

SPEAKERS PANEL (LIQUOR LICENSING)

Day: Thursday
Date: 20 August 2020
Time: 10.00 am
Place: Zoom Meeting

Item No.	AGENDA	Page No
4	APPLICANT'S SUBMISSION	1 - 162

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MERKUR CASHINO, DROYLSDEN SHOPPING CENTRE

LICENSING SUB-COMMITTEE HEARING

THURSDAY 20TH AUGUST 2020 AT 10.00

APPLICANT'S REMOTE HEARING BUNDLE INDEX

DOCUMENT	PAGE
Supplemental Statement completed by Andy Tipple, Head of Product, Cashino Gaming Limited	i
Copy of the Application Display Notice	1
Proposed Licence Conditions	2
Updated Local Area Risk Assessment	3 – 17
Copy of the Licensing Plan	18
Copy of the layout plan, for illustrative purposes	19
Cashino Gaming Limited Operational Standards	20 – 21
The Praesepe Group 'Working Together'	22 – 29
Highlighted Extracts of the Gambling Commission's Guidance to Licensing Authorities	30 – 37
Extracts from Hansard Parliamentary Debate discussing the inclusion of the prevention of public nuisance as a Licensing Objective	38 – 39
Copy of the Regulators' Code	40 – 46
Merkur Cashino Compliance and Social Responsibility Manual	47 – 115
Extracts of Merkur Cashino Operations Manual: <ul style="list-style-type: none"> a. Staff Guard Policy; b. CCTV Policy; c. Machine Fraud Policy; d. Compliance Policy 	116 - 133

LICENSING SUB-COMMITTEE HEARING – 20TH AUGUST 2020

SUPPLEMENTAL STATEMENT - ANDY TIPPLE

Cashino Gaming Limited

1. Cashino Gaming Limited operates 73 'High Street Bingo' premises, 5 bingo clubs, 5 Family Entertainment Centres and 87 Adult Gaming Centres throughout Great Britain.
2. High Street Bingo premises offer a combination of linked bingo games on electronic terminals, which are the driver of the high street bingo model, and gaming machines, both of which are compliant with the Gambling Act 2005.
3. The governing legislation provides strict limits on the number of high stake gaming machines that are permitted in licensed High Street Bingo venues.
4. Cashino Gaming Limited premises do not operate Fixed Odds Betting Terminals (FOBTs/category B2 gaming machines) unlike licensed betting premises.
5. Merkur Slots Droylsden will not operate 'infill' gaming machines.
6. All Cashino Gaming Limited premises are sufficiently staffed to ensure effective implementation of the Company's Think 25 policy and all staff are fully trained on the three Licensing Objectives under the Gambling Act 2005, with particular focus on the protection of vulnerable persons from being harmed or exploited by gambling.
7. High Street Bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to £2. Across Cashino Gaming Limited's venues the average stake placed is between 30p and 40p.
8. Local Area Risk Assessments are completed by Cashino Gaming Limited for all premises, which are subject to regular evaluation and update. For all new licence applications Cashino Gaming Limited proactively engages with local police licencing teams to ensure that a partnership is taken at the earliest opportunity.

Mr Andy Tipple, Head of Product, Cashino Gaming Limited

Date: 13th August July 2020

NOTICE OF APPLICATION FOR A PREMISES LICENCE

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

Notice is hereby given that **Cashino Gaming Limited**

of the following address -

**Seebeck House
1A Seebeck Place
Milton Keynes**

Postcode **MK5 8FR**

the number of whose operating licence is: **000-003266-N-103444**

who applied for an operating licence on: **N/A**

has made an application for a **Bingo Premises Licence**

The application relates to the following premises:

**Merkur Slots
Unit 8 & 9
Droylsden Shopping Centre
Greenside Lane
Manchester
M43 7YY**

The application for a premises licence has been made to the following licensing authority:

**Licensing Services
Tameside Metropolitan Borough Council
Tame Street Depot
Tame Street
Stalybridge
Tameside
SK15 1ST
Website: www.tameside.gov.uk**

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

The following person connected with the applicant is able to give further information about the application:

**Richard Bradley
0115 948 7424
Poppleston Allen
37 Stoney Street
The Lace Market
Nottingham
NG1 1LS**

Any representations under section 161 of the Gambling Act 2005 must be made no later than the following date: 21st July 2020

PROPOSED LICENCE CONDITIONS

All Merkur Slots premises maintain a high standard of operation and implement the measures listed below as standard.

Should the Licensing-Sub Committee be minded to grant the current application and believe that the addition of conditions to the premises licence would be appropriate, Cashino Gaming Limited would be willing to accept the following:

1. The premises shall install and maintain a comprehensive CCTV system with all recordings stored for a minimum period of 31 days. Recordings shall be made available upon the request of Police or authorised officers of the Licensing Authority, subject to data protection legislative requirements.
2. Notices shall be prominently displayed within the premises stating that CCTV is in operation.
3. An incident log shall be kept at the premises and made available on request to an authorised officer of the Licensing Authority or the Police. Details to include:
 - i. all crimes reported to the venue
 - ii. all ejections of patrons
 - iii. any complaints received concerning crime and disorder
 - iv. any incidents of disorder
 - v. all seizures of drugs or offensive weapons
 - vi. any visit by a relevant authority or emergency service.
 - vii. any attempts by children and young persons to gain access to the premises to gamble
 - viii. Any Challenge 25 Refusals.
4. A think 25 proof of age scheme shall be operated at the premises.
5. Signage advertising the aforementioned proof of age scheme shall be prominently displayed throughout the premises.
6. There shall be no pre-planned single staffing at the premises from 20:00 until closing.
7. Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises.
8. The licensee shall take reasonable steps to prevent nuisance directly outside the Premises.

Merkur Slots, Unit 8 & 9, Droylsden Shopping Centre, Greenside Lane, Manchester, M43 7YY

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise Address:	Unit 8 & 9, Droylsden Shopping Centre, Greenside Lane, Manchester, M43 7YY
Local Authority:	Tameside Metropolitan Borough Council
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-024 (Cashino Gaming Ltd)
Company Details:	Praesepe Group, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Cashino Gaming Limited
Name and Title of Assessor:	Gill Clulow
Date of Assessment:	1.1.20, 24.7.20
Review Date:	On opening in conjunction with local staff

Page 5

Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots Droylsden is located Droylsden Shopping Centre, Tameside in the North West region of England. The shopping centre provides a variety of independent and national retailers such as B&M, and Wilko's. The area surrounding the shopping centre is mainly terraced housing. At the centre of a residential are there are a number of schools within close proximity, bus stops on the edge of the centre service schools
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	further afield. Tameside local Authority reported 'No records of any issues with the premise. The licence was surrendered on the 30 June 2019'.
Establishments of note:	Within Droylsden Town are William Hill and Dave Puck Bookmakers both on Market Street outside of the centre. Newly opened Bar and Bottle is on the edge of the centre closing at 11pm and the Kings Head closing at 11:30pm.
Adjoining premises:	Merkur Slots is located at the end of a mall under the clock close to Café Rioba.
Crime statistics:	Droylsden Shopping Centre, Greenside Lane is within the Droylsden East policing neighbourhood, under the Greater Manchester Police force area. Crime in the Tameside area is at a similar level to similar areas at 112.92/1000 - the average 113.91/1000 and is lower than the average in other Greater Manchester areas - 116.71/1000. The current policing priorities relate to gangs of youths damaging passing vehicles and trams and acting in ASB way on trams and towards drivers. In June 2019, 124 crimes were committed within half a mile of the centre of Droylsden Shopping Centre, which predominantly consist of Violence and sexual offences (37), Criminal damage and arson (18), Anti-social behavior (17), Theft (17), Public order (11). There was 1 shoplifting incident reported on Greenside Lane and 4 near the shopping area.
Population:	Droylsden Shopping Centre, Greenside Lane area has a population of 2401 residents. The local area around M43 7YY is predominantly male (54%) which is higher than UK average (49%). Dominating age groups are 60-74 (23%), 30-44 (22%), and 45-59 (16.7%). In the immediate vicinity Greenside Lane, there is a large concentration of residents that are single - 44% of the resident population. (UK average 34%). Area of the Droylsden East ward shows lower than average levels of residents that report their health as Good or Very Good (56%), which contrasts UK average of 81.1%. This is an indicative of the area with older population. Droylsden Shopping Centre and surrounding area has a larger than average concentration of residents who have no qualifications - 41% of the resident population. On average, around 22.9% of census respondents fall into this category.
Culture:	As whole, the UK population claims itself as approximately 86% White, with Greenside Lane area being 92% White. 4% of local residents describe themselves as Black African and 2.5% as Mixed Ethnicity. Remaining 1.5% is equally divided between Chinese, Other Asian and Other ethnic groups. Dominating religion in this area is Christian (72%), which is higher than UK average of 59.3%. A sizeable portion of the local population (22%) claim to have no religion, while the remaining 6% did not state their religious views.
Unemployment:	This address within the Droylsden East ward showed a higher than average concentration of retired residents - 20% of the resident population. On average, around 13.8% of census respondents were retired. 38% of local population is in full-time or part-time employment, 13% is on long-term sick or disabled. Unemployment level of 7.7% does not show significant deviation from UK average (7.4%- Census 2011). Local area predominantly consist of semi-skilled and unskilled manual workers; those on state benefit/unemployed and lowest grade workers. Dominating employment industries are retail (26.4%) and manufacturing (13.9%)
Deprivation:	In the latest Index of Multiple Deprivation (IMD) Droylsden Shopping Centre, Greenside Lane area was ranked 3,258 out of 32,844 in England, where 1 was the most deprived and 32,844 the least. This is amongst 10% most deprived neighbourhoods in the country. Main areas of local deprivation are low income due to unemployment, lack of attainment and skills in the local population and poor physical or mental health.
Local Police:	Local Police has no concerns with regard to opening Merkur Slots Droylsden and issued very positive feedback 'hoping that the premises will enhance the local area and help in the regeneration of the Droylsden Town Centre'.

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

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

Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into account Tameside Metropolitan Borough Council local authority Statement of Gambling Principles, reference 11 Bingo Centres and Tameside Metropolitan Borough Profile 2011.

Environmental Factors

In preparing this assessment Praesepe has considered the relevance of environmental factors. In this context, environmental factors include the physical location of schools, playgrounds, residential areas, other retail premises and locations (bus stations, tube stations) which have an effect on football. We have set out below our position on risk in this area:

Licensing Objectives	Local Risks	Control Measures
Protecting children and other vulnerable people from being harmed or exploited by gambling	<p>Unemployment This address within the Droylsden East ward showed a higher than average concentration of retired residents - 20% of the resident population. On average, around 13.8% of census respondents were retired. 38% of local population is in full-time or part-time employment, 13% is on long-term sick or disabled. Unemployment level of 7.7% is the same as UK average (7.4% - Census 2011). Local area predominantly consist of semi-skilled and unskilled manual workers; those on state benefit/unemployed and lowest grade workers. Dominating employment industries are retail (26.4%) and manufacturing (13.9%)</p> <p>Deprivation In the latest Index of Multiple Deprivation (IMD) Droylsden Shopping Centre, Greenside Lane area was ranked 3,258 out of 32,844 in England, where 1 was the most deprived and 32,844 the least. This is amongst 10% most deprived neighbourhoods in the country. Main areas of local deprivation are low income due to unemployment, lack of attainment and skills in the local population and poor physical or mental health.</p> <p>Schools and Education St Mary's CofE Primary School, Church Street, M43 7BR Moorside Primary School, Market Street, M43 7DA St Stephen's RC Primary School, Chappell Road, M43 7NA Greenside Primary School, Greenside Lane, M43 7RA Fairfield Road Primary School, Fairfield Road, M43 6AF Manchester Road Primary Academy, Manchester Road, M43 6GD St Anne's RC Primary School, Clarendon Road, Audenshaw, M34 5QA St Clement's CofE Primary School, Abbey Hey Lane, Higher Openshaw, M11 1LR Higher Openshaw Community School, Saunton Road, Higher Openshaw, M11 1AJ Seymour Road Academy, Seymour Road South, M11 4PR Droylsden Academy, Manor Road, M43 6QD</p>	<p>Age Verification <i>Ensuring Under 18's do not have access to licensed premises</i> All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Praesepe operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Droylsden Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p> <p>Age verification test purchasing and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p>

	<p>Fairfield High School for Girls, Fairfield Avenue, M43 6AB Laurus Rycroft, Lumb Lane, M43 7LF Launchpad Pre-school, Baguley Street, M43 7BB Space Station Day Nursery, Market Street, M43 7AZ Twinkle Star Pre-School, 243 Market Street, M43 7AZ FunTimes Childcare, 1 Greenheys, M43 7GZ Greenside Day Nursery, Greenside Lane, M43 7RA Peacocks Nursery, 264 Manchester Road, Audenshaw, M34 5GJ Rocking Horse Nursery & Preschool, 30 Manchester Road, Audenshaw, M34 5GB Jack In The Box Day Nursery, 16 Rosina St, Openshaw, M11 1HX</p> <p>Community Centres and Youth Centres Fairfield Youth Centre, Grove St, M43 6TB St Marys Droylsden, Chyrch Street, M43 7BR Droylsden Little Theatre, 7 Castle Close, M43 7AS</p> <p>Parks, play grounds and sports/leisure facilities Lees Park, Unnamed Road, M43 7EN Active Medlock, Gardenfold Way, M43 7XU Copperas Field, Droylsden, Manchester M43 6FT Water Adventure Centre (WAC), The Old Boathouse Fairfield Locks Off, Maddison Road, M43 6ES</p> <p>Vulnerable and addiction support services Age Concern Home Care North Manchester Openshaw Resource Centre, 10 Catherine Street, Openshaw, Manchester M11 1WF Turning Point - Tameside 1.2 miles Caroline House, 146 Audenshaw Road, Audenshaw, Manchester M34 5HQ</p> <p>Homeless shelters and food banks The Trussell Trust Food Bank, Church St, M43 7BR</p> <p>Pawnbrokers and Loan Shops There is no pawnbrokers or loan shops in local vicinity following the closure of Albermarle Bond.</p> <p>Medical Centres, Care Homes and Mental Health facilities Medlock Vale Medical Practice, 58 Ashton Rd, M43 7BW Droylsden Medical Practice, 3 Albion Dr, M43 7NP</p>	<p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>Vulnerability Training and guidance is given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p>
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	<p>Market Street Medical Practice, 76 Market St, M43 6DE Manchester Road Surgery, 11 Manchester Rd, Audenshaw, M34 5PZ Ashton Road Surgery, 58 Ashton Rd, M43 7BW Sunnyside Care Home, Sunnyside Rd, M43 7QE</p> <p>Gambling premises William Hill, 135-137 Market St, M43 7AR Dave Pluck, 130 Market St, M43 7AA William Hill, FIVEWAYS, 164A Greenside Ln, M43 7UR Bedfred, Manchester Rd, Manchester</p> <p>Residential Areas The area containing Droylsden Shopping Centre, Greenside Lane consists predominantly of flats and terraced houses. This area contains a higher than average level of social housing - 57% of household spaces. This contrasts with the national average of just over 18%. Housing occupancy is mainly single person (69%).</p> <p>Bus stops and other Transport links Fairfield Railway Station, Booth Road, M43 6TT</p> <p>Locally Identified Premises Droylsden AFC- Football Club, Market Street, M43 7AY</p> <p>Public Houses and Alcohol Licensed Premise Lazy Toad, 14 Ashton Hill Ln, M43 7UB The Haddon Hall, Haddon Hall Rd, M43 6LB Sizzling Pubs, Lewis Rd, M43 6NP The Buxton, 339 Manchester Rd, M43 6GE Halfway House, Halfway House, 435 Manchester Rd, M43 6JE Strawberry Gardens Pub, 74-72 Moorside St, M43 7XD The Railway Inn, 326 Lumb Ln, M43 7LA Fairfield Arms, 92 Manchester Rd, M34 5GB Kings Head, 169 Market St, M43 7AY Church Hotel, Droylsden, Manchester M43 7BP Beehive Inn, 145 Market St, M43 7AR</p>	<p>Customer Interactions may result in the customer being guided to gambling support services such as Gamcare; encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Player Protection <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i></p> <p><i>Failure to provide information to customers on responsible gambling</i></p> <p><i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p> <p>'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are located in prominent locations within the premise and in private areas, such as customer toilets.</p> <p>Playright App available for customers to self-manage their play and spend and is able to send alerts to Merkur Slots Droylsden if the customer enters at a time they have chosen not to play which instigates an interaction with the customer.</p> <p>Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p> <p>Senior Management are members of the Bingo Association Executive and Social Responsible Committees and BACTA Divisional and Social Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> <p>Deprivation</p>
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		<p>Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is adopted at all times, therefore it is not a question of degrees of vigilance being implemented in different areas.</p> <p>Homelessness</p> <p>Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high risk premises, homeless shelters and foodbanks to provide social responsibility information.</p>	<p>Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is adopted at all times, therefore it is not a question of degrees of vigilance being implemented in different areas.</p> <p>Homelessness</p> <p>Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high risk premises, homeless shelters and foodbanks to provide social responsibility information.</p>
Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime	<p>Crime statistics:</p> <p>Droylsden Shopping Centre, Greenside Lane is within the Droylsden East policing neighbourhood, under the Greater Manchester Police force area.</p> <p>In June 2019, 124 crimes were committed within half a mile of the centre of Droylsden Shopping Centre, which predominantly consist of Violence and sexual offences (37), Criminal damage and arson (18), Anti-social behavior (17), Theft (17), Public order (11). There was 1 shoplifting incident reported on Greenside Lane and 4 near the shopping area.</p> <p>Local Police</p> <p>Local Police has no concerns with regard to opening Merkur Slots Droylsden and issued very positive feedback 'hoping that the premises will enhance the local area and help in the regeneration of the Droylsden Town Centre'.</p> <p>Public Houses and Alcohol Licensed Premise</p> <p>Lazy Toad, 14 Ashton Hill Ln, M43 7UB</p> <p>The Haddon Hall, Haddon Hall Rd, M43 6LB</p> <p>Sizzling Pubs, Lewis Rd, M43 6NP</p> <p>The Buxton, 339 Manchester Rd, M43 6GE</p> <p>Halfway House, Halfway House, 435 Manchester Rd, M43 6JE</p>	<p>Premise Security and violence in the workplace</p> <p>Poor security control measures which may increase vulnerability to crime</p> <p><i>Failure to protect employee and customers from harm during the hours of late night opening</i></p> <p>Merkur Slots Droylsden is subject to a separate security risk assessment, local factors are considered and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots Droylsden will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p>General Crime and Disorder</p>	<p>Premise Security and violence in the workplace</p> <p>Poor security control measures which may increase vulnerability to crime</p> <p><i>Failure to protect employee and customers from harm during the hours of late night opening</i></p> <p>Merkur Slots Droylsden is subject to a separate security risk assessment, local factors are considered and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots Droylsden will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p>General Crime and Disorder</p>

	<p>Strawberry Gardens Pub, 74-72 Moorside St, M43 7XD The Railway Inn, 326 Lumb Ln, M43 7LA Fairfield Arms, 92 Manchester Rd, M34 5GB Kings Head, 169 Market St, M43 7AY Church Hotel, Droylsden, Manchester M43 7BP Beehive Inn, 145 Market St, M43 7AR</p> <p>Pawnbrokers and Loan Shops There is no pawnbrokers or loan shops in local vicinity</p> <p>Gambling premises William Hill, 135-137 Market St, M43 7AR Dave Pluck, 130 Market St, M43 7AA William Hill, FIVEWAYS, 164A Greenside Ln, M43 7UR Bedfred, Manchester Rd, Droylsden, Manchester</p> <p>Residential Areas (impacted by Anti Social Behaviour) The area containing Droylsden Shopping Centre, Greenside Lane consists predominantly of flats and terraced houses. This area contains a higher than average level of social housing - 57% of household spaces. This contrasts with the national average of just over 18%. Housing occupancy is mainly single person (69%). There was 17 anti-social behavior incidents reported within half a mile from Droylsden Shopping Centre in June 2019, none of which happened directly on Greenside Lane.</p>	<p>To identify aggressive customers to prevent crime and disorder</p> <p>Awareness of local crime issues in the local area We have reviewed the Police UK hot-spot mapping for Droylsden East policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with Greater Manchester Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p> <p>Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.</p> <p>Merkur Slots Droylsden will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p> <p>Anti-social behaviour outside the premise Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.</p> <p>Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p>
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Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.

Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.

Money Laundering

Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.

Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML policies with clear escalation and reporting processes.

There is no pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.

IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.

Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.

Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.

Adequate staff will be maintained at all times and subject to regular review and risk assessment.

Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.

Merkur Slots Droydsden will operate TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay.

Staff do not carry cash floats and only management can open the machines and change machines.

	<p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management.</p> <p>The premise and staff will be protected by a Staffguard security system. Maglock and intruder alarms will be installed.</p> <p>Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.</p> <p>Alcohol and Drugs</p> <p>Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.</p> <p>'No Alcohol Allowed' signage on the door.</p> <p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p> <p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p>Money Lending</p> <p>Money lending is not tolerated within our premises.</p> <p>Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
Ensuring that gambling is conducted in a fair and open way	<p>Bingo/Gaming Machine and Supervision</p> <p>The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p>

Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling.

Customer Complaints

Failure to prevent customers complaints and disputes regarding gambling within our premises

Failure to resolve customer's complaints and disputes regarding our gambling premises.

Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website.

The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.

Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.

Complaints portal used to collate and manage responses.

4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints.

Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.

Marketing

Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns.

Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, Bingo Played Here, opening times and promotional activity.

All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.

Other	<p>Places of worship and Religious Buildings</p> <p>Droylsden Independent Church, 28 Ashton Hill Ln, M43 7UB</p> <p>Droylsden Methodist Church, Dunkirk St, M43 7DY</p> <p>Evangelical Church of the Lamb Ministries, 93 Market St, M43 6DD</p> <p>Fairfield Moravian Church, 28 Fairfield Square, M43 6AE</p> <p>The Parish Church of Saint Martin's Droylsden, 1 St Martins Cl, M43 7SJ</p> <p>St Stephens Presbytery, St Stephens Presbytery, Chappell Rd, M43 7NA</p> <p>St Martin's Church, Greenside Ln, M43 7QS</p> <p>Saint John's Church, 88A Moorside St, M43 7HL</p> <p>Masjid Darul Hijra Alula, 135-143 Fairfield Rd, M43 6AX</p>	<p>Ethnicity and Local Area Demographic</p> <p>Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training & Social Responsibility</p> <p>Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People; Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice yearly.</p> <p>COVID 19</p> <p>All staff receive training on COVID-19 guidelines.</p> <p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p>
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	<p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p>
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Merkur Slots Droylsden Premise Layout

Premise level:	Merkur Slots Droylsden is a ground floor premises in a local shopping centre with a main entrance under the clock tower and 2 nd entrance on the side along the mall.
Premise frontage:	Merkur Slots Droylsden will be a property will be of a style which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions will comply with LCCP and standards set by the Committee of Advertising Practise (CAP) and Broadcast Committee of Advertising Practise (BCAP)
Counter Position:	Merkur Slots Droylsden will have a floor layout will be designed to avoid blind spots to enable supervision of entrances and machines from the central service area and staff will regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons.
Floor layout:	Merkur Slots Droylsden floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed and staff will regularly


	patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets will be located in prominent locations within the premise.
Machine Positions:	Merkur Slots Droylsden will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p). Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling.
Hidden Areas:	Merkur Slots Droylsden will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.

