrough displays a retail/business profile similar to that of many town centres and as such has several high street Banks with free of charge withdraw ATM facilities and branded pawn brokers/retail exchange business (CEX, Cash Converters, Ramsdens etc.). Many of these businesses are within a 500m radius of the casino.

In addition to the above general banking and retail business associated with all town centres, a 'community bank' is situated on Newport Rd. This community bank (operated by Pioneer Credit Union) is a not-for-profit co-operative offering customers low-cost membership to financial advice and financial services such as savings accounts (Christmas savings club etc.) and low interest rate loans. It has also been noted that this community bank offers occasional additional services like a food bank and/or food swapping service.

### **Local Area profile - Medical & Support facilities**

\*In forming this part of the risk assessment, data from the Quality Care Commission, Middlesbrough Council's service register and both AA and GA websites has been used along with area tours and site visits to support open-source research.

There are 6 medical/health centre sites within the 1,500m radius. There are 4 practices within a single site situated in the Health Centre within the Cleveland Centre in the town centre (The Discovery Practice, Erimus Practice, The Endeavour Practice & Prospect Surgery). All are general practices offering GP services and minor clinical procedures. This Health Centre is within 500m of the casino.

A further 5 GP surgeries can also be found at: Foundations, Borough Road and Nunthorpe Medical Group, Newlands Medical Practice, Park Surgery (& ELM Alliance @ Park Surgery - the out of hours GP service).

There are no specialised mental health service facilities within the 1,500m radius\*

Additional services to consider for this risk assessment are:

\*There is a Drug and Alcohol clinic (CGL) operating from The Live Well Centre within the Dundas Arcade shopping centre (within 500m of the casino). This service offers support for those suffering from drug and alcohol dependency problems. A site visit shows opening times to be 9am-5pm Mon to Wed & Fri, 12pm-5pm Thursday and closed Sat & Sun.

In addition, it is worth noting that face to face Alcoholics Anonymous and Gamblers Anonymous support meetings have resumed following closures driven by the Coronavirus lockdowns. Both meetings are held at The Salvation Army, 2 Southfield Rd. TS1 3BZ which is 700m away from our casino.



Details below:

- Alcoholics Anonymous. A New Beginning.  
Tuesdays, Thursdays & Sundays  
Meetings are scheduled for 7pm and last for between 1 and 1.5 hours
- Gamblers Anonymous  
Mondays  
Meetings are scheduled for 7pm

Whilst outside the area considered for this risk assessment, it is worth noting that the main hospital for the Region is James Cook Hospital, 3.2km away from the casino.

### **Residential**

Whilst there is no housing in the direct proximity of the venue, residential properties become denser the further away from the venue site from around 500m. Housing within the 1,000m radius is largely terraced street housing and flats/apartments. Housing in the area is both owned and rented and a high proportion of the students who attend Teesside University will live in this area (due to the proximity of the town centre University campus).

In addition, there are several hotels located within the town centre: Holiday Inn Express, Travelodge, Premier Inn and Jury's Inn all within 500m of the casino. All hotels are typical, branded, 3-to-4-star hotels largely used for business/corporate use and as such, occupancy is higher midweek than on weekends. An additional 2 hotels are within 1,500m of the casino: The Baltimore and The Highfield Hotel.

## Crime

\*Where crime statistics are quoted, the full TS1 postcode has been referenced in line with reported crime figures available on the [www.police.uk](http://www.police.uk) website.

There are no known local problems with crime or anti-social behaviour specifically linked to gambling but the area itself (TS1 Postcode) does have relatively high levels of crime. Latest reported crime figures (available at the time of writing) from April 2023 and sourced from the [www.police.uk](http://www.police.uk) website show 1487 crimes reported within the TS1 postcode area with the three most frequently reported crimes being: violence or sexual offences (481), Anti-social behaviour (259), Public Order Offences (156). On weekend nights there are regular police patrols around the town centre to monitor the night-time economy. In addition, the venue will have appointed SIA registered security detail working within the venue at peak times and when directed by any licence conditions – subject to the statutory exemption that staff employed by a casino are not required to be SIA registered.

The Middlesbrough Council Statement of Principles (SOP) in relation to the Gambling Act 2005 has been considered in the completion of this assessment. 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, to this end the casino employs a range of measures to prevent customers suffering from gambling related harms and signposts those whose gambling is having an adverse impact on their life, to the best source of help, ensuring compliance with all of regulatory obligations.

In relation to the SOP, pages 15, 16 and 20 have guidance on the promotion of the licensing objectives, particularly in relation to safeguarding children and the vulnerable persons and sets out several measures to ensure the prevention of children and young person's gaining access are controlled by appropriate measures such as;

- a) supervision of entrances
- b) segregation of gambling areas from areas frequented by children (not relevant to these premises)
- c) supervision of gaming machines in non-adult gambling specific premises (not relevant to these premises).

Further expectations are also detailed and expected to be controlled with regards to identifying and preventing access to vulnerable persons by implementing safeguard measures with regards to;

- a) people who gamble more than they want to;
- b) people who gamble beyond their means;

c) people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs.

The Newport Road AGC and Casino businesses are adult only (18 years old +) venues and the SOP clearly details our expectation to implement strict processes and procedures to prevent and protect children and vulnerable persons from being harmed or exploited by gambling, all of which are standard provisions in our premises and are dealt with in detail in the risk management below. Gambling Commission's SR Code 3.2.1 applies specific additional controls for age-verification before entry can be gained to the casino.

Additionally the SOP stipulates that the Middlesbrough Council is committed to working in partnership with GamCare; likewise as an operator we also work in partnership with GamCare the UK's leading provider for free help, information and advice with regards to people who are adversely effected by gambling, the casino will also promote and direct people to GamCare should the need arise by customer request or the operator identifying any concerns with regards to anyone displaying signs that may indicate gambling is causing harm in any way.

Further to this guidance, the LRA guide references how it deals with local area profiles. A mapping tool which identifies certain types of premises it considers are relevant to the assessment of risk to the licensing objectives has been created. The map presents local risk to the licensing objectives. A copy of our map applied to the premises at Newport Road and the surrounding area is attached to this assessment.

Neither the SOP nor the LRA guide offer specific guidance on the geographic extent to be considered when completing a local risk assessment however for this assessment we have considered risks within a 1.5km radius of our venue

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"> <li>- Reception station will always be manned by a trained team member.</li> <li>- Reception station is positioned to give line of sight to the entrance.</li> <li>- Layout of premises considered when compiling team rotas. A trained, licensed member of the team will always be on duty on the gaming floor. Breaks and shift changes are planned to take account of school closing times to ensure there is always supervision of the gaming area.</li> <li>- Team members deployed to specific zones for which they have responsibility.</li> <li>- Machine layout takes into consideration lines of sight to the entrance.</li> <li>- CCTV cameras positioned to cover all parts of the premises but specifically the entrance and secluded areas.</li> <li>- A monitor displaying the entrance CCTV is positioned on the cash desk/above the refreshment station.</li> <li>- A 'live-monitored' security system has been installed to provide additional security and assist staff manage the premises.</li> <li>- There is a 'Think 25' policy in operation which has been trained to all staff.</li> <li>- All customers under the age of 25 are asked to register with their photo ID and become a casino member. Scanned ID is then retained on file providing both continual proof of age and ensuring the tracking of 100% of the customers play to aid in SG monitoring.</li> </ul>	Jun 2023
Children enter site with adult.	C	Low	Severe to business. Moderate to child.		Jun 2023
Children enter site and play before being noticed.	C	Low	Severe to business. Severe to child.		Jun 2023
Children enter site and play where age is misjudged.	C	Low	Severe to business. Severe to child.		Jun 2023
Age verification is not sought.	C	Low	Severe to business. Severe to child.		Jun 2023
Young person wearing face covering is not challenged for verification of age.	C	Low	Severe to business. Severe to child.		Jun 2023
Children knowingly allowed to play.	C	Low	Severe to business. Severe to child.		Jun 2023
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		Low	Severe to business. Severe to customer.		Jun 2023

<p><b>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)</b></p>				<ul style="list-style-type: none"> <li>- All team members are trained in social responsibility as part of their induction and are provided with regular refresher training which is delivered through two core eLearning modules.</li> <li>- 'Vulnerable people' are specifically dealt with in the training.</li> <li>- Posters and displays of acceptable identification on site for staff.</li> <li>- Clear 'Over 18' signage is displayed, visible from outside and also in the entrance to the venue.</li> <li>- Luxury Leisure/Talarius use independent test purchasing operations. All venues are tested at least twice in a rolling 12-month period.</li> <li>- 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.</li> <li>- Stringent disciplinary procedures for failures identified through Test Purchasing or other investigation.</li> <li>- Social Responsibility returns data reviewed through submissions from Area Managers to National Compliance Manager.</li> <li>- All social responsibility returns data subject to a quarterly compliance review.</li> <li>- Staff log all attempts to enter by young persons on the appropriate log.</li> <li>- 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.</li> </ul>	
					<p><b>Jun 2023</b></p>

<b>Failure to provide information to players on responsible gambling.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business Severe to customer</b>	<ul style="list-style-type: none"> <li>- A responsible Gambling message is displayed at all positions where gaming is possible through posters, leaflets and stickers on machines.</li> <li>- Responsible Gambling Poster or leaflet holder adjacent to ATM or desk PDQ Machine.</li> <li>- Poster/Leaflet designs to incorporate QR codes for GAMCARE, Playnice.org and Gambleaware contact information.</li> <li>- Responsible Gambling information stickers on all machines.</li> <li>- Compliance Audit function performed by Area Manager and also through regional field auditors and security managers.</li> <li>- Luxury Leisure Talarius have attained the Global Gaming Guidance Group (G4) accreditation for our responsible gambling measures.</li> </ul>	<b>Jun 2023</b>
<b>Failure to provide information in a suitable format.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>		<b>Jun 2023</b>
<b>Failure to recognise signs of problem gambling.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business Severe to customer</b>	<ul style="list-style-type: none"> <li>- Additional aspects to training incorporating guidance on identifying problem gambling, procedure for interaction and sources of help.</li> <li>- Clear policy to detail the procedure for interaction and level of staff that can 'intervene'.</li> <li>- New 'Stay in control leaflets' with QR codes to Playnice.org and GAMCARE and Gambleaware.</li> <li>- All recorded SR data subject to a quarterly compliance review by senior management.</li> <li>- 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 and also to identify if a customer attempting to enter is self-excluded.</li> </ul>	<b>Jun 2023</b>
<b>Failure to interact with customer displaying signs of problem gambling.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>		<b>Jun 2023</b>
<b>Failure to sign-post customer to help and support.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>		<b>Jun 2023</b>
	<b>C</b>	<b>Low</b>	<b>Severe to business.</b>		<b>Jun 2023</b>

