



Supplementary - Alcohol and Entertainment Licensing Sub-Committee

Wednesday 8 July 2020 at 10.00 am

This will be held as an online virtual Meeting

Details on how to access the link in order to view the meeting will be made available online via the following

link: <https://www.brent.gov.uk/your-council/democracy-in-brent/local-democracy/live-streaming/>

Membership:

Members

Councillors:

Ahmed (Chair)
Long (Vice-Chair)
Kennelly

Substitute Members

Councillors:

Chohan, Hector, McLeish, W Mitchell Murray and
RS Patel, Shahzad, Maurice

For further information contact: Devbai Bhanji, Governance Assistant
Tel: 020 8937 6841; Email: devbai.bhanji@brent.gov.uk

For electronic copies of minutes, reports and agendas, and to be alerted when the minutes of this meeting have been published visit:

www.brent.gov.uk/committees

The press and public are welcome to attend this meeting as an online virtual meeting. The link to view the meeting will be made available via the following link:
<https://www.brent.gov.uk/your-council/democracy-in-brent/local-democracy/live-streaming/>

Notes for Members - Declarations of Interest:

If a Member is aware they have a Disclosable Pecuniary Interest* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest** in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also significant enough to affect your judgement of a public interest and either it affects a financial position or relates to a regulatory matter then after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

***Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect of expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences** - Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

****Personal Interests:**

The business relates to or affects:

- (a) Anybody of which you are a member or in a position of general control or management, and:
 - To which you are appointed by the council;
 - which exercises functions of a public nature;
 - which is directed is to charitable purposes;
 - whose principal purposes include the influence of public opinion or policy (including a political party or trade union).
- (b) The interests of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

A decision in relation to that business might reasonably be regarded as affecting the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who is the subject of a registrable personal interest.

Agenda

Introductions, if appropriate.

Item		Page
3	Application for New Premises Licence by Lidl Great Britain Ltd for the premises known as Lidl, Minavil House, Ealing Road, Alperton, HA0 4EL, pursuant to the provisions of the Licensing Act 2003	1 - 112
4	Application for an Adult Gaming Centre by Future Leisure Ltd for the premises known as 141 Kilburn High Road, NW6 7HT, pursuant to the provisions of the Licensing Act 2003	113 - 304

Date of the next meeting: Date Not Specified



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APPLICATION FOR A NEW PREMISES LICENCE

BY LIDL GREAT BRITAIN LIMITED

FOR A PREMISES LOCATED AT
MINAVIL HOUSE, EALING ROAD, WEMBLEY HA0 4EL

THE LONDON BOROUGH OF BRENT

WITNESS STATEMENT OF RUSSELL JEFFERY, TRADING COMPLIANCE DIRECTOR OF LIDL GREAT BRITAIN LIMITED

I, Mr Russell Jeffery, Trading Compliance Director of Lidl Great Britain Limited whose head office is at 19 Worple Road, London, SW19 4JS will say as follows:-

1. I have been employed by Lidl since 2005. Since 2013 I have been Trading Compliance Director and my responsibilities include developing and maintaining all relevant policies and procedures that allow Lidl to remain legally and ethically compliant.
2. Part of my responsibility is to review the existing policies and procedures relating to the sale of alcohol. This would include reviewing signage displayed in stores, age verification policies, the alcohol range, the refusals procedures, training manuals and instore checklists.
3. Lidl is a national operator. We have over 800 stores in England and Wales operating in a variety of areas, including many stores operating successfully in areas that have been designated as cumulative impact zones.
4. In the event that a store has a premises licence with a condition attached to it placing obligations on the licence holder, beyond the obligations included in our own standard

internal procedures, one of my team will regularly contact the store manager to ensure ongoing compliance. For example, where a premises licence requires the provision of SIA registered security staff for a minimum number of hours per week, we will regularly check that security staff are in place for at least the required period of time.

The Application Process

5. Despite the suggestion in the representation from the Licensing Inspector that we had done no research into the area before submitting the application, I confirm that Lidl have been involved in the site since 2007. We have submitted a number of planning applications relating to the premises, so we are aware of the locality. We are also aware that, prior to the recent development, the premises had been a magnet for squatters and street drinkers. This was due to the fact that the site was run down and included a number of empty units.
6. We believe that the new development, including the Lidl store and multiple residential flats, will improve the area and deter street drinkers in the future. Indeed, the evidence appears to be that this is already happening.
7. When applying for a new premises licence we will volunteer conditions that we believe will address the licensing objectives and are relevant for the particular premises. These will ordinarily include provision of an extensive CCTV system, the implementation of a challenge 25 procedure and proper staff training.
8. Where we are aware that the premises are located in an area with existing issues, we will liaise with the local police and volunteer additional conditions. Additional conditions volunteered within this application include:-
 - a. the provision of security staff;
 - b. a prohibition on alcohol being sold in open containers or consumed on the premises;
 - c. confirmation that, other than when sold as part of a multipack or gift pack, spirits will not be sold in containers of less than 50cl; and

- d. a restriction on the sale of beer, lager and cider with an ABV of more than 6.5% (other than speciality and artisan products).
9. In advance of submitting this application I am aware that our licensing manager tried to contact both the police and the licensing department at the council to see if there were any particular conditions that they would expect to see within an application for this site. I refer to pages 1 to 5 of the Applicants Bundle, being a copy of the email correspondence between our licensing manager, the police and the licensing department prior to the application being lodged. It is clear from this correspondence that neither the police nor the licensing department were willing to enter into any discussions regarding the application.
10. In an email dated 13th May 2020, the police officer stated “with any new premises applications that fall within any of the Brent CIZs the police will submit representations and anticipate the application going to a hearing. Once we receive your application, we will be better placed to liaise with you in relation to any proposed conditions and our rationale”.
11. Our licensing manager tried to allay any concerns that the police may have had by stating that Lidl were experienced in running stores within CIZs. In response, Sgt Damian Smith said “Your development will certainly be better than the warehouse and college that used to be on the site”. It is unfortunate that Sgt Smith did not continue to be involved in the application, given his supportive comments and his recognition that the development would improve the area.
12. In a further email dated 13th May 2020, the licensing support officer of Brent Council stated “The Police have received the email you sent and unfortunately they will not provide any pre-consultation advice. Please note the presumption is that the application will be refused unless you can satisfactorily evidence that the application will not negatively impact on the licensing objectives. If the application is for both ‘on’ and ‘off’ sales you have the option to amend the application to remove the ‘off’ sales. At this point, you can continue to proceed with the application which will be determined by the licensing Sub Committee or you have the opportunity to withdraw it as it is unlikely to be granted unless there is sufficient evidence that the application can meet the licensing objectives”.
13. The application was therefore submitted without the benefit of any pre-consultation with the police and licensing department.

14. I am aware that the police and licensing officer have made representations in respect of this application. A copy of the representations appear at pages 6 to 18 in the Applicant's Bundle.

Police Representation

15. The police representation was received from PC Gary Norton who had taken over the application from Sgt Smith. On receipt of his representation our licensing manager contacted PC Norton by email asking if he would be happy to consider additional conditions that he would be looking for. A copy of this email chain appears at pages 19 to 22 of the Applicant's Bundle. After an initial suggestion that he would like the hours to be amended to provide for a 9am start time, PC Norton said that he would respond to the Lidl licensing manager once he had digested the Council's concerns and policies regarding CIZ applications. No further correspondence has been received from PC Norton.

16. I am also aware that our licensing solicitor spoke to PC Norton on 18th June 2020. During that conversation PC Norton said that he would be reluctant to consider any conditions as his first position was that the application should be refused. The solicitor explained that it could assist the licensing committee if we were able to have a list of agreed conditions that could be imposed in the event that they were willing to grant the application. PC Norton agreed to send a list of issues that should be addressed. Unfortunately, he has been unable to provide this to us by the date of this statement. He explained in a recent email that he has been very busy with variation applications arising out of COVID-19.

17. Given that the police representation seems to be based only on the fact that the premises are located within the CIZ, it is difficult for us to respond further.

Licensing Inspector Representation

18. This representation was received from Susana Figueiredo. No contact details were provided on the representation other than an email address. Our solicitor sent an email to Ms Figueiredo on 18th June 2020 asking her to make contact so that they would be able to discuss any concerns. A copy of this email appears at page 23 of the Applicant's Bundle. No response has been received, so we have been unable to discuss the representation or try to agree additional conditions to allay any concerns.

19. I would however like to respond to some of the matters raised within Ms Figueiredo's representation.
20. Ms Figueiredo makes reference to crime statistics, yet the police have presented no evidence of this. Many of these statistics are historic and I do not believe that they illustrate the improvements to the area. I believe that relevant evidence of crime and disorder should relate to the previous 12 months, as this is a more accurate reflection of the issues currently being experienced in the area.
21. Ms Figueiredo also refers to an historic issue with street drinking in the area within 1-minute walk of the proposed premises. A recent photo of the area appears within her representation, but she has also included various photos showing empty bottles and cans that were taken in 2017 (pages 13 and 14 of the Applicant's Bundle). I believe that the photos in the representation letter are slightly misleading as they do not show the clear improvement in the area since 2017. In that regard, I refer to the photos appearing at pages 24 to 26 of the Applicant's Bundle. These show the marked improvement in the area following development of the site where Lidl will be located.
22. That said, I acknowledge that Ms Figueiredo confirmed that street drinkers no longer frequent this area, having moved to another location. A plan on page 16 of the Applicant's Bundle within her representation shows a route supposedly taken by street drinkers to get to the canal bridge. No other licensed premises are marked on that map, but I am aware that the petrol station at the bottom left of the map is connected to a large Sainsburys store.
23. The fact that a Public Space Protection Order is in place does not prohibit us from applying for a new premises licence. As I will set out below, Lidl are a responsible retailer with experience of operating premises in areas within CIZs and, in particular, in areas where there are issues with street drinkers. I will set out later in this statement how Lidl successfully work to improve such areas and I will also give examples of when this has been acknowledged by local police.
24. I do not accept the suggestion that, if off licences did not exist, the number of street drinkers would decline. Ms Figueiredo has already stated that street drinkers travel significant distances. As such, they would be willing to travel to other areas to purchase their alcohol. In addition, I do not believe that an additional off licence in the area will cause

the number of street drinkers to increase. An additional off licence will merely be another potential source of alcohol but, as set out later in this statement, I am confident that street drinkers will not be permitted to purchase alcohol at any Lidl store.

25. Although Ms Figueiredo suggests that it is difficult to spot street drinkers, Lidl work closely with the police to ensure that local street drinkers can be easily identified and refused entrance to the store. This approach has been successful on previous occasions and I believe that it will be successful for this store.

26. Ms Figueiredo has criticised the application for listing a number of conditions and failing to include any substantive operating plan or evidence of research into the area. As previously mentioned, had the local authority engaged in pre-consultation, we would have known what additional information they would like to see within this application. In any event, the standard application forms do not lend themselves to setting out evidence of research or giving detailed operating plans. Any issues set out within box M will be converted to a condition so, to avoid confusion, we believe it is preferable to suggest exact working for any conditions to be attached to the licence.

27. Ms Figueiredo has suggested that we should have considered issues such as clearing up litter, labelling of alcohol or other measures to discourage street drinkers from loitering outside.

28. Unfortunately we do not own the pavement at the front of the premises. We are therefore unable to place litter bins or take over management of bins. We do carry out regular checks of our car park and we have litter bins located in the car park that are regularly emptied. Evidence of the system of checks appears in the store manager checklist appearing at pages 27 to 40 of the Applicant's Bundle which highlights the general cleanliness checks at the start and end of each day in external areas and at the front of the store. As referred to later in this statement, we also participate in many community projects and may therefore support any local litter picking initiatives.

29. It is also not practical for Lidl to label all alcohol sold at the store. A significant proportion of alcohol sold at a Lidl would be readily identifiable, either due to the fact that it is marked as being produced for Lidl or because it is from our exclusive, specialist range and no other store would sell it. In addition, from the remaining limited lines that are not Lidl

branded, these are often sold as part of multipacks e.g. Budweiser, Carlsberg, etc. It would therefore be very difficult if we were required to open, mark, and reseal the packaging.

30. We would also always discourage street drinkers from loitering outside our premises. You will appreciate that this can be intimidating to other customers, so it would be a priority for us. In any event, as shown by the photos of the area, street drinkers no longer congregate in that area and there is no reason for them to return. Given the robust policies and procedure that Lidl stores have in place, they will quickly become aware that they will not be able to purchase alcohol at the Lidl store and move on.
31. As previously stated, it is not usual for Lidl to volunteer any condition limiting the ABV of beer, lager and cider within an application. As such, the fact that we volunteered a condition suggesting a limit at 6.5% is in recognition of the CIZ. Had the council or police been willing to engage in pre-consultation or consultation following submission of the application, this is a condition that we could have discussed with them.
32. Comment is also made by Ms Figueiredo about our speciality/ artisan products that may have a higher ABV. We have suggested a condition that excludes these products from the ABV limit volunteered with the application. We offer a range of high-quality speciality and artisan products that appeal to the more discerning drinker. These are predominantly sold in glass bottles and therefore do not appeal to street drinkers. Craft and artesian products focus on quality, flavour, brewing technique and are produced in limited quantities – they are not mass produced. They are sold at a higher price and we have never identified or witnessed these lines appealing to street drinkers.
33. A photograph of the beer, lager and cider display appears at page 40b of the Applicant's Bundle. This includes the speciality and artisan products. By their nature, the speciality/ artisan range regularly changes to ensure that our customers get to experience a variety of products. This also allows us to support the smaller, local breweries. The majority of these products would be identifiable to Lidl as they are unlikely to be sold elsewhere. There are currently five such speciality and artisan products in the Lidl range with an ABV of 6% or over. These are all sold individually in glass bottles and at a premium price.
34. The issue of trading hours is also a matter that we would have been prepared to discuss during any consultation with the police and/ or licensing department. In any event I can

confirm that, if the committee is minded to grant the application, we would be willing to agree to an 8am start time for the sale of alcohol.

Lidl operations within CIZs

35. The premises are located within an area that has been designated by the London Borough of Brent as being a cumulative impact zone (CIZ). This policy is set out in pages 50 to 53 of the London Borough of Brent statement of licensing policy which states the CIZ has been introduced “specifically to address the public nuisance and crime and disorder (violence crimes in particular) that are caused through activities such as street drinking”.
36. We have applied for, and been granted, a number of new licences in similar areas that have been designated as being within a CIZ. As such, we are aware that the policy creates a rebuttable presumption that the application will be refused in the event that representations are made. The presumption should be rebuttable in cases where the applicant can show that their premises will not add to the cumulative impact being experienced.
37. I was involved in a previous application where there were similar issues. The application related to a premises located at Streatham Road, Mitcham within the London Borough of Merton. The premises were located within a CIZ.
38. Representations were received from the police, the licensing officer and a number of residents. The concerns centred around the fact that there were already issues with street drinkers in the surrounding area and, in particular, in the large park immediately opposite the application site.
39. The application was rejected on the grounds that the committee believed that we had failed to overcome the rebuttable presumption that the application should be refused. The notice of determination issued after the hearing confirmed that PC Stevens stated he had “no issue with the applicant as they were highly competent and responsible operators and had given PC Stevens the most positive response on other issues at another premises in the Borough compared to other chains”.
40. We appealed against the decision to refuse the licence as we felt that the decision was unreasonable in the circumstances. Prior to the appeal we were able to agree conditions with the council and the police, so the appeal was not determined by a magistrate.

41. The conditions agreed were extremely onerous and included a restriction on the permitted hours. Alcohol could not be sold prior to 9am. After about 9 months we contacted Russ Stevens of the police to ask whether he would object to an application to vary the licence to remove the onerous conditions and amend the permitted hours.
42. PC Stevens said that the premises have been operating for a few months now and, although there had been a few minor incidents, there had not been an increase in problems in the area. He confirmed that he would not have any objection to an application to vary the premises licence to remove the onerous conditions. He also confirmed that he would not object to an application to vary the permitted hours to allow the sale of alcohol from 8am.
43. Given that PC Stevens had previously stated that he objected to the new licence, regardless of what conditions would be offered, we believe this his change in position clearly illustrates how Lidl successfully work with police and the local community to address any local issues.

Working with Police

44. We seek to make a positive contribution to areas and have an excellent reputation for working with local police and communities.
45. For example, in 2017 PC Stevens approached us to ask us to stop selling fireworks to people under the age of 25 at our Mitcham Town store. The police and local residents in an area were experiencing issues with young people purchasing fireworks and using them inappropriately, causing a danger to the public. As a result of that request, the store restricted the sale of fireworks, as requested.
46. We also have a number of stores located near to major sporting venues such as football stadiums. For example, we have stores located near to Wembley and the Millennium stadium in Cardiff. We are regularly approached by police in these areas and asked to restrict the sale of alcohol before certain matches. We will always comply with these requests.
47. As national operators, we are aware that an increasing problem being experienced by police and residents is that of street drinkers. Street drinkers can cause antisocial behaviour and can intimidate local residents. We will work with police and local

communities to address any issues with street drinkers. In our experience, each area is unique and it is very difficult to produce a standard plan to address issues with street drinkers. For that reason, we will always work with the local police and support any of their initiatives.

48. By way of an example, in July 2017 we applied for a new premises licence for a store located at Units 1-2, West 12 Shopping Centre, Shepherds Bush, W12. The police objected to the application and initially asked that the sale of alcohol be prohibited prior to 10am. In the letter of objection, the police officer stated "This neighbourhood has a broad spectrum of policing concerns which range from street drinking, drug issues, the policing of Queens Park Rangers Football Club and the presence of Europe's largest shopping centre 'Westfield'. Within this tapestry of policing issues there lies the issue of alcohol related crime and disorder. Currently, the area is saturated with licensed premises in the form of pubs, clubs and bars, as well as off licences and take away food outlets. So much so, a cumulative impact policy has been put in place to deter additional, unnecessary and unwelcome sale of alcohol by retailers." When referring to crime statistics, the police confirmed in their letter that "this nuisance element is made up predominantly from littering and street drinking". A copy of the representation appears at pages 41 to 45 of the Applicant's Bundle.
49. Following receipt of this representation, we liaised with the police and agreed an amendment to the application. In particular, we agreed that the sale of alcohol would commence at 9am. The store opened in February 2018.
50. The store manager of Shepherd's Bush confirmed to me that, prior to opening day, he invited the Ward Sergeant (James Burgess) to visit the store and discuss the existing procedures that Lidl had in place along with any additional security measures that may be necessary.
51. At the outset, all managers of the store were made aware that there were a number of street drinkers in the area. I understand that many of these street drinkers tried to purchase alcohol from the store when it first opened, but the Store Leadership Team and Security prevented them from entering the building. As a result, the street drinkers no longer attempt to purchase alcohol at the Lidl store. This illustrates the effectiveness of our zero-tolerance approach.

52. I am aware that the police continue to visit the store and have built up an excellent relationship with the management team. I believe that the police are pleased with our trading compliance and approach to managing the licensing conditions. Indeed, in December 2018 the police officer confirmed that “The Police’s position is that the availability of alcohol before 10am contributes to alcohol related anti-social behaviour in the area and has a detrimental effect on local residents. That being said, Lidl have made attempts to address these issues and also have the ability to provide security at the premises when required. Based on this I can confirm that I will have no objections to the proposed extension of hours to the off sales of alcohol to 8am with the inclusion of the below mentioned conditions.”. For the avoidance of doubt, the conditions related to restricting ABV of beer, lager and cider. A copy of this email chain appears at pages 46 to 47 of the Applicant’s Bundle.
53. Given the concerns raised by the police during the initial application for the Shepherd’s Bush store, we were delighted with this response. I believe it shows how well Lidl work with local police to achieve positive outcomes.

Training

54. We expect very high standards from all staff. We have strict policies and procedures in place and require staff to follow these at all times. We also provide a high standard of training to our staff. Extracts of the training documentation appear at pages 48 to 63 of the Applicant’s Bundle.
55. We understand the importance of proper, high quality training and we provide an extensive programme.
56. Training takes place in store, and is led by the designated premises supervisor and the Area Manager. This is an extremely effective arrangement, as the DPS and Area Managers know their local areas and know any issues that may be specific to the store.
57. Staff are trained on how to stop underage sales, how to spot attempted proxy sales, how to deal with conflict, and how to avoid the sale of alcohol to people under the influence of alcohol. Staff are also advised of any local initiatives that the store are supporting.
58. Training of all staff starts immediately. No employee is able to operate the checkout until they have completed the relevant training course. Even then, they are closely monitored

and supported. Initially Shift Managers closely supervise new starters when they work on the checkout. Once they have proved that they are able to follow the correct policies and procedures, they continue to be closely supervised by other staff members. Training trolleys are also used – these contain a variety of products, including age restricted products. Staff members are expected to follow the correct procedure for each product.