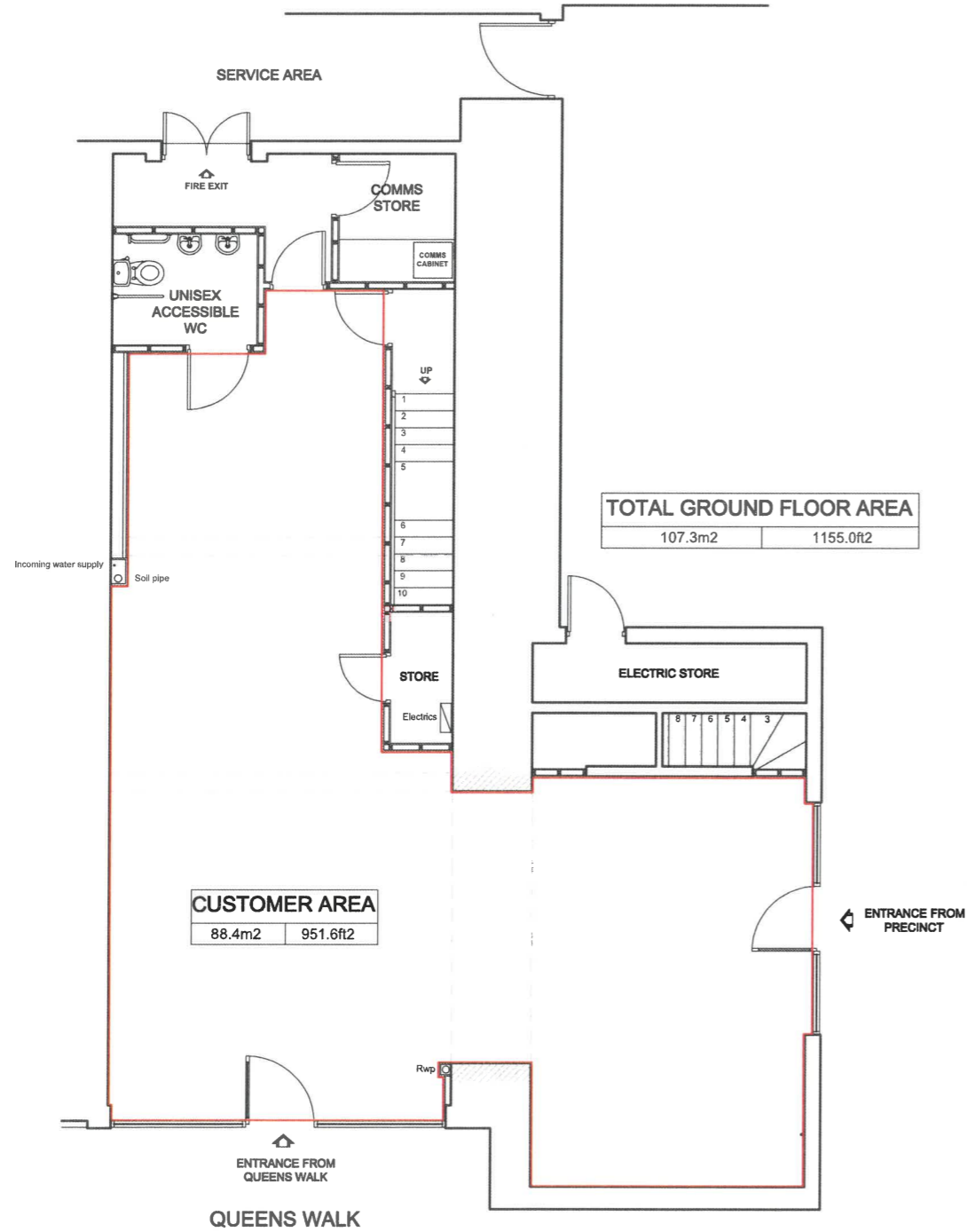
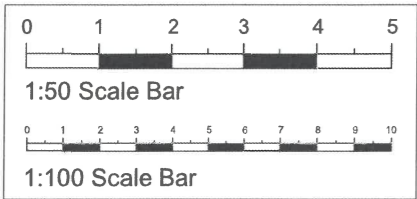
Additional Comments

I have worked in the Gaming Industry for 25 years in operations as a venue manager for 4 years and area manager for 20 years before moving to the Audit and Compliance department in 2019, prior to which I was in retail management. During my time in the industry, I have managed venues and areas in many locations from market towns such as Loughborough to large cities like Glasgow and Luton. When I was required to complete a Local Area Risk Assessment for the new Merkur Slots premises in Droylsden Shopping Centre I researched the area and then visited on 1.1.20. This visit was then followed up with a second visit on 24.7.20. On my second visit I was accompanied by Karen Smith an experienced venue manager with Merkur Casino working in several north west locations including, Rochdale, Farnworth and Birkenhead during her 20 years' service. We both felt comfortable with the location and that a Merkur Slots in Droylsden would not present challenges that we were unfamiliar.

This document provides an assessment of risk at premise level relating to the provision of these facilities for gambling. Praesepe is a national operator and employs a number of standard policies, procedures and control measures across all premises. These issues are clearly articulated in the "Compliance Manual"; to be found in the premise and in our Player Protection Framework. The company also carries out premises security risk assessments (available on request) and health and safety risk assessments which inter alia relate to the objective of keeping crime out of gambling.

Where relevant, Praesepe has also taken into account any substantive local risks identified in a wide range of policy statements related to gambling and local area profiles specifically related to gambling. However the company does not operate discriminatory policies against any identified groups based on social demographic or ethnic origin. Therefore identification of issues relating to gambling related harm are based on individual customer behaviour; even where particular groups are identified through research at being at greater risk of gambling related harm.

Assessors Name:	Gill Clulow
Signature:	
Date:	7.08.2020



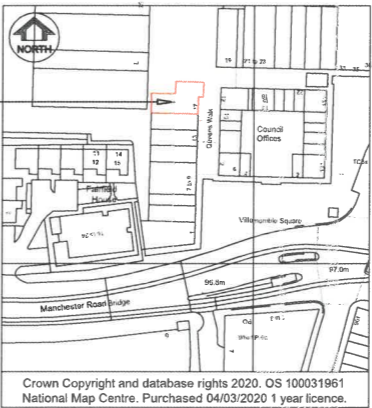
Proposed Ground Floor Plan 1:50

GAMBLING ACT 2005 LICENSING PLAN


Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for information purposes only, and does not form part of the premises licence

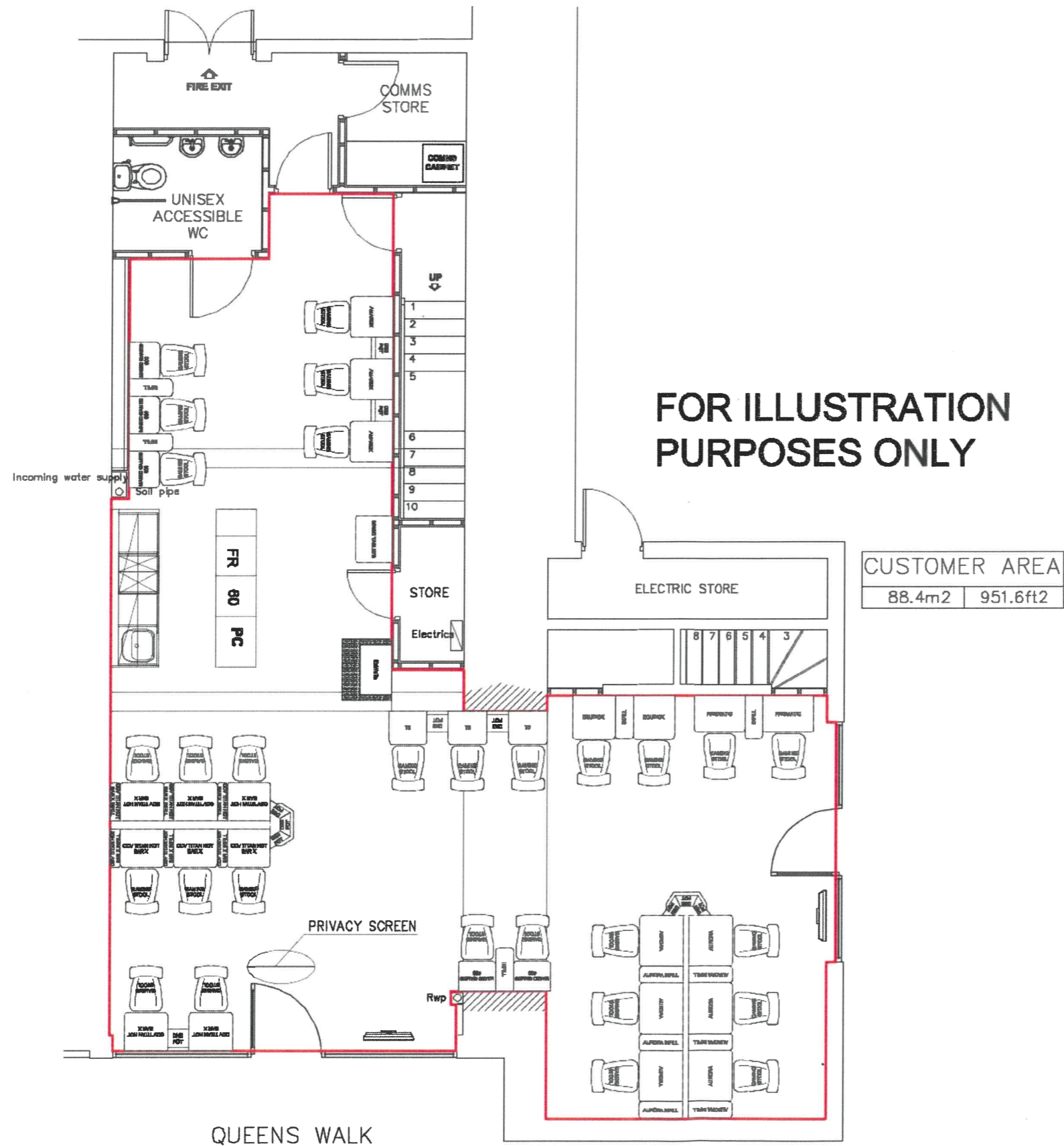
— Area in which facilities will be provided for gaming.

Indicates site in application at:
Unit 8 and 9 at:
17 QUEENS WALK
DROYLSDEN SHOPPING CENTRE
DROYLSDEN
GREATER MANCHESTER
M43 7AD




Location Plan 1:1250

A	17-04-20	Legend amended.
Rev	Date	Description
<div><div>MERKUR SLOTS</div></div>		
Address UNITS 8 AND 9 AT: 17 QUEENS WALK DROYLSDEN SHOPPING CENTRE DROYLSDEN M43 7AD		
Title LICENCE PLAN		
Drawn	Date	Scale
JAM	04/03/2020	1:50 @ A1
Customer Area	88.4m2	Revision A
Drawing Number	DSC/DD/02	
McKeowns Plans for Construction 301 Alvechurch Road, Birmingham, B31 4UB Tel: 0121 433 4715		
LICENCE PLAN		



REVISIONS	FIT OUT TYPE MERKUR SLOTS	REFERENCE DRAWINGS	
	PROJECT MERKUR SLOTS Unit 8/9, 17 Queens Walk Droylsden Shopping Centre Droylsden, Gtr Manchester M43 7AD	SCALE 1:50	
	DESCRIPTION PROPOSED MACHINE PLAN	DRAWN BY	
		DATE 15/05/2020	
		DRAWING No. ???-PR-05	REVISION

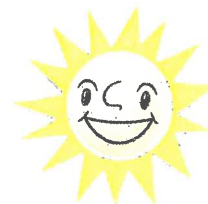


MERKUR
SLOTS

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THIS DRAWING SHOULD NOT BE SCALED. THE CONTRACTOR SHOULD CHECK ALL DIMENSIONS ON SITE. ANY ERROR OR OMISSION SHOULD BE REPORTED TO PRAESEPE PLC.

19



THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

Objective 1 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

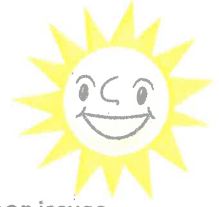
- Cashino Gaming Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Cashino Gaming Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Cashino Gaming Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Cashino Gaming Limited premises operate digital CCTV and customer areas are supervised.
- Cashino Gaming operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- The employees in Cashino Gaming premises are required to carry a portable alarm which is provided by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Cashino Gaming Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Cashino Gaming employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Cashino Gaming operate a robust late night working policy, which is fully supported by a full-time Night Manager.
- Cashino Gaming do not operate a single-manning policy between 8pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

Objective 2 - Ensuring that gambling is conducted in a fair and open way.

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.

Cashino Gaming Limited

Operational Standards



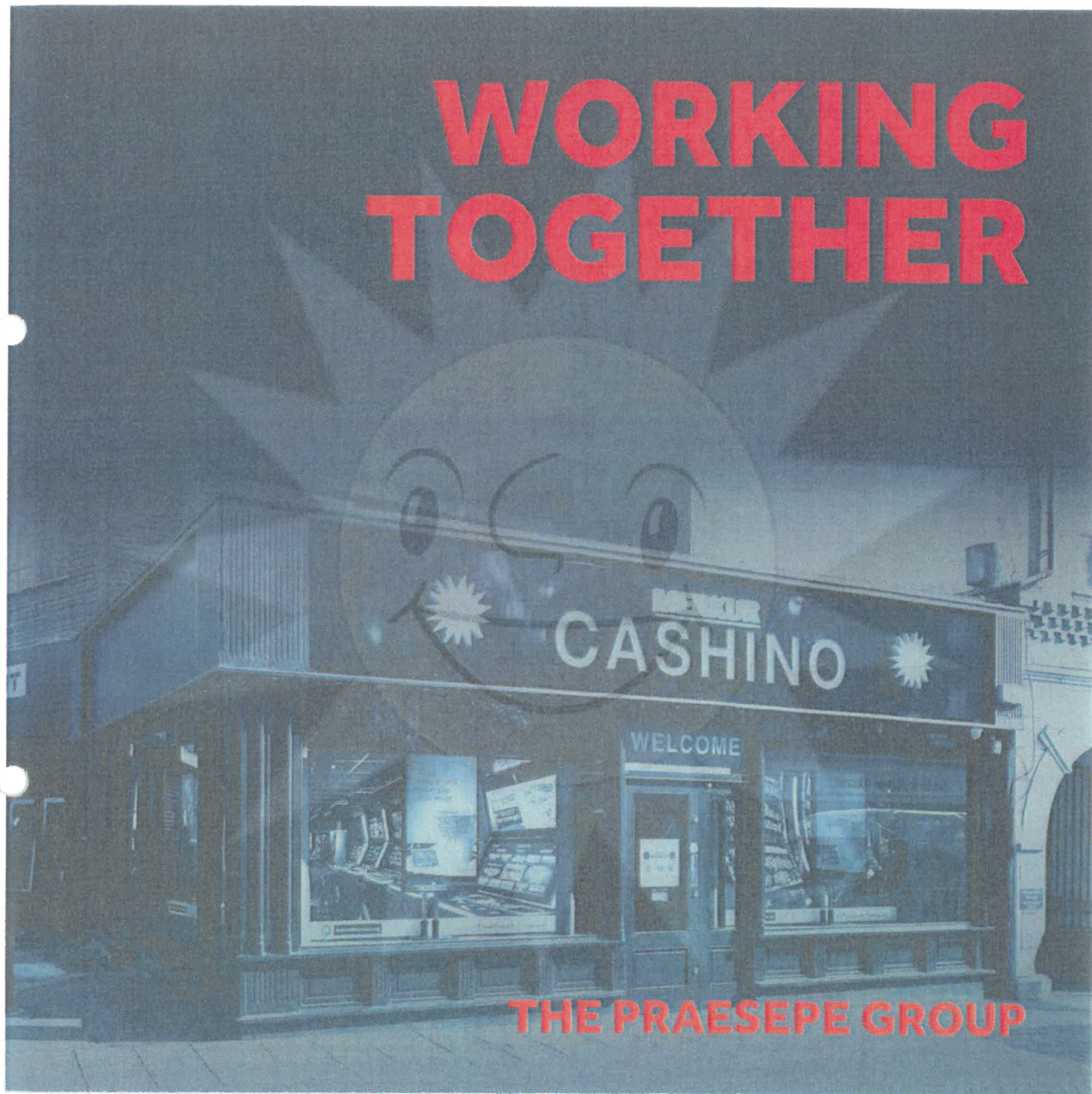
- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers attend our National Training Centre for a thorough induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during the course of their employment to ensure that potential issues can be addressed at the earliest opportunity.

Objective 3 - Protecting children and other vulnerable persons from being harmed or exploited by gambling

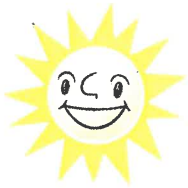
- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and Check Policy are our third-party independent partner for compliance testing.
- All licensed premise employees receive induction and six-monthly refresher training during the course of their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Playright is installed in all licensed premises - this is a self-help App available to customers to enable them to manage spend and play time.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.
- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, education and treatment of problem gambling.

All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

WORKING TOGETHER



THE PRAESEPE GROUP



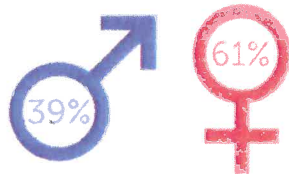
PART OF THE GAUSELMANN GROUP

A Strong Partner For More Than 60 Years



Praesepe is a subsidiary of the family run Gauselmann Group who are based in Espelkamp (Germany). Over the last 60 years the group has grown to operate more than 700 venues across Europe under the Merkur Brand. Millions of enthusiastic guests at home and abroad know our logo. The laughing MERKUR Sun is a guarantor for the best Entertainment.

Praesepe employs over 1,600 people (61% female*) over the 5 Bingo Clubs, 160 High Street Gaming centres (73 High Street Bingos and 87 Adult Gaming Centres) and 5 Family Entertainment Centres under three main brands:



61% of employees are female

39% of employees are male



Merkur Cashino is an established brand in the UK and represents the very best in terms of exciting "slot gaming" and high street bingo entertainment through delivering to our customers the latest in venue product and atmosphere. These venues are known for their highly trained teams and first class face to face service.



Merkur Slots is a new up and coming brand in the UK bringing the latest fun slots & bingo experience in smaller sized high street locations.



Beacon Bingo clubs are very important to our customers in their local communities. Our teams strive to deliver not just great service but a bingo experience which focusses on ambience, safety and fun in a modern environment. The flagship venue at Cricklewood, in North London, is the largest in Europe.

HIGH STREET BINGO



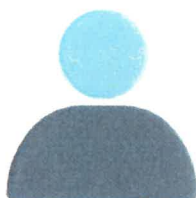
What is it?

Bingo is one of the UK's favourite pastimes and Praesepe is one of the UK's largest operators of licensed bingo and arcade premises. Our High Street Bingo Venues.



Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.

Our teams remain with the customers on the venue floor rather than behind a counter.



Our customers can attend and play bingo at any time with the numbers auto-called.



The market on the high street has evolved with venues now providing Electronic Bingo Tablets.

Our Bingo terminals offer B3, Cat C and Cat D products with an average stake of between 30-40p stake.



Bingo is available for play from 9am until midnight.

Bingo Terminals



Think 25

Think 25 Messaging



Players in Venue



RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

We Are Not A Problem

Being a responsible operator is high priority across the Gauselmann group and in the UK Praesepe is always looking at ways to adhere to the three licensing objectives as technology and customer behaviour changes

GAMBLING COMMISSION

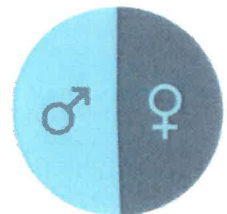
Praesepe is regulated by the
Gambling Commission and
Licensing Authorities



We provide complimentary refreshments, teas and coffees, to customers and do not sell alcohol. Our staff will not allow anyone into the premises who appears to be intoxicated.



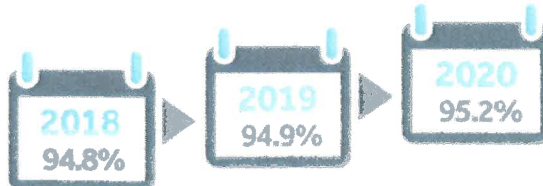
We are immensely proud of the fact that we have never had a licence revoked or even reviewed . Incidents are extremely rare. We simply do not generate noise and anti social behaviour.



Our venues operate a Think 25 policy whereby any person's who look under 25 have to produce a form of photo ID.



Our venues appeal to all ages with our membership gender database split of 52 % Male / 48% Female



Our venues have 3 external age test visits per year with a compliance rate of over 94% for the last 3 years, compared to other industries that sit around 80%.

SOCIAL RESPONSIBILITY MEASURES IN PLACE

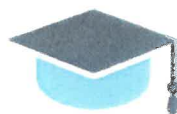


In Venue

Operationally we have a number of measures in place to protect our customers. Throughout the business Praesepe also has a number of socially responsible gambling tools, management and training that include:



All staff complete on-boarding and six-monthly refresher training on "The Essentials of Compliance and Social Responsibility" and "Safeguarding Children and Vulnerable People".



Dedicated Learning & Development Team and National training centres.

IHL SMART tablet in every venue for the recording of customer interactions, self-exclusions, incidents and alerts.



All Data is centrally reviewed and evaluated by an independent Audit/Compliance team.



Six monthly compliance audits to help identify training needs in venue.

Local Area Risk Assessments are updated annually to identify any changes in the local area.



PlayRight app installed in all venues that is a self help tool for customers to manage their gambling.

Compliance



Training Centre



PlayRight App



Online Training





Machine Messaging



Customer Interaction Training



SOCIAL RESPONSIBILITY MEASURES IN PLACE

All Levels

We provide an annual assurance statement to the Gambling Commission. This officially details the Board's commitment to the company values, purpose and culture and the accountability placed on delivery of the licensing objectives.



The statement contains information on how we operate effective governance, regulatory risk management, compliance controls, social responsibility and safer gambling initiatives.



It is also an opportunity to set out any initiatives relating to significant changes being introduced to improve control systems, risk-management, governance and safer gambling – Our recent commitments include; Socially Responsible Machine Messaging; Customer Set Your Limits; SMART Alert application to report criminal activity; opening our Second National Training Centre; Think 25 messaging and Customer Interaction Training.

Praesepe also engages with the **Bingo Association** and **Bacta** trade groups.



- Senior Manager representation Divisional meetings.
- Operations Director is the Vice Chair for division 3 representing Adult Gaming Centres.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Social Responsibility Committee.



- Operations Director and Head of Compliance are Directors.
- Head of Compliance is a member of the Social Responsibility Committee.

BENEFITS TO THE HIGH STREET



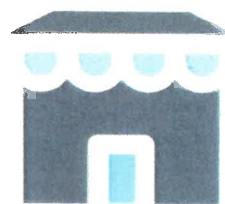
Benefits for your High Street Include:



Investment from £100,000 to £250,000 in long standing vacant venues.



Increased footfall to the high Street.



Linked trips with other shops helping to support other businesses.



Local jobs of between 6 and 12 people depending on the hours of operation.



We provide an important natural surveillance on the high street, particularly late into the evenings.

COMMUNITY & CHARITY



Praesepe has raised in excess of £1.2m for good causes since 2005 and currently supports the Bacta Charitable Trust.

Please contact us.

Praesepe PLC

Seebeck House

1A Seebeck Place

Knowhill

Milton Keynes

MK5 8FR

phone 01908 351200

email info@praesepeplc.com



Part 5: Principles to be applied by licensing authorities

Licensing objectives

- 5.1** In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:
- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
 - ensuring that gambling is conducted in a fair and open way
 - protecting children and other vulnerable persons from being harmed or exploited by gambling.

- 5.2** It is expected that the licensing authority will have set out their approach to regulation in their statement of policy, having taken into account local circumstances. This is dealt with in more detail at Part 6.

Objective 1 : Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

- 5.3** Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6.

- 5.4** A licensing authority will need to consider questions raised by the location of gambling premises when:
- formulating its statement of licensing policy
 - receiving relevant representations to an application
 - dealing with applications as a responsible authority in its own right
 - considering applications before it.

- 5.5** In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.

- 5.6** Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.

- 5.7** Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003 / Licensing (Scotland) Act 2005, in which context they have wider powers to also take into account measures to prevent nuisance.

- 5.8** In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in Part 9 of this Guidance.
- 5.9** There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. Further information can often be found on the website of industry trade associations⁵.
- 5.10** Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

Objective 2 : Ensuring that gambling is conducted in a fair and open way

- 5.11** Generally the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness is likely to be a matter for either the way specific gambling products are provided and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. However, if licensing authorities suspect that gambling is not being conducted in a fair and open way this should be brought to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.
- 5.12** In relation to the licensing of tracks, the licensing authority's role will be different from other premises in that track owners will not necessarily have an operating licence. In those circumstances the premises licence may need to contain conditions to ensure that the environment in which betting takes place is suitable. Further information can be found in Part 20 of this Guidance.

Objective 3 : Protecting children and other vulnerable persons from being harmed or exploited by gambling

- 5.13** In exercising their powers under s.153, licensing authorities should consider whether staff will be able to adequately supervise the gambling premises, as adequate staffing levels is a factor to consider regarding the prevention of underage gambling. The Commission would expect the operator and the licensing authority to work together to consider how any impediments to the supervision of premises might be most appropriately remedied. Supervision also applies to premises that are themselves not age-restricted (eg bingo and family entertainment centre (FEC) premises) but which make gambling products and facilities available.