<b>Failure to properly administer self-exclusion.</b>			<b>Severe to customer.</b>		
<b>Failure to impose exclusion in locality and in same types of establishments.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- Staff training incorporates policy and procedure for self-exclusion.</li> <li>- The Casino is a member of the Casino National Self Exclusion Scheme, SENSE.</li> <li>- The SENSE enrolment gallery is cross checked daily to ensure any existing casino member who has enrolled on SENSE within the past 24hrs is excluded from the venue.</li> <li>- The casino will offer two ways in which a customer can self-exclude: SENSE and 'Operator only' self-exclusion. While SENSE excludes a customer from all casinos partaking in SENSE, 'Operator only' excludes a customer from only those casinos managed by the operator.</li> <li>- Casino Managers also have the ability and authority to 'enforce exclusion' on any customer they believe may be at risk, using this Operator only self-exclusion system.</li> <li>- All self-excluded casino members are highlighted to the AGC Management team to ensure an interaction takes place and action is taken in line with the ACG policy, should the customer ever visit the AGC.</li> <li>- 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.</li> <li>- 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.</li> <li>- All SR returns data subject to a quarterly compliance review.</li> </ul>	<b>Jun 2023</b>
<b>Customer breaches of self-exclusion.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>		<b>Jun 2023</b>
<b>Customer breaches self-exclusion by using another to gamble on their behalf.</b>	<b>C</b>	<b>Unknown</b>	<b>Moderate to business. Severe to customer.</b>		<b>Jun 2023</b>
<b>Money Laundering</b>	<b>A</b>	<b>Low</b>	<b>Low – Severe</b>		<b>Jun 2023</b>

<b>(Dye-stained notes and Criminal spend).</b>					
<b>Commission of criminal offences to fund problem gambling</b>	<b>A</b>	<b>Low</b>	<b>Low – Severe</b>	<ul style="list-style-type: none"> <li>- The company have a Money Laundering Reporting Officer (MLRO).</li> <li>- Staff training at induction and refresh training.</li> <li>- Luxury Leisure/Talarius have a corporate AML Risk Assessment and policies and procedures relating to AML.</li> <li>- Automated alerts via Sentinel relating to machine note levels and handpay limits.</li> <li>- Technical parameters on note acceptors designed to reject poor quality notes. (Often notes obtained by way of robbery are perished).</li> <li>- Manufacturer activity alerts from machines on independent networks.</li> <li>- TITO tickets not transferable between sites.</li> <li>- Slim change machines set up so that notes cannot be changed 'up'.</li> <li>- Comprehensive CCTV coverage with recording of approx. 30 days of footage.</li> <li>- Partnerships with local police where appropriate to identify and discourage criminal spend.</li> </ul>	<b>Jun 2023</b>
<b>Anti-social behaviour associated with late night operation</b>	<b>A</b>	<b>Low</b>	<b>Low – Severe</b>	<ul style="list-style-type: none"> <li>- 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 players, Customer Interaction and Self-Exclusion.</li> </ul>	<b>Jun 2023</b>
<b>Poor security increasing vulnerability to robbery or theft.</b>	<b>A</b>	<b>Low</b>	<b>Low – Severe</b>	<ul style="list-style-type: none"> <li>- Access control measures either through door supervision or physical controls, utilised at night where appropriate</li> <li>- Policy of non-players refused entry or asked to leave.</li> <li>- Refreshments offered only to players and known customers.</li> </ul>	<b>Jun 2023</b>
				<ul style="list-style-type: none"> <li>- A 'live-monitored' hold-up alarm system is used so that monitoring station staff can communicate with</li> </ul>	<b>Jun 2023</b>



				<p>and support shop staff through CCTV and two-way audio using mics and speakers mounted in the ceiling.</p> <ul style="list-style-type: none"> <li>- All staff have personal attack 'hold-up' alarms and there are some strategically placed static alarms also.</li> <li>- 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.</li> <li>- Extensive CCTV coverage with recording of approx. 30 days of footage.</li> <li>- Strict key storage procedure.</li> <li>- Time lock and/or time delay safes utilised.</li> <li>- Drop safe used for banking.</li> <li>- Staff personal floats limited to £100.</li> </ul>	
<b>Advertising Standards and Marketing</b>	<b>A</b>	<b>Low</b>	<b>Low - Moderate</b>	<ul style="list-style-type: none"> <li>- All advertising and marketing by the Company comply 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"> <li>- legal, decent, honest and truthful</li> <li>- Prepared with a sense of responsibility to consumers and to society</li> <li>- Respectful to the principles of fair competition generally accepted in business</li> <li>- Not intended to bring advertising into disrepute.</li> </ul> </li> </ul> <p>Specifically, we ensure that:</p>	<p><b>Jun 2023</b> <b>Jun 2023</b></p>

				<ul style="list-style-type: none"> <li>- Advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise</li> <li>- Advertisements and promotions are socially responsible and do not encourage excessive gambling</li> <li>- Care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable</li> <li>- 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</li> <li>- Persons shown gambling are not, nor do they appear to be, under 25 years of age</li> <li>- 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</li> <li>- Advertising and promotional material carries a reference for the need to keep gambling under control</li> <li>- It is never suggested or implied that gambling is a means of getting out of financial difficulty.</li> <li>- Advertising and marketing material should not appear on any primary web page/screen or micro-site that provides advice or information on responsible gambling.</li> <li>- 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 &amp; Codes of Practice.</li> </ul>	
<b>Failure to display Terms and Conditions</b>	<b>B</b>	<b>Low</b>	<b>Low – Moderate</b>	- Terms and Conditions displayed prominently within the premises.	<b>Jun 2023</b>
<b>Failure to deal with customers making complaints about the outcome of gambling</b>	<b>B</b>	<b>Low</b>	<b>Low – Moderate</b>		<b>Jun 2023</b>

				<ul style="list-style-type: none"> <li>- Machines only acquired from licensed suppliers.</li> <li>- Machine maintenance carried out by qualified technician.</li> <li>- Clear service complaint protocol to deal with machine or game performance related customer complaints.</li> <li>- Customer complaints policy and procedure.</li> <li>- Complaints policy and procedure displayed prominently in each site.</li> <li>- Complaint forms available at each site.</li> <li>- Luxury Leisure head office complaints telephone line.</li> <li>- Novomatic UK group complaints channel.</li> <li>- The casino is registered with IBAS (Independent Betting Adjudication Service). IBAS customer leaflets are displayed throughout the venue detailing how customers can raise disputes via this independent channel.</li> </ul>	<b>Jun 2023</b>

**Key**

**(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.



### **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

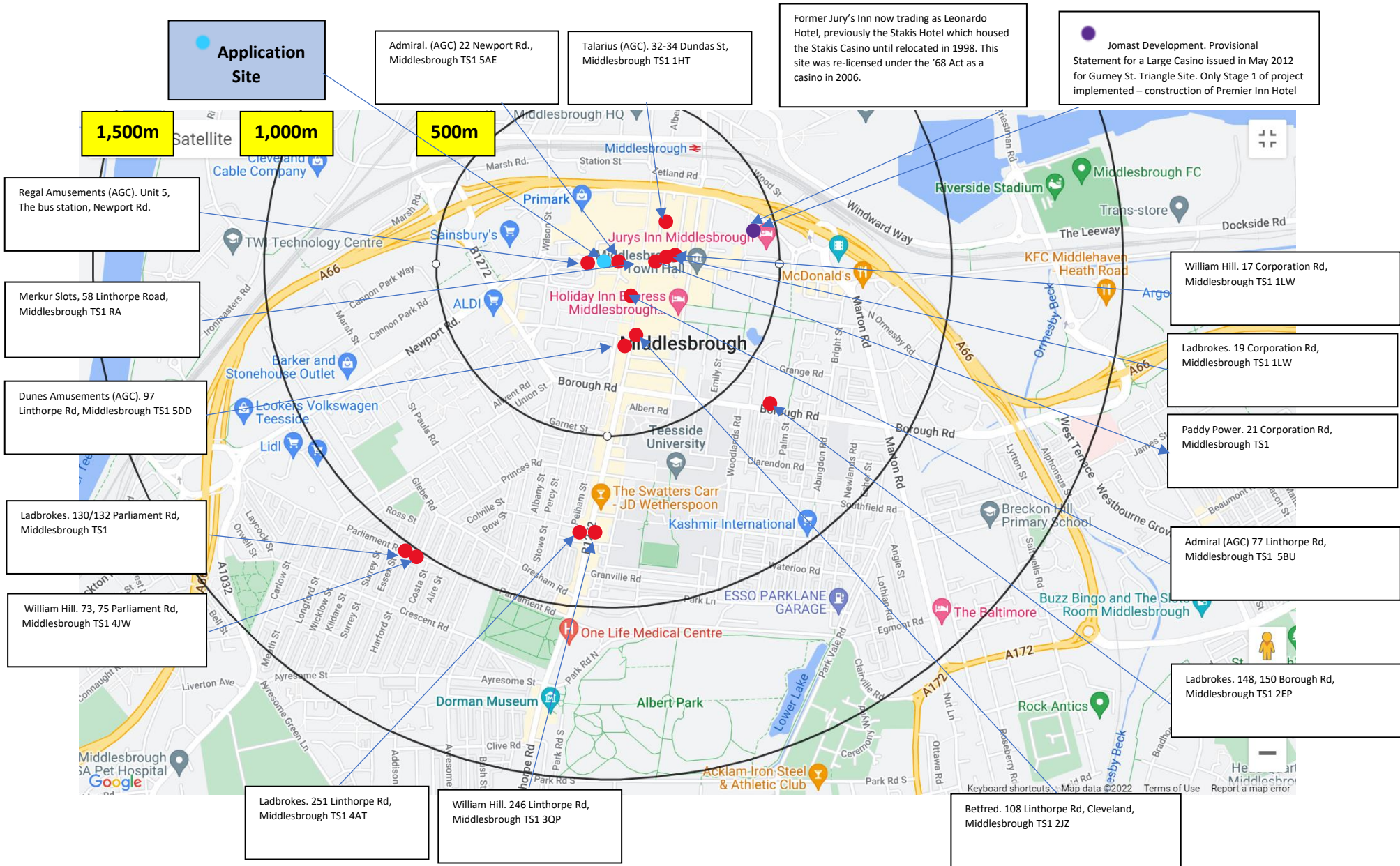
Effective as at 6 April 2016

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.