59. On completion of all training, including refresher training, staff are required to sign the Training Law Induction Sheet and the Lidl Age Restricted Policy Signature Sheet appearing at pages 50 and 61 of the Applicant's Bundle.

60. The training is regularly updated to reflect changing approaches or new legislation and is repeated every 6 months.

61. Pages 51 to 59 of the Applicant's Bundle contain an extract of the Lidl Age Restricted Sales section of Store Trading Law Manual, including an example of the age-restricted multiple-choice test (page 62) and the online training system, LEON (page 63). This manual is used for reference, induction and refresher training and a copy is available at all times via the office computer system located in the staff welfare area. During the first few weeks of work all staff area issued with a key fob to access the online training system, LEON. This provides theoretical training in all operational aspects including the sale of alcohol.

62. The Lidl Age-Restricted Policy is displayed in the welfare area of store. This is the area that all staff have access to. It is not accessible to the public. The notice acts as a constant reminder to all staff about the restrictions imposed by the licensing legislation. Pages 64 to 65 of the Applicant's Bundle shows the types and locations of all signs related to age restricted products.

Internal Policies and Procedures

63. Alongside the training on legislation, staff are also trained on the internal procedures they must follow when selling any age-restricted product.

64. All tills operate with a till prompt that alerts staff to a restricted product, such as alcohol. Once the till prompt has sounded, the staff member must make a positive selection before the sale can continue.

65. In the event that the staff member believes that the person attempting to purchase the alcohol appears to be under 25, is attempting a proxy sale, is a street drinker or is under the influence of alcohol, they must follow a particular procedure.
66. The staff member is not required to challenge the customer. We appreciate that it can be difficult to challenge customers and many of our more junior staff members may find the prospect intimidating. As such, they are required to press a button under the checkout that will sound a bell. Given the size of Lidl stores, this bell is audible throughout the premises. On hearing the bell, a Shift Manager or the DPS will go to the checkout. They will then challenge the customer and, if appropriate, they will ask for proof of age. It is the Shift Manager who will determine whether the sale can take place and it is the Shift Manager who notifies the customer of their decision.
67. This procedure sends a clear message to all customers that Lidl take their responsibilities very seriously and operates a zero-tolerance approach relating to the sale of alcohol. The Shift Managers are instructed to refuse a sale if there is any doubt.
68. We find that, when a new store opens, there are inevitably a high number of people attempting to purchase alcohol when they are prohibited from doing so, such as under age people or street drinkers. By following this procedure, it soon becomes clear that these people will not be able to purchase alcohol at any Lidl store. As such, if any of the street drinkers who may congregate near to the store attempt to purchase alcohol at the store, the sale will be refused.
69. Whilst we provide high quality training and have internal procedures in place, it is important that these are regularly checked to ensure ongoing compliance. We therefore have a system of checks in place.
70. As previously stated, all premises that have a condition attached to their licence that we would consider to be non-standard, will receive a call from me or a member of my compliance team at least once every 6 months. The purpose of this call is to check that the store is aware of the specific condition and is continuing to comply with the requirements. We also visit annually, or more regularly, to conduct physical inspections.

71. Store managers are also required to carry out regular checks to ensure compliance with a number of issues, including staff training. Examples of the checklists used by store managers appear at pages 27 to 40 of the Applicant's Bundle.
72. The Area Managers also carry out additional checks on trading laws and compliance at least once every 6 months. This includes checking store signage, staff training and staff awareness of policies and procedures. Examples of the check lists used by the Area Managers appear at pages 66 to 78 of the Applicant's Bundle.
73. Given the importance of compliance, Lidl also instruct Serve Legal to carry out annual test purchases at all stores throughout the country. This is an independent company who visit stores to ensure compliance with legislation and with internal procedures. I refer to page 79 of the Applicant's Bundle that shows recent results of test purchasing carried out in nearby stores. There is a pass rate of 100%. I believe that this shows how effective the Lidl policies and procedures are. The stores where they are no results have not been trading long enough to be included. In addition, I confirm that there are no results for 2020, give that test purchasing was stopped during COVID-19.

Lidl in the Community

74. At Lidl we believe that it is important for us to be part of the local community. We recognise that this is also important to local residents and businesses.
75. We believe that it is important for Lidl stores to be part of the local community. By having knowledge of the local community and any issues that may arise, Lidl can help to address these.

Member of Retail & Alcohol Standards Group

76. Lidl is a member of this group that focuses on preventing underage drinking, addressing issues with anti-social behaviour as well as promoting high standards among alcohol retailers. The group actively encourages positive relationships between retailers and other stakeholders.

Funder for Community Alcohol Partnerships

77. Lidl also works closely with Community Alcohol Partnerships (CAPs). Details of these schemes appear at pages 80 to 86 of the Applicant's Bundle.
78. CAP has developed into one of the most significant alcohol industry funded initiatives talking underage alcohol misuse.
79. Schemes operated by CAPs encourage local partnerships between retailers, trading standards, police, health services, education providers and other local stakeholders. These partnerships ensure that the schemes are properly targeted at addressing any issues being experienced in the specific area.
80. All participants of the scheme work together to tackle alcohol misuse and related anti-social behaviour
81. Importantly, the schemes evaluate local data (including local crime and ABS statistics, levels of alcohol-related litter, drinking areas, complaints, hospital admissions) and use that data to monitor success.
82. The schemes also encourage education and increased awareness about the law amongst young people and the impact of underage drinking.
83. As part of the CAP schemes, experienced retailers help to mentor other operators and help them put procedures in place to ensure that they operate responsibly and within the law.
84. By way of example, a CAP scheme was implemented at Islington. After 9 months, monitoring found that:-
- a. young people were less likely to attempt to buy alcohol;
 - b. retailers more aware of the law;
 - c. retailers were better equipped to refuse sales of alcohol;
 - d. the test purchase program run at the end of the scheme resulted with no failures;
 - e. there was greater awareness about law relating to proxy sales – with retailers and customers;
 - f. complaints about ASB were reduced
 - g. crime and accident levels were reduced

- h. youth alcohol related accidents requiring the attention of London Ambulance Service were halved

Drinkaware

85. Lidl also works closely with Drinkaware, an independent charity working to reduce alcohol misuse. We provide funding for various campaigns.

Charity support

86. Lidl also regularly support specific charities. We are currently working with the NSPCC and details of our campaign appear at pages 87 to 91 of the Applicant's Bundle of the bundle. Our campaign looks to support the NSPCC to deliver interactive workshops and assemblies in primary schools throughout the country.

Feed it Back

87. In 2017 we launched Feed it Back, a nationwide food surplus redistribution network , which connects all of our stores to good causes in their areas, such as charities and food banks. Not only does this enable each Lidl store to donate edible food surplus at a local level, it also helps to bring our store teams even closer to the communities they serve.

88. Working with our partner Neighbourly, we've directly connected each of our stores up and down the country to local charities, food banks, community cafes and soup kitchens, where our quality surplus is being put to good use every day.

Local events

89. We are also committed to being part of the smaller community projects. For example, we recently attended a local food festival where we provided water and fruit in exchange for a donation to the NSPCC.

90. Whilst I acknowledge that the charitable work does not specifically address a licensing objective, I believe that it shows how Lidl works to become a part of the local community. By becoming part of the local community and supporting local initiatives, we share local values. As previously stated, if litter was an issue in the area we would certainly consider supporting a litter-picking initiative.

91. In conclusion, Lidl have operated in areas where there are significant issues with street drinkers. We have worked with the police, responsible bodies and the local community to address the issues. In the event that the application is successful and the licence is granted, I do not believe that Lidl will add to the issues being experienced in the area. Indeed, I believe that we will make a positive contribution to the area.

I believe that the contents of this statement are true to the best of my knowledge, information and belief.

SIGNED MR RUSSELL JEFFERY:

A handwritten signature in black ink, consisting of several overlapping, fluid strokes that form a cursive, somewhat abstract representation of the name.

DATED: 01 July 2020

This page is intentionally left blank

APPLICATION FOR A NEW PREMISES LICENCE
BY LIDL GREAT BRITAIN LIMITED

FOR A PREMISES LOCATED AT
MINAVIL HOUSE, EALING ROAD, WEMBLEY HA0 4EL

THE LONDON BOROUGH OF BRENT

INDEX TO APPLICANT'S BUNDLE

Email correspondence with Council and Police	13.05.2020	1 - 5
Police representation	11.06.2020	6 - 7
Licensing Inspector representation	16.06.2020	8 – 18
Email correspondence with police	15.06.2020	19 – 22
Email correspondence to Licensing Inspector	18.06.2020	23
Photos of area (2017 – 2019)		24 – 26
Store Manager Checklist		27 – 40
Photo of beer/ lager/ cider display		40b
Police representation re Shepherd Bush application	27.07.2017	41 – 45
Email correspondence with police re Shepherd Bush store	06.12.2018	46 – 47
Training documentation		48 – 63
Store Signage		64 – 65
Area Manager Checklist		66 – 78
Serve Legal Test Purchase results	2016 – 2019	79
Community Alcohol Partnership information		80 – 86
Lidl supporting NSPCC		87 - 91



RE: Application for a New Premises Licence
NWMailbox.LicensingBrent to: licensing
Sent by: **<DAMIEN.J.Smith@met.police.uk>**

13/05/2020 11:04

Perfect.

Your development will certainly be better than the warehouses and college that used to be on that site,

Kind regards

Damien Smith 253NW

From: licensing@lidl.co.uk <licensing@lidl.co.uk>
Sent: 13 May 2020 10:50
To: NW Mailbox - Licensing Brent <NWMailbox.LicensingBrent@met.police.uk>
Subject: RE: Application for a New Premises Licence

Thanks Damien

Just to allay any initial concerns you may have, I can confirm that we are experienced in running stores that are within a cumulative impact zones and look forward to dealing with you on this application to reach mutually agreeable conditions.

We are more than happy to submit the application with our standard conditions and liaise with you throughout the consultation period to reach an agreement regarding conditions.

Kind regards

Beckie Bough
Licensing Manager

[T] + 44 (0)117 428 0315

[E] licensing@lidl.co.uk

[A] Licensing, Lidl Distribution Centre, Palmer Avenue, Central Park, Severn Beach, BS35 4DF

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From: <NWMailbox.LicensingBrent@met.police.uk>
To: <licensing@lidl.co.uk>
Date: 13/05/2020 09:44
Subject: RE: Application for a New Premises Licence
Sent by: <DAMIEN.J.Smith@met.police.uk>



Good Morning,

Please accept my apologies if you are experiencing difficulties with the telephone number. Currently licensing officers are being deployed in other portfolios and this has resulted in a limited service we can provide.

That said with any new premises licence applications that fall within any of the Brent CIZs the police will submit representations and anticipate the application going to a hearing.

Once we receive your actual application we will be better placed to liaise with you in relation to any proposed conditions and our rationale.

Please can you submit any further enquiries or application via nwmailbox.licensingbrent@met.police.uk

This mailbox is managed remotely and will afford the best line of communication,

Kind regards

Damien Smith 253NW



Partnership & Prevention

Harrow Police Station, 74 Northolt Road, HA2 0DN

From: licensing@lidl.co.uk <licensing@lidl.co.uk>
Sent: 12 May 2020 16:46
To: Licensing - QK <Licensing-QK@met.police.uk>
Cc: NW Mailbox - Licensing Brent <NWMailbox.LicensingBrent@met.police.uk>
Subject: Application for a New Premises Licence

Dear Sir or Madam

Application for a Premises Licence
Lidl, Minavil House, Ealing Road, Alperton

I understand from the Brent Council Licensing Policy that Ealing Road is within a CIZ, I have tried to call you but the number is incorrect.

Please could you contact me to discuss the possibilities of a licence at this store.

Many thanks

Beckie Bough
Licensing Manager

[T] + 44 (0)117 428 0315

[E] licensing@lidl.co.uk

[A] Licensing, Lidl Distribution Centre, Palmer Avenue, Central Park, Severn Beach, BS35 4DF

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Lidl Great Britain Limited

Registered Office: 19 Worple Road, London, SW19 4JS,

Registered in England & Wales No.02816429;

tel: 0800 977 7766 web: www.lidl.co.uk

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RE: Application for a New Premises Licence - Alperton
Business Licence to: licensing@lidl.co.uk

13/05/2020 09:21

Good morning,

Thank you for your email. I can confirm Ealing Road falls within a CIZ Area.

The Police have received the email you sent and unfortunately they will not provide any pre-consultation advice.

Please note the presumption is that the application will be refused unless you can satisfactorily evidence that the application will not negatively impact on the licensing objectives. If the application is for both 'on' and 'off' sales you have the option to amend the application to remove the 'off' sales.

At this point, you can continue to proceed with the application which will be determined by the licensing Sub Committee or you have the opportunity to withdraw it as it is unlikely to be granted unless there is sufficient evidence that the application can meet the licensing objectives.

We are accepting email application submissions with payment to be made over the phone.

Kind Regards,

Vanesha Haulkhory
Licensing Support Officer
Regulatory Services
Brent Council

(020) 8937 5179

www.brent.gov.uk
@Brent_Council

From: licensing@lidl.co.uk <licensing@lidl.co.uk>
Sent: 12 May 2020 16:44
To: Business Licence <business.licence@brent.gov.uk>
Subject: Application for a New Premises Licence - Alperton

Dear Sir or Madam

Application for a Premises Licence
Lidl, Minavil House, Ealing Road, Alperton

I am required to apply for a new premises licence for the above store. I understand from your website that the area is within a CIZ - please can you confirm that I am correct?

I would be grateful if you could provide me with a contact name and number for the police licensing officer so that I can discuss the application before we submit anything. In addition, do you have any thoughts on a new application for this area?

As we are not able to submit the application on GOV.UK, please can you confirm you would be happy to receive the application on email and we can pay over the phone?

I look forward to hearing from you.

Kind regards

Beckie Bough
Licensing Manager

[T] + 44 (0)117 428 0315

[E] licensing@lidl.co.uk

[A] Licensing, Lidl Distribution Centre, Palmer Avenue, Central Park, Severn Beach, BS35 4DF

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>> Viruses:



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POLICE**

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TERRITORIAL POLICING

Brent Police Licensing Unit

*Brent Civic Centre
Engineers Way
Wembley
Middlesex
HA9 0FJ*

Your ref: 19059

Our ref: 2965NW/192/20

**Brent Borough Licensing
NW CU**

*South Harrow Police Station
74 Northolt Road
South Harrow
HA2 0DN*

Email:

Gary.L.R.Norton@met.police.uk

Web: www.met.police.uk

Date: 11/06/2020

Police representations to the premises licence application for 'Lidl, Minavil House, Ealing Road, Wembley, HA0 4EL'.

I certify that I have considered the application shown above and I wish to make representations that the likely effect of the grant of the application is detrimental to the Council's Licensing Objectives for the reasons indicated below.

Officer: PC Gary Norton 2965NW

An officer of the Metropolitan Police, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

An application has been made to apply for a premises licence under section 17 of the Licensing Act 2003.

The Police representations are primarily concerned with all four licensing objectives:

Prevention of Crime & Disorder; Prevention of Public Nuisance; Public Safety &
The Protection of Children from Harm.

The premises site is within the Cumulative Impact Zone (CIZ), areas that have had repeated issues that undermine the licensing objectives, despite numerous conditions and action taken to reduce these problems. Therefore, as stated in Brent Councils guidance, "the presumption is that the application will be refused, unless the applicant can satisfactorily evidence that their application or variation will not negatively impact on the licensing objectives."

The application states a number of standard conditions in attempting to adhere to the licensing objectives, but not enough in my opinion to suggest this would mitigate the additional licensing issues in an area already saturated with premises offering alcohol sales.

However, a business renowned for its low cost quality products selling alcohol at 0700hrs in the morning does nothing to reassure me that anything other than more licensing concerns will result.

Therefore, I oppose the premises license application.

Yours Sincerely,

PC Gary Norton 2965NW
Barnet/Brent/Harrow Licensing
NorthWest Partnership & Prevention

Gary.L.R.Norton@met.police.uk



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Brent Civic Centre
Engineers Way
Wembley
Middlesex HA9 0FJ

EMAIL susana.figueiredo@brent.gov.uk

WEB www.brent.gov.uk

Lidl Great Britain Limited
Minavil House
Ealing Road
Alperton
HA0 4EL

16 June 2020

Dear Sir/Madam,

Licensing Representation to the Initial Application for the Premises Licence at Lidl, Minavil House, Ealing Road, Alperton, HA0 4EL

I certify that I have considered the application shown above and I wish to make a representation that the likely effect of the grant of the application is detrimental to the Licensing Objectives for the reasons indicated below.

An officer of the Licensing Authority, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

The application has been made for a new premises licence under section 17 of the Act.

The Licensing Authority representations are primarily concerned with the four licensing objectives;

- the prevention of crime and disorder;
- public safety;
- the prevention of public nuisance; and
- the protection of children from harm.

Cumulative Impact Zone (CIZ)

The Council's current Licensing Policy came into effect in January 2020. Crime and complaints assessments in 2015, did not identify any requirement for a CIZs. However, since 2016 there has been a significant and notable increase in alcohol related crime and anti-social behaviour which is having an adverse impact in some areas and neighbourhoods generating complaints from residents, councillors and the Police. This is undermining the licensing objectives and also has potential to undermine the vitality of Brent's town centres.

Wembley Central which includes Ealing Road has been identified as one of ten Cumulative Impact Zones (CIZs) in Brent, where the authorising of further licences may undermine the promotion of the licensing objectives.

The Statement of Licensing Policy states: -

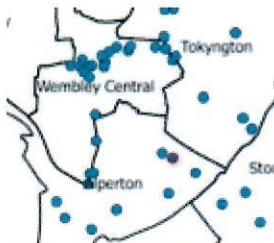
'Ealing Road

There are low level anti-social behaviour issues related to street drinking such as urination, defaecation etc. in this area. It is one of the areas where highest number of warning letters and fixed penalty notices have been issued to street drinkers. Further evidence has been provided by residents in the form of petition received during one of the licensing hearings. Therefore, it is proposed that a CIZ be introduced for off-licences on Ealing Road from the junction of High Road Wembley up to the junction of Bridgewater Road. The CIZ area includes Atlip Road, Mount Pleasant Road up to the junction of Orchard Close, Montrose crescent, Union Road and Coronet Parade'.

Data captured from various sources including alcohol related police and ambulance call outs has been mapped and shown sufficient evidence to implement CIZs in the specified area. In particular crime data and evidence shows a correlation between concentrations of off-licences and alcohol related anti-social behaviour, particularly that associated with street drinking.

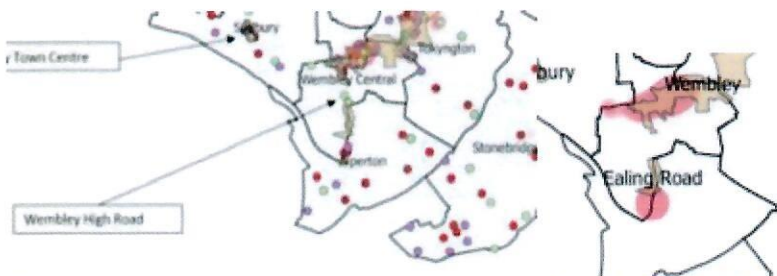
Street Drinking Hotspots

There are relatively few calls to police specifically about street drinking. This may be because they are recorded as other ASB types such as littering or noise. Between 01/06/2017 and 31/05/2018, there were only 53 calls to police. The following year, there were 142. This represents an increase of 168%. Part of this increase may be attributed to callers being aware of the borough wide PSPO on drinking in public which came into effect in October 2017.