⁵ For example, The Safe Bet Alliance's Voluntary Code of Safety and Security National Standards for Bookmakers

- 5.14** Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.
- 5.15** If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.
- 5.16** In relation to casinos, the Commission has issued a code of practice on access to casino premises by children and young persons, as provided for by s.176 of the Act. The code of practice is available as part of the [Licence Conditions and Codes of Practice](#) (LCCP) in accordance with s.176 of the Act, adherence to the code will be a condition of the premises licence. Further information can be found in Parts 9 and 17 of this Guidance.
- 5.17** The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. 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.
- 5.18** Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority's statement of policy. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

S.153 principles

- 5.19** S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:
- in accordance with any relevant code of practice under s.24 (ie the LCCP)
 - in accordance with any relevant guidance issued by the Commission under s.25 (ie this Guidance)
 - reasonably consistent with the licensing objectives (subject to a and b above), and
 - in accordance with the licensing authority's statement of licensing policy (subject to a to c above).
- 5.20** Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this Guidance, any relevant Commission code of practice, its own statement of policy, and the licensing objectives.
- 5.21** In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this Guidance, and its own statement of policy or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission's codes and this Guidance take precedence.

- 5.22 In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should **not** have regard to:
- s.153 makes it clear that in deciding whether or not to grant a licence, a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application
 - s.210 (1) of the Act states that 'in making a decision in respect of an application...a licensing authority should not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with law relating to planning or building'.

5.23 A licensing authority is therefore afforded significant scope to exercise its powers under s.153 on the grounds that it does not encroach on the two principles set out above.

5.24 The requirements in s.153 are subject to the licensing authority's power under s.166 to resolve not to issue casino premises licences. This means that a resolution not to issue a casino premises licence applies regardless of the matters set out in s.153.

Codes of Practice

5.25 The LCCP sets out the Commission's general licence conditions and associated codes of practice provisions under the Act. The codes of practice are set out within Part II of the LCCP.

5.26 To assist licensing authorities in determining premises applications and inspecting premises, [all the codes of practice](#) are also available as a single document. The codes specify a number of requirements, many of which relate to social responsibility issues and these may be of particular interest where a licensing authority has concern about matters such as protection of the young and vulnerable. It should be noted that the codes also apply to situations in which the gambling being offered is not normally the responsibility of an operating licence holder. Examples include the *Code of practice for equal chance gaming* and the *Code for gaming machines in clubs and premises with an alcohol licence*.

Good practice in regulation

5.27 Under the Legislative and Regulatory Reform Act 2006, any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation⁶ in the exercise of the function. These provide that regulatory activities should be carried out in a way which is transparent, accountable, proportionate, and consistent and should be targeted only at cases in which action is needed. The Commission has regard to these principles in relation to its responsibilities and also has regard to the requirements of the Regulators' Code⁷. The purpose of the Code is to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on business.

5.28 The statutory principles of good regulation and the Regulators' Code also apply to local authorities, who are under a statutory duty to have regard to them when fulfilling their regulatory functions under the Act⁸.

⁶ Legislative and Regulatory Reform Act 2006, section 21

⁷ Regulators' Code (previously the Regulators' Compliance Code), Department of Business, Innovation and Skills, 2014, issued under section 23 of the Legislative and Regulatory Reform Act 2006

⁸ The Legislative and Regulatory Reform (Regulatory Functions) Order 2007, was amended by the Legislative and Regulatory Reform (Regulatory Functions) (Amendment) Order 2009, which, amongst other things, extended the application of the 2007 Order to local authorities in Wales and Scotland exercising regulatory functions under the Gambling Act 2005 - see Parts 3 and 7

- 5.29 Guidance produced by the Better Regulation Delivery Office seeks to assist local authorities in interpreting the requirements of the Regulators' Code, for example in developing their Compliance and Enforcement Policy⁹, and in delivering risk-based regulation in relation to age restrictions¹⁰.

Human Rights Act 1998

- 5.30 The Secretary of State has certified that the Act is compatible with the European Convention on Human Rights. In considering applications, and taking enforcement action under the Act, licensing authorities should bear in mind that they are subject to the Human Rights Act 1998 and in particular:
- Article 1, Protocol 1 – peaceful enjoyment of possessions. A licence is considered a possession in law and people should not be deprived of their possessions except in the public interest
 - Article 6 – right to a fair hearing
 - Article 8 – respect for private and family life. In particular, removal or restriction of a licence may affect a person's private life
 - Article 10 – right to freedom of expression.

Other considerations

- 5.31 Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 5.32 In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.
- 5.33 Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in Part 9.
- 5.34 Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

⁹ *Template: Compliance and Enforcement Policy*, Better Regulation Delivery Office. This template policy was developed by the Local Better Regulation Office, with local authorities, to assist local authorities in developing a policy that is in line with the requirements of the Regulators' Compliance Code, or to review their existing policy. It is available on the BRDO website at <http://www.bis.gov.uk/brdo/resources/risk-based-regulation/compliance-policy>

¹⁰ *Age restricted products and services framework / updated April 2014* sets out an agreed set of shared responsibilities and reasonable expectations for young people, their parents and carers, businesses, employees and regulators with regards to access to age restricted products and services. The document forms the foundations of the *Age restricted products and services: a code of practice for regulatory delivery / updated April 2014*

Other provisions and legislation

- 4.7** Conditions on premises licences should relate only to gambling, as considered appropriate in light of the principles to be applied by licensing authorities under s.153 of the Act. Accordingly, if the Commission's [Licence Conditions and Codes of Practice](#) (LCCP) or other legislation places particular responsibilities or restrictions on an employer or the operator of premises, it is not necessary or appropriate to impose similar conditions on a premises licence issued in accordance with the Act.
- 4.8** Similarly, where other legislation confers powers on inspection and enforcement agencies in relation to separate activities or concerns, the Act does not affect the continued use of such powers, for example, the powers of an environmental health officer in respect of statutory nuisance under the Environmental Protection Act 1990.

Licensing authority decisions

- 4.9** S.153 provides that licensing authorities shall aim to permit the use of premises for gambling in so far as they think it is:
- in accordance with any relevant code of practice under s.24
 - in accordance with any relevant guidance issued by the Commission under s.25
 - reasonably consistent with the licensing objectives (subject to a and b above)
 - in accordance with the licensing authority's statement of licensing policy (statement of policy) (subject to a to c above).
- 4.10** Therefore, a licensing authority has no discretion in exercising its functions under Part 8 of the Act, to grant a premises licence where that would mean taking a course which it did not think accorded with the Guidance contained in this document, any relevant Commission code of practice the licensing authority's own statement of policy or were reasonably consistent with the licensing objectives.

Delegations

- 4.11** The decision making powers of licensing authorities may be delegated, as set out in s.154 of the Act for England and Wales and s.155 for Scotland. Decisions that are delegated to a licensing committee, may be further delegated to a sub-committee, which may then arrange for the decision to be taken by an officer of the authority.
- 4.12** It is open to licensing committees to choose not to delegate decisions. An important consideration in determining whether any particular decision should be delegated will be whether delegation might give rise to a risk of judicial review challenge, particularly on the basis of appearance of bias.
- 4.13** The tables at Appendix G set out a summary of licensing authority delegations permitted under the Act for England and Wales, and for Scotland.

- 7.50 A licence application, and any licence subsequently issued, is not valid if the relevant notifications have not been made.

Application for Premises Variation (s.187): 'material change'

- 7.51 Previous guidance from the Department for Culture, Media and Sport (DCMS) and the Commission has been that an application for a variation will only be required where there are material changes to the layout of the premises. What constitutes a material change will be a matter for local determination but it is expected that a common sense approach will be adopted. When considering an application for variations, the licensing authority will have regard to the principles to be applied as set out in s.153 of the Act.

Representations

- 7.52 In dealing with an application, licensing authorities are obliged to consider representations from two categories of person, referred to in the Act as 'responsible authorities' and 'interested parties'. Representations from other parties are inadmissible. Further information on these categories can be found in Part 8 of this Guidance.
- 7.53 Having determined that the representation is admissible, the licensing authority must consider its relevance. Only representations that relate to the licensing objectives, or that raise issues under the licensing authority's statement of policy, or the Commission's Guidance or Codes of Practice, are likely to be relevant.
- 7.54 The licensing authority will also need to consider if representations are 'frivolous' or 'vexatious'. This is a question of fact and licensing authorities are advised to seek help from their legal advisers in interpreting these phrases although relevant considerations may include:
- who is making the representation, and whether there is a history of making representations that are not relevant
 - whether it raises a 'relevant' issue
 - whether it raises issues specifically to do with the premises that are the subject of the application.
- 7.55 The Commission does not routinely make representations on premises licence applications. However, the fact that the Commission has not made a representation on a particular premises licence application should not be taken as indicating the Commission's approval of that application. Exceptionally, where an application for a premises licence, or the operation of a current premises licence, raises matters of wider or national significance, the Commission will consider making representations or requesting a review.

Making a decision

- 7.56 As explained earlier, the licensing authority's **primary obligation under s.153(1) is to** permit the use of premises in so far as it thinks that to do so is:
- a. in accordance with any relevant code of practice issued by the Commission
 - b. in accordance with any relevant guidance issued by the Commission
 - c. reasonably consistent with the licensing objectives (subject to a. and b. above), and
 - d. in accordance with the licensing authority's statement of licensing policy (statement of policy) (subject to a. to c. above).
- 7.57 Further information and guidance as to the meaning and effect of s.153 is set out at paragraph 5.19 above.

9.28 Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this Guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.

9.29 Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.

9.30 Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.

9.31 Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:

- relevant to the need to make the proposed building suitable as a gambling facility
- directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
- fairly and reasonably related to the scale and type of premises
- reasonable in all other respects.

Conditions that may not be attached to premises licences by licensing authorities

9.32 The Act sets out certain matters that may not be the subject of conditions:

- s.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition
- s.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation
- s.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)
- s.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.

Hansard Extract

On 9 November 2004 (Standing Committee B) there was a debate in the House of Commons over whether to amend the Licensing Objectives to include 'the prevention of public nuisance.) Below are the relevant paragraphs from Hansard.

The amendment was withdrawn. The following are material extracts from Hansard:

Column Number: 012

Mr Foster - Amendment to include prevention of public nuisance in Licensing Objectives:

Why is it important that we deal with that in the objectives? The answer is simple. As the Bill stands, the local authority is unable to take account of effects that may occur not in a new casino or on gambling premises, but further afield, outside those premises. It is crucial that local authorities have the opportunity to do so. Indeed, the Local Government Association said when it wrote to all Members about the Second Reading debate that the prevention of public nuisance should be a licensing objective:

"The licensing objectives set out in Clause 1 of the Bill do not address potential problems of nuisance arising in the street outside gambling premises. This is particularly likely late at night and when alcohol has been consumed. While the Environmental Protection Act 1990 places a duty on local authorities to deal with statutory nuisances arising from the premises itself, and to investigate residents' complaints, it is not possible to use this legislation to deal with street nuisance, even where the problem is directly attributable to a particular venue."

Use of the Environmental Protection Act for such matters is therefore not possible. The LGA goes on to say:

"This omission will seriously hamper the ability of councils to ensure effective management of the environment around gambling premises and provides residents with little scope to make representations should street nuisance occur. The LGA believes that a new licensing objective of the prevention of public nuisance should be added to Clause 1."

Column Number: 037

The Minister for Sport and Tourism *Mr Richard Caborn, addressing the amendment*

Some gambling premises (casinos and bingo clubs) are allowed to serve alcohol to their customers, and the Bill will not stop that happening. Their entitlement does not spring from gambling laws: as one or two of my hon. Friends have said, it comes from the licensing law itself. Casinos and bingo clubs in England and Wales get their entitlement from the Licensing Act 1964. However, by the time the Bill is on the statute book, the Licensing Act 2003 will have come into force. The equivalent licensing laws govern casinos and bingo clubs in Scotland. The 2003 Act includes the prevention of public nuisance as a licensing objective, understandably so given the unfortunate connection between excess alcohol intake and bad behaviour. That was referred to by a number of hon. Members this morning.

The relevant risks associated with licensing of pubs, bars and other premises on which alcohol is sold include noise and antisocial conduct, particularly at night. That has been referred to in connection with Guildford. Accordingly, it will be open to licensing authorities, when considering applications for casinos and bingo halls to be licensed premises under the 2003 Act, to take account of the public-nuisance risk just as they do when considering any other application. If any casino were to put its alcohol licence at risk by allowing public nuisance, it would almost certainly put its continued existence and its licence at risk. Therefore, it is unnecessary in the case of casinos and bingo clubs to duplicate provisions that are already in licensing law.

There is no intention of allowing other gambling premises, such as betting shops and machine arcades, to sell alcohol, and there is no reason to apply to them a nuisance test over and above the

law on noise and other nuisance. There is no well-established association between betting and nuisance of the sort that unfortunately exists between alcohol and nuisance. We do not believe that there is any reason to single out betting shops for special treatment in contrast to grocery shops, newsagents or any other shop.

There are provisions in the general criminal and civil law on the control of public nuisance. If they are not thought to be adequate, I am not expressing a Government view on this, the solution is to strengthen the general law, not to adopt specific measures for gambling premises on the basis of no

Column Number: 038

evidence of need. In practice, all licensed gambling premises are more likely to conduct themselves responsibly than the general run of premises, if only because they will have to satisfy not just the local licensing authority concerning their present licence, but the powerful gambling commission in relation to their operating licence.

Amendment No. 1 would be regulatory overkill. The official Opposition, who continually badger us about red tape and over-regulation, should reflect on their amendments in the light of my explanation. Amendment No. 1 would only reinforce the apprehension in the gambling industry that local authorities will be over-zealous in regulating premises, and I do not believe that those fears are well grounded. It would impact significantly on the matters that could be taken into account by local authorities and would go beyond what is reasonable. I cannot advise the Committee to accept it.



Department
for Business
Innovation & Skills

Better
Regulation
Delivery Office

Regulators' Code

April 2014

Foreword



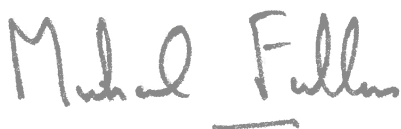
In the Autumn Statement 2012 Government announced that it would introduce a package of measures to improve the way regulation is delivered at the frontline such as the Focus on Enforcement review of appeals, the proposed Growth Duty for non-economic regulators and the Accountability for Regulator Impact measure.

This Government is committed to reducing regulatory burdens and supporting compliant business growth through the development of an open and constructive relationship between regulators and those they regulate. The Regulators' Code provides a flexible, principles based framework for regulatory delivery that supports and enables regulators to design their service and enforcement policies in a manner that best suits the needs of businesses and other regulated entities.

Our expectation is that by clarifying the provisions contained in the previous Regulators' Compliance Code, in a shorter and accessible format, regulators and those they regulate will have a clear understanding of the services that can be expected and will feel able to challenge if these are not being fulfilled.

Regulators within scope of the Regulators' Code are diverse but they share a common primary purpose – to regulate for the protection of the vulnerable, the environment, social or other objective. This Code does not detract from these core purposes but seeks to promote proportionate, consistent and targeted regulatory activity through the development of transparent and effective dialogue and understanding between regulators and those they regulate.

I believe the Regulators' Code will support a positive shift in how regulation is delivered by setting clear expectations and promising open dialogue. Ultimately this will give businesses greater confidence to invest and grow.

A handwritten signature in black ink that reads "Michael Fallon". The signature is written in a cursive style with a horizontal line underneath the name.

Michael Fallon
Minister of State for Business and Enterprise
Department for Business, Innovation and Skills

Regulators' Code

This Code was laid before Parliament in accordance with section 23 of the Legislative and Regulatory Reform Act 2006 ("the Act"). Regulators whose functions are specified by order under section 24(2) of the Act **must** have regard to the Code when developing policies and operational procedures that guide their regulatory activities. Regulators must equally have regard to the Code when setting standards or giving guidance which will guide the regulatory activities of other regulators. If a regulator concludes, on the basis of material evidence, that a specific provision of the Code is either not applicable or is outweighed by another relevant consideration, the regulator is not bound to follow that provision, but should record that decision and the reasons for it.

1. Regulators should carry out their activities in a way that supports those they regulate to comply and grow

1.1 Regulators should avoid imposing unnecessary regulatory burdens through their regulatory activities¹ and should assess whether similar social, environmental and economic outcomes could be achieved by less burdensome means. Regulators should choose proportionate approaches to those they regulate, based on relevant factors including, for example, business size and capacity.

1.2 When designing and reviewing policies, operational procedures and practices, regulators should consider how they might support or enable economic growth for compliant businesses and other regulated entities², for example, by considering how they can best:

- understand and minimise negative economic impacts of their regulatory activities;
- minimising the costs of compliance for those they regulate;
- improve confidence in compliance for those they regulate, by providing greater certainty; and
- encourage and promote compliance.

1.3 Regulators should ensure that their officers have the necessary knowledge and skills to support those they regulate, including having an understanding of those they regulate that enables them to choose proportionate and effective approaches.

1.4 Regulators should ensure that their officers understand the statutory principles of good regulation³ and of this Code, and how the regulator delivers its activities in accordance with them.

2. Regulators should provide simple and straightforward ways to engage with those they regulate and hear their views

2.1 Regulators should have mechanisms in place to engage those they regulate, citizens and others to offer views and contribute to the development of their policies and service standards. Before changing policies, practices or service standards, regulators should consider the impact on business and engage with business representatives.

¹ The term 'regulatory activities' refers to the whole range of regulatory options and interventions available to regulators.

² The terms 'business or businesses' is used throughout this document to refer to businesses and other regulated entities.

³ The statutory principles of good regulation can be viewed in Part 2 (21) on page 12: http://www.legislation.gov.uk/ukpga/2006/51/pdfs/ukpga_20060051_en.pdf.

- 2.2 In responding to non-compliance that they identify, regulators should clearly explain what the non-compliant item or activity is, the advice being given, actions required or decisions taken, and the reasons for these. Regulators should provide an opportunity for dialogue in relation to the advice, requirements or decisions, with a view to ensuring that they are acting in a way that is proportionate and consistent.

This paragraph does not apply where the regulator can demonstrate that immediate enforcement action is required to prevent or respond to a serious breach or where providing such an opportunity would be likely to defeat the purpose of the proposed enforcement action.

- 2.3 Regulators should provide an impartial and clearly explained route to appeal against a regulatory decision or a failure to act in accordance with this Code. Individual officers of the regulator who took the decision or action against which the appeal is being made should not be involved in considering the appeal. This route to appeal should be publicised to those who are regulated.
- 2.4 Regulators should provide a timely explanation in writing of any right to representation or right to appeal. This explanation should be in plain language and include practical information on the process involved.
- 2.5 Regulators should make available to those they regulate, clearly explained complaints procedures, allowing them to easily make a complaint about the conduct of the regulator.
- 2.6 Regulators should have a range of mechanisms to enable and regularly invite, receive and take on board customer feedback, including, for example, through customer satisfaction surveys of those they regulate⁴.

3. Regulators should base their regulatory activities on risk

- 3.1 Regulators should take an evidence based approach to determining the priority risks in their area of responsibility, and should allocate resources where they would be most effective in addressing those priority risks.
- 3.2 Regulators should consider risk at every stage of their decision-making processes, including choosing the most appropriate type of intervention or way of working with those regulated; targeting checks on compliance; and when taking enforcement action.
- 3.3 Regulators designing a risk assessment framework⁵, for their own use or for use by others, should have mechanisms in place to consult on the design with those affected, and to review it regularly.
- 3.4 Regulators, in making their assessment of risk, should recognise the compliance record of those they regulate, including using earned recognition approaches and should consider all available and relevant data on compliance, including evidence of relevant external verification.
- 3.5 Regulators should review the effectiveness of their chosen regulatory activities in delivering the desired outcomes and make any necessary adjustments accordingly.

⁴ The Government will discuss with national regulators a common approach to surveys to support benchmarking of their performance.

⁵ The term 'risk assessment framework' encompasses any model, scheme, methodology or risk rating approach that is used to inform risk-based targeting of regulatory activities in relation to individual businesses or other regulated entities.

4. Regulators should share information about compliance and risk

- 4.1 Regulators should collectively follow the principle of "collect once, use many times" when requesting information from those they regulate.
- 4.2 When the law allows, regulators should agree secure mechanisms to share information with each other about businesses and other bodies they regulate, to help target resources and activities and minimise duplication.

5. Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply

- 5.1 Regulators should provide advice and guidance that is focused on assisting those they regulate to understand and meet their responsibilities. When providing advice and guidance, legal requirements should be distinguished from suggested good practice and the impact of the advice or guidance should be considered so that it does not impose unnecessary burdens in itself.
- 5.2 Regulators should publish guidance, and information in a clear, accessible, concise format, using media appropriate to the target audience and written in plain language for the audience.
- 5.3 Regulators should have mechanisms in place to consult those they regulate in relation to the guidance they produce to ensure that it meets their needs.
- 5.4 Regulators should seek to create an environment in which those they regulate have confidence in the advice they receive and feel able to seek advice without fear of triggering enforcement action.
- 5.5 In responding to requests for advice, a regulator's primary concerns should be to provide the advice necessary to support compliance, and to ensure that the advice can be relied on.
- 5.6 Regulators should have mechanisms to work collaboratively to assist those regulated by more than one regulator. Regulators should consider advice provided by other regulators and, where there is disagreement about the advice provided, this should be discussed with the other regulator to reach agreement.

6. Regulators should ensure that their approach to their regulatory activities is transparent

- 6.1 Regulators should publish a set of clear service standards, setting out what those they regulate should expect from them.
- 6.2 Regulators' published service standards should include clear information on:
 - a) how they communicate with those they regulate and how they can be contacted;
 - b) their approach to providing information, guidance and advice;
 - c) their approach to checks on compliance⁶, including details of the risk assessment framework used to target those checks as well as protocols for their conduct, clearly setting out what those they regulate should expect;

⁶ Including inspections, audit, monitoring and sampling visits, and test purchases.

- d) their enforcement policy, explaining how they respond to non-compliance;
 - e) their fees and charges, if any. This information should clearly explain the basis on which these are calculated, and should include an explanation of whether compliance will affect fees and charges; and
 - f) how to comment or complain about the service provided and routes to appeal.
- 6.3 Information published to meet the provisions of this Code should be easily accessible, including being available at a single point⁷ on the regulator's website that is clearly signposted, and it should be kept up to date.
- 6.4 Regulators should have mechanisms in place to ensure that their officers act in accordance with their published service standards, including their enforcement policy.
- 6.5 Regulators should publish, on a regular basis, details of their performance against their service standards, including feedback received from those they regulate, such as customer satisfaction surveys, and data relating to complaints about them and appeals against their decisions.

⁷ This requirement may be satisfied by providing a single web page that includes links to information published elsewhere.

Monitoring the effectiveness of the Regulators' Code

The Government is committed to making sure the Regulators' Code is effective. To make sure that the Code is being used effectively, we want businesses, regulated bodies and citizens to challenge regulators who they believe are not acting in accordance with their published policies and standards. It is in the wider public interest that regulators are transparent and proportionate in their approaches to regulation.

The Government will monitor published policies and standards of regulators subject to the Regulators' Code, and will challenge regulators where there is evidence that policies and standards are not in line with the Code or are not followed.