# **Access to Gambling by Children and Young Persons**

(Including Employment of Children and  
Young Persons)

## **Section 10.1 Overview**

### **10.1.1 Scope of the policy**

This policy sets out the framework for the Companies' governance of all matters relating to the Codes contained under 3.2 and 3.6, ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

### **10.1.2 Policy Statement**

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licenced activities. The Companies strive to uphold the Licensing Objectives as set out in The Gambling Act 2005 and with particular relevance to this policy, protecting children and the vulnerable from being harmed or exploited from gambling. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

### **10.1.3 Linked Documentation**

- a. Fair and Open Practice policy.
- b. Assessing Local Risk policy.

## **Section 10.2 Key Terms and Definitions**

**Child** – A person under the age of 16 years old.

**Young person** – A person who is 16 or 17 years old.

**Adult gaming area** – An area within a Family Entertainment Centre (FEC) premises, entry to which is restricted by age to those over 18 years old because of the gambling activity available in that area.

**Test Purchase** – Often also referred to as Age Verification (AV) testing, this term is used to refer to the process employed by an independent external body we instruct to test the implementation of our age verification processes.

## **Section 10.3 Policy**

**10.3.1** The companies recognise and acknowledge their obligations in respect of these codes of practice relating to children and young persons.



**10.3.2** The companies have in place policies and processes designed to prevent underage gambling and monitor the effectiveness of these.

**10.3.3** Our procedures include, for AGCs, FECs with adult gaming areas, and bingo, those for checking the age of those apparently underage, removing those who appear underage and who cannot produce a suitable form of identification to verify their age and taking action when there are repeated attempts by young persons to enter. In order to achieve this, we operate a 'Think 25' Policy at all of our venues so that anyone who appears to be under the age of 25 is challenged to verify their age by producing identification.

**10.3.4** At our casino premises we designate a supervisor for each entrance. The role of the supervisor includes, verifying a customer's age with an acceptable form of identification should they appear to be under 25, refusing entry to those who cannot upon request verify their age and taking steps should someone repeatedly attempt to enter who has been refused entry or is clearly underage.

The supervisor is responsible for compliance with the applicable codes relating to access.

**10.3.5.** In all of our premises our policies and processes take account of the structure and layout of the premises.

**10.3.6** In our casino and AGC premises, we do not deliberately provide facilities for gambling in such a way as to appeal to children or young persons.

**10.3.7** We refuse service in our Casinos, bingo, FEC adult gaming areas and AGCs where an adult is accompanied by a child or young person and they are required to leave the premises. We do not allow adults to play in our premises where they have left a child or young person outside of the premises to wait for them.

**10.3.8** 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 our premises.

**10.3.9** We only accept identification that contains a photograph and from which the individual can be identified, states the date of birth, is valid and is legible and shows no evidence of tampering or being counterfeit.

**10.3.10** The only acceptable forms of identification are those carrying a PASS logo such as a Citizencard, a military identification card, a driver's licence photocard, passport or European national identity card.

**10.3.11** We employ independent test purchasing operations for age verification processes in all of our age restricted premises.

**10.3.12** It is a matter of gross misconduct to allow entry to our AGCs, Adult Gaming Area(s), bingo or casino premises (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 visitors.

**10.3.13** 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 AGCs, Adult Gaming Area(s), bingo or casino premises, which may lead to dismissal. This includes children in the company of an adult such as babies in prams or buggies etc.

**10.3.14** All staff are expected to uphold the licensing objectives and in doing so it is expected that, regardless of their role or whether they are off duty, if a staff member is on one of our premises they take appropriate action to prevent children or young persons from entering the premises and gambling.

**10.3.15** We do not employ anyone under the age of 18 years old in any capacity in any of our premises.

## **Section 10.4 Key processes**

**10.4.1** We display clear and prominent signage at all of our premises where entry is restricted by age.

**10.4.2** The companies operate a 'Think 25' policy, so that anyone who appears to be under 25 is required to verify their age.

**10.4.3** All attempts to enter our premises where a person is asked to verify their age by presenting identification are recorded on a log.

**10.4.4** We employ an independent company to conduct test purchasing operations in in our AGC premises and participate in the scheme offered by the BGC in our casino premises, in order to provide reasonable assurance that our policies and procedures to prevent underage gambling are effective, in particular Think 25.

Failed test purchase visits are reported to the local licensing authority and also the Gambling Commission and the venue retested within a month of the failed test date.

All premises are tested at least twice in a rolling 12-month period and some venues such as adult gaming areas within an FEC or premises in a traditional 'seaside' location are tested more often and particularly in the lead up to school holiday periods.

Test visits are conducted in the evening and at night where we operate later opening times.

**10.4.5** The Companies take a firm stance on failed AV test purchase visits and so the process is underpinned by a robust investigatory process and stringent disciplinary framework.

**10.4.6** Where it is appropriate and necessary to do so the Companies invest in technology to help in its efforts to prevent underage gambling, such as the deployment of a notification system that uses CCTV cameras and video analytics to inform staff when someone has moved into an adult gaming area from an FEC.

**10.4.7** Staff conducting interviews for employees must see proof of age before an interview can commence in order to ensure the Companies do not employ anyone under the age of 18 years old. Furthermore, a new employee cannot start until their right to work and age have been confirmed and proof uploaded onto the Companies HR system.

## **Section 10.5 Training**

**10.5.1** Staff receive specific training on induction and regular refresh training including on the requirements of this code.

**10.5.2** Staff training on induction is delivered through the Admiral Academy eLearning platform, as well as face to face training with an experienced member of staff or manager using a series of workbooks. Refresh training modules are completed via on the Admiral Academy and there are periodic face to face sessions delivered by the compliance team and managers.

**10.5.3** Core SR modules and refresher modules include the legal requirement to return stake and not pay prizes to underage customers.

**10.5.4** All staff complete an eLearning module on Child Sexual Exploitation (CSE).

<b>Section 10.6</b>	<b>Review</b>
---------------------	---------------

**10.6.1** This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

# **Self-Exclusion**

## Section 11.1

## Overview

### 11.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to the applicable Codes of Practice under 3.5 ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

### 11.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licensed activities. The Companies strive to uphold the Licensing Objectives as set out in The Gambling Act 2005 and with particular relevance to this policy, to protecting children and the vulnerable being harmed or exploited from gambling. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

### 11.1.3 Linked Documentation

- a. Data protection policy.
- b. Customer interaction policy.
- c. User guides relating to the self-exclusion systems in each of the AGC, Bingo and Casino sectors.

## Section 11.2

## Key Terms & Definitions

**Self-exclusion** – A customer-led arrangement whereby they ask a gambling provider to exclude them from using the facilities they provide for gambling for a period of time, usually between 6 and 12 months.

**Multi Operator Self-Exclusion Scheme (MOSES)** – Operators within a sector of gambling contribute to and support schemes that provide customers with the ability to self-exclude from facilities for gambling provided by other licensed operators in the local area.

**Self-Enrolment National Self-Exclusion (SENSE)** – Non-remote casino operators all participate in the national self-exclusion scheme administered by the Betting and Gaming Council, which excludes customers from all casinos in Great Britain for a minimum of six months.

## Section 11.3

## Policy

**11.3.1** The companies recognise and acknowledge their obligations in respect of the codes of practice relating to self-exclusion.

**11.3.2** The companies have in place policies and processes to promote safer gambling and provide tools, including self-exclusion, to allow our customers to manage their gambling but self-exclusion should be seen as last resort. It is our position that it is entirely more desirable that customers do not reach the position where they are suffering from gambling related harms so that the only option is to stop altogether. We do not take this position from a commercial perspective but from a social responsibility perspective. Our customer interaction processes allied with the

gambling management tools we offer are designed to arrest any descent towards behaviour that causes harms.

**11.3.3** We take reasonable steps to prevent those who have self-excluded from participating in gambling.

**11.3.4** We take all reasonable steps to prevent marketing materials being sent to self-excluded customers and also to remove their details from any marketing databases used by group companies.

**11.3.5** When self-excluding, a customer is required to show suitable identification and provide a photograph of sufficient quality that it can be used to identify them should they try and re-enter. If a customer will not provide such a photograph they cannot self-exclude.

They must also provide a signature acknowledging the terms of the agreement between the customer and the companies.

All customers who self-exclude are recorded on a company register as well as the national databases for the AGC MOSES schemes and SENSE in relation to casinos.

**11.3.6** Our staff are trained in self-exclusion and in particular they understand that any self-excluded customer found in our premises must be removed.

**11.3.7** All customers who self-exclude can do so without entering our premises, are spoken to discreetly and in private where they wish and are signposted to sources of help at that point as well as having previously been so during any interaction that may have preceded the self-exclusion.

**11.3.8** Customers who self-exclude are offered the opportunity to also exclude from other premises operated by the companies in the customers local area and are encouraged to exclude from other types of gambling. They are provided with a helpful information leaflet explaining how they can do this.

**11.3.9** All of the self-exclusion agreements we make with our customers are for a minimum of 6 months and for no more than 12 months at a time. They can be extended by one or more period of 6 months at a time.

**11.3.10** A customer who wishes to self-exclude immediately can do so. However, if they wish to speak with a more senior and experienced member of staff about their gambling, they can arrange a meeting with the Area Manager or consult other sources of help first (such as discuss with problem gambling groups) and complete the self-exclusion at a later time.

**11.3.11** When a self-exclusion agreement period ends it is automatically extended for 6 months if the customer does not take positive action to return to gambling.

If a self-excluded customer takes positive action to return to gambling within the 6-month period after the expiry of the exclusion, then we enforce a cooling off period of at least 24 hours. Although there is no requirement to do so we also enforce a 24-hour cooling off period for every customer that returns to gambling even if they return beyond the 6 months at the end of the exclusion period. Clearly this is subject to us being able to identify them as returning from a self-exclusion.

**11.3.12** In order to identify someone who breaches their self-exclusion Staff are required to check the MOSES or SENSE (as appropriate to the premises) system gallery of current self-excluded

customers at least once per week and the duty manager is required to check the gallery at the start of every shift.

**11.3.13** When a customer self-excludes, we will permanently suppress their details on our marketing database as soon as practicable and in any event within two days of completing the self-exclusion agreement.