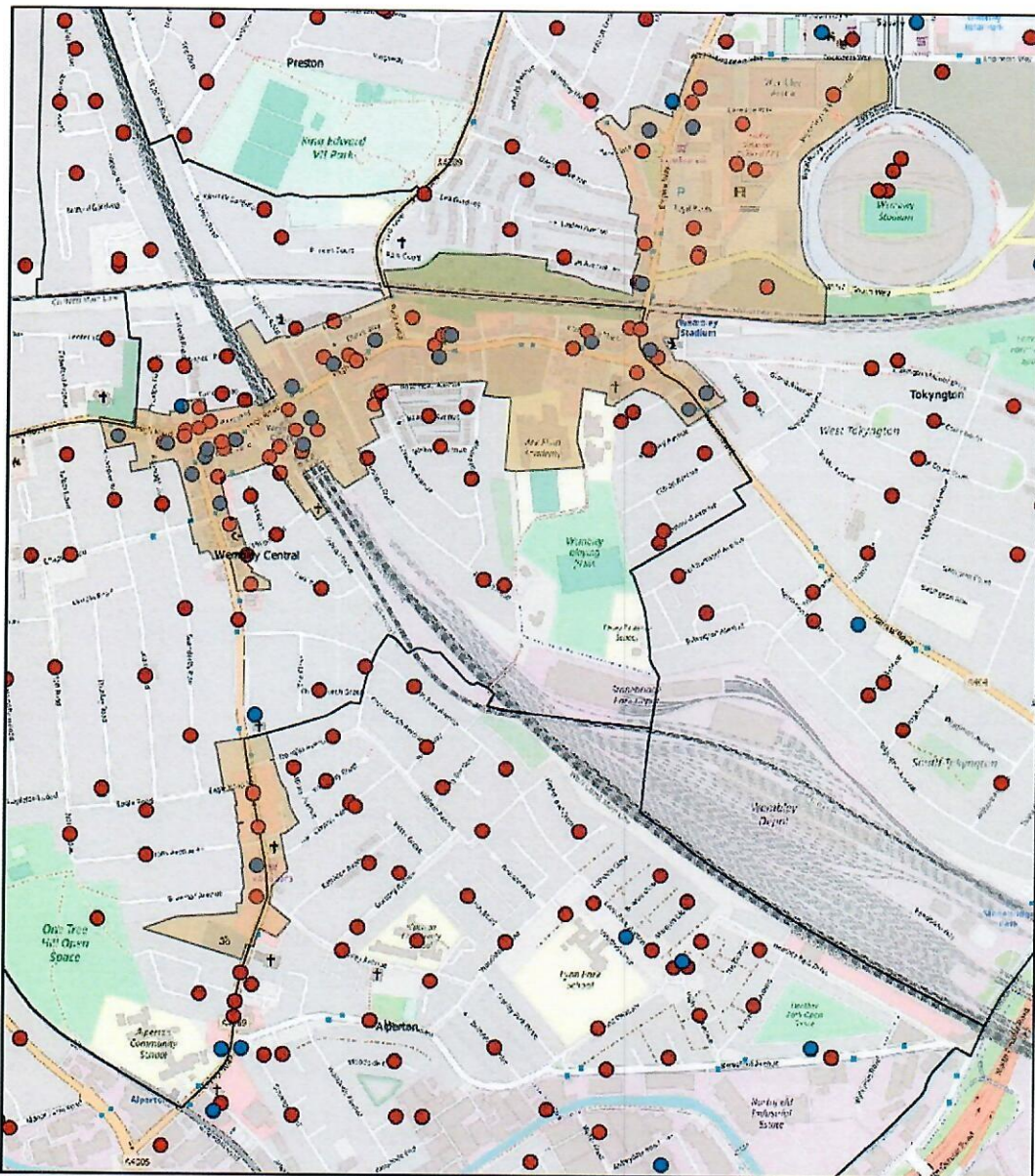
Calls to police specifically related to street drinking between 01/06/2017 and 31/05/2019

Hotspots in Brent in Ambulance and Police alcohol flagged call out data

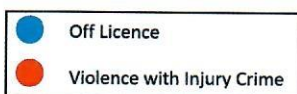


Alcohol-related ambulance and Police calls between 01/06/2017 to 31/05/2019

Hotspot of Violence with Injury Crimes

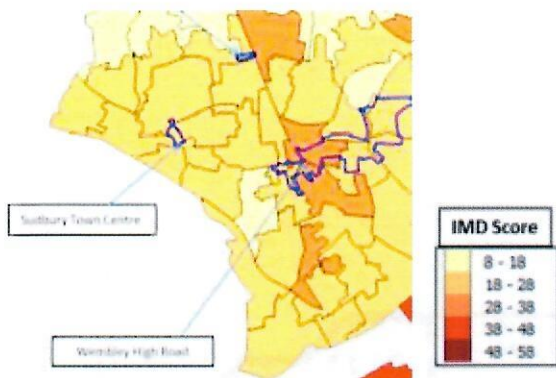


All violence with injury crimes and offences in Wembley (01/06/2017 and 31/05/2019)



Brent Index of Multiple Deprivation (IMD) score 2015 by Lower Super Output Areas

The Index of Multiple is made up of income deprivation, employment deprivation, education, skills and training deprivation, health deprivation and disability, crime, barriers to housing services and living environment.



Brent Index of Multiple Deprivation (IMD) score 2015 by Lower Super Output Areas

The purpose of the CIZ in Wembley Central and Ealing Road, is to address the issues mentioned above.

Evidencing the premises as being located in the CIZ

I am aware that the applicant questioned whether this premises fell within a CIZ because of its location. Below is the information taken from the Licensing Policy which confirms that the application for this off-licence does in fact fall within the CIZ.

'Any premises that are physically located, whereby any part of a building faces onto any of the above main roads and although the address does not form part of the above named road, it will be included in the CIZ. For e.g. a premises building that is positioned on the corner of Ealing Road and Braemar Avenue but where the address is Braemar Avenue, this premises will be included in the CIZ'.



In this case the building is located on Ealing Road and although it is unclear from the premises plan whether the entrance faces onto the section of Ealing Road that is included in the CIZ or not, the actual building falls within the CIZ.

where the proposed premises (marked in blue) is located in relation to where street drinking issues took place (marked in yellow). A sea of empty beer cans were frequently left behind a sectioned off brick wall shown in the photographs further below.

The proposed application is for the building marked near 'HG' in the photograph below, which shows where street drinkers used to frequent.



Key:

Location where street drinkers were known to drink ●

Proposed off licence ●



Ealing Road – Photograph taken 16th November 2017 @ 10.30am



Ealing Road – Photograph taken 16th November 2017 @ 10.30am



Ealing Road – Photograph taken 16th November 2017 @ 10.30am

As a result of an increase in complaints and enforcement action, the street drinkers no longer frequent this area. This however has not resolved the problem, but instead moved it to another location. The local Anti-Social Behaviour officer has advised that the street drinkers have now

moved off the main thorough-fare onto the end of Atlip Road, where they drink on top of and underneath the canal bridge.

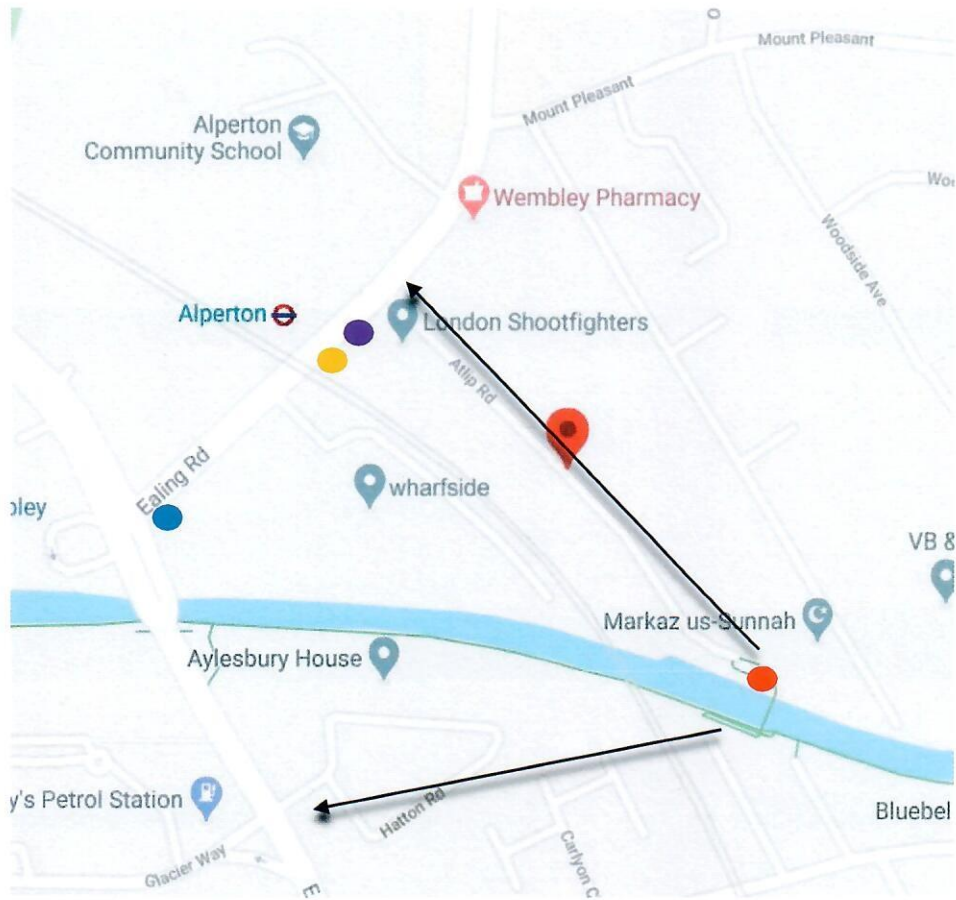
The street drinkers then use this bridge to cross over back down the side roads and then onto Ealing Road or go back up Atlip Road to return to the other side of Ealing Road, creating a square like area where the problem persists.



Atlip Road - Canal Bridge where street drinkers frequent



Atlip Road - Canal Bridge where street drinkers frequent



Key:

Existing off licences

Proposed off licence

Where street drinkers used to frequent

Where street drinkers currently frequent

Direction street drinkers walk to get back onto Ealing Road

Public Space Protection Order (PSPO)

The entire Borough of Brent is subject to a Public Space Protection Order for street drinking and therefore it is an offence to drink alcohol in any public place.

If a police officer reasonably believes that a person is, or has been, consuming intoxicating liquor within these areas, the officer may require the person concerned:

- not to consume in that place anything which is, or which the officer reasonably believes to be, intoxicating liquor
- to surrender anything in his/her possession which is, or which the officer reasonably believes to be, intoxicating liquor or a container for such liquor (other than a sealed container)
- An officer may dispose of anything surrendered to him/her as above.
- Issue fixed penalty notices on offenders
- Prosecute persistent offenders

However, in reality there are limited police officer resources, which in practice would prevent the above from being enforced. This therefore places a greater emphasis on the responsibility of those premises that are selling alcohol for consumption off the premises. It is clear that if off licences did not exist, the number of street drinkers would decline.

Therefore simply selling alcohol to customers who once off the premises, are no longer the responsibility of the licence holder, the Designated Premises Supervisor (DPS) and/or members of staff is no longer a viable option.

Linking Street Drinkers to Off-Licences

It is increasingly difficult to link issues with off-licences who serve street drinkers. Street drinkers are reluctant to give up information on where they have purchased their alcohol so as not to alert enforcement officers.

In the case of the locality of this premises, it is clear that street drinkers are happy to walk some distance to ensure they can drink without being seen. It can therefore be difficult to know where street drinkers have purchased alcohol when they no longer stay close to the premises where they have purchased the alcohol.

Historically street drinkers were also obvious in appearance. This is no longer the case, making it difficult for check-out staff to differentiate, therefore creating a pressure on them when selling alcohol.

Premises Licence Application

Operational Plan, Local Research & Conditions

The application which proposes a number of conditions, does not appear to consider customers once they leave the premises.

Simply listing a number of conditions without any type of substantive operational plan for example, appears inadequate. The Licensing Authority would expect to see information on how the business plans to ensure that their particular premises will go above and beyond in promoting the licensing objectives in an area located within a CIZ.

There has been no indication that the premises has done any research on issues such as street drinking in the immediate area and presented the outcome of those findings with the application. Even if it is the case that the street drinkers who drink on Atlip Road weren't discovered during such research, it would go a long way in showing that the premises had attempted to understand the local issues.

This would go some way in reassuring the Licensing Authority that the business has tried to consider whether the impact of adding an additional off licence would in fact impact the area before signing a lease (an assumption is made here that this has already taken place) to add a further supermarket to this area.

Safeguarding the Local Area

The Statement of Licensing Policy lists considerations to be made when applying for a new premises licence, particularly those considerations relating to street drinking.

However, the conditions that are mentioned in the application fail to address the likes of such things outside of the premises that could be directly linked back to the premises. This includes items such as the clearing up of litter which may be left outside the premises by customers, the labelling of alcohol with the premises name in order to link street drinkers back to the premises or measures to discourage street drinkers from loitering outside the premises.

The application also suggests an alcohol content of up to 6.5%, despite Brent's pool of model conditions setting a suggested limit of 6%. Although the applicant would not necessarily know that a suggested limit exists, they could have made enquiries prior to making an application.

Although 6.5% is not the same as some of the higher strength alcohol that exists, Brent Council's Statement of Licensing Policy makes it clear that a voluntary offering of a ban on high strength alcohol sales does not necessarily address the requirements under a Cumulative Impact Zone.

Further, there is no definition of 'speciality/artisan' when referring to beer, lager or cider and therefore it would be impossible to enforce this. A number of beer suppliers have for example included the word 'premium' on their products in order to get around local authority conditions.

The application proposes that alcohol is sold from 07.00hrs which again does not give the Licensing Authority any reassurance that the premises has taken any of the local issues into consideration.

Summary

The Statement of Licensing Policy states that any licence application in a CIZ area will need to demonstrate with evidence that its operation will not add to any cumulative impacts that the CIZ is seeking to address. Further, new applicants and those applying for variations would be required to demonstrate how their premises will not contribute to street drinking in those areas.

The effect of adopting a CIZ is to "create a rebuttable presumption" that applications for licences which are likely to add to the existing cumulative impact will normally be refused (or subject to certain limitations) unless the applicant can demonstrate that there will be no negative cumulative impact on the licensing objectives.

Other than the list of proposed conditions, the application and operating schedule fails to demonstrate that a grant will not lead to a negative cumulative impact on one or more of the licensing objectives and to the contrary add to the issues of an existing saturated area.

It is on this basis, that the Licensing Authority ask that the application for a new premises licence is refused by the Licensing Sub-Committee. Adding conditions to a premises licence, in the Licensing Authority's opinion is not adequate when the application does not demonstrate what is being put in place in order to avoid further cumulative impact. Adding an off licence to the immediate area, will no doubt be detrimental to the local area.

Yours faithfully



Susana Figueiredo
Licensing Inspector
Regulatory Services

Amanda Pillinger

From: licensing@lidl.co.uk
Sent: 16 June 2020 16:47
To: Amanda Pillinger
Subject: Fw: Lidl Ealing Road Reps 12 06 2020

Amanda

This was another email from the police, apologies i though that was in the other email chain.

Beckie Bough
Licensing Manager

[T] + 44 (0)117 428 0315
[E] licensing@lidl.co.uk
[A] Licensing, Lidl Distribution Centre, Palmer Avenue, Central Park, Severn Beach, BS35 4DF

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----- Forwarded by Licensing/WH460AVO/GB/LIDL on 16/06/2020 16:46 -----

From: <Gary.L.R.Norton@met.police.uk>
To: <licensing@lidl.co.uk>
Date: 15/06/2020 15:06
Subject: RE: Lidl Ealing Road Reps 12 06 2020

Hi Becky,

The CIZ in that area is quite new and yours would be one of the first applications to "test the waters" so to speak.

I am reading through the guidance I have found regarding the CIZ guidelines to get a broader picture of what is expected. Obviously, we operate independently from the Council, although certain areas do cause concern to both the Council and the Police. The implementation of the CIZ is no small matter and was based upon the long term issues in the area.

I will get back you tomorrow after digesting the Councils concerns and policies around these CIZ applications, as they are issues of common ground.

PC Gary Norton 2965NW
Barnet/Brent/Harrow Licensing
NorthWest Partnership & Prevention

Gary.L.R.Norton@met.police.uk



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From:licensing@lidl.co.uk <licensing@lidl.co.uk>
Sent: 12 June 2020 17:29
To: Norton Gary L.R - NW-CU <Gary.L.R.Norton@met.police.uk>
Cc: business.licence@brent.gov.uk
Subject: RE: Lidl Ealing Road Reps 12 06 2020

Hi Gary

I can confirm that the conditions offered in this application were considered carefully and they are not what we would normally offer as standard. It was taken into consideration that the store was within a CIZ when submitting the application.

I contacted the police prior to submission and dealt with your colleague, Damian Smith. He advised that once the application was received the police would be able to liaise with us regarding any additional proposed conditions they felt necessary.

I have received no representations to the application to date.

Kind regards

Beckie Bough
Licensing Manager

[T] + 44 (0)117 428 0315

[E] licensing@lidl.co.uk

[A] Licensing, Lidl Distribution Centre, Palmer Avenue, Central Park, Severn Beach, BS35 4DF

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From: <Gary.L.R.Norton@met.police.uk>
To: <licensing@lidl.co.uk>
Cc: <business.licence@brent.gov.uk>
Date: 12/06/2020 17:13
Subject: RE: Lidl Ealing Road Reps 12 06 2020

Dear Becky,

I appreciate your prompt reply. I think the major sticking point at the moment is what Lidl can do to go beyond the usual set of conditions given this area is now deemed a CIZ.

I would respectfully ask them to put back the starting time that sales of alcohol could take place, as the area has a pre-existing street drinking issue we are trying to eradicate; there are local schools in the area and the safety of the children to consider and I would suggest 09:00hrs.

I am not sure how the Council themselves will deal with the application as it stands, as this is within the CIZ, which suggests they would reject the application as well. Therefore, it may need to go to a hearing regardless of my representations.

Have you had any representations from the Council as yet?

Kind Regards,

PC Gary Norton 2965NW
Barnet/Brent/Harrow Licensing
NorthWest Partnership & Prevention

Gary.L.R.Norton@met.police.uk



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From: licensing@lidl.co.uk <licensing@lidl.co.uk>

Sent: 12 June 2020 15:15

To: Norton Gary L.R - NW-CU <Gary.L.R.Norton@met.police.uk>

Cc: business.licence@brent.gov.uk; Linda.Legister@brent.gov.uk; Susana.Figueiredo@brent.gov.uk

Subject: Re: Lidl Ealing Road Reps 12 06 2020

Sir

Thank you for your email.

Would you be happy to confirm any additional conditions that you would be looking for so that we could look to reach agreement without the need for a hearing? I note from your representation you only mention the hours.

I look forward to dealing with you further on this.

Kind regards

Beckie Bough
Licensing Manager

[T] + 44 (0)117 428 0315

[E] licensing@lidl.co.uk

[A] Licensing, Lidl Distribution Centre, Palmer Avenue, Central Park, Severn Beach, BS35 4DF

Follow us on Facebook, Twitter and Instagram

For more information visit www.lidl.co.uk

From: <Gary.L.R.Norton@met.police.uk>

To: <business.licence@brent.gov.uk>

Cc: <Linda.Legister@brent.gov.uk>, <Susana.Figueiredo@brent.gov.uk>, <licensing@lidl.co.uk>

Date: 12/06/2020 15:01

Subject: Lidl Ealing Road Reps 12 06 2020

Dear All,

Please find my representations regarding the Premises Licence application for a new Lidl store in Ealing Road.

Kind Regards,

PC Gary Norton 2965NW
Barnet/Brent/Harrow Licensing
NorthWest Partnership & Prevention

Gary.L.R.Norton@met.police.uk

Amanda Pillinger

From: Amanda Pillinger
Sent: 18 June 2020 11:13
To: 'Susana.Figueiredo@brent.gov.uk'
Subject: Lidl, Ealing Road

Dear Ms Figueiredo

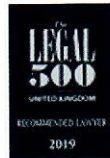
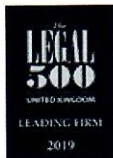
I am instructed by Lidl in relation to the application for a new premises licence at Ealing Road. I have been sent a copy of your representation and I would be grateful if you would contact me on 07764 764806 so that we can discuss your concerns.

I look forward to hearing from you.

Kind regards

Amanda Pillinger
Pillinger & Associates Solicitors

E: amanda@pillingerandassociates.co.uk
T: 01789 336957 / 07764 764806
W: www.pillingerandassociates.co.uk



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2017



Location of
discarded alcohol
cans, as shown in
Licensing
Authority's
Representation

Lidl Site – many
incidences of
squattling (a
problem site)



2018

Location of
discarded alcohol
cans, as shown in
Licensing
Authority's
Representation
—slightly improved
in this photo but
still evident.

Lidl Site – now
hoarded, but still
problems with
squatting.



Page 44



2019



Location of discarded alcohol cans, as shown in Licensing Authority's Representation –now completely clear.

Lidl Site – now under development. No squatters possible. A big improvement to the environment of large section of central Alpertown.