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This publication is also available on our website at:
<https://www.gov.uk/government/publications/regulators-code>

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COMPLIANCE & SOCIAL RESPONSIBILITY



CASHINO COMPLIANCE FOLDER TABLE OF CONTENTS		
1. INTRODUCTION	UPDATED	VERSION
1.1 SOCIAL RESPONSIBILITY - STATEMENT OF INTENT	January 2019	V1.2
1.2 THE 3 LICENSING OBJECTIVES	January 2020	V1.2
1.3 GAMBLING COMMISSION – LICENCE CONDITIONS AND CODES OF PRACTICE (LCCP)	January 2020	N/A
1.4 POWERS OF THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS	June 2016	V1.0
2. CRIME & DISORDER		
2.1 MONEY LAUNDERING AND CASH HANDLING	January 2019	V1.0
2.2 KEEPING ALCOHOL OUT	June 2016	V1.0
2.3 DEALING WITH AGGRESSIVE CUSTOMERS	June 2017	V1.1
3. FAIR AND OPEN		
3.1 COMPLAINTS PROCEDURE & COMPLAINTS LEAFLET	January 2020	V1.3
3.2 MARKETING AND PROMOTIONAL GUIDELINES	January 2019	V1.2
4. CHILDREN AND OTHER VULNERABLE PEOPLE		
4.1 ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS	June 2017	V1.1
4.2 EMPLOYMENT OF CHILDREN AND YOUNG PERSONS	June 2017	V1.1
4.3 CUSTOMER INTERACTION & GAMBLING COMMISSION GUIDANCE	January 2020	V1.3
4.4 SELF EXCLUSION	July 2020	V1.2
4.5 SELF EXCLUSION FLOWCHART	June 2017	V1.1
4.6 SELF EXCLUSION REVIEW FORM	July 2016	V1.0
5. RECORDING REQUIREMENTS		
5.1 MONTHLY LOG CHECK SUMMARY & PAPER PREMISES LOGS	April 2019	V1.6
6. TRAINING		
6.1 COMPLIANCE TRAINING LOG G	April 2019	V1.6



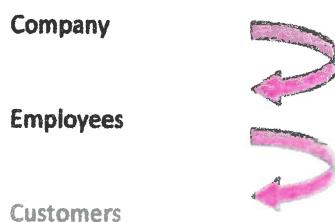
SOCIAL RESPONSIBILITY POLICY

1. STATEMENT OF INTENT

The responsibility for an individual's gambling is their own. The responsibility to exercise a duty of care is that of the operator. Cashino Gaming recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

WHAT IS SOCIAL RESPONSIBILITY?

Social responsibility is about going above and beyond what is called for by the law. Ideally, proactively identifying signs of problem behaviours is better than reacting to a problem. We apply our social responsibility through three levels:



Social responsibility is being responsible to people, for the actions of people, and for actions that affect people. Cashino Gaming has clear policies, procedures and codes of practice which outline and support the development of the way in which staff intervene where there is a suspected problem and the Company then monitors and supports the development of the awareness and knowledge of its staff in dealing with such interventions.

The idea of being responsible to customers has actually long been embedded in the ethics of business, treating a customer with respect, attention and genuinely caring about what the customer wants and needs. As a Company we understand our responsibility to help people.

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on three licensing objectives. These are to:

- Keep crime out of gambling
- Ensure that gambling is conducted in a fair and open way; and
- Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling.



It is our responsibility to ensure that we comply with these licensing objectives at all times.

COMPANY

Our Statement of Intent is published and available to all our employees.

To support the licensing objectives and in addition to our Social Responsibility Policy we also have: -

- Sensible gambling procedures including Self Exclusion
- 'Think 25' policy

EMPLOYEES

The Company ensures that all employees are inducted responsibly into our organisation through: -

- Induction checklist
- Employee Handbook
- Reviews and sign off at 4,8,12 weeks

The above documentation includes comprehensive coverage of the following: -

- Social Responsibility Policy
- Sensible gambling procedures
- 'Think 25' policy

Ongoing training is available to all our employees and we provide a Customer Care training programme, that specifically trains our staff about problem gambling and how to interact with customers who may be affected (including arrangements for self exclusion), whilst also covering the following areas:

- Customer care
- Conflict management
- Social responsibility

In addition employees will receive refresher training every 6 months.



CUSTOMER

Information is clearly provided to the customer to enable them to understand the machine/game they are playing and the percentage returns that apply on all games.

The customer is made aware of and given advice on problem gambling through appropriate advertising, notices, information and Staying In Control leaflets on site. Further information including sources of help and support is available via the following organisations: -

- | | |
|-------------------------------|---|
| ▪ Citizen's advice | https://www.citizensadvice.org.uk |
| ▪ Gamble Aware/GamCare | https://www.begambleaware.org |
| ▪ GamesAid | https://www.gamesaid.org |
| ▪ Gam-Anon | https://www.gam-anon.org |
| ▪ Gamblers Anonymous | https://www.gamblersanonymous.org.uk |
| ▪ Gordon Moody Association | https://www.gordonmoody.org.uk |
| ▪ Action for Children Charity | https://www.actionforchildren.org.uk |
| ▪ National Debtline | https://www.nationaldebtline.org |

The implementation of the following policies and procedures and through Customer Care Training ensures that this is consistent throughout the Company: -

- Social Responsibility Policy
- Sensible gambling Procedure
- 'Think 25' policy

.....

Stefan Bruns
Chief Executive Officer
January 2019



THE 3 LICENSING OBJECTIVES

1. Keeping crime out of gambling

Whilst crime is considered 'low/medium risk' in our business, we have to be mindful of the fact crime still exists and our venues could be considered as a target for money laundering gained from the proceeds of crime and terrorist financing, i.e. drug money, TITO technology to conceal 'fake notes', life style and spending habits.

2. Ensuring gambling is conducted fairly and openly

We have to ensure the terms we offer with regards to our business practices are fair and transparent to our customers and as Licensees we must comply with the Consumer Rights Act 2015. This means ensuring our machines and marketing are promoted in a fair and open way.

3. Protecting children and vulnerable people from being harmed or exploited by gambling

We have a duty of care to ensure children and young persons do not enter our premises, which are strictly for OVER 18's only. As a company we operate a 'Think 25' policy and ID checks are carried out if we suspect a person is under 18. Ensuring we protect people who may be 'at risk' from gambling and protecting them from harm, customer interaction and helpful advice is vital to ensure we promote our business in a socially responsible way.

AMERICAN COMMISSION

Conditions and codes of practice applicable to Non-remote bingo licences

Including sector-specific extract of
LCCP January 2020

Contents

If using an electronic version of this document, please click on the headings to move to the relevant section or provision.

General introduction	4
Part I: Statutory conditions attached by virtue of the Act	5
Part II: Operating licence conditions	6
1 Qualified persons and personal licences	6
1.1 Qualified persons	6
1.2 Personal licences	7
2 Technical standards, equipment specifications, remote gambling equipment and gambling software	8
4 Protection of customer funds	9
5 Payment	9
7 General 'fair and open' provisions	9
9 Types and rules of casino and other games	10
12 Anti-money laundering	10
14 Access to premises	11
15 Information requirements	11
15.1 Reporting suspicion of offences etc	11
15.2 Reporting key events and other reportable events	12
15.3 General and regulatory returns	16
16 Responsible placement of digital adverts	17

Part III:	Code of practice provisions	17
	Introduction to code of practice	17
1	General - Cooperation and responsibility for third parties	18
2	Financial requirements - Anti-money laundering	19
3	Protection of children and other vulnerable persons	19
	3.1 Combating problem gambling	19
	3.2 Access to gambling by children and young persons	20
	3.3 Gambling management tools and responsible gambling management information	22
	3.4 Customer interaction	23
	3.5 Self-exclusion	24
	3.6 Employment of children and young persons	27
	3.8 Money lending between customers	27
4	'Fair and open' provisions	28
	4.1 Fair terms	28
	4.2 Display of rules and supervision of games	28
5	Marketing	28
6	Complaints and disputes	31
7	Gambling licensees' staff	32
8	Information requirements	32
9	Gaming machines in gambling premises	33
10	Assessing local risk	33

General introduction

- 1 This document sets out the Gambling Commission's general licence conditions and associated code of practice provisions (LCCP) under the Gambling Act 2005 (the Act) which are applicable to the specified sector(s).
- 2 The LCCP document sets out:

Part I: (in black)	statutory conditions attached by virtue of the Act
Part II: (in orange)	the suite of general conditions attached to operating licences
Part III: (in blue)	the principal code of practice, distinguishing between 'social responsibility' provisions and 'ordinary' provisions (the social responsibility provisions are in shaded boxes within the text).
- 3 An [index](#) to the provisions is provided at the end of this document, and if using an electronic version of this document, links are provided from both the contents and index pages to aid navigation.
- 4 Copies of LCCP can be obtained from the Commission's website: www.gamblingcommission.gov.uk or by writing to:

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP
T 0121 230 6666
F 0121 230 6720
E info@gamblingcommission.gov.uk
- 5 The Commission also produces sector-specific extracts of LCCP and these will be made available on the website. Further information about the history of LCCP (such as the results of completed consultations) and potential future amendments to LCCP can also be found on the website.
- 6 This extract of LCCP comes into force on **1 January 2020**.
- 7 Relevant requirements of the conditions and code provisions were notified in draft to the European Commission in accordance with Directive (EU) 2015/1535.

Part I: Statutory conditions attached by virtue of the Act

Social Responsibility

This licence is subject to a condition that the licensee ensures compliance with any relevant social responsibility provision of a code of practice issued by the Commission. The social responsibility provisions that are relevant to the activities authorised by this licence are set out in the section entitled Codes of Practice (Part III).

(Sections 24 and 82(1) Gambling Act 2005)

Return of stakes to children

The following condition applies to all remote operating licences except remote pool betting operating licences restricted to football only

This licence is subject to a condition that if the licensee (or anyone employed by the licensee to perform an operational function within the meaning of Section 80 of the Act) becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, the licensee:

- (a) must return any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person as soon as is reasonably practicable; and
- (b) may not give a prize to the child or young person.

This condition does not apply to use of a Category D gaming machine.

(Section 83(1))

Credit

This licence is subject to a condition that the licensee may not:

- give credit in connection with gambling; or
- participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

But this condition shall not prevent the licensee from permitting the installation and use on their licensed premises of a machine enabling cash to be obtained on credit from a person (the "credit provider") provided that:

- the licensee has no other commercial connection with the credit provider in relation to gambling;
- the licensee neither makes nor receives any payment or reward (whether by way of commission, rent or otherwise) in connection with the machine; and
- any conditions about the nature, location or use of the machine which may be attached to this licence by the Commission or by virtue of regulations by the Secretary of State are complied with.

(Section 81(2))

Codes and conditions applicable to non-remote bingo

Page 6 of 34

Part 1: Suite of general condition to operating licences under Section 75 of the Gambling Act 2005 (the Act)

1 Qualified persons and personal licences

1.1 Qualified persons

Licence condition 1.1.1

Qualified persons – qualifying position

All operating licences, except ancillary remote licences, issued to small-scale operators

- 1 In this condition the terms 'small-scale operator', 'qualifying position' and 'qualified person' have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
- 2 Schedule X¹ lists those individuals notified to the Commission as qualified persons.
- 3 If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act for amendment of the details of the licence set out in Schedule X¹.
- 4 An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
- 5 In this condition 'qualified person' has the same meaning as in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

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

1.2 Personal licences

Licence condition 1.2.1

Specified management offices – personal management licences

All casino, bingo, general and pool betting, betting intermediary, gaming machine general, gaming machine technical, gambling software and lottery managers licences, except ancillary remote licences

- 1 Subject to 6 and 7 below, licensees must ensure:
 - a that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter 'a personal management licence'); and
 - b that at least one person occupies at least one of those offices
- 2 The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:
 - a the overall management and direction of the licensee's business or affairs
 - b the licensee's finance function as head of that function
 - c the licensee's gambling regulatory compliance function as head of that function
 - d the licensee's marketing function as head of that function
 - e the licensee's information technology function as head of that function in so far as it relates to gambling-related information technology and software
 - f oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area
 - g in the case of casino and bingo licences only, oversight of the day to day management of a single set of premises licensed under Part 8 of the Act.
- 3 The person responsible for the licensee's gambling regulatory compliance function as head of that function shall not, except with the Commission's express approval, occupy any other specified management office.
- 4 Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder's personal management licence.
- 5 Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual's work and any requirements of the Commission in respect of such matters applicable during the period of the review.
- 6 Paragraphs 1 to 5 above shall not apply to a licensee for so long as the licensee is a 'small-scale operator' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 ('the Regulations').
- 7 During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs 1 to 6 above shall apply subject to the proviso that the phrase 'each individual' in paragraph 1a shall not include any individual who was a 'qualified person' (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

2 Technical standards, equipment specification, remote gambling equipment and gambling software

2.3 Technical standards and equipment specifications

Licence condition 2.3.3

Casino equipment specifications

Non-remote casino operating licences and casino ancillary remote licences

- 1 Licensees must comply with the Commission's specifications for casino equipment.

4 Protection of customer funds

4.2 Disclosure to customers

Licence condition 4.2.1

Disclosure to customers

All operating licences, except gaming machine technical, gambling software, host, ancillary, remote bingo, and ancillary remote casino licences

- 1 Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
- 2 Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
- 3 In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
 - b winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and
 - c any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

5 Payment

5.1 Cash and cash equivalents, payment methods and services

Licence condition 5.1.1

Cash and cash equivalents

All operating licences except gaming machine technical, gambling software and host licences

- 1 Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (eg bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
- 2 Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

7 General 'fair and open provisions'

7.1 Fair and transparent terms and practices

Licence condition 7.1.1

Fair and transparent terms and practices

All operating licences except gaming machine technical and gambling software licences

- 1 Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015. Licensees must comply with those terms.
- 2 The contractual terms on which gambling is offered and any consumer notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
- 3 Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes to terms before they come into effect.
- 4 Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008, at any stage of their interactions with consumers.

9 Types and rules of casino and other games

9.1 Casino and bingo games

Licence condition 9.1.2

Prohibited bingo prize games

All non-remote bingo operating licences

- 1 Licensees must not offer or permit to be played prize gaming games that appear on any list of games prohibited by the Commission.

12 Anti-money laundering

12.1 Prevention of money laundering and terrorist financing

Licence condition 12.1.1

Anti-money laundering

Prevention of money laundering and terrorist financing

All operating licences except gaming machine technical and gambling software licences

- 1 Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
- 2 Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
- 3 Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

14 Access to premises

14.1 Access to premises

Licence condition 14.1.1

Access to premises

All operating licences

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

15 Information requirements

15.1 Reporting suspicion of offences

Licence condition 15.1.1

Reporting suspicion of offences etc - non-betting licences

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences

- 1 Licensees must as soon as reasonably practicable provide the Commission or ensure that the Commission is provided with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.

15.2 Reporting key events and other reportable events

Licence condition 15.2.1

Reporting key events

All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, or ensure the Commission is notified, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence¹.

Operator status

- 1 In the case of licensees which are companies, a petition being presented for their winding up or the winding up of any group company of theirs, or they or any group company being placed in administration or receivership or their directors proposing to creditors a composition in satisfaction of its debts or a scheme of arrangement of its affairs.
- 2 In the case of licensees which are bodies corporate, but not companies, any event substantially equivalent to those listed at 1 above.
- 3 In the case of a licensee who is an individual (or a partner in a partnership licensee) their being presented with a petition for their bankruptcy or sequestration or their entering into an individual voluntary arrangement.

Relevant persons and positions

- 4 In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.
- 5 Any investment in a licensee which is not by way of subscription for shares.
- 6 The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.
- 7 The entering into an arrangement whereby a third party provides services to, or grants any licence concession or permission to, the licensee other than for full value: full details of the arrangements must be supplied.
- 8 The appointment of a person to, or a person ceasing to occupy, a 'key position': a 'key position' in relation to a licensee is:
 - a in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
 - b in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c a position the holder of which is responsible for the licensee's anti-money laundering procedures, including suspicious activity reporting
 - d any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)
- 9 Any change to the structure or organisation of the licensee's business which affects a 'key position' or the responsibilities of its holder.

Financial events

- 10 Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
- 11 Any breach of a covenant given to a bank or other lender.
- 12 Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
- 13 Any court judgments (in whatever jurisdiction) against the licensee or, where the licensee is a body corporate, a group company, remaining unpaid 14 days after the date of judgment.
- 14 Where the licensee is required to have their accounts independently audited, any qualification to an auditors' report; and any unplanned change of auditor including a change prompted by a dispute or resulting from auditors being unable or unwilling to sign an unqualified audit report.
- 15 Any change in the licensee's arrangements for the protection of customer funds in accordance with the general licence condition 4 relating to the protection of customer funds (where applicable).
- 16 Where the licensee holds customer funds in a separate bank account, any deficit on reconciliation of such bank account.
- 17 Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

Legal or regulatory proceedings or reports

- 18 The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
- 19a Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities in relation to the licensed entity of a personal licence holder or a person occupying a qualifying position employed by them, where such an investigation could result in the imposition of a sanction or penalty which, if imposed, could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
- 19b Any criminal investigation by a law enforcement agency in any jurisdiction in relation to which:
 - the licensee is involved (including, but not limited to investigations of crimes allegedly committed against the licensee or involving the gambling facilities provided under the licence), AND
 - the circumstances are such that the Commission might reasonably be expected to question whether the licensee's measures to keep crime out of gambling had failed.Notification of the event must occur as soon as practicable after the licensee becomes aware of any such investigation in which the licensee is involved and measures may have failed.
- 20 The receipt of any report from a professional, statutory or other regulatory or government body (in whatever jurisdiction) of the outcome of a compliance assessment in relation to the gambling activity of the licensee or, where the licensee is a body corporate, of any group company in which at least one person who holds a key position in or in respect of the licensee holds a key position: a copy of the report should be provided where available to the licensee.

- 21 The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor) about the provision of facilities for gambling which are expressed (in whatever terms) as requiring attention as a high priority: a summary of the nature of the concerns must be provided.
- 22 The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
- 23 The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
- 24 The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

Gambling facilities

- 25a Any breach in the licensee's information security that adversely affects the confidentiality of customer data or prevents customers from accessing their accounts for longer than 24 hours.
- 25b Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
- 26 Any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
- 27 The reference of a dispute to an ADR entity other than one in respect of which contact details were given in accordance with the social responsibility code provision on complaints and disputes; the reason for selection of that ADR entity should be given.
- 28 In the case of remote gambling, the commencement or cessation of trading on website domains (*including mobile sites or mobile device applications*) or broadcast media through which the licensee provides gambling facilities.

In this condition:

'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof

- a in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
- b a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

Key events can be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk Alternatively, for operators unable to access this system, you can report a key event by email to: key.events@gamblingcommission.gov.uk
Alternatively, for operators unable to access this system, you can report a key event by email to: key.events@gamblingcommission.gov.uk

Licence condition 15.2.2
Other reportable events
All operating licences

- 1 Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, or ensure that the Commission is so notified, as soon as reasonably practicable of the occurrence of any of the following events¹:
- a the conclusion of a dispute referred to an ADR entity and in such case providing the Commission with a copy of the decision or note of the outcome².
 - b any outcome adverse to the licensee of any proceedings taken against the licensee (in whatever jurisdiction) by a customer in relation to a gambling transaction; but excluding proceedings allocated to the County Court small claims track or equivalent in jurisdictions outside England and Wales.
 - c their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised or their becoming aware of a sustained or meaningful generation of the 3% / 10% threshold being exceeded by the group.

In this condition:

- a 'group company' has the same meaning as in condition 15.2.1; and
- b without prejudice to section 327 of the Act, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

¹ Events required to be notified to the Commission by 15.2.1 or 15.2.2 may be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk or by email to: es@gbg.gamblingcommission.gov.uk

² In respect of the referral of disputes to an ADR entity the licensee's attention is drawn to social responsibility code provision 6.

15.3 General and regulatory returns

Licence condition 15.3.1
General and regulatory returns
All operating licences

- 1 On request, licensees must provide the Commission with such information as the Commission may require about the use made of facilities provided in accordance with this licence, and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on, including in particular information about:
- a the numbers of people making use of the facilities and the frequency of such use
 - b the range of gambling activities provided by the licensee and the numbers of staff employed in connection with them
 - c the licensee's policies in relation to, and experiences of, problem gambling.
- 2 In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit a Regulatory Return to the Commission containing such information as the Commission may from time to time require .

¹ Regulatory returns can be submitted securely online at the Commission's website through our eServices system available at www.gamblingcommission.gov.uk

16 Responsible placement of digital adverts

16.1 Responsible placement of digital adverts

Licence condition 16.1.1

Responsible placement of digital adverts

All licences

1 Licences must:

- a Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
- b take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
- c ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

Part III: Code of practice

Introduction

This is the Commission's principal code of practice, issued under section 24 of the Gambling Act 2005.

There are two types of code provisions in this document:

- social responsibility code provisions: compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution; these provisions are set out in shaded boxes
- ordinary code provisions: these do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner. Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty; these code provisions are in the unshaded boxes in this section.

Code provisions

1 General

1.1 Cooperation and responsibility for third parties

Ordinary Code Provision 1.1.1

Cooperation with the Commission

All licences

- 1 As made plain in its *Statement of principles for licensing and regulation*, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

Social responsibility code provision 1.1.2

Responsibility for third parties – all

licences All licences

- 1 Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
- 2 Licensees must ensure that the terms on which they contract with such third parties:
 - a require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

2 Financial requirements

2.1 Anti-money laundering

Ordinary code provision 2.1.2

Anti-money laundering – other than casino

All licences except casino licences

- 1 As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators)*.

3 Protection of children and other vulnerable persons

3.1 Combating problem gambling

Social responsibility code provision 3.1.1

Combating problem gambling

All licences

- 1 Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.
- 2 Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

3.2 Access to gambling by children and young persons

Social responsibility code provision 3.2.5

Access to gambling by children and young persons – bingo and FEC SR code

All non-remote bingo and family entertainment centre licences

- 1 Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2 This must include procedures for:
 - a checking the age of apparently underage customers
 - b refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c taking action when there are unlawful attempts to enter the adult-only areas.
- 3 Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 4 Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
- 5 Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
- 6 Licensees must only accept identification which:
 - a contains a photograph from which the individual can be identified
 - b states the individual's date of birth
 - c is valid
 - d is legible and has no visible signs of tampering or reproduction.
- 7 Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission.

Ordinary code provision 3.2.6

Access to gambling by children and young persons – bingo and FEC ordinary code All non-remote bingo and family entertainment centre licences

- 1 The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2 Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
- 3 Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
- 4 Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission and the police, and making available information on problem gambling to the child or young person concerned.
- 5 Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
- 6 Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
- 7 In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

3.3 Gambling management tools and responsible gambling management information

Social responsibility code provision 3.3.1

Responsible gambling information

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences

- 1** Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
- 2** The information must cover:
 - a** any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
 - b** timers or other forms of reminders or 'reality checks' where available
 - c** self-exclusion options
 - d** information about the availability of further help or advice.
- 3** The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
- 4** For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

Ordinary code provision 3.3.2

Responsible gambling information – foreign languages

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

- 1** Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
 - a** the information on how to gamble responsibly and access to help referred to above
 - b** the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
 - c** the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

3.4 Customer interaction

Social responsibility code provision 3.4.1

Customer interaction

All licences, except non-remote lottery, gaming machine technical, gambling software and host licences

- 1** Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a** identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b** interacting with customers who may be at risk of or experiencing harms associated with gambling.
 - c** understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
- 2** Licensees must take into account the Commission's guidance on customer interaction.

3.5 Self-exclusion

Social responsibility code provision 3.5.1

Self-exclusion – non-remote and trading rooms SR code

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences

- 1 Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
- 2 Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
- 3 Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
- 4 This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
- 5 Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
- 6 Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c staff training to ensure that staff are able to administer effectively the systems; and
 - d the removal of those persons found in the gambling area or attempting to gamble from the premises.
- 7 Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.
- 8 Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

Ordinary code provision 3.5.2

Self-exclusion – non-remote ordinary code

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences

- 1 Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
- 2 Individuals should be able to self-exclude without having to enter gambling premises.
- 3 Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
- 4 Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
- 5 Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
- 6 Customers should be given the opportunity to discuss self-exclusion in private, where possible.
- 7 Licensees should take steps to ensure that:
 - a the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
 - d at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
- 8 The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
- 9 Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
- 10 Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.

- 11 Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
- 12 In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

Social responsibility code provision 3.5.6

Self-exclusion – multi-operator non-remote SR code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1 Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises 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, by participating in one or more available multi-operator self-exclusion schemes.

Ordinary code provision 3.5.7

Self-exclusion – multi-operator non-remote ordinary code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1 Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).

3.6 Employment of children and young persons

Ordinary code provision 3.6.2

Employment of children and young people – bingo

All non-remote bingo licences

- 1 Licensees who employ children under (under-16-year-olds) and young persons (those aged 16 or 17) should be aware that it is an offence:
 - a to employ them to provide facilities for playing bingo;
 - b for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine; and
 - c to employ a child to perform any function on premises where, and at time when, facilities are being provided for playing bingo.
- 2 As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3 Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a children and young persons are never asked to perform tasks within 1a or 1b, above
 - b all staff, including those who are children and young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4 Licensees should consider adopting a policy that:
 - a children are not employed to work on bingo licensed premises at any time when the premises are open for business
 - b neither children nor young persons are in any event asked to work in areas where gaming machines are situated.