**11.3.14** We offer customers with whom we enter into a self-exclusion agreement, the opportunity to exclude from facilities for the same type of gambling offered in the locality by other operators through participating in Multi Operator Self-Exclusion Schemes (MOSES) available to the sectors in which we operate.

**11.3.15** Where a customer self-excludes on three or more separate occasions, they will automatically be banned from our venues for life (or a minimum period of 10 years).

## **Section 11.4 Key processes**

**11.4.1** When a customer requests that we prevent them from gambling using the facilities we provide, the customer and the duty manager (the most senior person on duty is in effect the duty manager and is the appointed person for this purpose) will formally document the request by completing a self-exclusion request form. (This can be a paper form but also by entering the customer details directly into the MOSES system as applicable).

**11.4.2** The companies participate in the MOSES systems appropriate to the premises they operate, the BACTA scheme for AGCs, the Bingo Association SMART exclusion in their Bingo premises and the SENSE (Self enrolment national self-exclusion scheme) system in their casino premises.

**11.4.3** When a customer requests to self-exclude there must always be an accompanying customer interaction record. (Please see the Customer Interaction Policy and associated training and guidance). A customer interaction relating to a request by the customer to self-exclude or on the basis of concerns held by members of staff monitoring a customer, should always include discussion of the available gambling management tools and the duty manager providing the customer with information on how to find sources of help and support.

**11.4.4** Once it is established between the customer and the staff member conducting the interaction that self-exclusion is the best option for the customer to manage their gambling behaviour, the terms and conditions applicable to the scheme must be explained clearly. A copy of the terms and conditions will be signed by the excluder as acknowledgement of understanding.

**11.4.5** A customer can self-exclude immediately, subject to verifying their identity, allowing staff to photograph their face and agreeing to it being shared on the appropriate MOSES system so that the exclusion can be enforced by staff at relevant premises.

Photo identification and a signature of the customer are 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 wherever possible. 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 a customer becomes abusive or is aggressive, regardless of their distress, our staff reserve the right to ask them to complete the self-exclusion process at a later time. This does not have to be at one of our premises but allows for the duty manager to consider the risks and plan accordingly.

**11.4.6** 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.

**11.4.7** In addition to the record the self-exclusion on the applicable MOSES system, it is also recorded in either the customer interaction and self-exclusion file in AGCs and Bingo premises or on the customers profile on the casino management system.

**11.4.8** Customers may not revoke a self-exclusion during the exclusion period. They will be refused entry to our venues and prevented from gambling by our staff. Members of staff are trained to be alert to self-excluded customers attempting to breach agreements and also to beware of the possibility that they may enlist another person to gamble on their behalf.

**11.4.9** Where the customer requests to self-exclude from other premises operated by The Companies outside of the local area, we will try to facilitate this request, but it is subject to the limits of the applicable system. The duty manager must contact the Compliance team to establish what extended area of exclusion can be set for the customer in the particular circumstances. On the SENSE system, national self-exclusions are entered automatically.

**11.4.10** Customer data relating to self-exclusion is handled in line with The Companies Data Protection Policy. Records held on the applicable MOSES system remain on the database for the duration of the self-exclusion period plus an additional 6 months unless extended at the request of the customer. After that period the data is automatically deleted by the system.

**11.4.11** The names of customers who have self-excluded along with the dates of the exclusion period and the primary venue they excluded from are retained on a central record in the compliance department for up to 10 years so that a customer's behaviour over a longer period can be monitored, especially in relation to multiple self-exclusions.

**11.4.12** Where a customer is excluded by the Companies in their own interest because of concerns over the harms they may be suffering because of their gambling behaviour, the data is retained for a period of 10 years. The most common example of this is where a customer is self-excluded on 3 separate occasions, it is our policy to ban them from our premises for life. In order to enforce this then we must retain their personal data. (See part 6 below).

## **Section 11.5                      Return to gambling**

**11.5.1** A customer must take positive action in order to return to gambling after the end of a self-exclusion period.

**11.5.2** If the customer takes positive action within 6 months of the end of the period then they must serve a 24 hour 'cooling off' period.

If the customer returns after the end of the 6 month period we still enforce a cooling off period if we are able to identify that the customer has returned from a self-exclusion. This is usually as a result of the staff recognising the returning customer or if the customer makes it known to staff that they are returning after a period of self-exclusion.

**11.5.3** A 'return to gambling' meeting is held with the venue (or duty) manager so that they can a) check that they have considered their decision and the implications of a return, and b) to explain and implement the 'cooling off' period.



**11.5.4** In addition we discuss with the customer, using the gambling management tools available, to stage their return and avoid a resumption of harmful play.

**11.5.5** This is recorded in the customer interaction and self-exclusion file for AGCs and bingo premises or the customer profile on the casino management system. If the customer interaction and self-exclusion file for that customer has been archived, then a new interaction is logged. The applicable MOSES system is also updated if the return is within the 6 months of the expiration of the exclusion and therefore still on the system.

## **Section 11.6 Company imposed exclusions**

**11.6.1** There are occasions, although rare, when it is clear that a customer's gambling behaviour is harmful and either they don't recognise it or don't wish to deal with it. One such circumstance is when a customer repeats a cycle of gambling then self-exclusion.

**11.6.2** The companies can and will impose bans on these customers to permanently exclude them in their own best interests. For example, once a customer self-excludes for the third time it is our position that this is an indication that they cannot control their gambling sufficiently and so in the best interests of the customer we ban them from gambling in any of our premises for life (minimum period of 10 years).

**11.6.3** These imposed exclusions are not catered for on the sector MOSES systems and so are managed by an internal process.

## **Section 11.7 Cross sector exclusions**

**11.7.1** The requirement of SR code 3.5.6 is only that licensees, in respect of those with whom they have a self-exclusion agreement, must offer the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies only. This means that there are sector specific MOSES schemes that do not cater for cross sector self-exclusions.

**11.7.2** If a customer self-excludes from an AGC or bingo premises and there are casino premises operated by the companies in the locality we will automatically ensure that they are also excluded from those casinos.

**11.7.3** If a customer self-excludes from a casino premises then we will not automatically exclude them from AGC and Bingo premises so that they may opt to play a lesser category of machine as a means of managing their gambling behaviour. This is discussed and agreed with the customer.

**11.7.4** All customers who self-exclude are given an information leaflet containing details of how they can exclude from other gambling sectors to the one they have entered into the agreement with.

## **Section 11.8 Training**

**11.8.1** Staff receive specific training on induction and regular refresh training including the requirements of these codes.

**11.8.2** Staff training is delivered through the Admiral Academy eLearning platform, as well as periodic face to face sessions delivered by the compliance team and managers.

<b>Section 11.9</b>	<b>Review</b>
---------------------	---------------

**11.9.1** This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

# **Customer Interaction**

## Section 12.1

## Overview

### 12.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to the Codes of Practice under 3.3 and 3.4, ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP). Also, the Gambling Commission formal guidance note relating to 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.

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

### 12.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licensed activities. The Companies strive to uphold the Licensing Objectives as set out in The Gambling Act 2005 and with particular relevance to this policy, ensuring gambling is conducted in a fair and open way and also protecting children and vulnerable people from being harmed or exploited by gambling. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

### 12.1.3 Linked Documentation

- a. The company's overall social responsibility policies and procedures document.
- b. Customer Interaction: formal guidance for premises-based operators. (Formal guidance under 3.4.1)
- c. Self-exclusion policy.
- d. Casino operating procedures
- e. MLTF policy.
- f. MLTF risk assessment.

## Section 12.2

## Key Terms and Definitions

**Gamblewise** – This is an 'app' based gambling management tool that uses iBeacon technology to allow customers to manage their gambling behaviour via an app on their mobile device. Users can manage their time and spend using the facilities on the app and even elect not to attend on elected days or times. The beacon detects the presence of the device and reminds both the user and the venue staff of the users' restrictions. It is provided to our customers free of charge.

**Vulnerable people** - The Gambling Act requires that we safeguard the interests of vulnerable people as well as young people from being harmed by gambling. Vulnerable people are not defined by the Act or the LCCP but the Commission says the following in its guidance for local authorities,

*The Commission does not seek to define 'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.*

The companies' position on this is to adopt a broad definition of vulnerability.

For example, someone could be considered to be vulnerable for the following reasons:

- 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.

## **Section 12.3 Policy**

**12.3.1** The companies recognise and acknowledge their obligations in respect of the applicable codes of practice associated with their operating licence.

**12.3.2** The companies will put into place systems for effective customer interaction so as to minimize the risk of customers experiencing harms associated with gambling.

**12.3.3** We will implement the guidance set out in the Commissions formal guidance on customer interaction for premises-based operators so that we will **Identify** customers who are at risk, **Interact** with them to reduce the risk of suffering harms and **Evaluate** the outcome.

**12.3.4** We will use the latest technologies to assist us identify and record our interactions.

**12.3.5** We will monitor a range of appropriate indicators in order to identify customers who may be experiencing harms.

**12.3.6** We offer a range of gambling management tools to our customers. (This is also covered in our combating problem gambling policy but also here for completeness).

**12.3.7** We will ensure that our processes relating to customer interaction, information about safer gambling for our customers, the gambling management tools we offer, and our self-exclusion processes provide a substantive framework for player protection.

## **Section 12.4 Key processes**

**12.4.1** In all of our venues, whether AGC, Bingo or Casino, we adopt the guidance from the Commission and implement a framework to Identify, Interact and Evaluate. The main difference in the processes that follow from this are based on the amount of information we know about the customer.

### **12.4.2 Identify**

In our AGC and Bingo premises, 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 also be used by staff in conjunction with knowledge of the machine category being played or any anecdotal information known to staff about the habits or background of a customer, in order to inform a judgement about whether they should interact with that customer.

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, but is not limited to, signs of distress, agitation, aggression, intense mood swings, hysteria or remorse. All staff are trained to recognise such behavioural indicators, and 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 an interaction log and the most senior person on duty informed.

We do not and cannot currently monitor a customer's spend through our data management system used in our AGCs and Bingo premises, primarily because the data is anonymous because it is not associated with a customer through any electronic or automated means.

In our Casino premises, although membership is not required, many of our customers are signed up to a loyalty scheme which identifies their play to our casino management system. This system allows us to tag and more effectively monitor play than in an AGC for example and therefore more indicators are available to our staff such as spend as well as frequency and length of play. This information will be used to automatically flag when agreed triggers are met, and to mark customers' profiles as 'Action on Entry' to initiate an interaction on their next visit.