Trading Compliance Checks* **Externals and Front of the Store** - Completed at

- ☐ General safety and cleanliness checks
- ☐ Baskets stacked to correct height
- ☐ Lighting in good working order
- ☐ External merchandising procedures followed
- ☐ Fire exits and routes clear

SIGN

Bakery including BUF(S)

- ☐ BUF organised, tidy and safe (load lines adhered to)
- ☐ BUF between -18°C and -32°C
- ☐ BUF floor free from trip hazards and no ice build up on floor or fan
- ☐ Antibacterial hand wash and drying facilities available
- ☐ Cleaning materials and equipment available

SIGN

Shopfloor

- ☐ Shopfloor clean and safe
- ☐ Shopfloor merchandising / pallets stable and safe
- ☐ Rotation and date checks completed

SIGN

Temperature Checks

- ☐ Convenience Chiller between +6°C and +11°C
- ☐ All Chiller cabinets between 0°C and +7°C
- ☐ M&P and Fish cabinets between 0°C and +4°C
- ☐ Limited Offer M&P in CPB (chilled promotional bay) between 0°C and +4°C
- ☐ Freezer cabinets between -18°C and -32°C
- ☐ Food products stored correctly (load lines etc.)

SIGN

Warehouse

- ☐ Warehouse clean and safe
- ☐ ABP Freezer clean and between -18°C and -32°C
- ☐ BUC between 0°C and +4°C
- ☐ BUC floor free from trip hazards and no ice build up on floor or fan
- ☐ Cleaning materials stored safely / away from food

SIGN

Office / Welfare Area

- ☐ Office is clean and safe
- ☐ Welfare area is clean and safe

SIGN

General – All Areas

- ☐ Employees following CAYG policy
- ☐ Employees using equipment safely
- ☐ Employees adopting correct manual handling technique
- ☐ Internal lighting in good working order
- ☐ Contractors / SMOs working safely
- ☐ Electrical equipment in good condition
- ☐ No signs of pest activity
- ☐ Combustibles and ignition sources controlled
- ☐ Equipment is safe and in good working order
- ☐ Fire exits and routes clear

SIGN

Haulier Monitoring

- ☐ Wearing correct PPE (safety boots and hi-vis)
- ☐ Hauliers using equipment safely
- ☐ Deliveries and haulier vehicle movements safe
- ☐ Delivery pallets in good condition and stable

SIGN

Fire Alarm

- ☐ Fire exits open / Maglocks release (on nominated day)
- ☐ Fire alarm tested (on nominated day)
- ☐ State callpoint location tested

SIGN

Important reminders for the week**Additional store specific checks**

Passenger lift / Goods lift / Scissor lift / Travellator

EPT / Double Stackers / Racking

Standing Trailers / Sprinkler Systems

Car Park Gates

Emergency Evacuation Chair

Cart Manager

Handwrite additional checks

Handwrite additional checks

SM Print:

SM Signature:

Date:

27

Trading Compliance Checks

Externals and Front of the store - Completed at

☒ General safety and cleanliness checks

SIGN

Bakery including BUF(s)

☐ BUF between -18°C and -32°C

☐ Stock in BUF is stored correctly and safely

SIGN

Shopfloor

☐ Shopfloor clean and safe

☐ Shopfloor merchandising /
pallets stable and safe

SIGN

Temperature Checks

☐ Convenience Chiller between +6°C and +11°C

☐ All Chiller cabinets between 0°C and +7°C

☐ M&P and Fish cabinets between 0°C and +4°C

☐ Limited Offer M&P in CPB (chilled promotional
bay) between 0°C and +4°C

☐ Freezer cabinets between -18°C and -32°C

☐ Food products stored correctly (load lines etc.)

SIGN

Warehouse

☐ Warehouse clean and safe

☐ ABP Freezer clean and between -18°C
and -32°C

☐ BUC between 0°C and +4°C

SIGN

Office / Welfare Area

☐ Office is clean and safe

☐ Welfare area is clean and safe

SIGN

General - All Areas

☐ Employees following CAYG policy

SIGN

General

☐ Contractors / SMOs working safely

SIGN

Haulier Monitoring

☐ Wearing correct PPE (safety boots and hi-vis)

☐ Hauliers using equipment safely

☐ Deliveries and haulier vehicle movements safe

☐ Delivery pallets in good condition and stable

SIGN

Comments

SM Print:

Page 47

SM Signature:

Date:

28

Trading Compliance ChecksExternals and Front of the store - Completed at

- ☐ General safety and cleanliness checks
- ☐ Baskets stacked to correct height
- ☐ Lighting in good working order
- ☐ External merchandising procedures followed
- ☐ Fire exits and routes clear
- ☐ EAS system working correctly
- ☐ Auto door and talking barrier check
- ☐ Disabled bell unobstructed and in working order
- ☐ Till scales checked
- ☐ PIN entry device in good order
- ☐ Trolleys in good working order

SIGN

Bakery

- ☐ BUF organised, tidy and safe (load lines adhered to)
- ☐ BUF between -18°C and -32°C
- ☐ BUF floor free from trip hazards and no ice build up on floor or fan
- ☐ Antibacterial hand wash and drying facilities available
- ☐ Cleaning materials and equipment available
- ☐ All Bakery equipment in good order
- ☐ Running hot and cold water available
- ☐ BUF door handle and alarm in good order
- ☐ All Bakery PPE equipment available

SIGN

Ambient Shopfloor

- ☐ Shopfloor clean and safe
- ☐ Shopfloor merchandising / pallets stable and safe
- ☐ Rotation and date checks completed
- ☐ Nut baskets and lids clean and in good condition

SIGN

Temperature Checks

- ☐ Convenience Chiller between +6°C and +11°C
- ☐ All Chiller cabinets between 0°C and +7°C
- ☐ M&P and Fish cabinets between 0°C and +4°C
- ☐ Limited Offer M&P in CPB (chilled promotional bay) between 0°C and +4°C
- ☐ Freezer cabinets between -18°C and -32°C
- ☐ Food products stored correctly (load lines etc.)

SIGN

Additional store specific checks

Passenger lift / Goods lift / Scissor lift / Travellator

EPT / Double Stackers / Racking

Standing Trailers / Sprinkler Systems

Car Park Gates

Emergency Evacuation Chair

Cart Manager

Handwrite additional checks

Handwrite additional checks

Warehouse

- ☐ Warehouse clean and safe
- ☐ ABP Freezer clean and between -18°C and -32°C
- ☐ BUC between 0°C and +4°C
- ☐ BUC floor free from trips hazards and no ice build up on floor or fan
- ☐ Compactor and baler interlock checks
- ☐ Cleaning materials stored safely / away from food
- ☐ Stepladders / steps in good order
- ☐ Store MPTs free from defects
- ☐ Floor cleaning machine and charger in working order
- ☐ Eye wash available next to PPT charger

SIGN

Office / Welfare Area

- ☐ Office is clean and safe
- ☐ Welfare area is clean and safe
- ☐ Toilets (including customer toilets) clean and safe
- ☐ First Aid Kit (fully stocked) and eye wash available
- ☐ All employees signed the age restricted policy register
- ☐ Fire control panel shows no fault codes
- ☐ Legionella (infrequently used outlets flushes)
- ☐ Pest control recommendations actioned

SIGN

General - All Areas

- ☐ Employees following CAYG policy
- ☐ Employees using equipment safely
- ☐ Employees adopting correct manual handling technique
- ☐ Internal lighting in good working order
- ☐ Contractors / SMOs working safely
- ☐ Electrical equipment in good condition
- ☐ No signs of pest activity
- ☐ Combustibles and ignition sources controlled
- ☐ Fire exits and routes clear
- ☐ Fire extinguishers in good order
- ☐ Fire doors in good condition
- ☐ Emergency lighting tested (Internal and External)
- ☐ PPE available and in good condition
- ☐ Equipment is safe and in good working order

SIGN

Haulier Monitoring

- ☐ Wearing correct PPE (safety boots and hi-vis)
- ☐ Hauliers using equipment safely
- ☐ Deliveries and haulier vehicle movements safe
- ☐ Delivery pallets in good condition and stable

SIGN

Fire Alarm

- ☐ Fire exits open / Maglocks release (on nominated day)
- ☐ Fire alarm tested (on nominated day)
- ☐ State callpoint location tested

SIGN

SM Print:

SM Signature:

Date:

29

Trading Compliance Checks**Cleanliness**

- ☐ Ensure office is clean and safe
- ☐ Welfare area clean and safe
- ☐ Shopfloor clean and safe
- ☐ Warehouse clean and safe
- ☐ Employees following CAYG policy

SIGN

Externals and Front of the store - Completed at

- ☐ General safety and cleanliness checks

SIGN

Bakery

- ☐ BUF between -18°C and -32°C
- ☐ Stock in BUF is stored correctly and safely

SIGN

Ambient Shopfloor

- ☐ Shopfloor clean and safe
- ☐ Shopfloor merchandising / pallets stable and safe

SIGN

Temperature Checks

- ☐ Convenience Chiller between +6°C and +11°C
- ☐ All Chiller cabinets between 0°C and +7°C
- ☐ M&P and Fish cabinets between 0°C and +4°C
- ☐ Limited Offer M&P in CPB (chilled promotional bay) between 0°C and +4°C
- ☐ Freezer cabinets between -18°C and -32°C
- ☐ Food products stored correctly (load lines etc.)

SIGN

Warehouse

- ☐ Warehouse clean and safe
- ☐ ABP Freezer clean and between -18°C and -32°C
- ☐ Backup chiller between 0°C and +4°C

SIGN

Office / Welfare Area

- ☐ Office is clean and safe
- ☐ Welfare area is clean and safe

SIGN

General - All Areas

- ☐ Employees following CAYG policy

SIGN

General

- ☐ Contractors / SMOs working safely

SIGN

Haulier Monitoring

- ☐ Wearing correct PPE (safety boots and hi-vis)
- ☐ Hauliers using equipment safely
- ☐ Deliveries and haulier vehicle movements safe
- ☐ Delivery pallets in good condition and stable

SIGN

Comments

SM Print:

SM Signature:

Date:

Trading Compliance Checks**Externals and Front of the Store** - Completed at

- ☐ General safety and cleanliness checks
- ☐ Baskets stacked to correct height
- ☐ Lighting in good working order
- ☐ External merchandising procedures followed
- ☐ Fire exits and routes clear

SIGN

Bakery

- ☐ BUF organised, tidy and safe (load lines adhered to)
- ☐ BUF between -18°C and -32°C
- ☐ BUF floor free from trip hazards and no ice build up on floor or fan
- ☐ Antibacterial hand wash and drying facilities available
- ☐ Cleaning materials and equipment available

SIGN

Ambient Shopfloor

- ☐ Shopfloor clean and safe
- ☐ Shopfloor merchandising / pallets stable and safe
- ☐ Rotation and date checks completed

SIGN

Temperature Checks

- ☐ Convenience Chiller between +6°C and +11°C
- ☐ All Chiller cabinets between 0°C and +7°C
- ☐ M&P and Fish cabinets between 0°C and +4°C
- ☐ Limited Offer M&P in CPB (chilled promotional bay) between 0°C and +4°C
- ☐ Freezer cabinets between -18°C and -32°C
- ☐ Food products stored correctly (load lines etc.)

SIGN

Warehouse

- ☐ Warehouse clean and safe
- ☐ ABP Freezer clean and between -18°C and -32°C
- ☐ BUC between 0°C and +4°C
- ☐ BUC floor free from trip hazards and no ice build up on floor or fan
- ☐ Cleaning materials stored safely / away from food

SIGN

Office / Welfare Area

- ☐ Office is clean and safe
- ☐ Welfare area is clean and safe

SIGN

General - All Areas

- ☐ Employees following CAYG policy
- ☐ Employees using equipment safely
- ☐ Employees adopting correct manual handling technique
- ☐ Internal lighting in good working order
- ☐ Contractors / SMOs working safely
- ☐ Electrical equipment in good condition
- ☐ No signs of pest activity
- ☐ Combustibles and ignition sources controlled
- ☐ Fire exits and routes clear
- ☐ Equipment is safe and in good working order

SIGN

Haulier Monitoring

- ☐ Wearing correct PPE (safety boots and hi-vis)
- ☐ Hauliers using equipment safely
- ☐ Deliveries and haulier vehicle movements safe
- ☐ Delivery pallets in good condition and stable

SIGN

Fire Alarm

- ☐ Fire exits open / Maglocks release (on nominated day)
- ☐ Fire alarm tested (on nominated day)
- ☐ State callpoint location tested

SIGN

Additional store specific checks

Passenger lift / Goods lift / Scissor lift / Travellator

EPT / Double Stackers / Racking

Standing Trailers / Sprinkler Systems

Car Park Gates

Emergency Evacuation Chair

Cart Manager

Handwrite additional checks

Handwrite additional checks

SM Print:

SM Signature:

Date:

31

Trading Compliance ChecksExternals and Front of the store - Completed at ☐ General safety and cleanliness checks

SIGN

Bakery☐ BUF between -18°C and -32°C

SIGN

Ambient Shopfloor☐ Shopfloor clean and safe☐ Shopfloor merchandising /
pallets stable and safe

SIGN

Temperature Checks☐ Convenience Chiller between +6°C and +11°C☐ All Chiller cabinets between 0°C and +7°C☐ M&P and Fish cabinets between 0°C and +4°C☐ Limited Offer M&P in CPB (chilled promotional
bay) between 0°C and +4°C☐ Freezer cabinets between -18°C and -32°C☐ Food products stored correctly (load lines etc.)

SIGN

Warehouse☐ Warehouse clean and safe☐ ABP Freezer clean and between -18°C
and -32°C☐ BUC between 0°C and +4°C

SIGN

Office / Welfare Area☐ Office is clean and safe☐ Welfare area is clean and safe

SIGN

General - All Areas☐ Employees following CAYG policy

SIGN

General☐ Contractors / SMOs working safely

SIGN

Haulier Monitoring☐ Wearing correct PPE (safety boots and hi-vis)☐ Hauliers using equipment safely☐ Deliveries and haulier vehicle movements safe☐ Delivery pallets in good condition and stable

SIGN

Comments

SM Print:

Page 51

SM Signature:

Date:

32

Trading Compliance Checks**Externals and Front of the Store** - Completed at

- ☐ General safety and cleanliness checks
- ☐ Baskets stacked to correct height
- ☐ Lighting in good working order
- ☐ External merchandising procedures followed
- ☐ Fire exits and routes clear

SIGN

Bakery

- ☐ BUF organised, tidy and safe (load lines adhered to)
- ☐ BUF between -18°C and -32°C
- ☐ BUF floor free from trip hazards and no ice build up on floor or fan
- ☐ Antibacterial hand wash and drying facilities available
- ☐ Cleaning materials and equipment available

SIGN

Ambient Shopfloor

- ☐ Shopfloor clean and safe
- ☐ Shopfloor merchandising / pallets stable and safe
- ☐ Rotation and date checks completed

SIGN

Temperature Checks

- ☐ Convenience Chiller between +6°C and +11°C
- ☐ All Chiller cabinets between 0°C and +7°C
- ☐ M&P and Fish cabinets between 0°C and +4°C
- ☐ Limited Offer M&P in CPB (chilled promotional bay) between 0°C and +4°C
- ☐ Freezer cabinets between -18°C and -32°C
- ☐ Food products stored correctly (load lines etc.)

SIGN

Warehouse

- ☐ Warehouse clean and safe
- ☐ ABP Freezer clean and between -18°C and -32°C
- ☐ BUC between 0°C and +4°C
- ☐ BUC floor free from trip hazards and no ice build up on floor or fan
- ☐ Cleaning materials stored safely / away from food

SIGN

Office / Welfare Area

- ☐ Office is clean and safe
- ☐ Welfare area is clean and safe

SIGN

General - All Areas

- ☐ Employees following CAYG policy
- ☐ Employees using equipment safely
- ☐ Employees adopting correct manual handling technique
- ☐ Internal lighting in good working order
- ☐ Contractors / SMOs working safely
- ☐ Electrical equipment in good condition
- ☐ No signs of pest activity
- ☐ Combustibles and ignition sources controlled
- ☐ Fire exits and routes clear
- ☐ Equipment is safe and in good working order

SIGN

Haulier Monitoring

- ☐ Wearing correct PPE (safety boots and hi-vis)
- ☐ Hauliers using equipment safely
- ☐ Deliveries and haulier vehicle movements safe
- ☐ Delivery pallets in good condition and stable

SIGN

Fire Alarm

- ☐ Fire exits open / Maglocks release (on nominated day)
- ☐ Fire alarm tested (on nominated day)
- ☐ State callpoint location tested

SIGN

Additional store specific checks

Passenger lift / Goods lift / Scissor lift / Travellator

EPT / Double Stackers / Racking

Standing Trailers / Sprinkler Systems

Car Park Gates

Emergency Evacuation Chair

Cart Manager

Handwrite additional checks

Handwrite additional checks

SM Print:

SM Signature:

Date

33

Trading Compliance Checks

Externals and Front of the store - Completed at

☐ General safety and cleanliness checks

SIGN

Bakery

☐ BUF between -18°C and -32°C

SIGN

Ambient Shopfloor

☐ Shopfloor clean and safe

☐ Shopfloor merchandising /
pallets stable and safe

SIGN

Temperature Checks

☐ Convenience Chiller between +6°C and +11°C

☐ All Chiller cabinets between 0°C and +7°C

☐ M&P and Fish cabinets between 0°C and +4°C

☐ Limited Offer M&P in CPB (chilled promotional
bay) between 0°C and +4°C

☐ Freezer cabinets between -18°C and -32°C

☐ Food products stored correctly (load lines etc.)

SIGN

Warehouse

☐ Warehouse clean and safe

☐ ABP Freezer clean and between -18°C
and -32°C

☐ BUC between 0°C and +4°C

SIGN

Office / Welfare Area

☐ Office is clean and safe

☐ Welfare area is clean and safe

SIGN

General – All Areas

☐ Employees following CAYG policy

SIGN

General

☐ Contractors / SMOs working safely

SIGN

Haulier Monitoring

☐ Wearing correct PPE (safety boots and hi-vis)

☐ Hauliers using equipment safely

☐ Deliveries and haulier vehicle movements safe

☐ Delivery pallets in good condition and stable

SIGN

Comments

SM Print:

Page 53

SM Signature:

Date:

34

Trading Compliance Checks**Externals and Front of the Store** - Completed at

- ☐ General safety and cleanliness checks
- ☐ Baskets stacked to correct height
- ☐ Lighting in good working order
- ☐ External merchandising procedures followed
- ☐ Fire exits and routes clear

SIGN

Bakery

- ☐ BUF organised, tidy and safe (load lines adhered to)
- ☐ BUF between -18°C and -32°C
- ☐ BUF floor free from trip hazards and no ice build up on floor or fan
- ☐ Antibacterial hand wash and drying facilities available
- ☐ Cleaning materials and equipment available

SIGN

Ambient Shopfloor

- ☐ Shopfloor clean and safe
- ☐ Shopfloor merchandising / pallets stable and safe
- ☐ Rotation and date checks completed

SIGN

Temperature Checks

- ☐ Convenience Chiller between +6°C and +11°C
- ☐ All Chiller cabinets between 0°C and +7°C
- ☐ M&P and Fish cabinets between 0°C and +4°C
- ☐ Limited Offer M&P in CPB (chilled promotional bay) between 0°C and +4°C
- ☐ Freezer cabinets between -18°C and -32°C
- ☐ Food products stored correctly (load lines etc.)

SIGN

Warehouse

- ☐ Warehouse clean and safe
- ☐ ABP Freezer clean and between -18°C and -32°C
- ☐ BUC between 0°C and +4°C
- ☐ BUC floor free from trip hazards and no ice build up on floor or fan
- ☐ Cleaning materials stored safely / away from food

SIGN

Office / Welfare Area

- ☐ Office is clean and safe
- ☐ Welfare area is clean and safe

SIGN

General - All Areas

- ☐ Employees following CAYG policy
- ☐ Employees using equipment safely
- ☐ Employees adopting correct manual handling technique
- ☐ Internal lighting in good working order
- ☐ Contractors / SMOs working safely
- ☐ Electrical equipment in good condition
- ☐ No signs of pest activity
- ☐ Combustibles and ignition sources controlled
- ☐ Fire exits and routes clear
- ☐ Equipment is safe and in good working order

SIGN

Haulier Monitoring

- ☐ Wearing correct PPE (safety boots and hi-vis)
- ☐ Hauliers using equipment safely
- ☐ Deliveries and haulier vehicle movements safe
- ☐ Delivery pallets in good condition and stable

SIGN

Fire Alarm

- ☐ Fire exits open / Maglocks release (on nominated day)
- ☐ Fire alarm tested (on nominated day)
- ☐ State callpoint location tested

SIGN

Additional store specific checks

Passenger lift / Goods lift / Scissor lift / Travellator

EPT / Double Stackers / Racking

Standing Trailers / Sprinkler Systems

Car Park Gates

Emergency Evacuation Chair

Cart Manager

Handwrite additional checks

Handwrite additional checks

SM Print:

SM Signature:

Date:

35

Trading Compliance Checks

Externals and Front of the store - Completed at

☐ General safety and cleanliness checks

SIGN

Bakery

☐ BUF between -18°C and -32°C

SIGN

Ambient Shopfloor

☐ Shopfloor clean and safe

☐ Shopfloor merchandising /
pallets stable and safe

SIGN

Temperature Checks

☐ Convenience Chiller between +6°C and +11°C

☐ All Chiller cabinets between 0°C and +7°C

☐ M&P and Fish cabinets between 0°C and +4°C

☐ Limited Offer M&P in CPB (chilled promotional
bay) between 0°C and +4°C

☐ Freezer cabinets between -18°C and -32°C

☐ Food products stored correctly (load lines etc.)