3.8 Money lending between customers

Ordinary code provision 3.8.2

Money-lending – other than casinos

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

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

4 'Fair and open' provisions

4.1 Fair terms

Social responsibility code provision 4.1.1

Fair terms

All licences, except gaming machine technical and gambling software licences

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

4.2 Display of rules and supervision of games

Social responsibility code provision 4.2.2

Display of rules - bingo

All non-remote bingo licences

- 1 In complying with any condition on a bingo premises licence or a 2005 Act large casino premises licence requiring the display of rules about gaming, licensees must ensure that the following are included:
 - a rules about each variant of bingo made available; and
 - b rules about any prize gaming made available.

5 Marketing

5.1 Rewards and bonuses

Social responsibility code provision 5.1.1

Rewards and bonuses – SR code

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

- 1 If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
 - a the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
 - b neither the receipt nor the value or amount of the benefit is:
 - i dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - ii altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
 - c if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
 - d if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.

Social responsibility code provision 5.1.3

Alcoholic drinks

All non-remote bingo and casino licences

- 1 If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
- 2 Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

Social responsibility code provision 5.1.3

Alcoholic drinks

All non-remote bingo and casino licences

- 3 If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
- 4 Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

Social responsibility code provision 5.1.6

Compliance with advertising codes

All licences, except lottery licences

- 1 All marketing of gambling products and services must be undertaken in a socially responsible manner.
- 2 In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
- 3 The restriction on allowing people who are, or seem to be, under 25 years old (ie: those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

Ordinary code provision 5.1.8

Compliance with industry advertising codes

All licences

- 1 Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

Social responsibility code provision 5.1.9

Other marketing requirements

All licences

- 1 Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
- 2 Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
- 3 The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

Ordinary code provision 5.1.10

Online marketing in proximity to information on responsible gambling

All licences

- 1 Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

Social Responsibility code provision 5.1.11

Direct electronic marketing consent

All licences

- 1 Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

6 Complaints and disputes

6.1 Complaints and disputes

Social responsibility code provision 6.1.1

Complaints and disputes

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences

- 1 Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
- 2 Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
- 3 The services of any such ADR entity must be free of charge to the customer.
- 4 Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
- 5 Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
- 6 Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
- 7 Licensees should keep records of customer complaints and disputes in such manner as the Commission may from time to time specify in advice or guidance. They must provide information to the Commission about customer complaints, disputes, the outcomes of disputes referred to ADR, and court proceedings adverse to the licensee, also in such manner as the Commission may from time to time specify.

In this Code, 'ADR entity' means

- a a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015, and
- b whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

7 Gambling licensees' staff

7.1 Gambling licensees' staff

Social responsibility code provision 7.1.2

Responsible gambling information for staff

All licences, including betting ancillary remote licences, but not other ancillary remote licences

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

8 Information requirements

8.1 Information requirements

Ordinary code provision 8.1.1

Information requirements – ordinary code

All licences

- 1 As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
- 2 Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence²:
 - a any material change in the licensee's structure or the operation of its business
 - b any material change in managerial responsibilities or governance arrangements
 - c any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

¹ These matters can be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk. Alternatively, for operators unable to access this system, you can these events by email to: key_events@gamblingcommission.gov.uk

² Events which *must* be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

9 Gaming machines in gambling premises

9.1 Gaming machines in gambling premises

Social responsibility code provision 9.1.2

Gaming machines in gambling premises – bingo

All non-remote bingo operating licences

- 1 Gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises.
- 2 Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
- 3 Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.

10 Assessing local risk

10.1 Assessing local risk

Social responsibility code provision 10.1.1

Assessing local risk

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.

- 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 policy¹.
- 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.

¹This is the statement of licensing policy under the Gambling Act 2005.

Ordinary code provision 10.1.2

Sharing local risk assessments

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

- 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.

making gambling fairer and safer

www.gamblingcommission.gov.uk



POWERS OF THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS & OTHER OFFICERS

STATEMENT

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

The Company acknowledges its obligation to ensure that staff co-operate with the Gambling Commission's Enforcement Officers in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises.

- The Company must provide the Gambling Commission with any information that they suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a license condition or a code of practice provision having the effect of a license condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating License.
- The Company must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as: -
 - the numbers of people making use of the facilities and the frequency of such use.
 - the range of gambling activities provided by the licensee and the number of staff employed in connection with them.
 - the licensee's policies in relation to, and experience of, problem gambling.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.



RIGHTS OF GAMBLING COMMISSION ENFORCEMENT OFFICERS

- A constable, enforcement officer or authorised person under the Act may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed.
- A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed.
- Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating license or premises license is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating license.
- Entry may also be made to assess the likely effects of activity when application has been made for a premises license.
- The powers of the constable, enforcement officer or authorised person can include inspection of any part of the premises or any machine, anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions.
- The power of inspection must be exercised only at a reasonable time.
- The enforcement officer or authorised person must provide evidence of his identify and authority.
- A constable, enforcement officer or authorised person may use reasonable force to enter a premise.
- It is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

Please refer to the training section where you will find the Compliance Training document to be used for training purposes. Our online UPSKILL Training platform hosts Essential of Compliance & Social Responsibility workbook and online quiz to be completed every 6 months by all employees.



PROCEDURE

Visits by Gambling Commission Enforcement Officers may be pre-arranged or unannounced, however: -

In all circumstances the employee must ask for identification from the visitor to establish that they are a Gambling Commission Enforcement Officer.

The Duty Manager must attend the Enforcement Officer without delay.

The visitor must also be requested to sign into the visitors log book.

Staff are to co-operate at all times with the Commission's Enforcement Officers in the proper performance of their compliance functions.

The Enforcement Officer may remove copies of documents as required.

Gambling Commission Sample ID

ON

Graham Burgin

Serial Number: 02300570

Date of Issue: 15.08.2007

If found, please return to
Victoria Square House, Victoria Square, Birmingham B2 4BP
www.gamblingcommission.gov.uk 0121 230 6500

EVIDENCE OF IDENTITY & AUTHORITY

Graham Burgin is designated, by the Gambling Commission, as an enforcement officer for the purposes of the Gambling Act 2005, and is authorised to exercise the relevant powers contained within this Act.


Jenny Williams, Chief Executive

Front Of Card

Contains the Following:

1. Officers Name
2. Photo ID
3. Serial Number
4. Date of Issue
5. Gambling Commission Contact Details

Back of Card

Contains the following:

1. Evidence of the Officers Identity
2. Signature of the Gambling Commission Chief Executive



MONEY LAUNDERING, CASH HANDLING AND SUSPICIOUS TRANSACTIONS

1. Introduction

This policy has been implemented in order to comply with the Money Laundering Regulations 2007 that requires processes to be adopted to avoid the possibility of money laundering.

New obligations in respect of money laundering were imposed by the Proceeds of Crime Act 2002 (the "POCA") and the Money Laundering Regulations 2007 ("the Regulations"). This legislation broadens the definition of money laundering and increases the range of activities caught by the statutory control framework. As of 31st October 2016 new money laundering regulations come into force. The regulations are applicable to the Licence Conditions & Codes of Practice (LCCP). Whilst our venues/sector is considered "Low Risk", this does not mean that there is "no risk" within our trading sectors.

As a result of this legislation Cashino Gaming is required to establish procedures to prevent the use of its services and resources for money laundering. Anti-Money Laundering is effective within our business by taking a "risk based" approach.

2. Money Laundering Definition

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. This definition of money laundering means that potentially any employee could contravene the Regulations if they were to become aware of or suspect the existence of criminal property and continue to be involved in a matter which relates to that property without reporting their concerns. In arcades, both Adult Gaming Centre (AGC) and Family Entertainment Centre (FEC), this is typically stained or dyed notes and foreign coins. We should also be mindful of significant increases in customer spending habits which may be an indicator of criminal spend. In practice this is the most likely area of potential money laundering within our venues.

3. Policy

Cashino Gaming is committed to ensuring that all necessary safeguards are in place with regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.

Cashino Gaming has appointed a designated Money Laundering Officer (MLO), Mrs. Amanda Kiernan.

Email: amandakiernan@praesepeplc.com



All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions. All venues need to report any suspicious cash transactions of any note denomination value, i.e. one stained/dyed note, and foreign coins to the value of £50 during one machine empty or cash collection. These incidents should be reported using the "(AML) ANTI MONEY LAUNDERING" app available on your IHL tablet. An automated alert will be sent to the Money Laundering Officer for the purpose of informing the relevant authorities.

4. Disclosure Procedure

Where it is suspected by a member of staff that money laundering activity is taking/has taken place, a disclosure must be made to the Money Laundering Officer as soon as possible. Because of the importance attached to the process, notification should normally take place immediately by telephone or, where that is not possible, by any other expedient means, including automated alerts of the "(AML) ANTI MONEY LAUNDERING" report available on your IHL tablet. Where there is suspicion of any type of potential money laundering incident CCTV images (if available and relevant) should be retained securely.

All incidents should be reported to your line Manager.

The Money Laundering Officer will maintain records of all notifications received detailing the method of verification used to identify the suspected person.

5. Cash Handling

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

- Monetary stakes introduced to machines (gross takings where available)
- Money introduced to refloat machines
- Token transactions
- Customer refunds due to machine malfunctions
- Money removed from machines (net takings where available). Where gross takings and net takings information is not available the operation will provide an explanation to the Commission
- Ticket In Ticket Out (TITO) vouchers from machines in arcades can be used for money laundering. Vouchers can be cashed in at a later date and criminals will use a range of outlets to disguise the origin of funds

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



KEEPING ALCOHOL OUT

At Cashino Gaming we have clear rules and guidelines on the consumption and influence of alcohol.

INDIVIDUALS UNDER THE INFLUENCE OF ALCOHOL ON ENTRY

In all our sites individuals who are deemed to be under the influence of excessive alcohol should be prevented from entering any of our premises.

Procedure

When such a situation occurs the member of staff should politely refuse entry to the site on the grounds of being under the influence of alcohol and ask the individual to leave the premises.

Should the individual resist or refrain from leaving the premises in the first instance a Manager or Duty Manager should be called. They should also request that the individual leave the premises immediately. If an individual fails to leave the premises or becomes a nuisance that cannot be dealt with by the staff on duty the police should be called to assist.

All incidents should be recorded fully on the premises log.

ALCOHOL CONSUMPTION ON SITE

Dependent upon which type of site you are on depends on the rules that need to be applied.

Bingo Clubs

Customers may purchase alcoholic drinks on site within the licensing regulations of the premises; however customers must not bring alcohol onsite to be consumed.

AGC's

Under no circumstances should customers be served alcoholic drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed.

Betting

Under no circumstances should customers be served alcoholic drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed.

Customers should be approached to either leave the premises or stop drinking on site.

EXCESSIVE CONSUMPTION

Procedure

For sites where alcohol may be purchased and a customer consumes to excess to the extent that their behaviour becomes inappropriate or disruptive they should in the first instance be prevented from consuming any more alcohol and should be requested to behave appropriately or be asked to leave the premises, usually by a duty manager.

Where the individual refuses to leave the premises then the police should be contacted for further assistance.



DEALING WITH AN AGGRESSIVE CUSTOMER

Both violence and aggression are used to show distress, to gain dominance, and sometimes to maintain stability. As such they can be termed 'normal' if not always socially acceptable.

WHAT CAUSES AGGRESSION AND VIOLENCE?

There are many reasons why someone may behave in an aggressive or violent manner towards an individual or object. Below are some of the reasons in different situations.

Platonic	Human beings tend to judge things they are familiar with as good and things not familiar as suspect.
Instinctive	The best defence is attack!
Learned Behaviour	Aggression is sometimes part of the behaviour we have learned from society.
Energy Source	Natural release of pent-up instinctual energy - a pressure relief valve. Many of the activities socially acceptable are high forms of controlled aggression. The career drive in some people may be explained as an attempt to express instinctual aggression drive, but in a way society accepts and rewards.
Frustration Response	When frustration in an individual reaches certain levels the only option open may be a display of aggression.

WHAT ARE SOME OF THE CAUSES OF VIOLENCE?

There are two aspects to consider:

Physical	Such as Brain Damage, Drug Abuse, Alcoholism, Sexual Abnormalities, Pain, Hunger, Sleep Deprivation, Environmental Changes (weather), Appearance, Illness, Defence of Territory of Possessions, Age
Psychological	Such as Fear, Frustration, Humiliation, Inappropriate Assertiveness, Pain, Vulnerability, Threats (Defence of self), Age, Illness (affective disorders, schizophrenia), Oppression.



IDENTIFYING AN AGGRESSIVE OR VIOLENT CUSTOMER

There are tell tale signs so the key thing is to observe customer discreetly whilst going about your duties. This way you will spot a change in demeanour or behaviour.

These are some of the signs that can help in predicting the likelihood of imminent violence:

- Muscles tensed?
- Facial expression?
- Balanced to move?
- Fingers or eyelids twitching?
- Pacing about?
- Withdrawn on approach?
- Voice - change of pitch/tone; insults; obscenities, threats?
- Sweating?
- Breathing - increase in respiration?
- Tears?
- Offensive weapon carried or available?

PROCEDURE

Quite simply whenever there is an incident you should: -

- H Hear the customer – listen to their complaint or issues.
- E Empathise – see to understand the problem.
- A Acknowledge – ‘I hear what you are saying’, ‘I’m sorry you feel that way’.
- T Take Action – progress with whatever action is relevant to the situation.

Here are some further techniques which can help when responding to a customer behaving aggressively or violently: -

- Be alert and consider if you need further assistance.
- Avoid eyeball to eyeball confrontation.
- Relieve the tension by adopting a calm approach.
- Speak and stand calmly but always remain balanced and ready to move - stay on person's weak side where possible.
- Consciously lower pitch and volume of voice.



- Speak clearly and slowly and don't stop talking because the other person doesn't answer.
- Try to get the person talking.
- Listen to what the person says and how it is said.
- Try to identify the source of concern and help if possible.
- Try to distract the person from the immediate cause of concern by changing the course of conversation - buy time to think, to plan, to obtain assistance.
- Understanding and kindness, simple human values which are often overlooked in today's society, can have a marked effect on the outcome of such cases.
- Do not argue! You really cannot win because the other person does not have to be logical. If you lose the argument and have to back off, your position is weakened. You may get so involved, if you do not carefully measure your own response, that you might, in the end, lose some of your own self-control.
- Do not give orders!
- Never make promises you cannot keep.
- Do not disagree where it is not necessary.
- Do not make threats that cannot be carried out or offer rewards for what started out as unlawful or improper conduct.
- Control your behaviour in body language, feelings and expression.
- In conversation with the person being confronted use expressions such as:
 - "I know you have a problem", "I know you are upset", "I believe you when you say something is wrong". Keep your voice at a calm, even pace.

These expressions will show that you have some affinity with the person and his/her position.

- Always consider if you need further assistance from a colleague, if the person becomes abusive in their language or behaviour they should be asked to leave immediately (remember to refund their stake money). If they refuse to leave then assistance from management or the police should be sought.



PREVENTING STAFF FROM BEING ABUSED

Under no circumstances should a member of staff put themselves at risk with an abusive customer. If the following of the guidelines above has failed in calming a customer or the customer refuses to leave the premises when asked a manager should be called. If the customer is still aggressive and still refuses to leave the premises then the police should be called.

At no time should a member of staff intervene physically in the removal of an individual from a site.

All incidents should be fully recorded on the incident reports log.



COMPLAINTS PROCEDURE

The Company's written complaints procedure is available as a separate leaflet. Cashino venues operate a 4 stage complaints procedure as below.

If you receive a visit from the Gambling Commission/Local Authority they may ask you who our **Alternative Dispute Resolution (ADR)** provider is so ensure you know the answer – see details below.





MARKETING AND PROMOTIONAL GUIDELINES

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

COMPLIANCE

All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

We adopt the general principles that our advertising is:

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

Specifically we ensure that:

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



MARKETING AND PROMOTION

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

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

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

Procedure

All Marketing and Promotions must be compliant.

All Marketing and Promotional activities must be approved by one of the following Managers relevant to the site.

For Bingo Sites

- Operations Director
- General Manager
- Marketing Manager

For AGC's

- Operations Director
- Marketing Manager

For Betting

- Operations Director
- Marketing Manager



ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. It is illegal for any person who is under 18 years of age to be permitted entry to any Licensed Premises.

PROCEDURE

- It is a matter of gross misconduct if a member of staff knowingly allows entry by any person who is under the age of 18 years to our Licensed Premises.
- Any person known to be under 18 years of age will be refused entry.
- Any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry or when it comes to the attention of staff. Members of staff are trained to 'think 25'.
- If the person admits to being under the age of 18, they are refused entry.
- Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and has to be provided before entry is allowed. If at any time there is suspicion of forged documents these incidents will be recorded and reported.
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction. Acceptable forms of identification include those that carry the PASS logo (e.g. Citizen card, Validate and the Government's own Connexions card); a driving licence (including a provisional licence) with photograph, or a passport and military identification cards.
- Where there is still doubt and the person cannot produce proof of age, they are advised that they will not be permitted to enter until such time as they provide such proof.
- They will be shown, have explained to them, and be given a 'proof of age card' application form or offered an explanation on how to apply for a card.
- Should the person then refuse to leave, they are advised that the age restriction is a legal requirement.

- If they still will not leave, the Duty Manager is immediately contacted to take over the situation.
- Any attempts by under-18s to enter the premises or designated area(s) are brought to the attention of the Duty Manager immediately and recorded as an entry on a log retained on the premises. Details of entry to include date, time, identity of the individual if known - or detailed description if unknown – member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence. The Log is to be countersigned by the Duty Manager.
- Service is refused in all circumstances where any adult is accompanied by a child or young person.
- All gaming machines, other than category 'D' machines, are inscribed with a notice prohibiting play by persons under the age of 18 years.
- Stakes are returned to under-18s attempting to gamble in an adult-only environment, and under-18s are not allowed to retain any prize.
- Consideration will be given to permanently excluding from our Licensed Premises any adult who has previously and repeatedly attempted to gain entry when accompanied by a child or young person or, should entry have been gained, if the offence was committed knowingly or recklessly. Notwithstanding, that adult shall be required to stop gambling immediately and told to leave the premises.
- In instances where a child or young person repeatedly attempts to gamble on premises or in designated area(s) restricted to adults, or where repeated oral warnings have been issued, consideration will be given to reporting the matter immediately to the Gambling Commission and, where appropriate, police or local education welfare department.
- Consideration is to be given to reminding customers of their parental responsibilities and to assess whether there is a need to develop procedures for dealing with young or otherwise vulnerable children left unattended in the vicinity of our premises.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log.



EMPLOYMENT OF CHILDREN AND YOUNG PERSONS

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

COMPLIANCE

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

- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on the Licensed Premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence. All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.

IT IS STRICT COMPANY POLICY THAT: -

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



CUSTOMER INTERACTION

REMEMBER reporting an Interaction is NOT the same as reporting an Incident.
An Interaction is a Gambling related issue with a customer.

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice listed under the Social responsibility code provision 3.4.1.

The Company makes use of all relevant sources of information to ensure effective customer interactions in particular, to identify at-risk customers who may not be displaying obvious signs of problem gambling.

If members of staff have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager should be informed at the earliest available opportunity.

The Duty Manager is required to observe the individual and make a judgment as to whether it is appropriate to suggest to the customer that they might want to be provided with information regarding where they can seek professional advice about the nature of their gambling activity, or to discuss other options.

New Customer interaction – formal guidance was introduced by the Gambling Commission 31st October 2019. A copy is available to read in this section of your Compliance folder. Customer interaction consists of the following 3 parts;

PROCEDURE

PART 1: Identify and observation – behavior or activity you have spotted or something the customer tells you.

PART 2: Interact and take action - contact to prompt the customer to think about their gambling, for you to find out more, and an opportunity for you to offer information or support.

PART 3: Evaluate and record the outcome – what you or the customer did next. In some cases, you may need to monitor the customer's gambling to spot any change which may prompt further action.

The above 3 parts include the following;

- Behaviours may include intense mood swings, aggression, hysteria, remorse, excessive ATM use, time and money spent, damage to property, violence or the threat of violence to staff or other customers.

- The Duty Manager may give consideration to refusing service or barring the customer from the premises and, in extreme situations, contacting police for assistance. Whenever police are called to the premises for assistance in handling any incident, a log entry will be made whether police attend or not. [SmartINCIDENT app on IHL tablet]
- Staff are aware of where customers can be directed for confidential advice should they be approached by them for help. This includes the Staying in Control information leaflet which includes GamCare Helpline details.
- Members of staff are trained to deal with the process of self-exclusion if they consider a customer is at risk and/or where a customer requests self-exclusion information, this will be fully explained for consideration.
- All venue staff should be aware of those customers that are frequent visitors or deemed to be "high value" players. Monitoring and interaction will take place with every customer during every visit. It is this interaction that may lead the Duty Manager to intervene or take appropriate action, possibly via the Machine Administration Reconciliation System (MARS), which is able to monitor the spend of particular customer on specific machines, who may be deemed "high value", and therefore potentially more at risk. Appropriate action would then be taken on a player by player basis.
- If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts the staff or other customers in potential danger, the Duty Manager will implement the Company's procedures for dealing with antisocial situations.
- Notwithstanding any other action that may have to be taken immediately to prevent an incident from worsening, the Duty Manager will log all such reports which may result in customer interaction on an appropriate future occasion. The interaction will be conducted between the Duty Manager and the customer in a confidential and meaningful manner.
- Members of staff are trained as part of their 3 month induction process in the understanding of, and the strict adherence to this policy and accompanying logs.



SELF EXCLUSION

POLICY

Whilst most customers are able to enjoy and control their gambling, Cashino Gaming recognises its duty of care to those who cannot. Accordingly we provide a self – exclusion facility for those customers to request their exclusion for a fixed period of time, which is for a minimum of not less than 6 months, nor more than 12 months, with the customer, on request, having the option to extend one or more periods for a further 6 months each.

New regulations were implemented by the Gambling Commission and as from 6th April 2016, all gaming operators have to be part of a multi operator self-exclusion scheme, referred to as MOSES.

IF A CUSTOMER WISHES TO SELF-EXCLUDE IMMEDIATELY, WITHOUT MEETING WITH THE AREA MANAGER/DUTY MANAGER/SUPERVISOR OR WITHOUT A FURTHER VISIT TO OUR PREMISES, THEN THEIR DECISION MUST BE RESPECTED. THE DUTY MANAGER OR SUPERVISOR SHOULD ASSIST THE CUSTOMER IN THE COMPLETION OF A SELF EXCLUSION REQUEST IMMEDIATELY, SO THAT THE CUSTOMER NEED NOT MAKE A FURTHER VISIT TO THE GAMING PREMISES. PLEASE NOTE: YOU WILL NEED A WIFI CONNECTION IN ORDER TO ACCESS THE IHL HUB AND THE SmartEXCLUSION PAGE ON THE TABLET.

PROCEDURE – using the SmartEXCLUSION tablet

When a customer has requested that they be refused entry to our premises, the customer and the Area Manager/Duty Manager/Supervisor will formally acknowledge and document their request on the SmartEXCLUSION tablet, available at all Cashino venues. For further information please refer to the “SmartEXCLUSION User Guide” available at the venue.

Self-exclusion is sector specific:-

- **AGC LICENSED PREMISES** - 0.25km – 1km exclusion zone.
- **BINGO LICENSED PREMISES** – Traditional Bingo Clubs eg Beacon, Mecca and Gala plus High Street Bingo’s – National exclusion zone
- **Please Note: the staff member dealing with the self exclusion process should make the customer aware that if they self-exclude from a Cashino Venue with a Bingo Licence, they will be self excluded from ALL High Street Bingo’s and Traditional Bingo clubs in the UK.**
- **Therefore you need to know what type of Premises Licence you hold at your venue. It will either be ADULT GAMING CENTRE PREMISES LICENCE (AGC) or BINGO PREMISES LICENCE. The tablet is set up to select your sector type by default, either AGC or BINGO. You will need to explain to ALL CUSTOMERS who wish to self-exclude, that it is sector specific and that they need to visit other establishments in your local area if they frequent premises operating Bingo, AGC, Licensed Betting Shops and Casinos licenses in order for them to self-exclude from ALL gambling premises.**



The customer will be asked to assist us in applying the exclusion by allowing you to take an up-to-date photograph. The SmartEXCLUSION tablet has a built in web cam for this purpose. You will be prompted by the on-screen instructions when to take a photo of the customer during the self-exclusion process. **A photo is a mandatory requirement. The photo should be taken of head and shoulders only.**

The Area Manager/Duty Manager/Supervisor will confirm the customer's exclusion for a minimum period of not less than six months, nor more than 12 months.

The exclusion will apply to all Adult Gaming Centre (AGC) venues within a radius of 0.25km – 1 km, if your venue holds an AGC license and ALL Bingo licensed premises – Traditional and High Street if your premises hold a Bingo License.