Our Casino staff are trained to observe and recognise the same behavioural indicators listed above and to interact with customers as appropriate. They also have access to additional data which can be used in conjunction with these observations to inform decisions about customer interactions. This data can be in relation to a player's level of spend for example and also information about how a player deals with limit setting.

#### **12.4.3 Interact**

An effective interaction has three parts. Observation, Action and Outcome. An initial interaction could well be the Observation of behaviour. For instance, a member of staff identifies a change in the behaviour of a customer, either throughout their period of play or over time if they are a more regular customer.

#### AGC/Bingo

Having made this **Observation**, they then make a first entry on the Customer Interaction Log.

If the behaviour continues then a second entry may be required to record that the change in behaviour was more than fleeting. In an AGC or Bingo premises a 'Customer Interaction & Self Exclusion file' is then opened and the initial entry copied across before the second observation is recorded thus creating a single record for this customer.

Venue managers (and duty managers of any rank) are designated persons for the purpose of customer interaction, and it is their responsibility for making the decision as to whether there should be contact with the customer to prompt them to think about their gambling (**Action**) such as speaking with the 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.

In an AGC or Bingo premises an **Outcome** should be recorded on the 'Customer Interaction & Self Exclusion file'.

### Casino

In a Casino, having made an initial **Observation**, this is recorded on the customer profile on the casino management system.

If the behaviour continues then a second entry on the customer profile may be required to record that the change in behaviour was more than fleeting.

The duty PML holder or supervisor on the premises, are designated persons for the purpose of customer interaction, and it is their responsibility for making the decision as to whether there should be an **Action** such as speaking with the customer.

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 - AGC) or the duty PML holder or supervisor (Casino) is required to record what has or is to happen next as an **Outcome** of this interaction. This could range from continuing to observe the customer's behaviour to speaking to them about gambling management tools such as 'Gamblewise' to signposting them to sources of help. It is essential that details of any conversations are recorded on the customer profile, including advice given and actions agreed by the customer.

In a casino premises there is a breakout area for customers to take a break and reflect or they can serve as a quiet and discreet area for interactions by staff.

In a casino an **Outcome** should be recorded in the customer profile on the casino management system.

Staff should not tolerate any form of abusive or anti-social behaviour during an interaction with a customer. This policy and associated procedures are consistent with and implemented with due regard to the company's duty in respect of the health and safety of members of staff.

#### **12.4.4 Evaluate**

By maintaining individual logs for customers in our AGC and Bingo premises and customer profiles in our Casino premises, we are able to monitor behaviour and the effectiveness of our controls over time.

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

data, including interactions are reviewed by board members and stakeholders from the senior management team.

The data from our casino management system is interrogated daily and reviewed weekly at formal meetings between managers from both operations and the compliance department. As a minimum, the following are reviewed: -

- All interactions
- All customers who have reached the threshold for verification of identity
- All customers subject to CDD
- All customers subject to EDD
- All customers identified as 'high spend customers'

## **Section 12.5 High Spend Customers**

AGC/Bingo

**12.5.1** In our AGC and Bingo premises we identify our top spending customers using the knowledge of our venue staff. Each venue then produces a list of either their top 5, 10 or 20 highest spending customers according to the model below.

Small venue – with average weekly income of under £10k = Top 5

Medium venue – with average weekly income of under £20k = Top 10

Large venue – with average weekly income of over £20k = Top 20

**12.5.2** In order to monitor these customers there is an arbitrary reporting model whereby the venue manager reports any changes in the behaviour of those customers each week. In order to identify changes in behaviour, and therefore a potential indication of gambling related harm, we must first benchmark the customers behaviour. We achieve this by asking the following questions about each of the customers in the list.

What is their typical stake?

How long is their typical session?

How many visits per week?

Other known factors about the customer?

Each customer on this 'High Spend Log' is then given a pseudonym, as their true identity may not be known to us.

**12.5.3** The customer is then monitored through a process whereby the venue manager comments on each customer on the 'High Spend Log' once per week, noting any changes in behaviour and adding any commentary as required.

**12.5.4** Any changes in behaviour are then evaluated by the venue manager to determine if and what kind of interaction is required. If necessary, the venue manager can consult with their operational seniors or members of the compliance department.

Casino

**12.5.5** In our casino premises, although membership is not required, our staff encourage everyone entering the premises to register as a member of the rewards scheme, collecting basic information and verifying ID at that point. If a customer declines to give personal information they are still reminded of the threshold requirement. The casino management system also allows us



to tag players and create customer profiles in circumstances where they decline personal information.

**12.5.6** We consider a high spend customer in a casino premises as a customer who conducts any single transaction of over £10,000; any cumulative transactions in a single identifiable session of play of over £10,000; or any monthly cumulative transactions of over £50,000.

These customer profiles are monitored and reviewed at the weekly casino compliance meetings. Interactions with these customers are recorded on their profile.

## **Section 12.6                      Gambling Management Tools**

**12.6.1** In all of our premises we use the following methods and advice to provide our customers with appropriate tools to manage their gambling.

- To visit less often.
- To shorten their periods of play.
- To take a 'time out' from visiting our premises.
- To play a lesser category of slot machine.
- Utilise the Gamblewise app to manage their time and location with regards to gambling.
- Machine limit setting.
- Self-exclusion (see section 12).

**12.6.2** Gamblewise is a gambling management tool that we offer to our customers for free. It is operated through an app available for customers to download onto their mobile device and use to manage their time spent gambling. They can set themselves limits as to where and when they wish to gamble. The settings in 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 reminded by staff that they have set a limit on the app that they are not adhering to and advised to reflect on this before commencing play. These interactions are recorded as appropriate to the premises type and accompanied by signposts to sources of help through staff providing a 'Stay in Control' leaflet or pointing out where information relating to sources of help is available in the venue.

## **Section 12.7                      Training**

**12.7.1** Staff receive specific training on induction and regular refresh training including the requirements of these codes.

**12.7.2** Staff training is delivered through the Admiral Academy eLearning platform, as well as periodic face to face sessions delivered by the compliance team and managers.

**Section 12.8****Review**

**12.8.1** This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

# Assessing Local Risk

## Section 15.1 Overview

### 15.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to the Codes contained under 10.1, ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

### 15.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licenced activities. The Companies strive to uphold the Licensing Objectives as set out in The Gambling Act 2005 and with particular relevance to this policy, ensuring gambling is conducted in a fair and open way and also protecting children and the vulnerable being harmed or exploited from gambling. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

### 15.1.3 Linked Documentation

- a. Fair and Open Practice policy.
- b. Customer interaction policy.
- c. Self-exclusion policy.
- d. Information Requirements policy.
- e. Local Risk Assessment form.
- f. Risk maps.

## Section 15.2 Key Terms and Definitions

**Local Risk Assessment** – A process to identify, assess and manage risk in accordance with the requirements of the codes of practice. The document used to record this is often referred to as an LRA.

**Mapping Tool & Risk Maps** – The Companies use a bespoke, open-source tool that assists with the identification of locations within the locality of our premises that may present a risk to the licensing objectives. The tool produces risk maps that accompany the local risk assessment.

**Statement of policy/principles (under the Gambling Act 2005)** – Local authorities are required to produce a statement of licensing policy (sometimes called a statement of principles) relating to gambling. They must be considered in the assessment of local risk.

## Section 15.3 Policy

**15.3.1** The companies recognise and acknowledge their obligations in respect of this code of practice associated with their operating licence.

**15.3.2** The companies have in place policies and processes for the assessment of local risk to the licensing objectives at each of their FEC, bingo, AGC and casino premises.

**15.3.3** The local risk assessments are conducted by an Area Manager so that they are dealt with by someone with local knowledge but also a level of seniority.

**15.3.4.** We will use technologies, where available and as appropriate, to assist in the identification of local risks.

**15.3.5** The local authority statement of policy is considered when conducting an assessment.

**15.3.6** The local risk assessments are reviewed at least annually or in the event of significant changes at our premises or significant changes in the local circumstances.

**15.3.7** A local risk assessment is reviewed if the Companies apply for a variation to their licence or a new risk assessment is completed if an application is made for a new licence.

**15.3.8** We will implement processes to ensure that a local risk assessment document can be shared on request.

## **Section 15.4 Key processes**

**15.4.1** The risk assessment documents are stored at each venue along with its local risk map and the local authority's statement of policy.

**15.4.2** A copy of all local risk assessments are stored digitally on a central 'Compliance' drive.

**15.4.3** The companies have commissioned the development of a bespoke open-source tool that assists the assessment process by identifying places that may pose a risk to the licensing objectives because they are locations where vulnerable people might congregate for example.

**15.4.4** Local risk assessments are completed by a local manager, usually the Area Manager, with assistance and support from the Compliance department.

**15.4.5** A Venue Manager is required to notify the Area Manager and the Compliance department immediately if any significant changes occur in the locality to allow for the risk assessment to be updated.

## **Section 15.5 Training**

**15.5.1** Staff receive specific training on induction and regular refresh training including the requirements of this code.

**15.5.2** Staff training is delivered through the Admiral Academy eLearning platform, as well as periodic face to face sessions delivered by the compliance team and managers.

**15.5.3** Specific training on the requirements relating to local risk assessments is provided.

**Section 15.6****Review**

**15.6.1** This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

# **Customer Entry & Door Entry Control**

**Luxury Leisure - Standard Operating Procedures**

## Contents

Section 1	Overview	Page 3
Section 2	Policy	Page 3
Section 3	Training	Page 6
Section 4	Review	Page 8



## **Section 1 Overview**

### **1.1 Scope of the policy**

This policy sets out the framework for the Companies' approach to customer entry and door entry control, ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

### **1.2 Policy Statement**

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licensed activities. The Companies strive to uphold the Licensing Objectives as set out in the Gambling Act 2005.

## **Section 2 Policy**

### **New & Non-Registered Guests - Screening entry - process & requirements**

- The Casino will adopt a “hybrid approach” to control customer entry and access to the casino gaming floor.
- The control measures will manage the entry for both registered customers (members) and non-registered guests (non-members)
- This approach will ensure that consistent vigilance is maintained during all operating hours and all persons wishing to gain access are identified and assessed.
- All persons permitted entry are 18+ years of age – all employees will be trained to “Think 25” and challenge any person who does not look clearly over the age of 25 years of age, for recognised and acceptable photo identification for example, Passport, Driving License, recognised ID cards with pass logo, warrant cards, etc.
- Any person who cannot provide suitable Identification will be refused entry and asked to leave immediately, all challenges will be recorded on the “Attempts by Children and Young Persons to enter log”.
- Requirements and actions for persons who are challenged:
  - a) Non-registered customers (non-members) appearing under 25 years of age have their ID checked by the Receptionist to ensure they are over 18. No ID, no entry to the casino. This refusal of entry is recorded in the ‘Refusals Register’.
  - b) Non-registered customers who are challenged for looking under 25 but are over 18 (confirmed on production of valid ID) are asked to register and become casino members.
- Prevent access to vulnerable persons, undesirables, barred or self-excluded persons and those who appear to be overly intoxicated with alcohol or under the influence of any drug or any other substance.
- Any person who appears to be or is suspected of being overly intoxicated or under the influence of drugs and/or substances the receptions will seek the support of the duty manager (PML). The duty manager (PML) will assess the situation and decide if entry will be permitted or not. If entry is not permitted the duty manager will instruct the person to leave immediately.