SIGN

Warehouse

☐ Warehouse clean and safe

☐ ABP Freezer clean and between -18°C
and -32°C

☐ BUC between 0°C and +4°C

SIGN

Office / Welfare Area

☐ Office is clean and safe

☐ Welfare area is clean and safe

SIGN

General - All Areas

☐ Employees following CAYG policy

SIGN

General

☐ Contractors / SMOs working safely

SIGN

Haulier Monitoring

☐ Wearing correct PPE (safety boots and hi-vis)

☐ Hauliers using equipment safely

☐ Deliveries and haulier vehicle movements safe

☐ Delivery pallets in good condition and stable

SIGN

Comments

SM Print:

Page 55

SM Signature:

Date:

36

Trading Compliance Checks**Externals and Front of the Store** - Completed at

- ☐ General safety and cleanliness checks
- ☐ Baskets stacked to correct height
- ☐ Lighting in good working order
- ☐ External merchandising procedures followed
- ☐ Fire exits and routes clear

SIGN

Bakery

- ☐ BUF organised, tidy and safe (load lines adhered to)
- ☐ BUF between -18°C and -32°C
- ☐ BUF floor free from trip hazards and no ice build up on floor or fan
- ☐ Antibacterial hand wash and drying facilities available
- ☐ Cleaning materials and equipment available

SIGN

Ambient Shopfloor

- ☐ Shopfloor clean and safe
- ☐ Shopfloor merchandising / pallets stable and safe
- ☐ Rotation and date checks completed

SIGN

Temperature Checks

- ☐ Convenience Chiller between +6°C and +11°C
- ☐ All Chiller cabinets between 0°C and +7°C
- ☐ M&P and Fish cabinets between 0°C and +4°C
- ☐ Limited Offer M&P in CPB (chilled promotional bay) between 0°C and +4°C
- ☐ Freezer cabinets between -18°C and -32°C
- ☐ Food products stored correctly (load lines etc.)

SIGN

Warehouse

- ☐ Warehouse clean and safe
- ☐ ABP Freezer clean and between -18°C and -32°C
- ☐ BUC between 0°C and +4°C
- ☐ BUC floor free from trip hazards and no ice build up on floor or fan
- ☐ Cleaning materials stored safely / away from food

SIGN

Office / Welfare Area

- ☐ Office is clean and safe
- ☐ Welfare area is clean and safe

SIGN

General – All Areas

- ☐ Employees following CAYG policy
- ☐ Employees using equipment safely
- ☐ Employees adopting correct manual handling technique
- ☐ Internal lighting in good working order
- ☐ Contractors / SMOs working safely
- ☐ Electrical equipment in good condition
- ☐ No signs of pest activity
- ☐ Combustibles and ignition sources controlled
- ☐ Fire exits and routes clear
- ☐ Equipment is safe and in good working order

SIGN

Haulier Monitoring

- ☐ Wearing correct PPE (safety boots and hi-vis)
- ☐ Hauliers using equipment safely
- ☐ Deliveries and haulier vehicle movements safe
- ☐ Delivery pallets in good condition and stable

SIGN

Fire Alarm

- ☐ Fire exits open / Maglocks release (on nominated day)
- ☐ Fire alarm tested (on nominated day)
- ☐ State callpoint location tested

SIGN

Additional store specific checks

Passenger lift / Goods lift / Scissor lift / Travellator

EPT / Double Stackers / Racking

Standing Trailers / Sprinkler Systems

Car Park Gates

Emergency Evacuation Chair

Cart Manager

Handwrite additional checks

Handwrite additional checks

SM Print:

SM Signature:

Date:

37

Trading Compliance Checks

Externals and Front of the store - Completed at ☐ General safety and cleanliness checks

SIGN

Bakery

☐ BUF between -18°C and -32°C

SIGN

Ambient Shopfloor

☐ Shopfloor clean and safe☐ Shopfloor merchandising /
pallets stable and safe

SIGN

Temperature Checks

☐ Convenience Chiller between +6°C and +11°C☐ All Chiller cabinets between 0°C and +7°C☐ M&P and Fish cabinets between 0°C and +4°C☐ Limited Offer M&P in CPB (chilled promotional
bay) between 0°C and +4°C☐ Freezer cabinets between -18°C and -32°C☐ Food products stored correctly (load lines etc.)

SIGN

Warehouse

☐ Warehouse clean and safe☐ ABP Freezer clean and between -18°C
and -32°C☐ BUC between 0°C and +4°C

SIGN

Office / Welfare Area

☐ Office is clean and safe☐ Welfare area is clean and safe

SIGN

General - All Areas

☐ Employees following CAYG policy

SIGN

General

☐ Contractors / SMOs working safely

SIGN

Haulier Monitoring

☐ Wearing correct PPE (safety boots and hi-vis)☐ Hauliers using equipment safely☐ Deliveries and haulier vehicle movements safe☐ Delivery pallets in good condition and stable

SIGN

Comments

SM Print:

Page 57

SM Signature:

Date:

38

Trading Compliance Checks**Externals and Front of the Store** - Completed at

- ☐ General safety and cleanliness checks
- ☐ Baskets stacked to correct height
- ☐ Lighting in good working order
- ☐ External merchandising procedures followed
- ☐ Fire exits and routes clear

SIGN

Bakery

- ☐ BUF organised, tidy and safe (load lines adhered to)
- ☐ BUF between -18°C and -32°C
- ☐ BUF floor free from trip hazards and no ice build up on floor or fan
- ☐ Antibacterial hand wash and drying facilities available
- ☐ Cleaning materials and equipment available

SIGN

Ambient Shopfloor

- ☐ Shopfloor clean and safe
- ☐ Shopfloor merchandising / pallets stable and safe
- ☐ Rotation and date checks completed

SIGN

Temperature Checks

- ☐ Convenience Chiller between +6°C and +11°C
- ☐ All Chiller cabinets between 0°C and +7°C
- ☐ M&P and Fish cabinets between 0°C and +4°C
- ☐ Limited Offer M&P in CPB (chilled promotional bay) between 0°C and +4°C
- ☐ Freezer cabinets between -18°C and -32°C
- ☐ Food products stored correctly (load lines etc.)

SIGN

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- ☐ Warehouse clean and safe
- ☐ ABP Freezer clean and between -18°C and -32°C
- ☐ BUC between 0°C and +4°C
- ☐ BUC floor free from trip hazards and no ice build up on floor or fan
- ☐ Cleaning materials stored safely / away from food

SIGN

Office / Welfare Area

- ☐ Office is clean and safe
- ☐ Welfare area is clean and safe
- ☐ Weekly cleaning schedule completed

SIGN

General - All Areas

- ☐ Employees following CAYG policy
- ☐ Employees using equipment safely
- ☐ Employees adopting correct manual handling technique
- ☐ Internal lighting in good working order
- ☐ Contractors / SMOs working safely
- ☐ Electrical equipment in good condition
- ☐ No signs of pest activity
- ☐ Combustibles and ignition sources controlled
- ☐ Fire exits and routes clear
- ☐ Equipment is safe and in good working order

SIGN

Haulier Monitoring

- ☐ Wearing correct PPE (safety boots and hi-vis)
- ☐ Hauliers using equipment safely
- ☐ Deliveries and haulier vehicle movements safe
- ☐ Delivery pallets in good condition and stable

SIGN

Fire Alarm

- ☐ Fire exits open / Maglocks release (on nominated day)
- ☐ Fire alarm tested (on nominated day)
- ☐ State callpoint location tested

SIGN

Additional store specific checks

Passenger lift / Goods lift / Scissor lift / Travellator

EPT / Double Stackers / Racking

Standing Trailers / Sprinkler Systems

Car Park Gates

Emergency Evacuation Chair

Cart Manager

Handwrite additional checks

Handwrite additional checks

SM Print:

SM Signature:

Date:

39

Trading Compliance ChecksExternals and Front of the store - Completed at ☐ General safety and cleanliness checks

SIGN

Bakery☐ BUF between -18°C and -32°C

SIGN

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SIGN

Office / Welfare Area☐ Office is clean and safe☐ Welfare area is clean and safe

SIGN

General - All Areas☐ Employees following CAYG policy

SIGN

General☐ Contractors / SMOs working safely

SIGN

Haulier Monitoring☐ Wearing correct PPE (safety boots and hi-vis)☐ Hauliers using equipment safely☐ Deliveries and haulier vehicle movements safe☐ Delivery pallets in good condition and stable

SIGN

Comments

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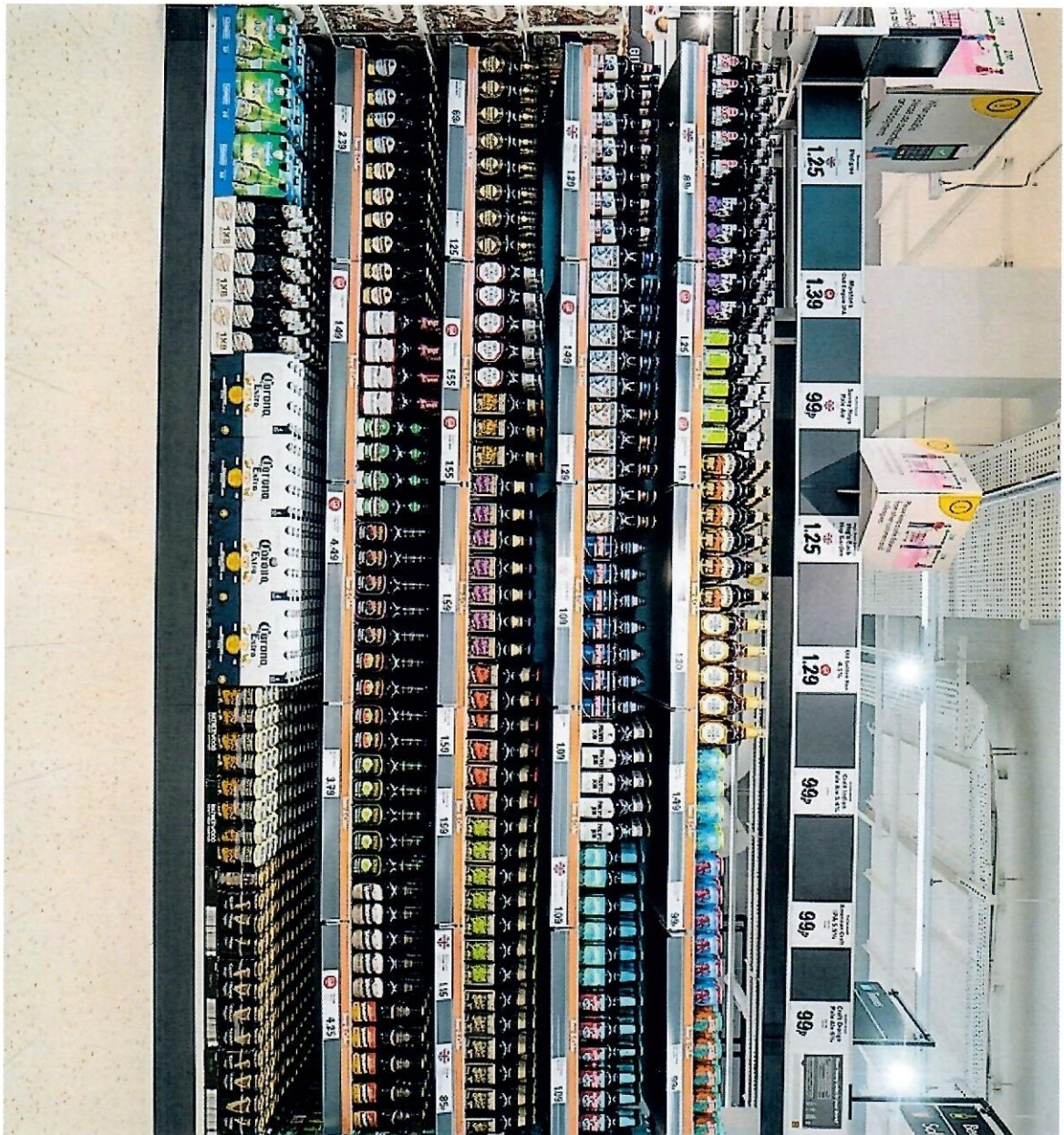
SM Signature:

Date:

AM Print:

AM Signature:

Date:



Lisa White

Licensing Officer

Hammersmith and Fulham Borough Council
Hammersmith Town Hall Extension
King Street
W6 9JU

**FH - Hammersmith & Fulham
Borough**

Shepherds Bush Police Station
253-258 Uxbridge Road
London
W12 7JB

Telephone: 02082462886

Email:

Joseph.McDaniel@met.police.uk
www.met.police.uk

Your ref:

Our ref:

27th July 2017

Dear Miss White,

I am writing to you in my position as Licensing Officer for Hammersmith and Fulham Police with regard to a premises licence application for **LIDL, Units 1-2, West 12 Shopping Centre, Shepherds Bush, W12.**

The applicant has applied for sale of alcohol for consumption off the premises, of **07:00 - 23:00 hours Mon-Sun** inclusive. Police understand that LIDL is a large supermarket chain who sell a wide variety of grocery products.

Police wish to object to this application, due to the proposed early alcohol sale time; on the grounds of the prevention of crime and disorder, prevention of public nuisance and protection of children from harm.

Contact with the applicant was made prior to formal objection with a suggested amendment to alcohol sale times, of **10:00 - 23:00 hours Mon-Sun**, but an agreement could not be met.

Geography - Shepherds Bush Green

The area of Shepherds Bush is geographically centred around Shepherds Bush Green, the premises in question is located within a shopping complex named 'West 12 Shopping Centre' on the South side of Shepherds Bush Green. This area is a landmark on the borough and has historically provided the borough of Hammersmith and Fulham with its most challenging policing neighbourhood. This neighbourhood has a broad spectrum of policing concerns which range from street drinking, drug issues, the policing of Queens Park Rangers Football Club and the presence of Europe's largest shopping centre 'Westfield'. Within this tapestry of policing issues there lies the issue of alcohol related crime and disorder. Currently, the area is saturated with licensed premises in the form of pubs, clubs and bars, as well as off licences and take away food outlets. So much so, a cumulative impact policy has been put in place to deter additional, unnecessary and unwelcome sale of alcohol by retailers.

Cumulative Impact Policy

The area centred on Shepherds Bush Green has historically been a focus for crime and disorder. Cumulative Impact is referred to in *Home Office Guidance Issued Under s.182 of The Licensing Act 2003*. This guidance states Cumulative Impact is the “*potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area.*”

The Council's *Statement of Licensing Policy* was renewed in January 2011. The policy has direct regard to Cumulative Impact in 6.1 and 6.2, specifically:

6.1 *In determining an application, where there has been a relevant representation, the licensing authority will, where appropriate, take into account the cumulative effect of the number, type and density of licensed premises already existing in the area. A saturation of licensed premises can attract customers to an area to such a degree, that it has an adverse impact on the surrounding area beyond the control of individual licence holders.*

And,

6.2 *Where the cumulative effect of many licenced premises within an area gives rise to problems of public disorder and nuisance in the surrounding area the council may consider it inappropriate for any further licenced premises to be established in the area or capacities to be increased. In such circumstances, an application for a licence for activities, which would undermine the promotion of any of the four Licensing Objectives would be refused.*

The *Statement of Licensing Policy* also has specific regard to shops and supermarkets:

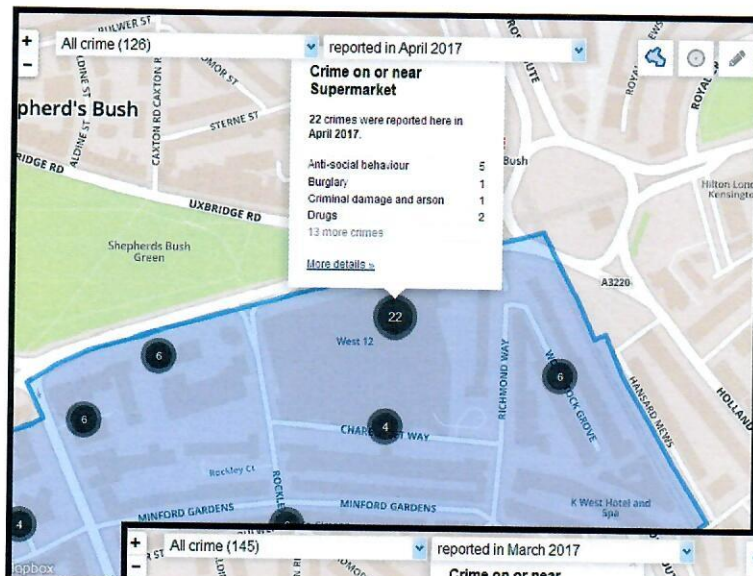
8.7 *Off licences, shops, supermarkets and stores selling alcohol for consumption off the premises potentially have a high risk of crime and disorder and well as being targeted as an easy premises from where to acquire alcohol. Such premises can contribute to anti-social behaviour and disorder through the consumption of alcohol on the street and in open spaces by groups of drinkers, through the sale of alcohol to children, and through the sale of alcohol to street drinkers and persons who are already drunk.*

The Cumulative Impact Policy was overwhelmingly supported by local residents and Responsible Authorities. The Cumulative Impact Policy has been tested at Magistrates Court and been upheld. Police respectfully request the Licensing Committee to take into account the Councils own policy with regard to Cumulative Impact.

Crime Statistics

The exact position of the premises faces a significant issue with regard to anti-social behaviour and crime in general. A brief snapshot from the publicly available police crime mapping site shows this for the most recently recorded 3 months. To quote, the category of recorded offences classed as anti-social behaviour consist of “personal, environmental and nuisance anti-social behaviour”. In Shepherds Bush Green, it has been shown this nuisance element is made up predominantly from littering and **street drinking**, this is further represented by the amount of alcohol seizures which remain the highest in the borough for Hammersmith & Fulham.

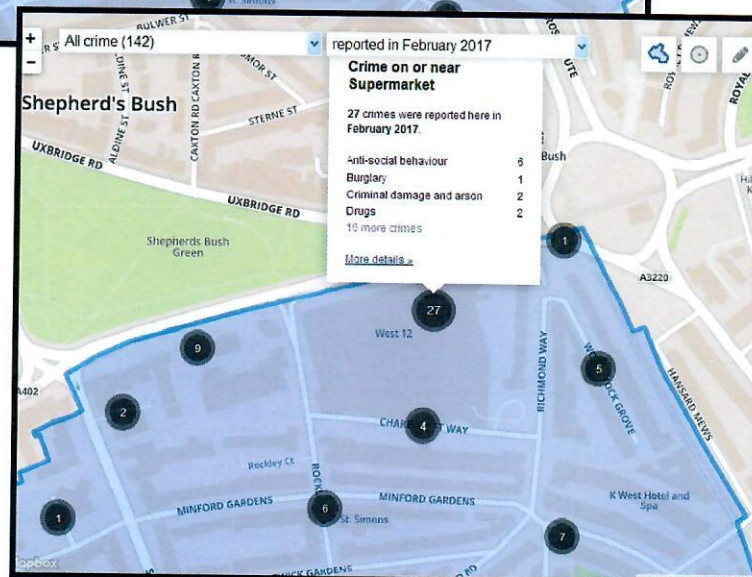
April 2017



March 2017



February 2017



As we can see from the above crime mapping extracts which are impartial - in comparison to the surrounding area, overall crime appears to gravitate to the precise location of the shopping centre where the premise will be situated. This includes violent and alcohol fuelled crime.

Controlled Drinking Zone

The area is part of a designated no drinking zone under S.13 Criminal Justice and Police Act 2001. This is designed to combat problems of street drinking which have a considerable impact upon crime and disorder in the area. In respect of this, the requested early hours of alcohol sale from **07:00 hours** onwards is felt to be completely unnecessary. Purchase of alcohol at this time of day is not an essential requirement for the majority of shoppers, instead this is more likely to draw custom from those who are dependent on alcohol or otherwise provide access to alcohol at a time of day when alcohol consumption should not be encouraged.