It must be made clear to the customer that they may not revoke the self-exclusion during this time.

Once the customer has entered their electronic signature on the tablet and the self-exclusion is confirmed, the information will be retained on the tablet at the venue and electronic notification sent out to other similar licensed premises, nationally for Bingo licensed premises and within a 0.25km – 1km radius for AGC licensed premises.

A photo gallery is available to view for ease of identifying customers who have self-excluded in the local area and includes your venue within the selected radius. Milton Keynes Head Office will automatically be notified of all self-exclusions.

Please note on the photo gallery,


- Exclusions which are live have no coloured border.
- Exclusions which are in the 6 month 'cooling off' period have a **RED** border. These photos will remain on the tablet for 6 months. If the customer does not return to gambling within the 6 months period, photo will automatically disappear and be archived.
- Exclusions in the 24 hour 'cooling off period have a **BLUE** border. This will be visible for customers who have reinstated and wish to resume gambling and will disappear after the 24 hour period.

If a customer tries to enter gaming premises during a self-exclusion period, this is classed as a breach and details should be recorded on the tablet by selecting the customer photo and selecting the Report Breach button 

When the self-exclusion period ends, a customer has the option to return to gambling. **The customer should return to the venue where they originally self-excluded from to complete the re-instatement process on the tablet.** This button will be visible on the tablet only after the end

date of the self-exclusion period 



If a customer wishes to extend their self-exclusion period for a further 6 months, they may do so by selecting the  button on the tablet.

PLEASE NOTE: For staff training purposes follow the instructions on the tablet and enter the following details on New Exclusion – Contact Details page:

First Name: dummy

Last Name: test

You **do not** need to take a photo of a person, just point the camera to the floor and take the photo. All test entries will automatically get archived once a week from the database.

As of 6th April 2016 you no longer need to add any self-exclusions completed on the tablet to 'LOG E – Self Exclusion' as the new SmartEXCLUSION tablet acts as the electronic log. (See details below for old style paper Self Exclusions).

PROCEDURE – using the old paper Self Exclusion Request Forms which have yet to expire

PLEASE NOTE: You will need to retain any previous paper copies of SELF EXCLUSION REQUEST FORMS on file, until such time they have expired and the 'END DATE' is reached. This could be up to 2020. Do not throw them away as they are proof that a customer self-excluded prior to 6th APRIL 2016, when the regulations changed. You will also need to retain the paper copy of the SELF EXCLUSION REVIEW FORM. This form will need to be completed if a customer wishes to return to our premises and resume gambling. You will only need to use this form for paper copies of self-exclusions which are not on the tablet.

PLEASE NOTE: For old style paper self-exclusions you have in your Compliance folder, which are still active, (see 'end date'), the Duty Manager or any other authorised person and the customer will review the request and record the process on a self-exclusion review form and attach this to the original self-exclusion request form. If the customer wishes to extend their self-exclusion, this will need to be completed on the tablet as a new entry for a minimum period of 6 months.

You will need to record on LOG E, any actions for old style paper Self Exclusion Request Forms you still have on file i.e. customer breach, customer review/resume gambling and 24 hour cooling off period.

If the customer does wish to continue gambling after the expiry of an exclusion period then a 24 hour cooling off period must be taken before gambling is resumed.

Paper self-exclusion request forms should be destroyed 6 months after the end date due to the data protection act.

PLEASE NOTE: Self-exclusion social responsibility code provision 3.5.1 is a condition of our Licence Conditions and Codes of Practice – (LCCP)



SELF EXCLUSION PROCEDURE FLOWCHART

CUSTOMER:

Requests to be excluded.

AREA MANAGER/DUTY MANAGER/SUPERVISOR:

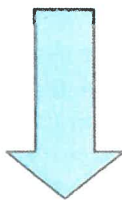
Goes through the implications, for a minimum period of not less than six months, nor more than 12 months, with the customer, upon request, having the option to extend one or more periods for at least a further six months each. Advises the customer of the GamCare Self-Assessment test (on tablet) before self-excluding.

CUSTOMER AND

AREA MANAGER/DUTY MANAGER/SUPERVISOR:

Completes the customer exclusion request using the SmartEXCLUSION tablet and follows the on screen instructions.

CUSTOMER:



Must allow a photograph to be taken using the built in webcam using the SmartEXCLUSION tablet.

AREA MANAGER/DUTY MANAGER/SUPERVISOR:

Explains to customer the exclusion is sector specific and applies to other similar operating premises in the locality within the default 0.25km – 1 km radius.

CUSTOMER:

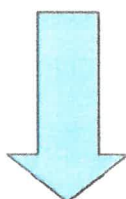
Once customer has electronically signed and Duty Manager confirmed the self-exclusion on the SmartEXCLUSION tablet, the customer must now leave the site.



MANAGER:

Checks the SmartEXCLUSION tablet and photo gallery includes the customer in question. Informs Team Members and any regular relief staff. Make new starters aware if they start during the exclusion period.

MANAGER/DUTY STAFF



Must record a breach on the Smart EXCLUSION tablet when a customer who has elected to self-exclude themselves tries to enter the premises.

AFTER THE END OF THE EXCLUSION PERIOD:

Customers will be offered support and advice should they wish to resume gambling. They should return to the venue where they originally self-excluded from to complete the re-instatement process. If this is the case a 24 hour cooling off period is put in place. Information will also be provided on how to extend the self-exclusion period should they wish to do so.

See above instructions for old style paper self-exclusion request forms which have expired and reached the end date and the process to follow.

Full operating instructions for your SmartEXCLUSION tablet are available at all venues. Please refer to the SmartEXCLUSION User Guide available at your venue.

SOCIAL RESPONSIBILITY & CODES OF PRACTICE

PREMISES LOGS

The Log Book contains the following:

NEW:	Venue Monthly Compliance Log Check Summary
LOG A:	Attempts By Children And Young Persons To Access Adult Areas – (recorded electronically using Age Verification app on tablet as of 9th July 2018)
LOG B: 1	Customer Interaction - Gambling Related "At Risk" Customers – (recorded electronically using the SmartINTERACTION app on tablet as of 8th April 2019)
LOG B: 2	Customer Incidents – Not Gambling Related – (recorded electronically using SmartINCIDENTS app on tablet as of 1st October 2018)
LOG C:	Customer Complaints and Disputes (paper Log)
LOG D:	Customer Incidents Requiring Police Assistance – (recorded electronically using SmartINCIDENT app on tablet as of 1st October 2018)
LOG E:	Self-Exclusion Log - to be used for <u>old paper Self Exclusions Forms</u> which are not on the tablet and retained in Compliance Folder
LOG F:	Incidents Relating To Aggressive Customers and Alcohol – (recorded electronically using SmartINCIDENT app on tablet as of 1st October 2018)
LOG G:	Staff Training Summary – paper log to be signed and dated every 6 months by all staff, when they complete "Essentials of Compliance" training module. Venue Managers to check the log is up to date at the end of the month and sign the Log Check Summary to verify the log is correct. (this will remain as a paper Log and will not be on the tablet)

NOTE: You can download and print these Premises Logs on Upskill > Knowledge Base > Categories > Casino Compliance Folder Content

(Casino Premises Logs – section 5 - Updated April 2019 – V1.6)



Venue Monthly: Compliance Log Check Summary

Venue Name	Month and Year			
Log	Description	Total No.	Comments	
A	Attempts by children and young persons to enter venue [Age Verification app on tablet as of 9th July 2018]			
B 1	Customer Interactions related to Problem Gambling [SmartINTERACTION app on tablet as of 8th April 2019]			
B 2	Customer Incidents <u>not</u> related to Problem Gambling [SmartINCIDENT app on tablet as of 1st October 2018]			
C	Customer Complaints and Disputes [paper log]			
D	Customer Incidents Requiring Police Assistance [SmartINCIDENT app on tablet as of 1st October 2018]			
E	Paper Self-Exclusions , Attempts to enter, Attempts to Gamble [complete for any paper self- exclusion forms you have on file] further information on log sheet			
F	Incidents Relating to Aggressive Customers and Alcohol [SmartINCIDENT app on tablet as of 1st October 2018]			
G	Summary of Staff Training : Essentials of Compliance Only (EOC) [paper log to be completed & signed by ALL STAFF for EOC training]	N/A	NOTE: Please check at the end of each month training dates on Log G correspond with Upskill EOC dates	

Document to be completed checked and signed monthly by Venue Manager or designated person at the end of each month.
Area Manager check and sign every 8 weeks.

Signed Venue Manager	Date	
Signed Area Manager	Date	Comments
Signed Auditor/Compliance Manager	Date	Comments

(Regulatory reports to the Gambling Commission are for the period 1st April to 31st March each year)



SITE ADDRESS and NUMBER :

Month/Year:

LOG C : CUSTOMER COMPLAINTS AND DISPUTES

Date	Time	Details of Incident	Outcome/Action Taken – Complaint Resolved?	Duty Manager



SITE ADDRESS and NUMBER :

Month/Year:

LOG E : SELF-EXCLUSION LOG

Name	DOB	Photo Yes	Start Date	Attempts to Enter Date(s)	Attempts to Gamble Date(s)	Preventative Measures	End Date	'Cooling Off'	Resumed Gambling Y/N

1. This form needs to be completed only for old paper self-exclusion requests forms you still have on file which have yet to reach the "End" date. This could be up to 5th April 2020!
2. If a customer wishes to return to gambling, a Self Exclusion Review Form (copy in Compliance folder) needs to be completed and signed by you and the customer. You also need to complete the last 2 columns on this form.
3. This form needs to be completed if a customer who is self-excluded on old paper request form enters & attempts to gamble in the venue. This would be classed as a "BREACH". Name of Customer and date/time and measures you took need to be recorded



SITE ADDRESS and NUMBER :

LOG G : SUMMARY OF STAFF TRAINING -- Page 1
TO BE COMPLETED SIGNED AND DATED BY ALL EMPLOYEES EVERY 6 MONTHS FOR UPSKILL -- ESSENTIALS OF COMPLIANCE TRAINING (EOC) AND QUIZ

Management and staff have declared that they have read and understood the following training documents and are fully aware of Company policy and procedures relating to them:

1. Access to Gambling by Children and Young Persons	6. Money laundering and Proceeds of Crime Act 2002
2. Access to Premises by the Gambling Commission's Enforcement Officers	7. Self-Exclusion
3. Advertising Standards and Marketing	8. Customer Interaction for "At Risk" customers
4. Fair and Open Practice and Alternative Dispute Resolution/IBAS	9. Incidents relating to Aggressive Customers and Alcohol
5. Information on how to Gamble Responsibly and Help for Gamblers with problems	10. Employment of Children and Young Persons

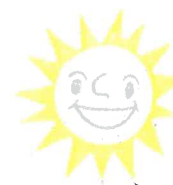
Name	Position in Company	Training Date EOC Quiz	Staff Signature	Next Training Date Due in 6 months	Leaving Date	1	2	3	4	5	6	7	8	9	10
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓



SITE ADDRESS and NUMBER :

LOG G : SUMMARY OF STAFF TRAINING -- Page 2
 TO BE COMPLETED SIGNED AND DATED BY ALL EMPLOYEES EVERY 6 MONTHS FOR UPSKILL -- ESSENTIALS OF COMPLIANCE TRAINING (EOC) AND QUIZ

Name	Position in Company	Training Date EOC Quiz	Staff Signature	Next Training Date Due in 6 months	Leaving Date	1	2	3	4	5	6	7	8	9	10
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓



Staff Guard / P.A. Policy / Static Alarm

Why:

The security of employees is of the upmost importance; therefore personal alarm systems and the staff guard system have been installed to help deter aggressive incidents and give employees a way of contacting help when required.

Best Result:

The staff guard and MPA fobs are carried by employees at all times as per policy. This increases the security of our employees and guests. Employees become more comfortable in their roles knowing they have methods of contacting assistance in emergency situations.

Worst Result:

The staff guard and MPA fobs are not carried by employees which reduces the safety of employees and guests. During events when emergency assistance is needed, it is not acquired.

What:

- Employees should always carry a mobile panic alarm (MPA) or staff guard fob on their person while at work. (ideally both should be carried)
- Activation of staff guard should be prioritised over using the MPA in circumstances which do not require immediate police attention.
- Staff guard should be tested at least once per week (Note: it is recommended to test the system during times of higher customer numbers, as it makes the customers aware that staff have a communication link to a security service)
- **Employees should not be hesitant to use staff guard** – This is a service which we pay for, there are no issues with false alarms or over usage. Use as often as necessary.
- Employees should be more thoughtful about using the MPA system, and should only activate it in times of imminent physical threat or robbery, or anything which police would usually be called for. This is a system which is linked directly to police. Inappropriate use of this device may lead to the venue losing the right to use it altogether.
- Staff guard and the MPA system should only be used if it is safe to do so – never endanger colleagues or customers during a situation arising when it would not be safe to active either system.
- For Static alarms ensure that the reset key is available at all times.



When:

- The staff guard unit should be tested once per week.
- The staff guard unit should be activated whenever staff are feeling uncomfortable or threatened.
- The MPA system should be used only when immediate police assistance is required

Who:

- The MPA unit and/or Staff guard fob should be carried by employees at all times.
- All venue employees should have access to these devices
- All venue employees should have received training on how to use these devices.

Related / supporting documents:

- N/A

Order of who to contact if in need of help / advice:

- Area Manager
- Commercial administrator
- For any technical issues regarding staff guard call: 01623 649013 (This is a 24hr line but it's best to call during normal business hours Out of hours, the number transfers straight to an engineer so he may be woken by the call Do not press the fob if you have maintenance issues – dial this number as directed)



How:

To Operate The Staff Guard Unit

1. Slide cover up on fob and press the red button – this dials Staff Guard.
2. A blue light will flash on the unit which shows that it's dialing.
3. The red light appears/will stay on continuously after a few seconds meaning the call has connected and someone is listening. They will not speak for the first 10 seconds.

IF YOU ARE IN IMMEDIATE DANGER SAY:

CALL THE MANAGER - This is our pass phrase that tells them to call for **IMMEDIATE POLICE ASSISTANCE**

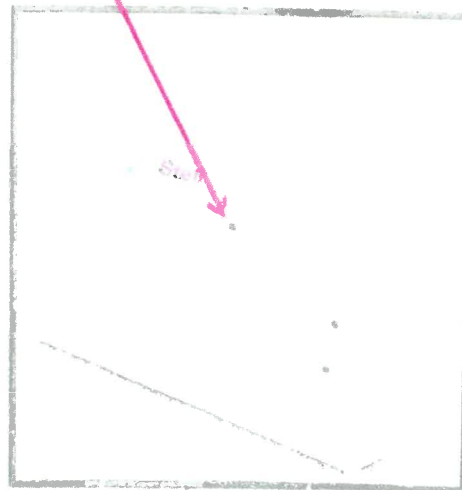
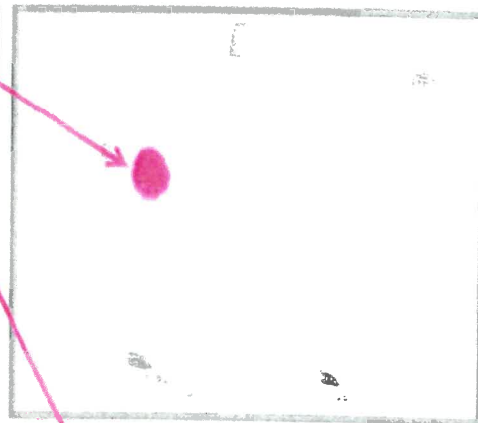
However, they will also call the police if they can hear that a crime is being committed, or anyone is in immediate threat.

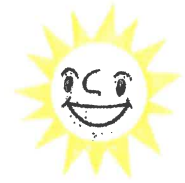
If you say: "Stand By"

They will stay online and listen to whatever is happening so you can use this as a safety measure if you feel a situation could escalate. Again, they will call the appropriate authorities if required.

They will say "Standing by" every few minutes to assure/remind you that they are still there.

Say: "Stand down" once you no longer need





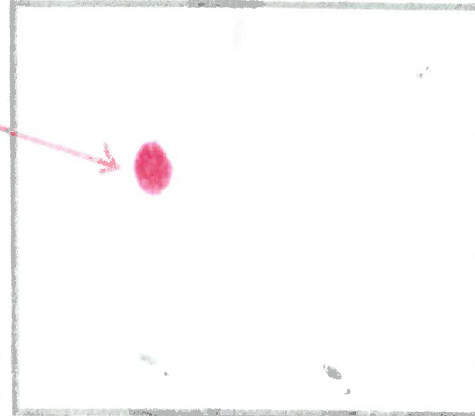
How To Make A Test Call:

Once per week a test call must be made:

1. Press the fob (red button) and wait for a response. Say, "Just a test call" and give the password when asked.

The password is your venue name and number.

2. They will confirm the test and end the call



Mobile Panic Alarms (MPA)

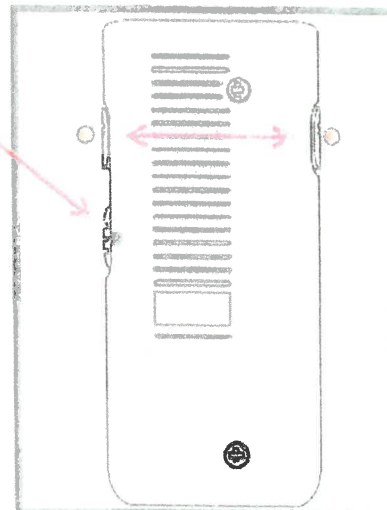
Mobile Panic Alarms are designed to offer staff the security of a personal attack alarm at all times whilst they are at work. The MPAs should be worn by staff members and key holders should be issued with one to keep with them at all times. MPAs are not to be taken off site and should not be taken home.

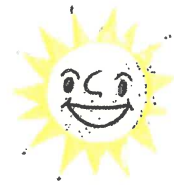
1. Slide the black button downwards to unlock the orange buttons

2. Press the two orange side buttons together

The panic alarm does not work if you press only one button

The black button should be kept in the locked position to prevent false activations





How It Works

The MPA transmits a signal to a receiver on site. This signal is then transmitted INSTANTLY to an alarm control centre who inform the local Police. The Police will aim to attend site in less than 5 minutes when a MPA is activated as this is given priority over a normal 999 call.

CAUTION – The transmitter range will be affected by the condition of the MPA aerial, always ensure your MPAs are in good condition. If the MPA is defective or damaged, contact the Commercial Administrator to arrange a repair/replacement straight away.

When To Use It

MPA's should only be used when there is the threat of serious injury to staff or customers.

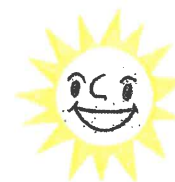
Example of when to use;

- ✦ Any physical violence is carried out towards a member of staff or customer;
- ✦ When the threat of physical violence is considered imminent; or
- ✦ The site is subject to a robbery.

At all other times ring the police directly. The number is displayed on the office notice board.

Problems

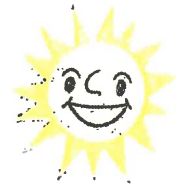
Any problems with the MPA should be addressed to your Line Manager or Area Manager who will inform the Commercial Administrator.



How To Test Your MPAs

1. Call your alarm supplier, a list of numbers is provided below.
2. Tell the alarm operative you want to test your MPAs, give them your site name (Cashino Gaming), site address and site password.
3. The alarm operative will then tell you that they have disconnected the signaling, at which point you will be asked to activate each MPA in turn.
4. For example; you will press MPA 1 when instructed to by the alarm operative and they will tell you if a signal has been received, you will then move on to MPA 2 and the alarm operative will tell you if a signal has been received, you will then move on to MPA 3 etc. etc.
5. You will do this until all of your MPAs have been tested.
6. After each individual MPA test, the alarm operative will tell you if the signal has been received or not. If not, your MPA is faulty and will need to be repaired or replaced. In this instance, please report it to the Commercial Administrator straight away.
7. You will need to log that you have carried out an MPA test on your MPA Test Record Sheet, which should be maintained in your Premises Log in your Compliance Folder

Alarm Provider	Contact
ASG	0121 358 1524
ADT	0344 800 1999 option 5
LSG	TO BE INSERTED
METRO	0115 983 3801
GEM	0844 879 1703
ABEL	0844 800 3022



What To Do After Your MPA Test / Activation

When the MPA testing exercise has been completed the alarm company will reactivate the signaling and the police response will be reinstated.

You will then need to reset your alarm control panel.

If you have a fob operated system, press your fob against your keypad, as if you are going to set the system for closure. The keypad will ask you if you want to set the system. Press 'yes'. The system will start to arm, so immediately hold your fob up to the keypad once again to unset the system. Your system will now be reset.

If you have a code operated system, input your code, as if you are going to set the system for closure. The keypad will ask you if you want to set the system. Press 'yes'. The system will start to arm, so immediately input your code, as if you are opening and this will unset the system. Your system will now be reset



CCTV Policy

Why:

CCTV is an essential tool to help prevent crime and capture those responsible for breaking the law. In a business where cash is being transferred continuously between customers, machines and employees, it is important for the safety of employees and customers that all areas of the venue area covered by CCTV at all times.

Best Result:

The CCTV system is only accessed by those with authority to do so. Cameras angles are never changed without the correct authority. The security of the venue is increased

Worst Result:

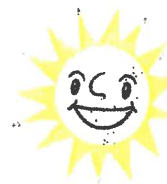
The CCTV is accessed by those who should have no access, data is lost. Cameras are moved without authorization causing a loss of coverage of key areas. The security of the venue is compromised

What:

- The CCTV system should be switched on and recording at all times.
- Any faults with the CCTV System should be communicated to your Area Manager immediately.
- CCTV should always cover: The front and rear exits, All machines, The offices and The GeWeTe
- The CCTV should be checked daily to ensure its working correctly and the time and date are all correct.
- Information in regards to the CCTV should never be disclosed to any 3rd parties.
- Placing and adjusting of the cameras should only be completed by the Area Manager or Operations Director (or another with authorisation from AM/OD)
- Records should be kept to show who has access to the CCTV password and username.
- Decorations should be not placed in areas which obscure the CCTV monitors
- The CCTV should be in a security cabinet
- The key to the Security Cabinet to be locked in the Key Cabinet

Checklist:

- The CCTV should be checked daily to ensure correct function.



Machine Fraud Policy

Why:

Machine fraud is a threat which is ever present. Employees should be aware of the ways in which fraud can take place and what to do in the event of spotting a “customer” defrauding a machine.

Best Result:

All employees are aware of the policy in regards to machine fraud and what to look out for. Machine fraud is reduced and the income for the business protected.

Worst Result:

Employees fail to identify fraud taking place resulting in loss of income. Further venues are targeted. The employees responsible may be subject to disciplinary processes.

What:

- The venue floor should never be left unattended.
- Employees should be thoughtful in regards to customers who they are not familiar with
- Employees should be given access to photos of known fraudsters by the manager
- Known fraudsters shall be asked to leave immediately upon entrance with no explanation needed to be given
- Following any machine being defrauded, at the earliest opportunity the duty manager must send an email to the security address with as much evidence and information as possible
- Employees are not to endanger themselves or customers at any time when dealing with a fraudster.

Fraud may be taking place when

- Machines are being played with large amounts of credit. Normally people do not play with large credit in the machine (be aware that some customers may have won a jackpot and have that credit sitting in their balance)
- Machines going empty regularly or a large succession of tickets being collected.
- Suspicious activity – Large amounts of customers coming into the venue and dispersing or trying to distract employees.
- Customers with their hands over the coin mech, display or pay out tray.
- Large amounts of coins (one pounds and ten pence coins) being separated into denominations in the payout tray.

- Customers leaving the venue with machines still having money left in the bank.

Who:

- All employees have a responsibility for protecting the business from machine fraud.
- The manager should provide employees with photos of known fraudsters
- The duty manager should inform the security email address following machine fraud taking place

Order of who to contact if in need of help / advice:

- Venue Manager
- Area Manager
- Income Protection.

How:

If you suspect that machine fraud is taking place either:

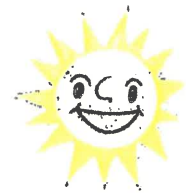
- Activate staff guard and ask the customer to leave the venue if you feel comfortable to do so

Or:

- Do not alert the suspect(s)
- Inform the duty manager who will telephone the police.
- Continue to watch the suspect(s) and try not to alert their attention that you have identified them

Following a fraud

1. Information should be gathered from the CCTV and stored on a memory stick.
2. This information should be provided by email to security@praespeplc.com as soon as possible to prevent another venue being targeted in the local area
3. The Area Manager should be contacted to inform them of the event.
4. Income protection should be informed.