- Any person who attempts to enter the casino who is found to be registered as an active self-excluded customer will be refused entry and asked to leave immediately, all attempts to enter made by active self-excluded customers will be recorded as an attempt to breach on the “breach Log” by the duty manager (PML).
- Ensure the “Threshold” limit of €2000 spend or win, is monitored, tracked and addressed in line with Money Laundering Regulations. (Current Company policy measures this threshold amount as £1,500 pound Stirling however may change in the future, in line with British Stirling/Euro exchange rates).

The above approach will minimise the risk of any person gaining entry undetected to the premises that fall into any of the criteria detailed and will ensure that every person seeking access will be assessed at the reception area enabling the appointed person to quickly assess their membership/guest status and suitability before being granted access.

#### **New & Non-Registered Guests – Enabling access to play - processes and requirements.**

- Non-registered customers (non-members) are asked to register however registration is not compulsory. These customers may enter as guests (provided entry assessment has been passed) following the guest entry process).
- Registration includes the required elements of ‘Customer Due Diligence’ (CDD), electronically saving the following to a membership profile on the Casino Management database: taking a photograph of customer, scanning a copy of a valid ID, details of ID (issue date, expiry date, issue number), D.O.B. home address and Nationality. A dedicated, individually numbered membership card is then issued to the customer.
- All electronic roulette terminals and B1 machines will only operate with either; a guest card or an active membership card.
- No machine will be able to be played without a card at any time. Guest entry includes the issue of a ‘guest’ membership card assigned to a guest profile within the Casino Management System ensuring their play can be tracked and monitored in line with the threshold limit.
- Guest cards will only be issued once the screening for entry process has been verified and entry to the casino gaming floor has been granted.
- Guest cards will only be active for a specified period of time and will expire within 24 hours of issue, this process will be automated and will ensure non-members are unable to reuse the guest card on any additional visits.

The above process will ensure that access to play any gaming machine in the casino is managed on a visit by visit basis, and also serve as a secondary safe guarding measure to guarantee that no person can actively play any machine who is under age, overly intoxicated, self-excluded or considered vulnerable from gambling, furthermore this process also assists in the monitoring and tracking of non-members who are reaching or have reached the “Threshold” limit of €2000 spend or win, in line with Money Laundering Regulation.

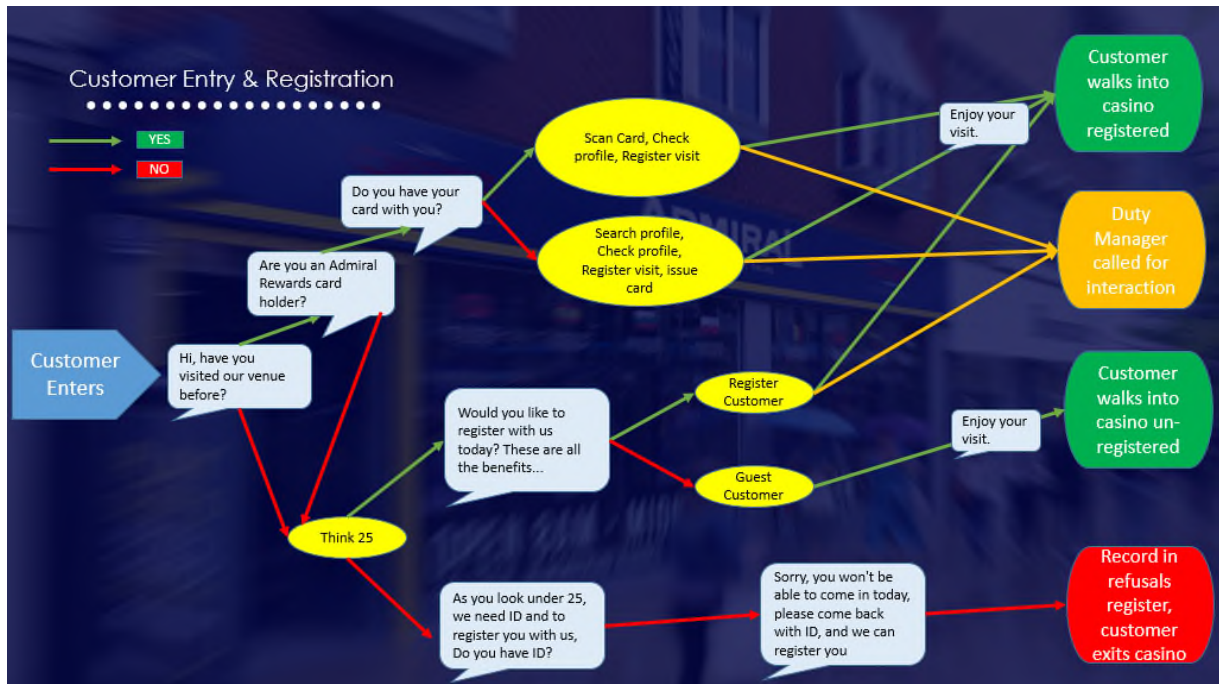
### **Existing Members - Entry - processes & requirements**

- Challenge 25 applied by Receptionist:
  - a) Registered customers (members) appearing under 25 are asked for their membership card. Their identity is verified by the Receptionist using the PC to search the customer database to ensure scanned, valid ID is held for that customer and is over 18.
- Existing members may be greeted by the Receptionist and enter the casino by scanning their membership card. On scanning their card, their membership profile (from the membership database) appears on the PC screen in front of the Receptionist. The Receptionist checks the customer photo to ensure correct card usage and check details held on the membership profile, such as the scanned ID. Existing members who do not have their membership card are checked via accessing the membership database to verify status and identity and a new card will be issued.
- Should the Receptionist discover a 'soft suspension' or customer message has been applied to the customer, the Receptionist asks the customer to wait in Reception area for the Duty Manager. The Duty Manager is called to hold an interaction. Examples of where a soft suspension may be applied;
  - Customer has been identified for an interaction, further enhanced due diligence is to be requested,
  - customer has appeared on Pubwatch and been barred from the casino.
  - The Duty Manager will assess if customer entry is to proceed, or the customer asked to leave.
- Should an existing member be found to have a 'suspension' applied to their membership profile while attempting to enter, entry is denied, and the Duty Manager called to assess the situation. Suspensions are applied for customers who :
  - are enrolled on SENSE
  - who have excluded for Safer Gambling reasons from only this venue (either via self-exclusion or enforced exclusion)
  - who are included in the local Pubwatch scheme
  - are barred for behavioural issue
  - are suspended due to AML concerns (Enhanced Due Diligence not submitted upon request or a SAR submitted to the Nominated Officer (NO) with NO agreement to suspend) etc.

### **Existing Members – Enabling access to play - processes, and requirements**

- All electronic roulette terminals and B1 machines will only operate with either, a guest card or an active membership card.
- No electronic roulette terminals or B1 machines will be able to be played without a card at any time. Guest entry includes the issue of a 'guest' membership card assigned to a guest profile within the Casino Management System ensuring their play can be tracked and monitored in line with the threshold limit.
- All registered members will be able to play roulette terminals and gaming machines by using their membership cards on each visit.

## Guest / Registered customer journey flow chart



Note: Customer will be asked to leave larger bags (backpacks, shopping bags etc.) at Reception. Small bags (handbags, purses, shoulder bags etc.) will be allowed. This is to enhance security and minimise H&S risks.

## Section 3 Training

### Staff Training - (in relation to customer entry & monitoring threshold limit)

- 1) Receptionist training includes:
  - Customer entry procedures
  - Casino Management Systems training
  - AML training, Safer Gambling training including recognising vulnerability / behaviours / markers of harm
  - Challenge 25
  - Selling Alcohol Responsibly including effects of alcohol and recognising signs of drunkenness and sobriety
  - LRA and AML Risk Assessment
  - Reception Procedure Manual training
  - Customer Registration process, what constitutes suitable ID
  - SENSE and self-exclusion training

2) Electronic Gaming Host Training includes:

- Customer entry procedures
- Casino Management Systems training (including tracking members and guests)
- Cash Desk training
- AML training
- Safer Gambling training including recognising vulnerability / behaviours / markers of harm
- Challenge 25
- Selling Alcohol Responsibly including effects of alcohol and recognising signs of drunkenness and sobriety
- LRA and AML Risk Assessment
- Reception Procedure Manual training
- Electronic Gaming Manual training
- Customer Registration process, what constitutes suitable ID
- SENSE and self-exclusion training

**Door Security**

- 1) Door Security will be present in line with the liquor license (not yet granted) with Door Supervisors being the first line check (for Challenge 25, vulnerability, sobriety etc.) when on duty.
- 2) The Receptionist checks still apply giving an enhanced, 2 layered level of control.

**Player Tracking & Threshold limit monitoring**

- 1) A trained, PFL holding team member (Electronic Gaming Host) will be on duty on the Gaming Floor monitoring the machines and customers play, at all times.
- 2) All electronic roulette terminals or B1 machines require a membership card to be inserted to unlock and allow play. Every customer who enters will be in possession of a card (membership card or guest card) ensuring 100% of customer 'buy-in' is tracked.
- 3) Electronic Gaming Hosts will continually monitor the inside of the casino and interact with customers regularly. The Electronic Gaming Host will be in possession of a tablet linked to the Casino Management System with the functionality to monitor customer play in real time via a 'customer gallery'. This gallery clearly shows all registered customers and guest customers and their current levels of play.
- 4) Monitoring Thresholds :
  - £500 threshold - An interaction will take place with the customer when they reach the lower threshold of £500 spend or win.
  - £1,000 threshold - a further interaction takes place should the customer reach £1,000 spend or win.
  - £1,500 threshold - should the customers play reach £1,500, the customer will be informed that they cannot buy-in with any more cash or cash out until valid ID is produced and CDD is completed via customer registration (becoming a member).
- 5) Automatic teller payment machines will be set to cash out a maximum of £1,000 and are continuously monitored by the Electronic Gaming Hosts.