Further to this, it is clear that 'LIDL' market their products to offer value for money and affordability, this will provide further appeal to street drinkers as a source to purchase cheap alcohol from. By increasing the presence of intoxicated street drinkers to the area, this will subsequently increase interactions with the large numbers of families who reside there. Be it adults commuting to work at this time of day, or more worryingly; children making their way to school. This increased interaction should not be encouraged, providing an increased opportunity for reported anti-social behaviour and a raised and unnecessary risk of children coming to harm.

The Application

- CCTV - the application makes mention of installing a CCTV system which will supply footage on to removable media. This is vague and potentially problematic for police due to restrictive security issues. If prior consultation had been carried out with the police service, specifically the borough's design out crime unit - the application would stipulate that footage will be burnt to disk and provided to police upon **immediate** request. Currently, the application states that **48 hours** notice must be given before footage can be provided. This is utterly inadequate when forming part of a criminal investigation, especially considering the demand on current record low police resources on the street. A staff member conversant with the CCTV system should be present at all times the premise is open to the public to ensure this is possible, this is currently not specified.

Companies have a corporate responsibility to assist with the prevention and detection of crime which form part of the licensing objectives, at present this element of the application does not support this sufficiently.

- The application makes no mention of a security staff presence within the store. Given its large size and position within a borough which faces challenging levels of crime and anti-social behaviour, a provision of this function should be considered essential to safeguard customers and staff members whose dedicated roles are not to tackle crime related issues. These security staff members should be at minimum SIA registered.

- There is no mention of a refusals book, which should be kept at the premises to record details of all refusals to sell alcohol. This should be available to council and police licensing authorities upon immediate request.

In summary, police strongly object to the applicant's premises licence application, specifically the requested time for early morning alcohol sales from 07:00 hours. It is wholeheartedly believed that these timings are unnecessary and will only pose detrimental in respect of the licensing objectives. Whilst essential control measures to support the objectives are currently considered incomplete; it is felt that no amount of control measures can account for the premises' presence within an over-saturated CIP and a controlled drinking zone - where street drinking and alcohol fuelled crime is a consistent problem. Therefore, I firmly believe that if this application is granted, it should only be granted with careful consideration to its timings of alcohol sales.

Submitted respectfully for your consideration.

Joe McDaniel

Licensing Officer

Hammersmith & Fulham Police

From: Tom.Stewart@met.police.uk
Sent: 06 December 2018 14:58
To: Amanda Pillinger
CC: Kristen.Cardwell@met.police.uk
Subject: RE: Lidl , Shepherds Bush

Dear Amanda,

Thank you for your email. The Police's position is that the availability of alcohol before 10am contributes to alcohol related anti-social behaviour in the area and has a detrimental effect on local residents.

That being said, Lidl have made attempts to address these issues and also have the ability to provide security at the premises when required. Based on this I can confirm that I will have no objections to the proposed extension of hours to the off sales of alcohol to 8am with the inclusion of the below mentioned conditions.

Kind regards

Tom

Tom Stewart 230FH
Acting Police Sergeant
Licensing Officer - Hammersmith and Fulham
Metropolitan Police Service
02082462715
07876707570
Tom.stewart@met.pnn.police.uk
FHLicensing@met.police.uk
Shepherds Bush Police Station
www.met.police.uk


From: Amanda Pillinger [mailto:amanda@pillingerandassociates.co.uk]
Sent: 05 December 2018 15:02
To: Stewart Tom - FH <Tom.Stewart@met.police.uk>
Subject: Lidl , Shepherds Bush
Importance: High

Dear Sgt Stewart

Re: Lidl, Shepherds Bush

As you are aware, a premises licence was granted in respect of Lidl, Shepherd's Bush in September 2017. At the time of the application, the police raised concerns that there were significant issues with Street drinkers in the area. As a result of these concerns, the licence was granted with restricted hours. The permitted hours applied for

commenced at 7am but the permitted hours of the licence commence at 9am.

The store has now been trading for a few months. On the day before the store opened, the manager invited the Ward Sergeant (James Burgess) to visit the store and discuss any additional security measures that may be necessary. The police continue to visit the store and we believe that they are pleased with our trading compliance and approach to managing the licensing conditions.

The managers were made aware of a number of street drinkers in the area. Many of these street drinkers tried to purchase alcohol from the store when it first opened, but the Store Leadership Team and Security have prevented them from entering the building. They now know that they will not be permitted to enter the store to purchase alcohol.

We therefore believe that, in working with the police and in ensuring compliance with strict internal policies and procedures, Lidl have addressed the concerns that the police had at the time of the application.

Lidl therefore wish to apply to vary the premises licence to allow the store to open from 7am or 8am, in line with all other Lidl stores. If you are able to support such an application they would be willing to volunteer additional conditions further addressing any concerns about street drinkers as follows:-

- There shall be no sale of single cans of beer, lager or cider sold at the premises.
- No canned or bottled super-strength beer, lager or cider of 6% ABV or above shall be sold at the premises other than speciality/ artisan beer, lager or cider.

I would be grateful if you would confirm that you are happy for Lidl to make a variation application on that basis.

Kind regards

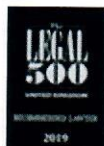
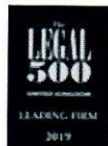
Amanda Pillinger

Pillinger & Associates Solicitors

E: amanda@pillingerandassociates.co.uk

T: 01789 336957 / 07764 764806

W: www.pillingerandassociates.co.uk



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Employee Name: _____

Employee Number: _____

Store Name: _____

Store Number: _____

Trading Law Induction Training - 05/18

The following provides an overview of the key Trading Law points that you will be made fully aware of during your first day in store. You must understand each topic, and your responsibilities, before you undertake any task actively within the store. If you have any questions relating to these points, you must raise these immediately.

1. Food Safety

Food Safety is fundamental to the success of our business. We have a comprehensive food safety management system in place that ensures we can provide customers with safe food, which is of the highest freshness and quality. You must ensure that our food safety procedures are strictly adhered to.

Please be aware of the following:

- What our food safety management system is (HACCP), what it contains and where it is located (i.e. Lidl Library)
- The high standards of personal hygiene which must be maintained at all times
- What to do if you are suffering from vomiting or diarrhoea
- Temperature control parameters and the actions that are required to maintain the chill chain
- Know how to identify a breakdown of temperature controlled equipment and what action to take
- Where provided, maximum load lines must never be exceeded
- Be fully aware of the standards and procedures when working in the in-store bakery
- The importance of cleaning, safe use of cleaning equipment and cleaning products that should be used, including their storage
- Stock rotation and the prevention of cross contamination, including removing any damaged products and correct product placement
- Food must never be on display or sold out-of-date, and must only be sold in line with our "C" date policy
- Types of pest that could affect our stores, signs of pest activity, action to take if activity is identified and the correct reporting procedures
- Store recycling procedures including ABP and WEEE

2. Health & Safety

The health, safety and welfare of all our employees, customers and contractors is our priority. It is our aim to provide the safest environment in which to work and visit and we can only do this with your help. Use common sense, act in a manner which does not put you or other people in danger. Only use equipment which you have been trained to use. If you see anything that could pose a danger to yourself or to customers act upon it, or tell a member of Store Management.

Please ensure that you are aware of the following:

- What risk assessments are and how they control hazards
- How to lift, move and handle stock safely (manual handling)
- How to merchandise stock safely and how to prevent damage
- How to safely use a manual pallet truck
- How to deal with spillages and how to avoid slips and trips
- How to use the floor cleaning machine
- How to use a retractable blade knife safely
- Working at height and the safe use of the store step ladders and kick steps
- What to do in the event of an accident and the reporting procedures, including investigation and RIDDOR
- Where first aid equipment is located and our first aid arrangements
- How to use the store baler/compactor safely
- The safe use of all equipment (including electrical equipment and bakery equipment)
- Be aware of the defect reporting procedure (e.g. defective or leaking equipment, damage to fixtures and fittings within the store etc.) and the actions which should be taken including taking the equipment out-of-use or segregating the affected area
- Be aware of any site specific equipment or procedures - car park gates, scissor lifts, etc.
- How to work safely in cold rooms and walk-in freezers, including ice-management
- How to work safely in external areas, including the car park and ensuring delivery safety
- The personal protective equipment (PPE) available - how it should be used, stored and how to obtain replacements
- Monitor contractors to ensure they are working safely - this includes delivery drivers. Never assist contractors

3. Fire Safety

Being fully aware of fire safety in your store is key in providing the safest possible working environment. The consequences of fire can be severe. Be aware of fire safety provisions and preventative measures including:

- Be familiar with our fire risk assessment, where it is kept and what it contains
- How to identify sources of ignition, fuel and how to prevent a fire from starting
- Fire exits and escapes must never be blocked or locked
- What you should do in the event of a fire and your assembly point location
- How to raise the alarm in the event of a fire and what the alarm sounds like
- How Maglocks operate and how to release a Maglocked door in the event of failure
- Know the location, type and the use of fire extinguishers
- Smoking (including electronic cigarettes) is not permitted inside the building
- Where fire exits and alarm call points are located
- How to handle, merchandise and store aerosols safely

4. Age-Restricted Products

We have a legal and moral responsibility not to sell any age-restricted products to under-age customers. Our Age-Restricted Policy must be read, understood and signed prior to starting your first shift or working on the tills (including self-service tills). When selling any age-restricted products remember - **ALWAYS THINK 25**. The Designated Premises Supervisor (DPS) or a member of Store Management must check the identification of anyone who looks under 25. Acceptable forms of identification are an in-date Passport, Photo Driving Licence, PASS hologram proof of age card, Military ID and National ID cards.

Alcohol must not be sold to:

- Anyone under 18
- Anyone who you believe to be giving alcohol to anyone under 18 (proxy sales)
- Anyone who you believe is under the influence of alcohol or drugs
- Police Officers in uniform (Scotland only)

Other age-restricted products:

- Solvents, butane gas and lighter refills must not be sold to anyone under 18
- Knives and offensive weapons must not be sold to anyone under 18
- Fireworks must not be sold to anyone under 18. Prior to the store selling fireworks, the Firework Policy must be read, understood and signed
- Lottery tickets, party poppers and aerosol spray paints must not be sold to anyone under 16
- Christmas crackers must not be sold to anyone under the age of 12
- DVD/Video/CD & Electronic games software age-restrictions must be followed

Remember the potential consequences to you can be severe if you allow an underage person to buy an age restricted product - prosecution, fine, criminal conviction and the loss of your job.

5. Consumer Protection

To ensure we do not mislead our customers in any way, it is important that you are aware of the following:

- Scales should be checked to ensure they read zero at the start of each shift - ensure you are aware of how to carry out the weekly check
- What information a price card should contain and the action which should be taken if information appears to be incorrect
- A maximum of two packets of Paracetamol and two packets of Ibuprofen (or similar items) may be sold to customer at a time
- What action needs to be taken when a customer complaint is received or a product is recalled
- To prevent fraudulent transactions, security checks on card payment terminals should be undertaken

6. Equality Regulations

Employees should be aware of the access facilities which are available in store, including disabled car parking bays, disabled trolleys, assistance bells etc.:

In the event that any customer requires assistance and alerts staff by ringing the bell located in the entrance, the following steps must be taken.

- An immediate response is required
- Ascertain the customer's requirements (e.g. wheelchair users, blind or visually impaired etc.)
- An employee must be available to assist and meet the needs of the customer
- Assistance should always be offered to every customer regardless of circumstance. This includes packing shopping, carrying shopping out to cars, explanation of ingredients/contents of items, reaching items around the store and direction to specific items
- Assistance dogs are permitted in-store

7. Personal Safety and Security

Your safety is paramount whilst you are at work. Ensure you are aware of the following:

- How to deal with violence and aggression
- What to do in the event of shoplifting or a robbery. Never chase a shoplifter
- Action to be taken in the event of a bomb threat
- How store cash collections should be undertaken
- Measures to be taken to avoid or defuse violence or aggression at work
- What action to take if you or someone else is injured
- What to do if you feel stressed
- Attending alarm call-outs

I understand that further information about all Trading Law topics is provided in the Store Trading Law Manual. The Trading Law Manual can be found electronically on Lidl Library and that I should familiarise myself with its contents and refer to it when required. If there is anything that I do not understand, then I will ask a member of management for clarification.

I have been given induction training as outlined above, and I understand that it is my responsibility to ensure that the procedures that are communicated to me are adhered to in my workplace.

Print Name:

Employee Signature:

Date:

Print Name:

Trainer Signature:

Date:

Once completed, please send this document to the Regional Training Team (scan to email).

The document will be processed to create a record of training and will be held on the Personnel File for the duration of employment + 3 years.

All other copies must be shredded/deleted no later than at the end of the basic training period.

During data processing, your data will be disclosed to the Lidl GB HR department.

10.01 Age Restricted Sales – General

Operational Procedure

Further Info:

Procedure: -
Form: 13.04

General

The following procedure covers the selling of age restricted products within the store. It is essential age-restricted products are not sold to underage persons to ensure legal compliance and to fulfil Lidl's moral responsibility.

Age-Restricted Sales

Certain products that are sold are classed as age-restricted products to protect the health and wellbeing of younger people within the community.



In order to prevent under age sales from occurring it is imperative that store staff are:

- Aware of and understand the Lidl age restricted sales policies and procedures; and
- Comply with the procedures to ensure underage sales do not occur.

A summary of the Age Restricted Sale Policy can be found in module 12.

Repercussions if an Underage Sale Occurs

If a member of staff sells an age-restricted product to someone who is underage:

- The cashier can be liable to a criminal conviction;
- The cashier may receive a fine of up to £5,000 and/or 6 months imprisonment;
- The cashier may be dismissed from their employment;
- The company may be contributing to behaviour that is damaging to the health and wellbeing of the community; and
- The company could be contributing to the sort of anti-social behaviour that often results from the misuse of some age-restricted products.



Important: If you sell an age-restricted product such as sharp implements, alcohol or fireworks to anyone under the age of 18, you face a fine of up to £5,000 and/or imprisonment.

DON'T GAMBLE WITH THE LAW
IF IN DOUBT ALWAYS CALL STORE MANAGEMENT

Types of Age-Restricted Goods

Age-Restricted goods include:

Alcohol



Knives



Fireworks



Corrosive Substances



The minimum purchase age for age-restricted products sold at Lidl are:-

Alcohol	
Fireworks	
Knives and Offensive Weapons	
Solvents/ Butane Gas/ Lighter Refills	
Corrosive Substances	
Party Poppers	
Health Lottery Ticket	
Aerosol Spray Paints	
Energy Drinks (containing more than 150mg of caffeine per litre)	
Christmas Crackers	
Videos/ DVDs	Various

Age-Restricted Sales Procedure

Lidl operates a "Think 25" policy. The Think 25 policy requires all cashiers to challenge anyone they believe looks under 25 who is attempting to purchase an age restricted product.

The following procedure must be adopted:

1. Customer attempts to purchase an age-restricted product.
2. THINK 25 – does the customer look under 25?
3. If a customer looks under 25 inform the customer that it is Lidl policy that anyone who is lucky enough to look under 25 is required to produce valid identification and a member of store management must check it.
4. Ring two bells for store management to attend the checkout.
5. Store management should request the customer produces identification.
6. Store management should check the identification to ensure:
 - That it is genuine and an acceptable form of identification (see below); and
 - It confirms that the customer is at least the required age (18 / 16 etc.).
7. If the identification is acceptable and the customer at least the required age, the sale should proceed. If the customer cannot produce identification or the identification is not acceptable, the sale should be refused.



THINK25

If in doubt ask.



Important: Store assistants must always be cautious. If in any doubt – store management must be called to ask for proof of age.

Acceptable Identification

Acceptable forms of identification include:

Passports (not limited to UK)



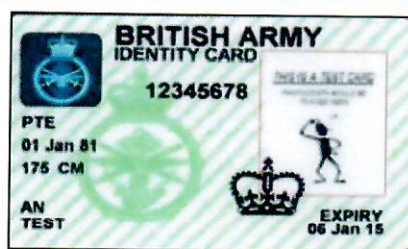
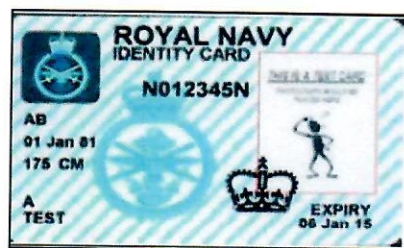
Driver licence with photograph (not limited to UK)



Proof of age cards bearing the PASS hologram



Military I.D.



National ID cards



Store management should ensure that I.D:

- Has not been tampered with; and
- Dates or names have not been overwritten.

Proxy Sales

A proxy sale is where a person over the legal minimum age attempts to purchase an age-restricted product on behalf of someone who is under the legal minimum age.

It is a criminal offence to complete a proxy sale therefore it is important that store management and cashiers remain vigilant of potential proxy sales. Indications of a proxy sale include:

- Groups of youths congregating outside approaching members of the public who enter the store.
- If members of the public who might have been approached, ask for the same alcohol product / age restricted item which you have just refused to sell to an underage person.
- If the adult wishes to pay separately for the age-restricted product and keeps the change separate.
- If the age restricted product is kept separate from their other shopping.
- If you know your local community and your customers, and the purchase of such an alcoholic product is totally out of character, remind them that it is an offence to "proxy" purchase.
- If the adult re-enters the store just to buy alcohol after they have left.
- If an adult is with a child, and you see the adult asking the child what alcohol they would like or their behaviour suggests the alcohol is for the child, you should refuse the sale. **Important:** Just because a child accompanies an adult, it does not mean that they are attempting to buy alcohol for the child.
- If a group of young people approach the till and appears to be purchasing alcohol for the entire group, the whole group should produce a valid form of identification.



Important: You are under no obligation to sell an age-restricted product! If in doubt, refuse the sale.

Refusing the Sale of an Age-Restricted Product

By refusing to sell age-restricted products to under age persons or to those who it is believed are buying for under age persons (proxy sale), staff may be exposed to hostility and aggression.

Due to the age-restricted sales policy a member of store management should be present or on their way to the checkout. Store management should take the lead in dealing with the customer.

If a customer protests about a refusal to sell a product, the following basic calming techniques should be adopted:

- Keep your voice calm, your hands open and try to maintain eye contact;
- Do not respond to verbal abuse;
- Do not waiver. Stick to your reasons for refusing the sale;
- Try to ensure that the potential buyer understands why the sale cannot take place; and
- Complete the Refusals Log (only when prior authorisation for use of a refusals log has been given by TC).



If a potential customer uses abusive language or becomes aggressive, then try to stick to these guidelines:

- Do not allow yourself to be provoked;
- Do not shout or interrupt;
- Keep to a safe and non-threatening distance;
- Keep your voice low and your movements slow;
- Be consistent in your reasons for not selling; and
- Make it clear that you are not picking on anyone and that the same law applies to everyone.



If an underage person persistently attempts to buy an age-restricted product or staff feel threatened in anyway, the police should always be called.

Selling Alcohol

In addition to the general age-restricted sales procedure there are additional requirements for the sale of alcohol:

- Selling alcohol requires a license from the local council. All Lidl stores that sell alcohol are licensed to do so;
- Every licensed store has a Designated Premises Supervisor (DPS) / Premises Manager (PM) who is usually the SM. In order to be a DPS / PM the employee must:
 - Have attended and successfully completed the BIIAB training course held by a qualified Regional Training Consultant (RTC)
 - Be a Personal Licence Holder
 - Received a satisfactory police check (in some cases via interview)
- All Store Managers and Deputy managers should hold a Personal Licence. Training in BIIAB Award for Personal Licence Holders is carried out at the RDC by the RTC (Regional Training Consultant);
- There should be a sufficient number of Personal Licence holders at each licensed store to ensure that if the DPS leaves, a Personal Licence holder can be nominated to replace them;
- The DPS / PM is the person nominated as being in day-to-day control of alcohol sales in the store and provides a single point of accountability in the event of problems occurring at the store;



- The DPS / PM is permitted to authorise the sale of alcohol. It is normal for all members of store management including the DPS / PM to hold a personal license;
- Every member of staff that sells alcohol must be authorised by the DPS / PM. The DPS / PM authorises store staff by ensuring staff sign the Age-Restricted Sales Policy Signature Sheet;
- The DPS / PM must ensure that every member of staff (temporary and permanent) understand the age-restricted sales policy and sign the signature sheet. This includes staff visiting the store from another location;
- The DPS / PM must ensure that this policy is regularly re-iterated and closely monitor staff at all times;
- The DPS / PM must ensure that only staff over the age of 18 serve on a till; and
- Customers carrying open alcoholic drinks are not permitted on the premises.