Machine Ratio Check Policy

Why:

The quantity of B3 Machines which a venue is permitted to have is limited, in general to 20% of its total machines. Checks need to be completed to ensure that at all times every venue operates within its correct ratio.

Best Result:

The Machine Ratio Check policy is completed and the venue complies with legislation and operates within the legal ratio for B3 Machines

Worst Result:

The Machine Ratio Check policy is not completed and the venue operates more B3 machines than it is legally allowed.

What:

- MC105 should be completed
- Completed MC105 should be emailed to Incomeprotection@praesepepic.com

When:

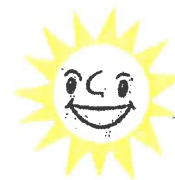
- After any Machine Move.
- When any Machine or Tablet is reported as out of order and not repaired on the next visit by the Service Engineer.

Who:

- The Duty Manager at the time of the move/removal.

Related / supporting documents:

- MC105 Machine Ratio Check Record.



Order of who to contact if in need of help / advice:

- Area Manager
- Income protection
- Gaming Machines.

How:

Complete the MC 105 Machine Ratio Check Record

MACHINE RATIO CHECK RECORD

Venue Name	<input type="text"/>	Venue No	<input type="text"/>
Date of Move	<input type="text"/>	Week No	<input type="text"/>
Name	<input type="text"/>	Signature	<input type="text"/>

Walk around the venue and complete all the relevant sections with the correct number of machines in the main area of the venue

AREA 1 - MAIN	
Total number of B3 Machines	<input type="text"/>
Total number of Cat C Machines	<input type="text"/>
Total number of Cat D Machines	<input type="text"/>
Total No of Cat C/D Tablets	<input type="text"/>
Total No of Twin player Infills (count as 2 machines) (do not include any Class 2)	<input type="text"/>
Total	<input type="text"/> a
Total number of B3 allowed legal ratio - (a) divided by 5	<input type="text"/> b
Total number of B3 Machines (b) actual count	<input type="text"/> c

AREA 2 - SUB DIVISION	
Total number of B3 Machines	<input type="text"/>
Total number of Cat C Machines	<input type="text"/>
Total No of Cat C Tablets	<input type="text"/>
Total No of Cat C/D Tablets	<input type="text"/>
Total No of Twin player Infills (count as 2 machines) (do not include any Class 2)	<input type="text"/>
Total	<input type="text"/> a
Total number of B3 allowed legal ratio - (a) divided by 5	<input type="text"/> b
Total number of B3 Machines (b) actual count	<input type="text"/> c

Complete all relevant sections with correct number of machines if the venue has a 2nd licensed area

Total number of actual B3 (c) must not exceed number allowed

This form must be emailed to IncomeProtection@praesepepolo.com

If your B3 actual total exceeds the allowed legal ratio you must contact your Area Manager immediately and email this form to gamingmachines@praesepepolo.com

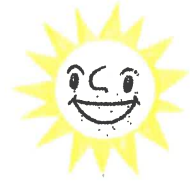
Confirm action taken:

Email Completed document

MC105-V1



6.Compliance



Compliance Policy

Why:

The responsibility for an individual's gambling is their own. The responsibility to exercise a duty of care is that of the operator. Cashino Gaming recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

Best Result:

All employees are fully aware of the importance of following policy and processes in regards to compliance and social responsibility. The business is run in line with the license conditions and codes of practice at all times and all employees work together to ensure the 3 licensing objectives are met.

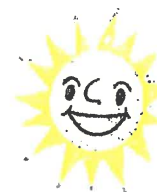
Worst Result:

Employees are not aware of the policy and processes in regards to compliance. The company is not operated in line with the 3 licensing objectives and the license conditions and codes of practice. The business is put at risk of its license being lost.

The 3 licensing objectives:

- Keep crime out of gambling
- Ensure that gambling is conducted in a fair and open way
- Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling





What:

- Employees must complete compliance training before being able to work with customers in any venue
- It is the responsibility of the venue manager to ensure that all employees are correctly trained and up to date with compliance training
- It is the responsibility of employees to check that they have completed all relevant compliance training on their Inform people/upskill account regularly
- Employees must always follow the policies and processes in regards to compliance which are found in the Compliance and Social Responsibility folder

When:

- The policies and processes which form compliance and social responsibility apply at all times of operation.

Who:

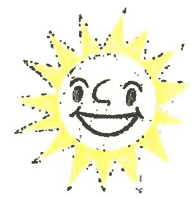
- All employees have a responsibility to ensure that the business is operated in a way which is compliant at all times.

Related / supporting documents:

- The compliance and social responsibility folder.

Order of who to contact if in need of help / advice:

- Venue Manager
- Area Manager
- Compliance Manager



Smoking / Vaping Policy

Why:

The smoke free laws passed on 1st July 2007 prevent smoking in work places and other public places. Therefore to remain compliant with the law smoking should only be permitted in designated areas for employees and customers alike.

Best Result:

All employees and customers observe the smoke free policy and only smoke in areas in which smoking is permitted. We are compliant with the law.

Worst Result:

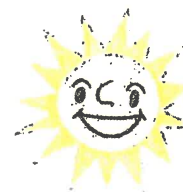
Employees and customers do not observe the smoking policy, the customer experience is negatively affected and we are not compliant with the law. Employees found smoking inside the premises may face disciplinary action.

What:

- Smoking is strictly prohibited within venues
- Customers should not be allowed to smoke inside doorways or toilets
- Where possible there should always be a place to dispose of finished cigarettes
- Should the venue have no smoking area at the back of the venue, there should be steps taken to keep the front of the venue looking presentable at all times
- Vaping is allowed within our venues however these devices should not produce excess vapour
- Employees are not permitted to vape while on shift and therefore must take designated breaks to vape as smokers do. Employees must not vape in the venue.
- Employees who smoke / vape must cover their uniform while smoking and when possible smoke separately from customers
- No smoking signs should be clearly displayed



- It is illegal for anyone to smoke inside the premises at any time.
- This policy is applicable at all times.



Who:

- This policy relates to both employees and customers.
- All employees are responsible for ensuring that this policy is followed at all times.

Order of who to contact if in need of help / advice:

- Venue manager
- Area manager
- Customer service manager

SMOKEFREE



Who:

- The venue manager has responsibility for the CCTV system being checked and fully functional.

Order of who to contact if in need of help / advice:

- Area Manager.
- Commercial Administrator

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MERKUR CASHINO, DROYLSDEN SHOPPING CENTRE

LICENSING SUB-COMMITTEE HEARING

THURSDAY 20TH AUGUST 2020 AT 10.00

APPLICANT'S REMOTE HEARING SUPPLEMENTAL BUNDLE INDEX

DOCUMENT	PAGE
Cashino Gaming Limited –Skeleton Argument, prepared by Philip Kolvin QC	1 - 9
Statement completed by Amanda Kiernan, Head of Compliance, Cashino Gaming Limited	10 - 13
Witness Statement of Darrell Butterworth, Licensing and Security Authority Compliance Consultant: <ul style="list-style-type: none">▪ Exhibit DJB1▪ Exhibit DJB2	14 – 25

TAMESIDE METROPOLITAN BOROUGH
SPEAKERS PANEL (LIQUOR LICENSING)
APPLICATION FOR NEW GAMBLING PREMISES LICENCE
CASHINO GAMING LIMITED
UNIT 8 AND 9, 17 QUEENS WALK, DROYLSDEN M43 7AD

SKELETON ARGUMENT ON BEHALF OF APPLICANT

Introduction

1. This is an application for a new bingo premises licence by Cashino Gaming Limited.
2. The purpose of this skeleton argument is to set out some of the background to the application, to address the representations which have been made and to assist the Panel in its approach to its discretion under the Gambling Act 2005.

Background

3. Cashino Gaming Limited is part of the Gauselmann group, which is one of the most experienced providers of gaming premises on the high street across the UK, including adult gaming centres and bingo premises. Players in high street bingo premises access bingo games through the use of tablets, which are increasingly replacing the former large, flat-floor bingo halls.
4. Bingo premises are subject to a high degree of regulation in order to support the licensing objectives, including the following:
 - a. Premises and their management and operation are subject to the Gambling Commission's extensive Licence Conditions and Codes of Practice applicable to non-remote bingo licences.
 - b. The number of machines, the way they operate and their stake and prize limits, is set by the Gambling Act 2005 and regulations.

5. In this case, the applicant has offered a further raft of individual licence conditions, which will be described and discussed at the hearing.
6. As one would expect, Cashino and its sister companies have detailed systems for compliance with the law and promotion of the licensing objectives, which it implements through staff training and management programmes and supervises through area and national management oversight and independent audit.
7. Cashino is very much alive to the issue of problem gambling:
 - a. As required by the Gambling Commission's Licence Conditions and Codes of Practice, its systems include processes for customer interaction and self-exclusion, operated by trained staff. Interventions are recorded electronically so that they can be overseen by independent compliance auditors.
 - b. Customers are encouraged to use a self-help, app-based tool to assist them with managing their gambling behaviour.
 - c. "Stay in Control" posters and leaflets with the Gamcare helpline number are located prominently in the premises.
 - d. Socially responsible messaging is displayed on digital machines.
 - e. All machines display "Gamble Responsibly" notices with helpline contact details.
8. Although the law permits children to visit bingo establishments, Cashino does not, and entry to children is effectively controlled through a Think 25 Policy, age verification test purchasing and mystery shopper visits, overseen by senior management and shared with the Gambling Commission. The exterior appearance of the premises is such that gambling cannot be seen from the outside and there is no advertising depicting images which may appeal to children.
9. Cashino premises are effectively supervised by trained staff. Unlike bookmakers, which attract a younger, sports-oriented demographic and can become crowded at race or event times, bingo premises attract an older demographic, with attendance at lower levels. Staff walk around the premises chatting to customers, rather than being behind a counter screen. Supervision is therefore properly maintained.
10. Crime and disorder inside Cashino premises is vanishingly rare. In any event, premises are fully covered by CCTV. The Police reaction to this application was positive, "hoping that the

premises will enhance the local area and help in the regeneration of the Droylsden Town Centre.”

11. Staff are trained to monitor the exterior of the premises. In the event of any issues outside, the issue is recorded, and staff are trained to notify area management or local police as required. The premises therefore become part of the network of local control.
12. One measure of effectiveness of its systems is that Cashino Gaming Limited has never experienced a licence review or prosecution. This is despite the fact that it operates in areas with higher and lower social deprivation and other social issues. Its systems and staff training have proved sufficient to ensure that the licensing objectives are promoted. Naturally, as part of their training, staff are made aware of the locational and social context of the individual premises.
13. In the very rare event of any kind of issue, Cashino will liaise with relevant authorities to ensure that it is resolved.
14. Here, the thrust of the objections is that Droylsden is a place of high deprivation. The applicant understands this, and has reflected it in its local area risk assessment as required by the Licensing Conditions and Codes of Practice. It will ensure that this is fully borne in mind in its staff training and implementation of the company’s protective systems at the premises. It would also be more than content to involve Tameside officers in its staff training to ensure that staff and management are fully aware of local issues from the outset.

Tameside's policy

15. In its Guidance to Licensing Authorities, the Gambling Commission suggests that licensing authorities create Local Area Profiles, setting out a range of social and environmental factors for local areas.
16. The purpose of Local Area Profiles is described by the Commission as follows:

6.53 As stated, there is no mandatory requirement to have a local area profile, but there are a number of benefits:

- *it enables licensing authorities to better serve their local community, by better reflecting the community and the risks within it*

- *greater clarity for operators as to the relevant factors in licensing authority decision making, will lead to improved premises licence applications, with the operator already incorporating controls and measures to mitigate risk in their application*
- *it enables licensing authorities to make robust but fair decisions, based on a clear, published set of factors and risks, which are therefore less susceptible to challenge*
- *it encourages a proactive approach to risk that is likely to result in reduced compliance and enforcement action.*

17. In Tameside's case, it has not elected to produce local area profiles. The reason for this is set out in its Statement of Gambling Principles at para 26.1, which explains that the main issues will be covered by the applicant's risk assessment required under the Gambling Commission's Licence Conditions and Codes of Practice.

18. In accordance with Tameside's Statement of Gambling Principles, the applicant's detailed risk assessment is included in its bundle.

19. Importantly, Tameside's Statement of Gambling Principles does not define any area as one in which further gambling premises should not be permitted. To the contrary, paragraph 8.14 states:

As per the Gambling Commission's Guidance to local authorities, this authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder. Should any specific policy be decided upon as regards areas where gambling premises should not be located, this statement will be updated.

20. Instead, the Statement of Gambling Principles asks that risk to the licensing objectives be properly addressed by individual applicants. Those risks have been addressed by the applicant in this case.

21. The Statement of Gambling Principles set out the measures which it expects operators to take. So far as protection of children and vulnerable people are concerned, these measures are all dealt with by the applicant as follows.

Paragraph number	Requirement	Response
8.23	Supervision of entrances / machines	Entrances are supervised by staff and CCTV. Think 25 is operated.
8.23	Segregation of areas	Children are not permitted to enter so segregation is not required
8.25	Premises layout to ensure children do not access areas used for gambling.	Children are not permitted to enter at all.
8.25	Think 21	Cashino operates Think 25
8.25	Signage at entrance	Cashino displays age restrictions at entrance
8.25	Staff training re safeguarding	All staff are trained
8.25	Reporting loitering outside premises	Staff are trained to monitor, record and report
8.25	Door supervision if required	Cashino will employ door supervisors if required in particular premises, in the light of experience, although the need for this has proved rare.
8.26	Policies and procedures as required by Gambling Commission, in particular staff training records and self-exclusion records.	Cashino maintains documented staff training records and self-exclusion records.
8.27	Self-exclusion policies.	Cashino has self-exclusion policies, which are the subject of staff training. The policies are implemented and records are

		kept and audited.
8.29	Alcohol not to be offered as an inducement to gamble.	No alcohol is available at all.
8.30	Provision of problem gambling information, including machine gaming odds and time or monetary limits.	Cashino provides extensive information. Machines explain odds. Customers have the facility to set time and money limits.
8.31	Data on problem gambling including interventions, self-exclusions, attempted entry / gambling by children.	All records are stored electronically and are available for inspection.

22. Accordingly, the application is compliant with all of Tameside's requirements.

Application of statutory test

23. As the Panel will be aware, each piece of licensing legislation sets out a different approach to the question of grant. The approach relevant to gambling is in section 153 of the Gambling Act 2005:

"In exercising their functions under this Part, a licensing authority shall aim to permit the use of premises for gambling in so far as the authority thinks it:

(a) in accordance with any relevant code of practice [issued by the Gambling Commission]

(b) in accordance with any relevant guidance issued by the Commission

(c) reasonably consistent with the licensing objectives (subject to (a) and (b))

(d) in accordance with the [authority's statement of licensing policy] (subject to (a) to (c))."

24. In this case,

(a) the application is fully compliant with the relevant codes of practice;

- (b) it is fully compliant with the Commission's guidance;
 - (c) it is reasonably consistent with the licensing objectives (which are in any event subject to (a) and (b));
 - (d) it is in accordance with Tameside's policy (which is in any event subject to (a) to (c)).
25. Accordingly, the Act states that the licensing authority should aim to permit the application. The Commission describes this as the authority's "primary obligation" (Guidance para 7.56).
26. As the Commission also advises:
- (a) Licences should not be refused where relevant objections can be dealt with through the use of conditions (para 9.28);
 - (b) Moral and ethical objections to gambling are not a valid reason to reject an application (para 5.34);
 - (c) An authority's decision cannot be based on a dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (para 5.34);
 - (d) Any refusal should be for reasons which demonstrate that the licensing objectives will not or are unlikely to be met (para 5.34).
27. In this case, all the requirements of the Gambling Commission's Codes and Guidance are met, as are the requirements of the licensing authority's own policy, which itself does not presume against applications in any give area. More than this, the authority may take assurance from the fact that the applicant is a highly competent operator with an excellent track record, which will manage the premises in a compliant manner, work with the authorities and protect players in accordance with the law and regulation, and in a manner which reflects local concerns.

Objections

28. The thrust of the objections is that the premises are on a thoroughfare used by children and young people, that local youths congregate and engage in anti-social behaviour and that vulnerable persons in what is a deprived area may be enticed to gamble.
29. So far as the use of the thoroughfare is concerned, all Cashino premises are in busy high street locations which are extensively used by persons of all ages. The prohibition of entry for under 18s, the lack of any advertising attractive to young people, clear signage preventing under 18s

coming into the premises and the enforcement of a Think 25 policy means that this is not an issue in Cashino premises.

30. So far as the behaviour of local youths is concerned, the Police are supportive of the application because it will add to rather than harm local surveillance and control. In the event of issues arising, the applicant is a well-resourced national company with the ability to respond to such issues if they arise.
31. So far as protection of players is concerned, the applicant is an industry-leader in terms of protective systems. The fact that gambling comes with risks is the reason why there is a system of gambling regulation which is rooted in the test under section 153. Where that test is not complied with, and the issues cannot be overcome with conditions, a refusal would normally follow. Conversely, where the test is complied with, the statutory obligation is to aim to grant. Here the test is complied with.
32. If, however, a licence is granted but issues emerge, the licence may be reviewed. This has never happened at a Cashino premises, but the authority and objectors may take assurance that the power is there to be used if necessary.
33. Finally, a more detailed objection has been made by the Registrar of Public Health. It is necessary just to say a word or two about the objection.
34. The objection suggests that 3% of the adult population is likely to have a gambling problem which leads to a suggestion that there are 570 adults in Droylsden with a gambling problem.
35. The authoritative information on rates of gambling problems is set out in the Gambling Commission's Statistical Report "*Participation in gambling and rates of problem gambling*" (April 2018), which is in turn based on the British Gambling Prevalence Survey and the Combined Health Surveys for England. The report states that 0.7% of the population are problem gamblers according to standard diagnostic criteria. Those who are problem gamblers tend to play across a number of platforms (e.g. online, betting offices, pub gambling etc.)
36. The Registrar's figure of 3% derives from a study based on a YouGov survey. However, as the study itself concludes:

Analysis of these differences concluded that probability estimates in the combined health surveys may somewhat under-estimate the true prevalence of problem gambling, whereas in the YouGov population survey estimates are likely to be working in the opposite direction. The true value probably lies closer to the combined health surveys than to the YouGov survey.

37. The Registrar then refers to a study showing that 14% of children in the age 11-16 bracket have gambled in the last week and 39% in the last 12 months. However, as the study itself states, the most common gambling activities among young people are betting with friends, National Lottery Scratchcards, fruit machines in arcades, pubs or clubs and cards for money with friends. As it says:

"Much of the gambling activity among this age group takes place in locations that do not require a gambling premises licence (for example, playing on fruit machines in pubs or private bets at school or at home). Underage gambling activity is less prevalent at licensed premises such as betting shops, bingo halls and casinos."

38. The applicant is able to assure the licensing authority that underage gambling will not be an issue in these premises, if licensed.
39. More fundamentally, it does not follow that if there are problem gamblers in an area that a licence should be refused. That is not what the Act, national guidance or local policy says. Rather, operators must have appropriate measures to mitigate risk as required by the law, Commission conditions and codes of practice and local authority policy. Here, there is no challenge to the adequacy of the applicant's measures.

Conclusion

40. This application is fully in accordance with the requirements of the Gambling Act and Regulations, the Commission's Codes of Practice and Guidance and Tameside's local policy. That local policy, rightly, does not state that applications made in particular areas, including Droylsden, should be refused. Rather, it requires a competent risk assessment and a set of measures to mitigate the risk of gambling-related harm. These have been described and will be fully delivered.
41. Accordingly, the authority is respectfully requested to grant this application, subject to the suggested conditions.

PHILIP KOLVIN QC
17TH August 2020

Cornerstone Barristers
London WC1

LICENSING SUB - COMMITTEE HEARING – 20TH AUGUST 2020

SUPPLEMENTAL STATEMENT – AMANDA KIERNAN

Cashino Gaming Limited

1. Cashino Gaming Limited operates a national estate of over 163 licensed bingo, adult gaming centre and family entertainment centre premises
2. Cashino Gaming Limited is a leading national operator of bingo premises with clear and proactive policies to promote the Gambling Licensing Objectives. We always endeavour to liaise with Responsible Authorities concerning the operation of our premises and pre-consult with the police prior to making new applications.
3. Cashino Gaming Limited has full authority to provide bingo facilities through the grant of an Operating Licence issued by the Gambling Commission, which has approved the measures which Cashino Gaming Limited has put in place to ensure that it implements effective anti-money laundering procedures, security procedures and trades responsibly in accordance with gambling legislation, the Licensing Objectives and the Licence Conditions and Codes of Practice.
4. Cashino Gaming has never had a review of a bingo premises licence.
5. Cashino Gaming Limited holds key positions within the Bingo Association and BACTA (the trade association for the amusement and gaming machine industry in the UK) Executive and Social Responsibility Committees, working closely with these groups to innovate and promote Compliance and Social Responsibility within the industry.
6. Cashino Gaming Limited has 50 Personal Management Licence Holders throughout its Operational structure, all of which are aware of their roles and responsibilities in regard to the Licence Conditions and Codes of Practice (LCCP).
7. Cashino Gaming Limited has appointed a dedicated team of compliance auditors that work independently of the Company's Operations Team to continually assess premises' compliance with the governing legislative standards and Company Policy and Procedure. The Company conducts a minimum of two compliance audits per year in each venue. Audits include Regulatory Compliance, Customer Interaction, Incidents, Self-exclusion breaches and Age Verification records. During the audits, premises staff are tested on their level of knowledge and understanding of all relevant criteria. Venues may be re-visited and any additional training needs addressed. Records of incidents, interactions, self-exclusion breaches and age verification checks are collated on a central hub, which is regularly reviewed and monthly reports are provided to Operations Teams.
8. Cashino Gaming Limited operates a strict marketing and promotional guidelines policy, which has been developed in accordance with the Gambling Commission's Licence Conditions and Codes of Practice and the Advertising Standards Authority's Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP) Codes. Venue window displays are designed in consideration of premises location and maintain the Company's focus that all gambling should be carried out in socially responsible manner. Direct line of sight into premises is blocked by appropriate window displays and barriers adjacent to entrances, which minimise exposure of underage individuals to ambient gambling.

Relationship with the Responsible Authorities and Interested Parties

9. Cashino Gaming Limited takes its duty to operate safe and Gambling Act 2005 compliant premises seriously. To this end, the Company has always sought to maintain good relations with local police and licensing authority teams.
10. For the purposes of the current application the local Police Licensing team were initially consulted in June 2020.
11. PC Martin Thorley, District Police Licensing Officer discussed our proposals with local ward enforcement officers who did not raise any concerns regarding the proposed Merkur Slots operation, nor were any concerns identified regarding the operation of the Coral Racing Limited betting premises that previously operated at the shopping centre. The police licensing team did not identify any concerns of crime or disorder associated with gambling premises.
12. Cashino Gaming Limited has considered the police licensing team's comments, local police crime statistics and the premises location. In line with the Company's operational procedures a number of licence conditions have been proposed, a copy of which is included within our hearing documentation.
13. Lines of communication will be maintained with the local police to ensure that local knowledge is continuously shared and that the premises adapt to any emerging risks or local concerns identified.
14. Throughout the 28 day consultation period, none of the Responsible Authorities under the Gambling Act 2005, those of most relevance being the Licensing Authority, local Police, Gambling Commission, Environmental Health and Child Protection teams, have raised any concerns or questions regarding Cashino Gaming Limited's bingo premises licence proposals. None have objected.

Cashino Gaming Limited Compliance – Protection of the Vulnerable

15. Cashino Gaming Limited operates on-boarding and 6-monthly refresher training programmes for all employees. Training modules include 'The Essentials of Compliance and Social Responsibility' which covers the Gambling Act 2005 and Licence Conditions and Codes of Practice objectives and 'Safeguarding Children & Vulnerable People', which focusses on assisting staff to recognise and respond to indicative behaviours of potentially problem gambling and vulnerability and how to conduct effective customer interaction.
16. Cashino Gaming Limited have two National Training Centres where venue teams receive face to face training which includes identifying signs of potential problem gambling and other vulnerabilities such as homelessness. Staff are rigorously trained to take appropriate action such as where to refuse service and to support the customer including advising them of gambling support agencies such as GambleAware.
17. All Cashino Gaming Limited's training and compliance policies and procedures have been audited by the Gambling Commission and comply with the Operating Licence conditions.
18. Cashino Gaming Limited ensures that all staff continue to promote responsible gambling through customer behaviour observation and interaction.
19. Cashino Gaming Limited promotes the use of the customer self-help tool called Playright. All venues have the capability for customers to sign up to the App and staff are fully trained and able to advise on its use. This responsible gambling tool enables

customers to set time limits on their machine play. Subject to the customers' set permissions, the system has the ability to send an alert to the venue should the customer enter at a time they have chosen not to gamble. This alert would then trigger a customer interaction.