- 6) All transactions ('buy-ins' and 'cash outs') made at the Cash Desk are 'tagged' to the customers play profile in the Casino Management system.

#### **Exclusion (Safer Gambling)**

- 1) The casino will partake in the SENSE (Self Enrolment National Self Exclusion scheme):
  - a. Allowing customers to enroll on SENSE in our venue
  - b. Ensuring customer who have enrolled on SENSE at other venues and are members of our casino, are barred from entering our venue.
- 2) The casino will also have a procedure for self-excluding from only our venue, ensuring that a customer who wishes to self-exclude but does not wish to enroll on SENSE have the option.
- 3) Our PML's Management team reserve the right to 'enforce exclusion' on any customer they feel at risk of gambling harm but does not wish to self-exclude. This will be known as 'enforced exclusion'.
- 4) All customers excluded due to Safer Gambling concerns will be barred on the Casino Management System and entry always denied.
- 5) Any customer wishing to self-exclude will be spoken to by a trained, PML holding Duty Manager.

**5.1** All staff receive training relating to the licence conditions and codes of practice relevant to our licences during induction and also regular refresh training.

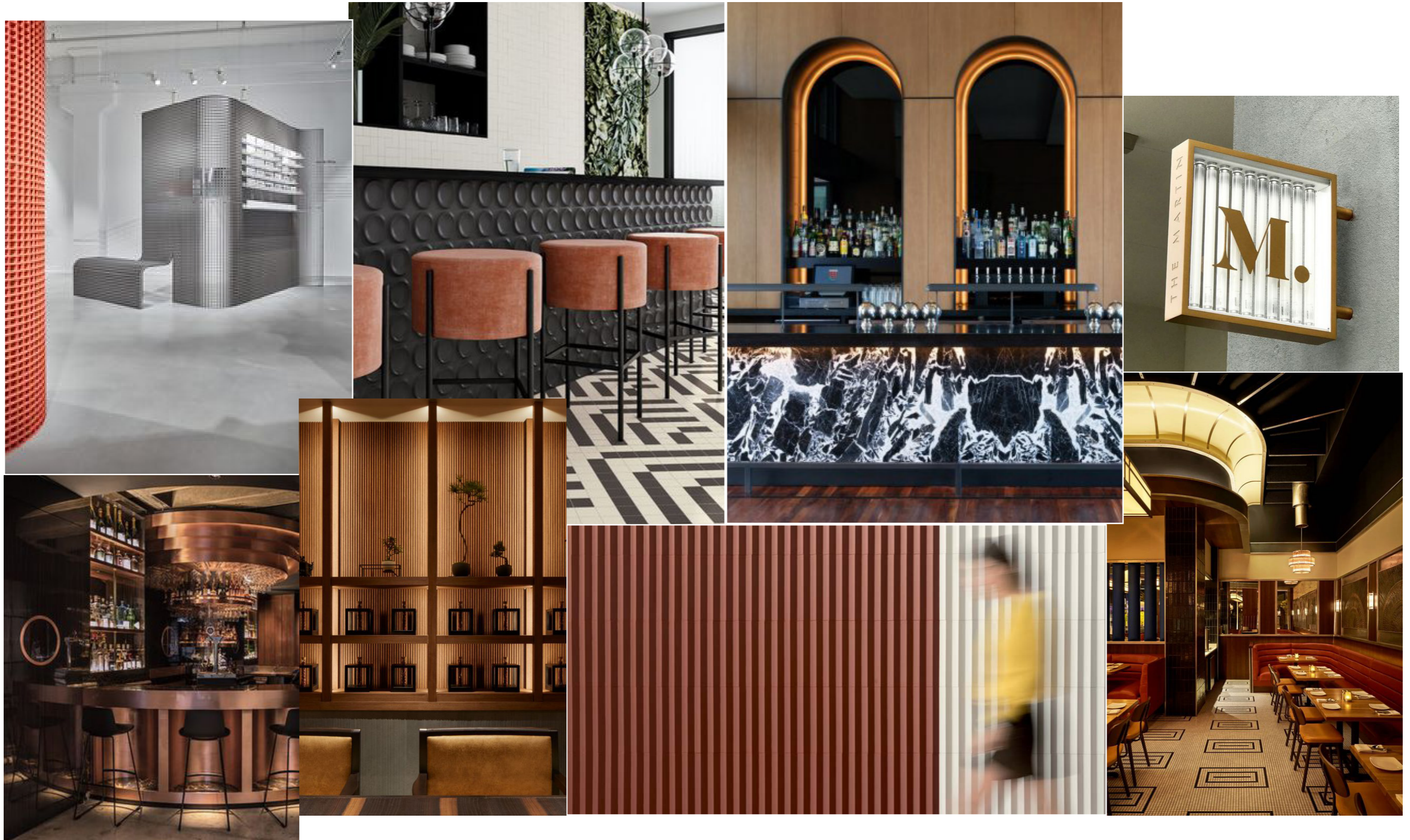
**5.2** PML holders are also required to complete an additional training module specifically on the topic of their responsibilities as personal licence holders. This is delivered by the compliance team.

<b>Section 4</b>	<b>Review</b>
------------------	---------------

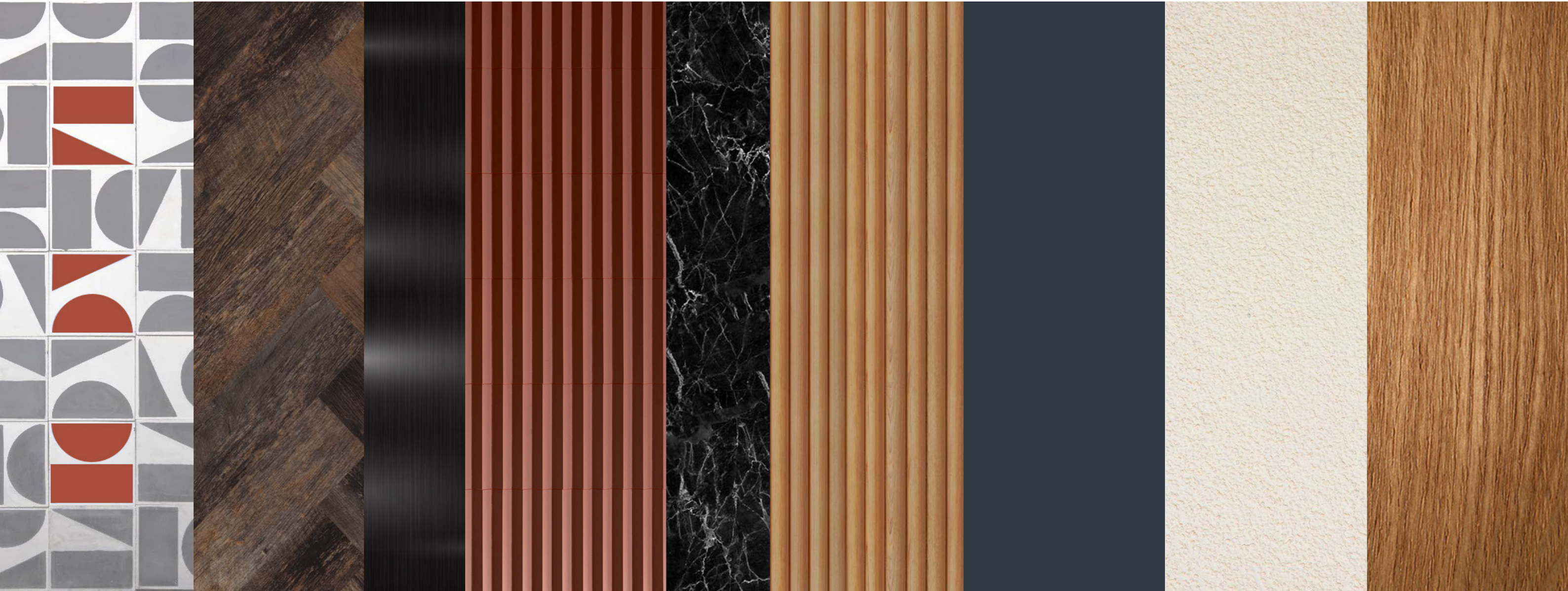
This policy is reviewed as a minimum every 12 months, usually in line with the review of all the company policy and procedures relevant to Social Responsibility.

# Look & Feel

Nostalgic Details, Warm Textural Finishes, Soft Curves



# Palette



1. Floor Tile (Burt & May Grey Split Tile,; Random Pattern)
2. Laminate Flooring (Herringbone Wood)
3. Skirting and Channels (Powder-coated Black Metal)
4. Bar Front (Domus Rombini Tile)
5. Bar Worktop (Silvestone Et Marquina Stone)
6. Wall Panelling (Round Fluted Wood)
7. Wall Paint (Dulux Heritage - DH Oxford Blue))
8. Wall Render (Textured Cream Finish)
9. Wood Panelling (Warm Oak - Spec TBC)