The DPS / PM must also ensure that:

- All staff have received age-restricted sale training; and
- A constant awareness is maintained with regard to alcohol sales.
- The Alcohol Premises Licence Summary must be displayed at the entrance to the store. The certified copy of the Premises Licence must be stored in the store safe.

In addition to ensuring that alcohol is not sold to underage persons (directly or via proxy sales) all staff should ensure that alcohol is not sold:

- To anyone who appears to be under the influence of alcohol or drugs;
- To a police officer in uniform (Scotland only); and
- Outside the hours permitted by the premises license.

Identifying a person under the influence of alcohol or drugs

When serving, cashiers should be aware of the signs of a person under the influence for alcohol or drugs. Signs and symptoms may include:

- Smelling of alcohol;
- Involuntary eye movements;
- Bloodshot eyes;
- Difficulty standing;
- Swaying and staggering;
- Vomiting;
- Violent behaviour;
- Rambling conversations;
- Slurred speech; and
- Foul language.

If an issue with 'street drinkers' is identified, HO Trading Compliance should be contacted for further advice.

Selling Knives and Offensive Weapons

During 2008 there were approximately 277 deaths from stabbings in England and Wales alone. This represents an average death toll as a direct result of stabbings of over five deaths every week. It is therefore important that the selling of knives and offensive weapons is strictly controlled.

Knives or offensive weapons include:

- A knife, blade or non-safety razor blade;
- An axe; or
- Any article, which has a blade or which is sharply pointed and which is made or adapted for use for causing injury to a person.



The THINK 25 procedure should be applied for knives / offensive weapons.

Selling Fireworks

At certain times of the year Lidl stores are registered to sell fireworks with the local Trading Standards Department or the local Fire Service. Fireworks can only be sold from the 15 October and ending on the 10 November and, from 26 December and ending on 31 December. Fireworks can be dangerous if handled / used incorrectly and can become a nuisance to the local neighbourhood due to the associated noise.



Fireworks should not be sold to any person under the age of 18.

In preparation for the sale of fireworks and prior to fireworks arriving at the store, a fireworks training pack will be sent to all stores. The training pack contains the fireworks risk assessment and associated safety procedures required to be implemented. Store management should ensure all staff receive refresher training in line with the training pack.

Selling Corrosive Substances

Corrosive substances are products that contain acid as an active ingredient. From time to time Lidl sells corrosive substances such as drain cleaner. These products are becoming increasingly used during attacks to inflict permanent injury on others and therefore, as part of our moral responsibility, we have decided to place a voluntary age-restriction on corrosive substances.



Corrosive substances should not be sold to any person under the age of 18. To ensure that sales are controlled, the THINK 25 policy should be implemented at all times when selling corrosive substances. In addition, all applicable corrosive substances will have a till prompt assigned to them. This negates the requirement for store employees to determine what products are age-restricted corrosive substances.

Selling Solvents

Under the Intoxicating Substances (Supply) Act 1985 it is an offence to supply any solvent based products or aerosols if the person is under 18 and if you have reason to believe that the product will be used for intoxication.

Solvent abuse is the inhaling (sniffing) of fumes given off by a wide range of solvent based products and aerosols. The fumes give a drug-like effect and are often inhaled from a plastic bag.

The following are examples of products that are classed as solvents:

- Glue
- Office correction fluid
- Plaster remover
- Nail varnish
- Nail varnish remover
- Paint strippers
- Aerosols e.g. deodorant, hairspray, air freshener etc.



Identifying a Solvent Abuser

When serving, cashiers should be aware of the signs of a possible solvent abuser

- The smell of glue or solvents on a person's clothes.
- Slurred speech or behaviour similar to drunkenness.
- Spots and sores around the mouth.
- Young people who buy solvents frequently or who make multiple purchases.
- Young people buying solvents who are acting suspiciously or are very giggly.
- The purchase of plastic bags at the same time.

If anyone appears to be under 18 and you have a reason to believe that the product will be used for intoxication you should call the Store Manager immediately. The Store Manager will then ask the customer the reasons for buying the solvents. If the customer cannot give a genuine reason for buying the product then the sale must be refused.



As a solvent can be sold to a person under the age of 18 for its intended purpose, a till prompt is **not** automatically applied.

There are however certain solvents, including butane gas, that the Company has imposed conditions over and above what the law requires. These products include certain glues, weed burners etc. and they must not be sold to a person under the age of 18. These products will be highlighted at the till by a prompt that is automatically applied. When selling these products, and when the till prompt activates, the Lidl age-restricted policy including Think 25 must be adopted.

Selling DVDs

The age limit on DVDs will depend on the DVD and could be 12, 15 or 18. When selling DVDs it is important to check the age-rating of the DVD. Till prompts are not assigned to DVDs on manned checkouts. On self-checkouts DVDs are assigned as a high risk item (see self-checkout section below for further details).

The THINK 25 policy should be adopted at all times when selling an age-rated DVD. Age-rated DVDs must not be sold to persons under the relevant age limit.

Selling Health Lottery Tickets

It is illegal for any person to sell health lottery tickets to a child under the age of 16. To ensure the sale of health lottery tickets is controlled, the THINK 25 policy should be adopted at all times.



The maximum fine for under age sales of a lottery ticket or a scratch card is £5000 and the terminal may be disconnected.

Selling Energy Drinks

As part of our moral responsibility, Lidl GB has decided to implement a voluntary age-restriction on energy drinks containing more than 150mg of caffeine per litre. When selling energy drinks, a till prompt will not appear on manned checkouts. Cashiers must apply their discretion and ask for suitable proof of age, if they believe the customer to be under 16. In these instances, there is no requirement to call for a member of store management, the identification can be checked by the cashier. On self-checkouts energy drinks are assigned as a high risk item (see self-checkout section below for further details).



Local Council and Police Test Purchasing

Trading Standards Officers and the police carry out test purchases using children to check that underage sales are not occurring in stores.

If an underage sale occurs the following people can be prosecuted:

- The person making the sale;
- The DPS / PM; and / or
- Lidl.



An “on the spot” fine for the sale of an age-restricted product to an underage customer may be offered to the offender. It is the decision of the individual whether they choose to accept this.

Self-Checkouts

Self-Checkouts (SCOs) are enabled with a non-blocking alert for alcohol, knife and corrosive substance age-restricted products. This means that if a customer attempts to purchase an age-restricted product, the transaction will continue up until the point of payment. At this point, the Checkout Supervisor must THINK 25, call the manager of duty if required to check the customer's ID, and only authorise the age-restricted products when satisfied that the customer is over the required age.

DVD's that have differing age-restrictions (i.e. 16, 12), party poppers, paint spray aerosols, energy drinks and Christmas crackers are categorised as “high risk” items. This means that if a customer attempts to purchase a DVD, an alert will be triggered. This allows the customer to continue the transaction up until the point of payment, when the Checkout Supervisor must authorise the sale and ensure the customer is over the required age to purchase the product.

Only employees who have received full age-restricted sales training, and who have signed the Age-Restricted Policy Register are permitted to assume the role of the Checkout Supervisor.

Store Management Responsibility

Store management should ensure that:

- All Lidl employees receive comprehensive age-restricted sale induction and refresher training at least every 6 months;
- A constant focus of age-restricted sales is maintained and promoted at every opportunity;
- New starters are supervised on the tills;
- Where required a training trolley containing age-restricted goods is used to train staff and to demonstrate the till prompt system;
- Queues at the tills are monitored for underage customers attempting to buy alcohol or other age-restricted goods;
- Possible underage customers in the alcohol aisle or looking at age-restricted products are approached and asked for identification;
- Staff are regularly reminded about underage sales, especially prior to school holidays;
- Staff under the age of 18 must not serve on a till; and
- Store assistants are regularly reminded that only store management should ask for and check identification.

13.04 Age-Restricted Policy

In order to prevent the sale of age-restricted products to any individual below the legally specified age limit, it is essential that all store staff **THINK 25**. It is against the law to sell the following age-restricted products to persons under the required minimum age.

Product	Age	Product	Age
Alcohol		Party Poppers	
Fireworks		Health Lottery Tickets	
Knives and Offensive Weapons		Energy Drinks	
Solvents/ Butane Gas/ Lighter Refills		Videos / DVDs	Various
Corrosive Substances			

If anyone appears to be **UNDER 25** and attempts to buy any of the above age-restricted products you should call a member of store management immediately. The Manager will then ask for formal identification. This must be in the form of a passport, identity card bearing the PASS hologram, new style driving licence (with photograph), MOD card or a national ID card.



If the manager is not satisfied of the person's age then no sale must take place (and the Refusals Log completed where applicable). If an underage person persistently attempts to purchase prohibited goods then the police must be called.

- Alcohol must not be sold to any person, whatever their age, if it is believed that they intend to pass the goods to a person under 18 years old (proxy sale).
- It is an offence to sell alcohol to people who are under the influence of drink or drugs or to any person if they intend to pass the alcohol to any person under the influence of drink or drugs.
- All sales of alcohol must be authorised by the Designated Premises Supervisor (DPS) / Premises Manager (PM).
- No sales of alcohol can take place if the DPS / PM, as stated on the Premises Licence, is no longer permanently employed at the designated store.
- Alcohol must only be sold during the hours specified on the store's premises licence.
- Staff working at a different store to usual must sign the Lidl Alcohol Policy Register at the new store before commencing any work on the checkouts.
- Alcohol must not be served to a Police Officer in uniform (*Scotland only*).
- All staff must have completed the mandatory 2 hour training and signed the Lidl Alcohol Policy Register before commencing any work on the checkouts (*Scotland only*).



Any member of staff who breaches this procedure is likely to be dismissed. All members of staff are required to sign the register to confirm they understand this policy and understand the **THINK 25** Procedure.

For further information on age-restricted sales refer to module 10 of the Store Trading Law Manual.

13.04a Age-Restricted Policy Register

Store Name:		Store No:	
-------------	--	-----------	--

"I _____ (insert name) _____ (sign) as the Designated Premises Supervisor / Premises Manager, confirm the undersigned have received full comprehensive training on the legal and social responsibilities relating to the sale of age-restricted products, including **THINK 25**, and authorise the persons to make sales of alcohol on my behalf".

[illegible]

13.17b Age-Restricted Sales Multiple Choice Test**Version 10/15**

Name (Print):

Store No:

Name (Sign):

Date:

1 What forms of identification do we accept as proof of age?

- a) Passport, birth certificate and a driving licence.
- b) Student card, passport and driving licence.
- c) Passport, photo driving licence, PASS Card, MOD card & National ID card
- d) Passport, birth certificate and library card.

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5 Who should check customer I.D. to confirm the customers age?

- a) Cashier making the sale.
- b) Another cashier.
- c) Member of store management.
- d) The customer.

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2 What is the age-restriction for selling alcohol, knives and fireworks?

- a) 21
- b) 16
- c) 30
- d) 18

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6 An adult is permitted to purchase alcohol on behalf of a child (i.e. proxy sale) in which instance:

- a) With permission of the Store Manager.
- b) When it's the child's birthday / special occasion.
- c) Never, proxy sales are illegal.
- d) When the adult is the child's parent.

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3 What is the age restriction for selling DVDs?

- a) 18
- b) 12
- c) 25
- d) Various

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7 If you suspect an underage customer is attempting to purchase an age-restricted product, you should....

- a) Serve the customer quickly.
- b) Call a member of store management to check their identification.
- c) Call the police.
- d) Ask the customer to use another till.

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4 Whenever you sell an age-restricted product or, when you hear the till prompt, what should you do?

- a) Look up and THINK 21.
- b) Look up and THINK 25.
- c) Do nothing.
- d) Immediately refuse the sale.

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8 What are the consequences for selling an age-restricted product to an underage customer?

- a) A £5,000 fine and/or six months imprisonment.
- b) A criminal conviction.
- c) Dismissal from your employment.
- d) All of the above.

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AM / SM Use Only

Score: out of 8.

Refresher training should be provided on any topics that are answered incorrectly.

AM / SM signs to acknowledge marking and refresher training provided where required:

Name:

Sign:

Date:

Completed tests should be returned to the RDC and filed in the Store Training, Forms & Checklists Folder at the RDC.

Age restricted sales



- It is an offence to sell alcohol to anyone under the age of 18.
- Even an unintentional sale of alcohol to a minor is punishable by law.
- Remember to "Think 25". Ring the bell to check the I.D. of any customer attempting to purchase alcohol if they appear to be under the age of 25.

What do you think?

Which of these items may only be purchased by customers over the age of 18?



OK

10.03a Age Restricted Sales – Signage (England & Wales) Operational Procedure

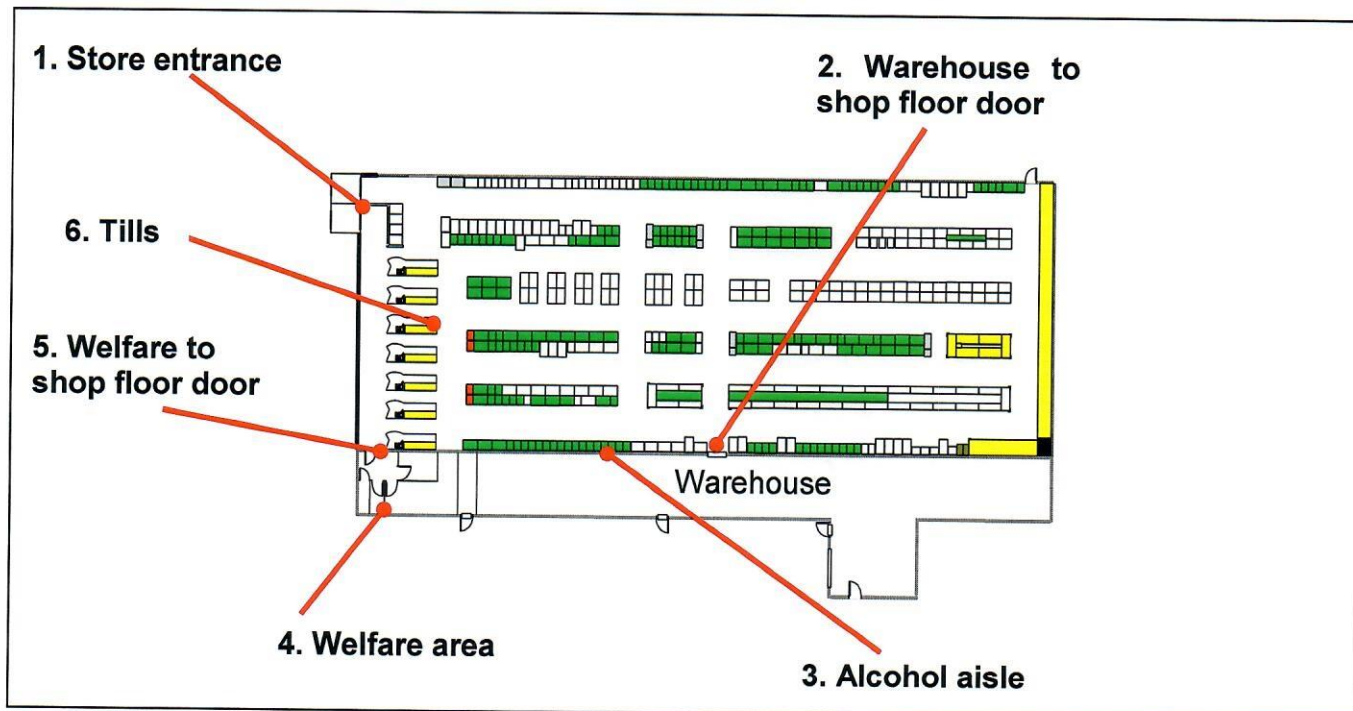
Further Info:



Procedure: -
Form: 13.04a

General


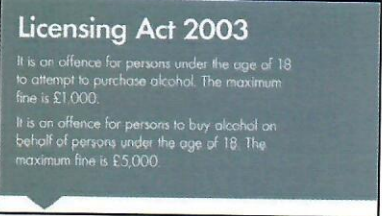




To ensure the highest levels of awareness regarding alcohol licensing laws and company procedures and policies relating to the sale of age-restricted products, it is important that signage is displayed in line with the following plan.

Standard Premise Plan and Signage Locations



<p>1.</p>  <p>The sign contains the following information:</p> <ul style="list-style-type: none"> Further Information Icons for: CCTV in operation, No smoking, No animals except assistance dogs, and a THINK 25 sign. Text: "Products are electronically tagged for security. It is a criminal offence to remove or tamper with these tags. Please do not do this." and "Please don't be offended if we ask for ID. It's the law." (under the THINK 25 icon). Text: "We accept the following methods of payment." followed by logos for Apple Pay, Mastercard, Visa, and American Express. 	<p>Store entrance. Signs should be A4 in size and displayed at the store entrance in a prominent position to ensure every member of the public entering the store is aware of the THINK 25 Policy in operation. This also reminds members of the public of the forms of identification that are accepted in Lidl Stores.</p>
<p>2.</p>  <p>The sign features a large red hand icon inside a triangle, with the text:</p> <p>THINK25</p> <p>Always ask for ID of customers looking under the age of 25. It is a criminal offence to sell alcohol to minors.</p>	<p>Warehouse to shop floor door. The 0.8m x 0.8m THINK 25 sign should be clearly displayed to remind staff to THINK 25, always ask for ID of customers looking under the age of 25 and that it is a criminal offence to sell alcohol to minors. This sign should be visible to every member of staff walking from the warehouse to the sales area of the store.</p>

64

3.	 	<p>Alcohol aisle. Signs should be A4 in size. 3 signs should be displayed in the alcohol aisle above alcoholic products. The signs act as a further reminder to customers that we THINK 25 and that they will be required to provide proof of age if buying an age-restricted product and look under 25 years of age.</p> <p>Alcohol aisle. As a reminder to members of the public entering the store, an A4 sign should be displayed in the price board summarising the Licensing Laws under the 2003 Act.</p>
4.		<p>Welfare Area. The 0.8m x 0.8m THINK 25 poster should be displayed in every welfare area reminding staff to THINK 25, always ask for ID of customers looking under the age of 25 and, that it is a criminal offence to sell alcohol to minors.</p>
5.		<p>Welfare to shop floor door. Sign should be A3 in size and displayed on the back of the door leading to the shop floor. Every member of staff sees this sign when commencing every shift, after every break and on their way to the till area.</p>
6.		<p>Tills. A5 Signs should be displayed on every till pole to remind customers of our THINK 25 Policy prior to them arriving at a till.</p>
6.		<p>Tills. A sign should be attached to every till drawer, visible to the cashier during every transaction to act as a reminder regarding the sale of age restricted products.</p>

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13.08 AM Trading Law Checks & Fire Risk Assessment Audit – September 2018

Checklist (see 5.14)

Once complete return this document to the RDC for signature and archiving

Store Name:		
Store Number:		Date:

Food Safety, Health and Safety and Age Restricted Sales

	Observation	TLM Ref.	OK (✓)	Not OK	NA (✓)	Comments	Action Required	Date Completed
1.00	Trading Law Documentation - Office							
1.01	Trading Law Manual – Forms and Checklists Folder 5 up to date.	13.0						
1.02	Completed forms and checklists returned to the RDC in accordance with Module 14.	Mod 14						
1.03	Ecolab Treatment Report Book available and store visited within last 8 weeks, all recommendations actioned.	6.05						
2.00	Welfare Area							
2.01	Is a HSE Health and Safety Law Poster displayed and completed correctly?	5.19						
2.02	Important Information Board in Welfare Area displays the correct signage (inc. the Age-Restricted Policy Register signed by all staff).	13.04						
2.03	First aid box stored in the correct location, identified by a sticker on the cupboard door and fully stocked with all items in date.	5.03						
2.04	Equipment in eyewash station sealed and in date.	5.03						
2.05	Suitable means of hand washing (hot and cold water running water) and drying available.	5.01 6.04						
2.06	Sharps bin is available (if full send to RDC).	5.87						
2.07	The following areas are clean and safe; toilets (including baby change facilities), welfare area and offices.	6.03						
2.08	Portable electrical equipment not located near to sources of water (e.g. toaster away from the sink etc.).	5.82						

(66)