20. All Cashino Gaming Limited's bingo premises are adult only and operate a strict Challenge 25 policy. Age verification procedures are embedded in Company training platforms and responsible gambling policies. Age verification test purchasing and mystery shopper visits are frequently carried out by third party companies (Check Policy and Store Checker). Company age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the Industry average and all venues receive 3 or 4 random test visits per year.
21. Extracts of Cashino Gaming Limited's Compliance and Social Responsibility policy have been included with our hearing documentation, which highlight the priority given to responsible gambling and the provision of responsible gambling information to our customers and staff members.

Proposed site location

22. Coral Racing Limited previously operated a licensed betting premises from Unit 28 of the Shopping Centre until last year when the premises licence was surrendered. As such, there will be no net increase in the number of gambling premises at the centre as a result of the current application and I note that the location was previously deemed suitable for the operation of gambling premises.
23. Cashino Gaming Limited has prepared a detailed local area risk assessment in consideration of Tameside Metropolitan Borough Council's Statement of Principles under the Gambling Act 2005, local crime statistics and local establishments.
24. Cashino Gaming Limited operates in many high street and other locations that are situated in the vicinity of shops and schools, which are subject to potentially higher levels of footfall from Children and Young Persons. Staff training and company policy is designed to mitigate the potential risk of underage gambling.
25. Potential risks identified by analysis of local area vulnerability statistics are incorporated in to the premises' local area risk assessment.
26. It is rare for our premises to be associated with anti-social behaviour or crime and disorder but our staff training procedures and security measures are designed to monitor customer behaviour and external areas for anti-social behaviour. Company policy ensures that appropriate steps are taken to minimise any risks and we record and report any incidents or concerns to Company management, for internal review and assessment, and local authorities.
27. All staff training is developed to consider local area characteristics and Merkur Slots operates on the basis that its controls and best practice are adopted at all times. Cashino Gaming Limited's training scheme and control systems are proven to be effective across the Company's licensed estate but local premises management will happily work with any local authorities to reinforce local concerns within premises' training and operation.

Premises Operation

28. The premises will be managed by an experienced shop manager who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role. Training focuses on the promotion of the

Licensing Objectives and a copy our Policies and Procedures have been provided as part of our hearing bundle.

29. The Merkur Cashino premises layout has been developed to facilitate customer observation and all staff members provide regular sweeps of the premises to ensure positive engagement with our customers and facilitate observation and customer interaction.
30. All Cashino Gaming Limited's staff members actively monitor and manage the area immediately outside their premises and record all incidents should they occur. Reporting lines are set up with local police teams to ensure that any potential local issues are identified and addressed.
31. All Cashino Gaming Limited premises operate extensive CCTV throughout customer facing areas and also external areas to assist with monitoring customer behaviour and that of other individuals in the immediate vicinity of the premises. CCTV monitors are appropriately situated to ensure that all customer areas are monitored.
32. Cashino Gaming Limited premises are willing to actively participate in any local area Betwatch/Pubwatch or similar schemes, should they be set up in the future.
33. The premises will operate a no pre-planned single staffing policy after 20:00 policy and staff rotas are designed to be adaptable to customer numbers.

Conclusion

34. The business of Cashino Gaming Limited is the provision of safe and pleasant gaming environments. It remains crucial to the business that customers feel safe and welcome in Merkur bingo premises. This principle is fundamental to Company management strategy from head office to premises level.
35. When and if issues of any kind do arise, the resources and commitment are in place to ensure that they are speedily resolved. For obvious reasons, Cashino Gaming Limited does not wish to run licensed venues which cause regulatory issues, and the Company devotes a great deal of time and resources to ensuring that there are none.
36. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
37. In my experience I can state that it is rare for bingo premises to be the cause of, or otherwise associated with, crime, disorder or nuisance to nearby premises due to the nature of our gaming premises and our customer base.
38. Cashino Gaming Limited continues to take very seriously any issue which its presence creates, both out of respect for the local community and because its licence and commercial reputation depends upon it.

Ms Amanda Kiernan, Head of Compliance, Cashino Gaming Limited

Date: 14th August 2020

WITNESS STATEMENT

(CJ Act 1967, s. 9, MC Act 1980, s.s.5A (3a) and 5B MC Rules 1981, r70)

Statement of: Darrell John Butterworth

Age if under 18: Over 18

Occupation: Licensing and Security
Compliance Manager

(if over 18 insert "over 18")

This statement (consisting of 10 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Dated the 17th August 2020

Signature: D J Butterworth

1. My name is Darrell John Butterworth and I currently operate as a self-employed Licensing and Security Authority Compliance Consultant. I have conducted this business since creating a company, Edmund Locard Licensing and Security Solutions, on the 1st January 2011. I make this statement in relation to an application by Merkur Slots for a Premises Licence under the Gaming Act at Unit 8/9 Droylsden Shopping Centre, Manchester M43 7YY ("The Venue").

Experience

2. Prior to taking up this role with Edmund Locard Ltd I completed 30 years service with the Greater Manchester Police in a variety of uniform and non-uniformed roles. The longest period of attachment to a department was between 1998 and 2006 when I performed the role of Force Licensing Inspector. This role involved the supervision of 12 divisional licensing officers, tasking and management of a covert licensing unit comprising a sergeant and six constables, developing force policy and enforcement in relation to all licensed units and employment and briefing of a licensing solicitor to act on behalf of the force in more complex licensing hearings.
3. During the period as the Force Licensing Inspector I was responsible for the good conduct and compliance of premises operating under a variety of licences including outlets involved in selling alcohol but also those that provided gambling, betting and bingo facilities. I have represented Greater Manchester Police at Magistrates Court hearings, Crown Court Appeals, The High Court, The Court of Appeal and Council Licensing Committee hearings to

Signature *D J Butterworth*

oppose unsuitable applications and to take enforcement action against those premises whose standards had fallen below an acceptable level.

4. Throughout my period in the central licensing role Assistant Chief Constable Robert Taylor, also from the Greater Manchester Police, was the Association of Chief Police officers (ACPO) lead spokesman on Alcohol and Licensing matters. As a result of this connection I became secretariat to the ACPO National Licensing officers group and National Licensing Forum (NLF).
5. During my time in charge of the Licensing Unit I worked very closely with David Thornton, the local Gambling Commission Inspector, conducting joint operations on both legal and illegal gaming establishments.
6. In 2006 on leaving the Central Licensing Unit I received a Chief Officers Commendation, recognising the contribution I had made to licensing enforcement across Greater Manchester, particularly in relation to my leadership and commitment shown in developing force policy and training in response to the Licensing Act 2003.
7. Between 2006 and my retirement from the Greater Manchester Police in December 2010 I took up the role of Neighbourhood Inspector for the town of Heywood on the Rochdale division. This involved the supervision of over 50 police officers, community support officers and civilian support staff. Within my role as a Neighbourhood Policing Team Inspector I was required to conduct analysis of crime and incident trends in order to ensure that resources and tactics were deployed appropriately. The outcome of this analysis ensured that resources were deployed in the right numbers, in the right areas at the right time. On a monthly basis I also presented these statistics to the town's multi agency tasking group to ensure all agencies had the relevant information on crime trends.
8. I have continued my professional development in regards to licensing knowledge by taking and passing the National Licensees Certificate and National Door Supervisors course. This enabled me to successfully apply for a Personal Licence and become approved by the Security Industry Authority (SIA) as a front line operative. In September 2011 I successfully applied to become a nominated tutor with the BII enabling me to carry out training in the award for responsible alcohol retailing and award for personal licence holders. In October 2018 I attended a training course on Licensing Hearings and Appeals and in November 2019 I attended a seminar for Licensing Consultants.

9. I have conducted a number of gambling-related assessments both for local authorities and private companies. When conducting observations I act totally independently of those instructing me and my report accurately reflects what I have seen. I insist that local operators are unaware of my visits taking place and understand that this was the case for the current investigation.

Terms of reference

10. I have been requested by Richard Bradley of Poppleston Allen solicitors to conduct an investigation into a new Gambling Premises Licence application at Unit 8/9 Droylsden Shopping Centre, Greenside Lane, Manchester M43 7YY. The application has received representations from a number of interested parties and the following terms of reference for the investigation have been agreed with those instructing me.
- a. To visit the areas of the proposed site and conduct observations to verify the veracity, or otherwise of the statements made within the representations.
 - b. To visit similar locations where Merkur Slots currently operate licences to assess the impact of those venues on the local communities.
 - c. To analyse the current crime trends in the area to see what impact the existing premises have on Crime and Disorder.
11. In order to address my investigations to the matters of concern I have seen and read the application, representations submitted and area impact assessment report. I ascertained that representations had been made on the following grounds:
- The premises closing much later than the shops ;
 - Teenagers hang around and break into places;
 - That it is on a well-trodden school route;
 - That there is a high prevalence of teenage gambling including bingo; and
 - That this is a particularly impoverished area.

Crime and Disorder

12. In my experience it is unusual for objections to be made to an application based on Crime and Disorder in the area that the premises is operated in without the supporting evidence of police intelligence reports or crime records.
13. None of the representations made seek to criticise the operator or the manner in which they operate other venues in similar challenging locations. The representations appear to be about the area and local community in

which the premises is located. Although statistical evidence was provided to support the representations, no evidence has been provided to show that the current Gaming Centres traded by the applicant caused any of the issues raised in the application. It is notable that the Greater Manchester Police, custodians of all the data held on this area and other locations where Merkur Slots operate, have not felt it necessary to seek any special conditions at this site by way of a formal police representation.

14. In my experience the crime, disorder and anti-social behaviour issues created from a premises licensed as a bingo club or adult gaming centre are much lower than those created from a licence granted to a betting office. There are a number of reasons for this, including the fact that people tend to go to Adult Gaming Centres on their own or in small numbers. Other than playing the machines there is no event taking place for customers to engage with each other, nor use the venues as a social meeting place.
15. The staff employed at such centres are not engaged or distracted by taking or paying out on bets so they can spend more time on the "shop floor" observing customer behaviour and resolving any low level issues before they can escalate. The general environment of such premises is also generally cleaner and tidier than an ordinary bookmakers as there are no need for betting slips, newspapers and pens which often get discarded on the floor of betting shops.
16. As a result of this less intimidating environment many managers are female and this was certainly the case in the Rochdale location visited. A further difference between high street bingo clubs and adult gaming centres and traditional betting offices are people tend to spend less time at a venue on each visit. They do not wait around the venue for an event to start or to finish. As a result of this, customers of such premises do not tend to loiter at a premises having engaged in gambling, and do not smoke at the front of the venue between events taking place. I did not observe any issues regarding customers congregating outside the Rochdale Merkur Slots venue or any of the other premises observed during my observations
17. As a result of the representations made regarding the unique nature of the area subject to the application, and that there appeared to be no representations made regarding the manner that Merkur Slots operated elsewhere, I decided to visit the area of the current application and the Rochdale area where Merkur Slots have operated for over 30 years.

Friday 14th August 2020

18. Merkur Slots Yorkshire Street Rochdale

Signature *D J Butterworth* Page 154

19. My observation commenced in the Yorkshire Street area of Rochdale from 12:30 pm and concluded at 14:50 that day. The Rochdale location was chosen as I have resided in the town all my life. I was also stationed as an Inspector on the Rochdale division from 1996-1998 and 2006-2010. I was aware that a Gaming Premises had been at this location for over 30 years and during my time as an Inspector I am unaware of any problems being raised by its presence.
20. As well as having a local knowledge of the area, in 2019 Rochdale town centre was deemed to be the most deprived area in Greater Manchester and 31stth most deprived area in the country.
Latest government figures show the LSOA (Lower-layer Super Output Area) which includes Rochdale town centre and parts of the neighbouring estates of College Bank and Lower Falinge is the 31st most deprived place in England.
21. On arrival on Yorkshire Street I noticed the regular presence of groups of street drinkers and a male sat on an old blanket begging. I photographed the Merkur Slots venue (exhibit reference letter DJB 1 refers). The unit advertised as being open 24/7. I then looked around the area for signs of local authority controlled CCTV cameras which are often located in areas of high crime and disorder. One such dome camera was located immediately outside the premises at the junction of Yorkshire Street and New Bailey Street.
22. I then looked around the area for signs of residential accommodation which I could not find in the immediate vicinity. Two other gambling machine premises were located at 55 (LeisureTime) and 88 (Admiral) Yorkshire Street. A pawn brokers (H & T) was located opposite, William Hill next door but one, and Paddy Power and Betfred bookmakers diagonally opposite.
23. The nearest educational establishment was the Rochdale sixth form college on St Mary's gate and the nearest religious building was the parish church of St Mary located in the Baum. The Regal Moon Wetherspoon's and Roebuck public houses were within 50 metres of the premises.
24. At 1244 I observed a dishevelled looking male searching through the rubbish bins on Yorkshire Street. 1 person was betting in Betfred, 9 customers in Paddy Power and 8 customers in William Hill. I then entered the Merkur Slots venue where 4 customers, wearing face masks were using the machines. A male and female member of staff were present and I noted signage containing the Gambling Premises Licence, Challenge 25, responsible gambling and No alcohol. Face covering was mandatory and hand sanitisers were positioned in a number of locations around the premises. I later returned to the venue and took a photograph of the signage (exhibit reference DJB 2 refers).

25. I then visited the LeisureTime and Admiral premises. LeisureTime was advertised as opening from 0830 till late and had 11 customers. Admiral was advertised as opening until 11pm and did not have any customers inside. I then visited the Regal Moon public house which had approximately 90 customers, the majority of whom appeared to be consuming intoxicants.
26. I then positioned myself opposite the front of the Merkur Slots premises and conducted observations on the patrons entering and leaving and the passing pedestrians. Without exception the passing pedestrians appeared to be indifferent to the presence of the gambling premises. Customers entering and leaving the premises appeared to be aged 30+ and was 50% male and female. None of the street drinkers or beggars went near the premises, attempted to enter or harassed the customers entering or leaving. Between 1315 and 1330 315 people passed along Yorkshire Street past the front of the premises.
27. At 1333 two Rochdale Council refuse collectors entered the Merkur Slots premises and exited a few minutes later holding mugs of tea which they drank whilst enjoying the afternoon sunshine. At 1354 two males sat on the public benches opposite the shop and talked in loud voices about football and horse bets that they had put on.
28. At 1418 a male aged approx. 27 asks one of the males sat on the bench for a rizzla paper which is handed over. Neither of the males were customers of Merkur Slots. Between 1415 and 1430 407 pedestrians walk past the shop
29. At 1433 there were 4 customers in Betfred, 8 in Paddy Power and 5 in Merkur Slots. I then identified myself to the two members of staff in Merkur Slots in order to make a more detailed assessment of the unit. Both members of staff wore ID badges and a challenge 25 pin badge. Irene the assistant manager informed me that the premises had 67 machines. They did not feel that the premises was an intimidating place to work and infrequently they had to ask customers to prove their age. At 1448 I then left the premises and revisited William Hill (9 customers), LeisureTime (12 customers) and Admiral (2 customers and two female members of staff). I then ceased my observations and made my way to the Droylsden area of Greater Manchester.

Droylsden Shopping Precinct

30. I arrived at the Droylsden shopping precinct at 1530 hours on Friday 14th August 2020. I located unit 8/9 and noted that the two shuttered doorways to the units were displaying the legal notices advertising the application. I then looked around the area for council controlled CCTV cameras. The only cameras that I could locate were on the retail shopping centre car park, at the junction of Market Street and Manchester Road, Metrolink platform and outside the post office on Manchester Road.

31. I then looked around the area for signs of residential accommodation that may have been impacted by the granting of the licence at this location. The nearest residence I could locate was the Guinness Trust Housing at Fairfield House on Manchester Road. The nearest school to the application site was St Margaret's C of E primary school on Church Street. The nearest religious buildings were St Margaret's Church also on Church Street and the Evangelical Church of the Lamb Ministries, Market Street located on the other side of Manchester Road.
32. Rioba café was open at this time and was located diagonally opposite the clock tower. Also open in the area were Silly Country (40 customers), Bee Hive, Church Hotel and the Kings Head public houses. Other gambling premises open in the area were William Hill (3 customers) and David Puck (4 customers). The second William Hill shop and Betfred were 0.5 miles away so I did not visit those locations. I noted that 4 units were closed and up for Let on the retail park and 25 units were closed on the shopping precinct.
33. At 1607 4 teenagers sat on the public benches outside Barnardo's talking before moving off. Between 1615 and 1630 53 pedestrians walked past the site of the proposed shop. An advertisement in Savers stated that the store would be closing down on the 15th August, Select Store was having a "Massive Clearance Sale", and Poundstretcher was having a closing down sale, meaning further empty units in the area. I did note a new venue advertised to be opening soon on the Manchester Road side of the precinct. Industry Bar and Pizza was being created, which would assumedly open into the later evening than some of the other units in the area,
34. I noted that there was none of the begging or street drinkers in the area that I had noted in my Rochdale observations. Of the closed down units, only one with shutters had been tagged with initials "KLAS" and those with-out shutters none had windows broken or been vandalised. There was no damage to any of the street furniture or shrubbery and the area appeared to be well respected. There was no evidence to support the representation that youths frequented the area causing damage and breaking into properties.
35. At 1702 a male pedestrian was observed reading the licence application notice. At 1710 5 males, aged approx. 12 years, were sat talking on the public benches at the front of the application site. At 1721 a male urinated at the rear bin stores behind Gregg's bakery. The male then got into the driver's seat of a nearby car and drove off. Between 1715 and 1730 33 pedestrians walked past the site of the proposed premises. Between 1815 and 1830 only 6 adults and no children walked past the site of the proposed shop.

36. Still open in the area at 1830 were William Hill, David Puck, Hannah's Nails, Bee Hive, Kings Head, Bespoke Hair and Lash Bar, Raajas, Bombay Spice,

Radhuny, Tortuga, Fade Blade, Silly Country, Raw Shack, Pronto Pizza, Save More, Rosa's, Vape Lounge, Sake, Carimex, Tame, Church Hotel, Jam Works, Mumbai to London and David Puck.

37. I continued to watch the precinct area from 1900- 2115. During this time approximately 70 people walked past the site of the proposed shop. None of these people loitered on the precinct but passed by towards Manchester Road, Market Street or across the retail car park. The age of these people ranged from 7 years to 75 years and a mixture of single males and females, dog walkers, joggers, and other small groups of pedestrians. Between 2010 and 2100 5 females and 2 males aged approx. 16 years of age were sat in the centre of the retail car park. The group were talking and on one occasion two girls left and returned a short time later carrying soft drinks and what appeared to be pre-prepared couscous. So respectful were this group that they made regular trips to the litter bins in front of the retail units to deposit their rubbish. At 2100 the two males went to the tram stop and the females left the area on foot.

38. Still open in the area at 2130 were William Hill (No customers), Bee Hive, Kings Head, Raajas, Bombay Spice, Radhuny, David puck. (2 customers), Mumbai to London, Jam works, Silly country, Sake, Carimex, Church hotel, Pronto Pizza, Rosa, Giovanni, Purple flame, Bollywood and Tortuga. At 2145 I ceased my observations and left the area.

Saturday 15th August 2020

39. I arrived in the Droylsden area at 1315 hours. The area appeared to be the same as on my previous days visit. Two new units had opened on the precinct (Fix my phone and British Red Cross) meaning 23 of the units appeared to be closed down. The same other shops appeared to be open and 12 customers were seated outside Rioba and 8 inside. Between 1330 and 1345 129 pedestrians walk past the site of the proposed shop. 30 people were inside and outside Silly Country, the majority appearing to be consuming alcohol. At 1348 David Puck had 1 customer and 7 people were in William Hill.

40. At 1420 a male and female were seen handing out leaflets on the corner of the proposed site. Thinking that it may have been leaflets to highlight the current application I enquired what the leaflets were for and found that they advertised a specialist shoe service for females and young children.

41. From 1430-1445 131 pedestrians walked past the proposed site. At 1542 cafe Rioba closes. From 1530-1545 95 pedestrians walked past the proposed site. 53 customers were inside and outside Silly Country. At 1610 David Puck had 2 customers and William Hill had 6 customers. At 1626 a male reads the licensing notice attached to the shutter of the venue. At 1644 2 females walk through the precinct and one says to the other, "Bloody hell. It's going to be

like a ghost town if any other shops close". From 1630-1645 56 pedestrians walk past the site of the proposed shop.

42. At 1730 a female member of staff from Saver shouted, "Bye Droylsden" to an empty precinct as they closed their doors for the last time. From 1730-1745 28 pedestrians walked through the precinct. At 1800. 4 females age 14 sit on the benches outside Rioba talking. At 1832 the 4 females leave the area. From 1830-1845 15 people pass through the precinct. Still open at 1900 were Bombay Spice, Raajas, Radhuny, William Hill (4 customers), David Pluck. (2 customers), Mumbai to London, Jam Works, Silly Country (120 customers), Church Hotel, Sake, Carimex, Pronto Pizza, Save, Rosa's, Rasta barbers, Vape lounge, Giovannis, Purple Flame, Bollywood and Tortuga. Between 1900 and 2030 63 people pass through the precinct. The age range was from children in prams to 65 years of age. The only noteworthy occurrence was at 1933 a scruffy male aged approx. 28 years of age was seen picking what appeared to be cigarette dregs up off the floor as he passed through. Still open in the area at 2045 were William Hill, Bee Hive, Kings Head, Raajas, Bombay Spice, Radhuny, David Pluck, Mumbai to London, Jam works, Silly country, Sake, Carimex, Church hotel, Pronto Pizza, Rosa, Giovanni, Purple flame, Bollywood and Tortuga. At 2100 I concluded my observations and left the area.

Summary

43. During this period of observations I did not observe any conduct outside any of the Gaming Centres or betting offices which came close to the comments made within some of the representations in respect of the application.
44. During my time spent at the two locations I saw no signs of routine foot patrolling of the areas by police officers or police community support officers. Conduct often associated with areas of high incidents of Crime and Disorder.
45. Having visited the two areas where a current licence exists and the area of the proposed site I would consider the Rochdale site to be the most challenging to operate a gambling premises. This assumption is made based on the footfall through the area, social deprivation and the presence of street drinkers and beggars. Since the operator has managed to run their business in such an area for three decades, without creating the issues raised in the representations, I see no reason why a similar operation in the Droylsden precinct would cause any such problems. I would say the same even if I had seen signs of youths loitering in the centre. In my experience, there is no reason to believe that this operation would add to any issues being experienced.

Conditions proposed by the applicant

46. Although I did not see any issues of concern during these observations I have seen the list of conditions that have been proposed by the applicant in support of their application. In my opinion the conditions offered will act as a

deterrent to crime and disorder and prevent the concerns highlighted within the representations.

Conclusion

47. Having conducted observations at hundreds of locations across the country over the past ten years, these observations in Droylsden were probably the most incident free that I have undertaken. Despite the area containing 6 public houses, two betting offices, take-away and off licence venues, along with visiting the area on hot summers nights and one evening when Manchester City played a European Cup quarter final, I still found little of noteworthiness. Other than recording routine footfall counts and shop closing times I struggled to find anything to include in my report.
48. I did not observe any conduct to support the concerns raised in the representations made to the application based on its location or the applicant. I therefore concluded that the granting of a gaming premises licence at this location would not lead to a change in the current situation as envisaged. The granting of such a licence may have the opposite effect and assist in the regeneration of a shopping area that appears to be struggling to survive. From my experience, there is no reason to suppose that the presence of a bingo premises at this location would exacerbate any issues in the centre.
49. This conclusion is based on my observations in the Rochdale and Droylsden area, 30 years' experience in Greater Manchester Police (6 years as an Inspector on the Rochdale division) and residing in the Rochdale area where this operator has functioned successfully for over 30 years.

D J Butterworth

17th August 2020

Appendix

Exhibit reference letter DJB 1 Photograph of existing site in Rochdale

Exhibit reference letter DJB 2 Photograph of notices at the Rochdale site