# Lighting Inspiration



Linear Wall Sconce, Brass  
Manufacturer: Vraiment Beau



Samba Hanging light, opal glass/black  
Manufacturer: Euluna



Opal glass ball sconce  
Manufacturer: ClearHalo



Pennon, Pendant light  
Manufacturer: Bert Frank



Rift, Pendant light  
Manufacturer: Bert Frank

# Furniture Inspiration



Revolver bar stool  
Manufacturer: HAY



Obi Swivel Counter Stool  
Manufacturer: Powell & Bonnell



Heidi stool  
Manufacturer:  
Established and Sons



Robin Day Chevron Chair  
Manufacturer: twentytwentyone



Barcelona Chair  
Manufacturer: Knoll



T1 Chair,  
Manufacturer: OMK 1965

# Ceiling Applications



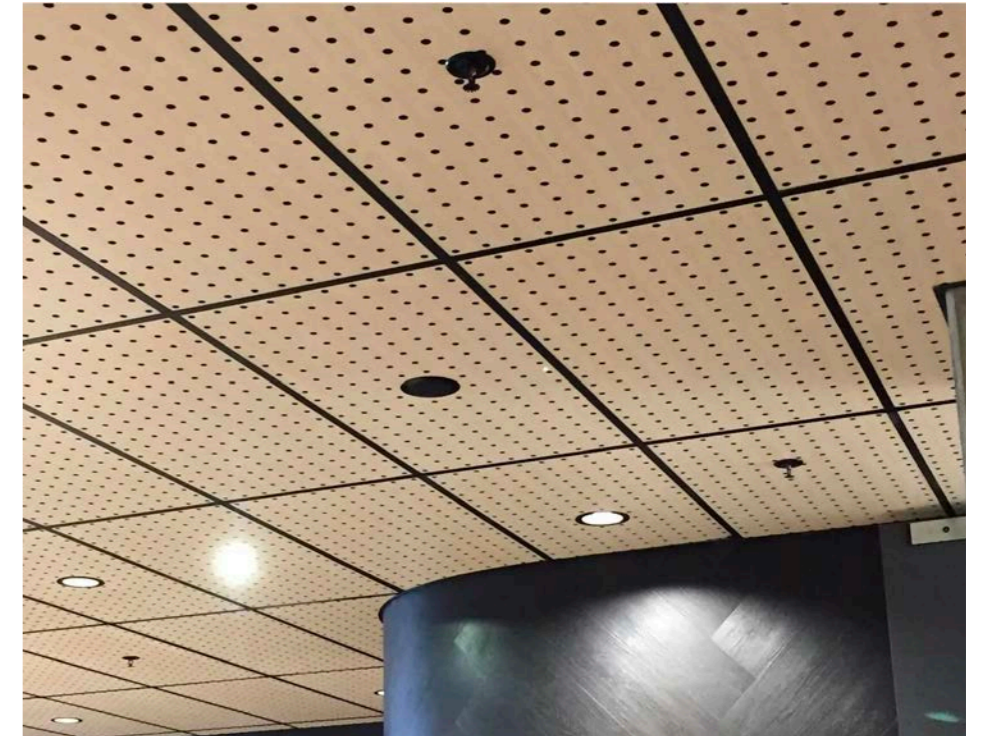
Wood grid system

Wood veneer panels to sit in  
standard grid system  
(Dimensions TBC)



Open Grid System

Suspended open grid system  
(Colour and Dimensions TBC)



Acoustic Wood panel system

Perforated Wood veneer panels  
to sit in standard grid system  
(Dimensions TBC)

# Bar Area (Opt 01)



Bar Area (Opt 02)



# Service Area



# Bar and Service Area

Bar Includes Straight And Curved Modules To Allow Different Configurations

Adjacent Service Desk.  
Can Be Separated  
Depending On Site

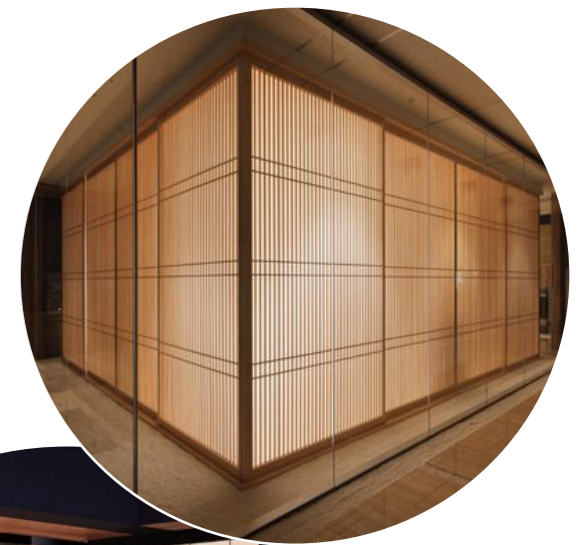


# Seating Area





# Seating Area



- Modular system includes:
- Back illuminated Panel
  - End Panel (Concave curve)
  - Central Panel (Convex Curve)



# Roulette Area



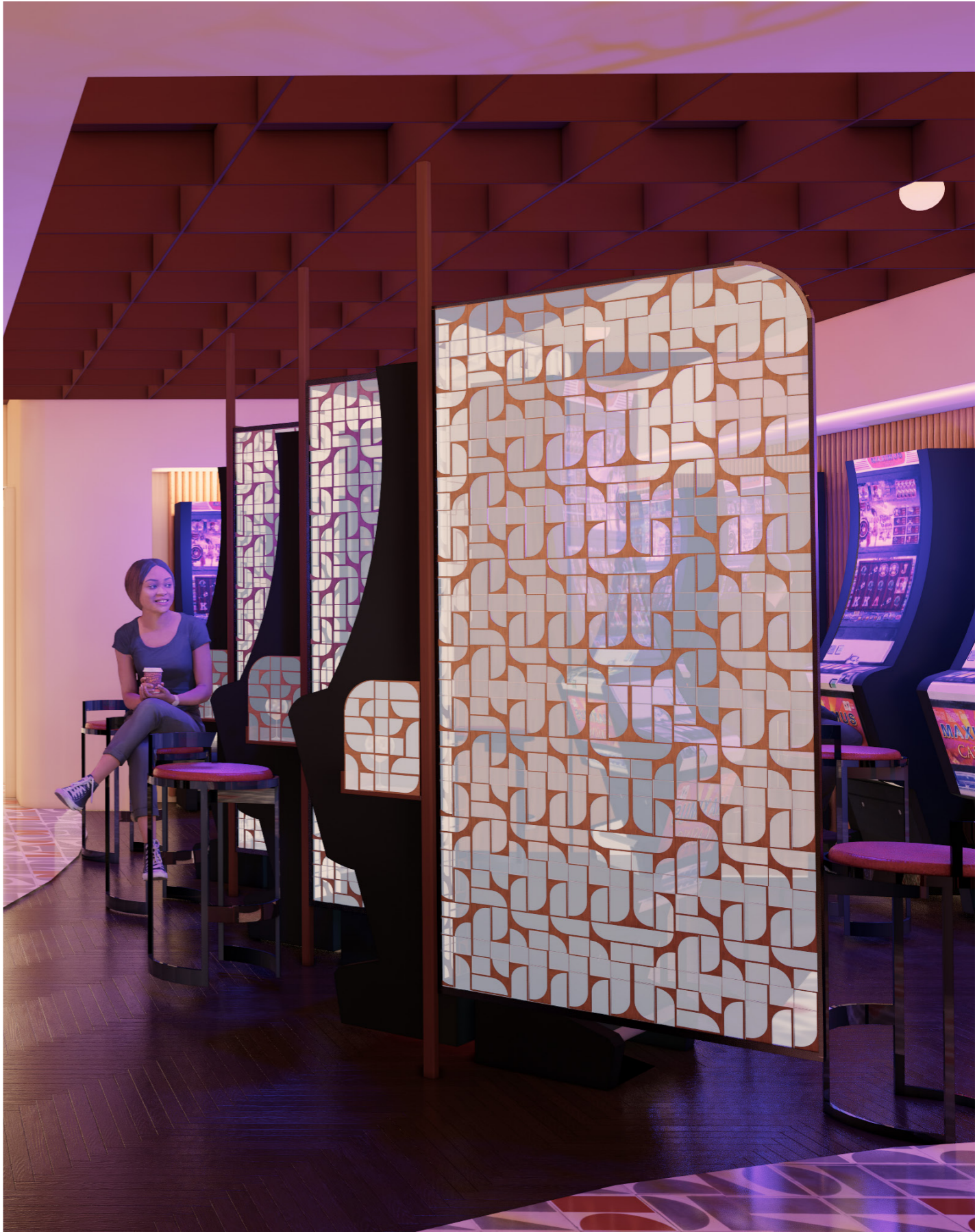
# Roulette Area



# Fixed Tables



Fixed tables for food and drink to be served to mid-floor machines



Games Area

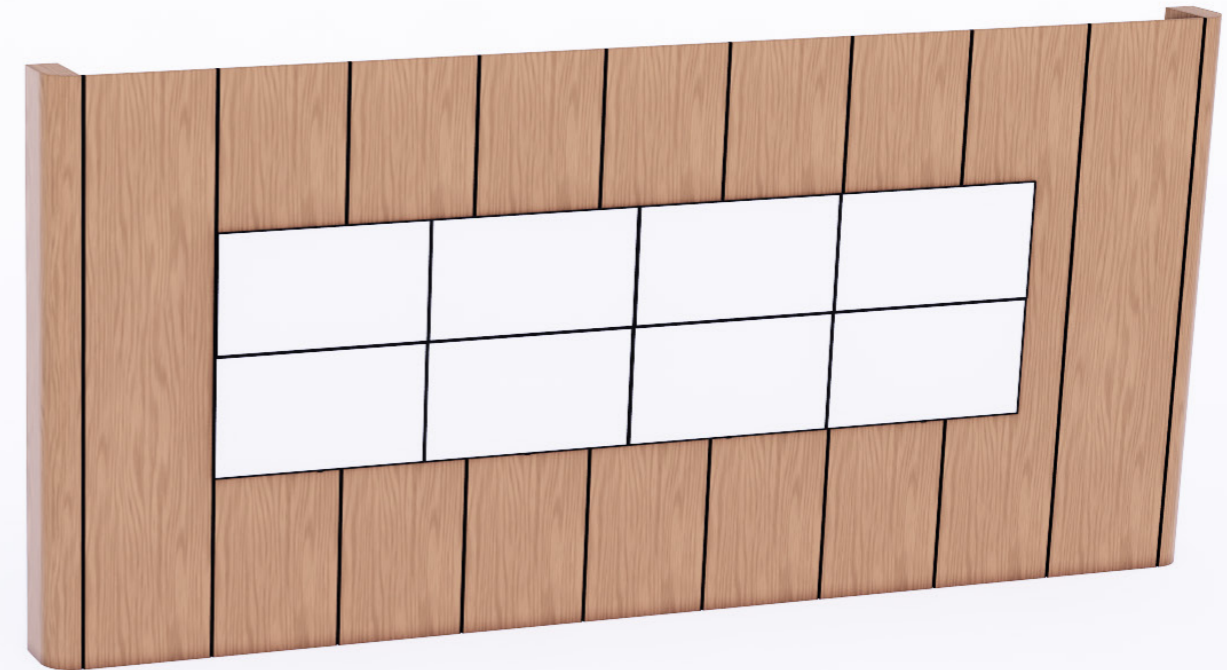


# Modular Panels

**TYPE A: WALL MACHINES**  
Fluted wood panel  
2.2m in height to sit  
below bulkhead



**TYPE B: MID-FLOOR MACHINES**  
Acrylic with cnc cut pattern.  
Self-illuminated with power  
through floor/ceiling mount



**TYPE C&D: TV WALL AREA**  
Wood veneer panels with metal  
u-channel including curved end  
module.

# Games Area