	Observation	TLM Ref.	OK (✓)	Not OK	NA (✓)	Comments	Action Required	Date Completed
3.00	Warehouse							
3.01	Ebro TLC 730 temperature probe is located at the designated location in the warehouse, with an in-date calibration sticker, calibration certificate and cleaning materials available.	6.02						
3.02	Thermometers that can be manually changed must have the emissivity set to 95E.	6.02						
3.03	All store management are aware of the correct delivery temperature parameters.	6.02						
3.04	All store management are aware of how to perform a surface and core temperature check.	6.02						
3.05	The store temperature control poster (WH035 – Version 07/18 is displayed in the warehouse.	6.02						
3.06	The orange warning light on the internal condenser pack is not flashing.	6.02						
3.07	PPT battery charging area clear and tidy. PPT charger is mounted on the wall.	5.71						
3.08	PPT battery charging unit (if applicable) and leads are in good condition.	5.71						
3.09	The utilities area is clear and easily accessible.	5.20						
3.10	Goods stacked to a max of 1.8m (except for light "top-up line" products e.g. toilet roll).	5.45						
3.11	All equipment and stock stable and stored appropriately.	5.20						
3.12	The ABP freezer is sufficiently labelled and is being used correctly. Vents are not blocked by stock, equipment etc.	12.02 7.01						
3.13	The following areas are 100% clean; sluice area (hot running water available), recycling area (setup correctly), baler/compactor and tiles, walls and ceiling tiles.	6.03 6.04 12.01						
3.14	Consumables bay fully stocked and organised.	5.85						
3.15	All cleaning chemicals are correctly stored within their original packaging in good condition, fully labelled and with user instructions are legible.	5.85						

	Observation	TLM Ref.	OK (✓)	Not OK	NA (✓)	Comments	Action Required	Date Completed
3.16	The store floor cleaning machine is clean, in good working order and the correct cleaning chemical is being used.	5.51						
3.17	The store baler/compactor interlocks are working correctly and the correct signage is displayed.	5.48						
3.18	The store stepladders and steps are in a state of good repair.	5.31						
3.19	Store manual pallet trucks and decard trolleys are in good condition and free from defects.	5.41						
3.20	Suitable number of poster hanging tools available in store and in good condition.	5.33						
3.21	Sufficient number of hazard cones and absorbent materials available for spillages (including suitable number of Zorba strips).	5.20						
3.22	Non-Food tables stacked in a stable manner.	5.40						
3.23	Where in place, cat ladders have a padlocked hoop guard present to prevent unauthorised access when area not in use.	5.30						
3.24	All electrical fuse cabinets and electrical utility rooms are labelled with an electrical warning sign and are locked where possible.	5.82						
3.25	The following PPE is available and in good condition; safety glasses, safety gloves, hi-vis jacket and thermal clothing.	5.62						
4.00	Bakery Area							
4.01	Oven gloves are available and in good repair.	11.01						
4.02	Disposable bakery aprons are available and worn by staff where required.	11.01						
4.03	All equipment is clean and in good working order, including bakery ovens and trolleys.	11.01						
4.04	Packaging materials (e.g. blue foam, plastic etc.) is removed from new bakery equipment.	11.01						
4.05	Correct cleaning chemicals used (no cleaning wipes permitted).	11.01						

68

	Observation	TLM Ref.	OK (✓)	Not OK	NA (✓)	Comments	Action Required	Date Completed
4.06	All surfaces, including the floor, are free from ice-build up in the freezer chamber, with an ice scraper available. If ice is present, it is reported on IMS for immediate action and access to the area is restricted.	11.02						
4.07	Back-up bakery freezer door signage is in place – slip risk warning and error codes.	11.02						
4.08	Bakery freezer emergency door release handle / alarm accessible and in good working order.	11.02						
4.9	The bakery stock in the freezer chamber is stored in a stable and organised manner with load lines markers visible.	11.01						
4.10	No slip or trip hazards are present in the freezer chamber.	11.02						
4.11	Allergen signage is displayed prominently in the bakery area.	11.01						
5.00	Sales Floor							
5.01	The most recent FHRS/FHIS sticker is displayed in all stores in Wales, and where the following is achieved; a score of 4 or 5 in England, or a Pass in Scotland.	6.01						
5.02	Alcohol Licence Summary is displayed above the entrance door. Stores in Scotland must display their ALS within the alcohol display area.	-						
5.03	Assistance bell accessible and unobstructed.	7.03						
5.04	Automatic doors functioning correctly, with appropriate signage attached. SM checks are being carried out.	5.52						
5.06	Customer entrance / exit auto doors have pocket screens or barriers installed to prevent finger trap.	5.52						
5.07	Basket and customer information sign secured to all basket holders with cable ties and in good condition.	5.53 13.01						
5.08	Baskets are not over-stacked.	5.53						
5.09	F&V scales are clean and functioning correctly. SM checks are being carried out.	9.03						

69

	Observation	TLM Ref.	OK (✓)	Not OK	NA (✓)	Comments	Action Required	Date Completed
5.10	Wall and ceiling hanging signage and posters are secure with all fixings in place.	5.33						
5.11	Goods stacked to a maximum of around 1.8m except for lightweight products (e.g. toilet roll).	5.40						
5.12	Food special merchandising procedure followed correctly (e.g. no food under toxic substances).	6.04						
5.13	All products are stacked in a stable manner, and pallets are in good condition.	5.46						
5.14	Where in place, chiller blinds are in good condition and operate correctly.	6.02						
5.14	The following areas are 100% clean; freezer and M&P cabinets, chiller under pallets, shelves, plinths, tiles, walls and ceiling tiles.	6.03						
5.15	M&P and freezer cabinets in good condition with all doors and lids free from damage.	5.46						
5.16	The only knives in use are the Lidl provided retractable safety knives.	5.55						
5.17	All current age-restricted sales awareness and information signage is displayed correctly.	10.03						
5.18	Chairs provided at each checkout, are in good condition and can be adjusted.	5.53						
5.19	Card reader cabling free and sufficient length to enable use by wheelchair users.	9.02						
5.20	Suitable access is available throughout the shop floor including for wheel chair users.	9.02						
5.21	All scales stamped showing the correct verification stickers, set to zero and tested weekly to ensure accuracy. Test receipts are stapled to the SMWCF.	9.03						
5.22	All visitors, including contractors, sign the Visitors Book and are provided with a site induction using the Site Safety Rules.	5.13						
6.00	External							
6.01	All external merchandising equipment is in good condition and correctly located, with all merchandised products stable.	5.44						
6.02	Cars are only parked in the marked bays.	5.11						

	Observation	TLM Ref.	OK (✓)	Not OK	NA (✓)	Comments	Action Required	Date Completed
6.03	All floor markings are clear and visible.	5.11						
6.04	Disabled bays are not used by non-Blue Badge holders and where abuse is noted, corrective action is being taken by the store.	9.02						
6.05	All surfaces are free from trip hazards e.g. potholes, loose drain covers etc.	5.11 5.20						
6.06	Vehicles and pedestrians are able to circulate safely.	5.11						
6.07	Loading bay, trolley bay and external landscaping clean and tidy.	5.23						
6.08	The grit bin is sufficiently stocked.	5.22						
6.09	External condenser fans are undamaged and clear of any obstruction.	-						
7.00	Store Deliveries							
7.01	Access to the loading bay is unobstructed and in good repair.	5.11						
7.02	The dock leveller / drawbridge / scissor lift is in visually good condition with no obvious defects or signs of tampering.	5.46						
7.03	Manual drawbridge edge protection in good condition and all fixings, brackets and screws are secure and tight.	5.14						
7.04	Store deliveries can take place safely and without risk to pedestrians.	5.11						
7.05	Store delivery restrictions are adhered to in place.	12.04						
8.00	General Working Environment							
8.01	Suitable temperature levels are achieved and maintained in the store.	5.01						
8.02	Suitable lighting is present in all areas of the store including in the warehouse, bakery freezer, welfare area and car park.	5.01 5.11 5.86						
8.03	Access and fragile roof signage at the loft entrance hatch is in place.	5.30						
8.04	Handrails on stairs are installed where required and are in good condition.	5.20						
8.05	All Ecolab bait boxes are located in line with the bait plan.	6.05						

	Observation	TLM Ref.	OK (✓)	Not OK	NA (✓)	Comments	Action Required	Date Completed
9.00	Staff Training and Awareness							
9.01	Staff are aware of how to carryout pre-use checks of equipment (stepladders, manual pallet trucks, Hako, decard trolleys, bakery trolleys, etc.).	05.09						
9.02	Staff are aware of the Lidl spillage procedure.	05.20						
9.03	Store management are aware of the Lidl accident reporting procedure (send by email) and RIDDOR reporting procedure.	05.02						
9.04	Store management aware of the Lidl contractor procedure and requirement to monitor contractors.	05.12						
9.05	There is a positive health and safety culture within the store.	05.10						
9.06	Staff aware of the Lidl age-restricted policies and procedures e.g. calling for a manager to check identification, Think 25, etc.	10.01						
9.07	Staff are aware of the signs of rodent activity, how to prevent rodent activity, the role of our pest control contractor and the actions to take in the event of pest activity.	06.05						
9.08	Staff have been asked about the health and safety hazards associated with store activities. State any that are not covered within the TLM.	-						
9.09	Staff demonstrate competence (staff monitored) in operating equipment safely.	Mod 5						
9.10	Store staff wear sensible footwear to ensure that ladders and kick steps can be used safely, and slip & trip risk is reduced.	05.11						
9.11	All equipment within the store is covered by the Store Trading Law Manual.	-						
9.12	Staff aware that they must not use delivery equipment e.g. PPT, dock leveller etc.	05.30						
9.13	Store staff never help a delivery driver reverse (Banksman) or assist in the unloading process.	05.16						
10.00	Non-Standard Stores							
10.01	Protective railings to higher level areas are secure, safe and undamaged.	05.30						

72

	Observation	TLM Ref.	OK (✓)	Not OK	NA (✓)	Comments	Action Required	Date Completed
10.02	Travellator is in good condition, with all of the necessary signage in place.	05.97						
10.03	Where present, a copy of the Asbestos Register and Site Plan is available, printed in colour, and in a state of good repair. All staff trained in Asbestos Awareness.	5.74						

Fire Risk Assessment Audit

	Observation	TLM Ref.	OK (✓)	Not OK	NA (✓)	Comments	Action Required	Date Completed
11.00	Identifying sources of ignition							
11.01	Combustible materials are not stored within close proximity to light bulbs / fittings, or within 1.5m of the MHE battery charger.	7.03 7.01						
11.02	MHE charger cables are suitably restrained and should not trail over combustible materials.	7.01						
11.03	Adaptors / extension leads (where in use), are in good condition and not overloaded.	5.82						
11.04	All portable appliances are Lidl owned, free from visible defects and in good condition.	5.82						
11.05	All portable electrical appliances are tested every 24 months and suitably labelled.	5.82						
11.06	Combustible materials are not placed adjacent to or covering any electrical heaters.	7.03						
11.07	There are no other potential sources of heat that are likely to cause a fire.	7.01						
11.08	Smoking is only undertaken off the premises or in a designated area with a suitable cigarette bin provided.	7.01						
11.09	The ventilation grills of electrical equipment are not blocked by pallets, stock, paperwork, etc..	7.01						
12.00	Identifying Sources of Fuel							
12.01	Back-up freezer insulated panels are in good condition with no damage or core material exposed. No materials are stored on the roof.	7.01						

73

	Observation	TLM Ref.	OK (✓)	Not OK	NA (✓)	Comments	Action Required	Date Completed
12.02	There is no excess storage of combustible materials.	7.01						
12.03	No combustibles to be stored externally.	7.01						
12.04	All store furniture is free from rips / tears / damage. Any damaged furniture should be repaired or replaced.	7.01						
12.05	No aerosols are stored in direct sunlight.	7.09						
12.06	Combustible materials are not stored in plant rooms, by electrical intakes or within 2.5m of distribution boards.	7.01						
13.00	Identifying people who might be at risk							
13.01	All customers, visitors, contractors and staff have continuous and adequate means of escape at all times.	7.03						
14.00	Emergency Lighting							
14.01	Emergency lighting is installed in all areas of the store including escape stairwells.	7.05						
14.02	SMs are aware of the process of on/off testing emergency lighting and have the facility to carry out the check.	7.05						
14.03	Emergency lighting tested by AM to ensure that it illuminates for min one hour on battery power.	7.05						
14.04	External escape routes fitted with emergency lighting where there is no borrowed light e.g. no street lights.	7.05						
15.00	Fire Alarms and Fire Fighting Equipment							
15.01	The fire alarm should be audible within all areas of the premises.	7.06						
15.02	No faults shown on the fire alarm panel.	7.06						
15.03	All break glass call points should be free from defects, visible and unobstructed at all times.	7.03						
15.04	"Fire Action" notices must be fully completed and displayed by all call points.	7.03						
15.05	Fire Extinguishers are clear of obstruction, either wall mounted or on stands, and with the relevant type signage located above them.	7.02						

74

	Observation	TLM Ref.	OK (✓)	Not OK	NA (✓)	Comments	Action Required	Date Completed
15.06	Fire Extinguishers have been serviced in the last 12 months.	7.02						
15.07	Staff are aware what type of extinguisher to use on which type of fire.	7.02						
15.08	CO ₂ extinguishers are located at or adjacent to electrical distribution boards.	7.02						
15.09	Smoke and heat detectors must be unobstructed at all times e.g. no plastic covers.	7.01						
15.10	Where sprinklers are installed, the heads are unobstructed and no faults shown on the panel.	-						
15.11	All walls, windows and doors in good condition.	7.01						
16.00	Fire Procedures							
16.01	No Fire evacuation of the store is required as part of the September 2018 refresher training							
16.02	All managers and staff understand their responsibilities for the Fire Emergency Plan, fire evacuation and the operation of the fire alarm and equipment.	13.05						
16.03	Contractors and visitors are made aware of the fire exits and basic fire precautions via the site safety rules during the site induction.	5.12 5.13						
16.04	The Fire Emergency Plan is completed and displayed on the Important Information Board.	13.05						
16.05	Evacuation chairs are suitably positioned and in good condition (where required). All persons competent and trained.	7.04						
17.00	Escape Routes							
17.01	There is an escape route from all areas.	7.03						
17.02	Escape routes lead to a place of relative or total safety away from the building.	7.03 7.04						
17.03	No materials are stored beneath stairwells.	7.03						
17.04	Stairwells and escape routes are well maintained and clear of obstruction.	7.03						
17.05	There are sufficient exits of suitable width for wheelchair users.	7.03						

	Observation	TLM Ref.	OK (✓)	Not OK	NA (✓)	Comments	Action Required	Date Completed
17.06	Store management are aware of the standard PEEPs (procedures to ensure disabled persons reach a place of safety during an evacuation).	7.07						
17.07	All escape routes are clearly marked with a green running man sign leading to and above exit doors.	7.03						
17.08	Gangways and escape routes are free from obstructions and any combustible material.	7.03						
17.09	All internal fire doors are fit for purpose and in good condition.	7.03						
17.10	Checkout barriers open in the direction of travel towards the emergency exit. Green directional arrow stickers must point in the direction of travel, or removed from the barriers.	-						
17.11	Fire doors that form an escape route open in the direction of travel (where possible).	7.03						
17.12	All final exit doors are operable without the use of a key and using one mechanism e.g. a push bar.	7.03						
17.13	External sides of final exit doors are free from obstruction and clearly marked "Fire Exit – Keep Clear".	7.03						
17.14	All magnetic locks fail to safety when the fire alarm is activated.	7.03						
17.15	Entrance and exit auto doors open automatically when the fire alarm is activated.	7.03						
17.16	All staff should be aware that by pressing a call point adjacent to a maglock door, the door maglock will release (fail safe).	7.03						
17.17	Fire exits are not blocked by external shutters.	7.03						
17.18	There are no rooms where staff work for long periods with dead ends, where escape would be restricted in the event of a fire.	-						
17.19	Where applicable, the escape route from the mezzanine plant deck is clearly identified, no obstructions and the base of any ladder clear.	-						

76

	Observation	TLM Ref.	OK (✓)	Not OK	NA (✓)	Comments	Action Required	Date Completed
18.00	Lifts (Passenger and Goods)							
18.01	Customer lift does not travel to first floor level without use of employee fob (NFK stores only).	07.04						
18.02	Lift alarms fully functioning (including communal areas where applicable). A "Do Not Use in Event of Fire" sign is displayed at all landing levels.	5.11 5.58 5.98						
18.03	Lift programmed to cancel all car and landing calls and continue to travel to the designated floor on fire alarm activation.	7.04						
19.00	Travellers							
19.01	Travellator operates correctly on activation of fire alarm (complete half cycle and stop).	5.11 5.97						
20.00	Multiple Occupancy							
20.01	Contact details for other tenants are available and up to date (commercial tenants only)	7.10						

Other significant findings:

Page 98

AM signs to acknowledge completion:

Sign:

Print:

Date:

HoS signs to acknowledge action required:

Sign:

Print:

Date:

77

Site	Visit Date	Result
0386 LON-Hanwell	09/08/2016	PASS
	16/08/2017	PASS
	21/06/2018	PASS
	18/06/2019	PASS
0409 LON-Wembley Stadium	02/05/2016	PASS
	06/09/2017	PASS
	05/06/2018	PASS
	12/06/2019	PASS
0518 LON-Wembley Blackbird Hill	09/08/2016	PASS
	05/09/2017	PASS
	10/07/2018	PASS
	17/06/2019	PASS
0652 LON-Greenford	12/08/2016	PASS
	09/08/2017	PASS
	10/08/2018	PASS
	16/07/2019	PASS
1397 LON-West Ealing	09/08/2016	PASS
	16/08/2017	PASS
	01/06/2018	PASS
	19/06/2019	PASS
1702 LON-Acton	No visit data available	
1838 LON-North Greenford		



About Community Alcohol Partnerships

Community Alcohol Partnerships (CAP) is a Community Interest Company (CiC) which brings together and supports local partnerships of councils, police, retailers, schools, health providers and community groups across the UK to reduce alcohol harm among young people, improve their health and wellbeing and enhance their communities.

The single most important function of CAP is as a catalyst for effective local partnership work to reduce alcohol harm. We work with local communities to bring together and support stakeholders with a shared interest in preventing underage drinking and encouraging responsible drinking among young adults.

Local CAP partners will typically include police, trading standards, relevant local authority departments such as public health, licensing, community engagement and youth services, schools, local charities, housing associations, resident associations and alcohol retailers/licensees.

Each local CAP partnership is supported by a small head office team and local advisers, and is managed by a co-ordinator, who is often an employee of the local authority or police force.

CAP CiC has an independent Chair, Derek Lewis, and a Board of Directors (/about/cap-board) which includes retailers, representatives of voluntary and charity sectors, the police and trading standards.

Funding for CAP CiC is provided by major alcohol retailers and alcohol producers who share our concerns about the harm of underage drinking. However, CAP's work is entirely independent of these funders. Local CAPs receive additional funding from a wide variety of sources, including community funds and regional grants.

Our core activities are:

Education (/what-we-do/education)



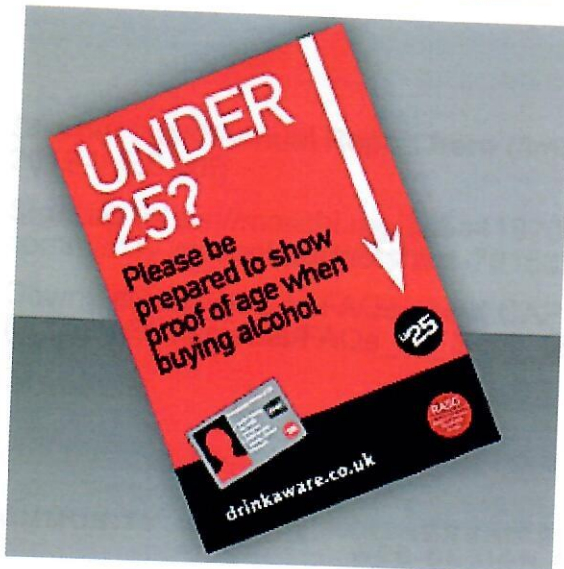
Diversionary activities for young people (/what-we-do/diversionary-activity)



Enforcement (/what-we-do/enforcement)



(/what-we-do/enforcement)Business Engagement



IN THIS SECTION:

ORIGINS (/ABOUT/ORIGINS)

FUNDING PARTNERS (/ABOUT/FUNDING-PARTNERS)

CAP BOARD (/ABOUT/CAP-BOARD)

PRINCIPLES (/ABOUT/PRINCIPLES)

SCHEMES IN THE UK (/ABOUT/CAP-SCHEMES-IN-THE-UK)

SETTING UP A CAP (/ABOUT/SET-UP-A-CAP)

'The Reading Community Alcohol Partnership is clearly very active around the town and it's good to hear that its multi-agency approach is aiming to tackle underage drinking through direct engagement with young people, enforcing the law with regard to underage consumption and proxy purchasing, and maintaining a constructive dialogue with businesses and retailers.'

ROB WILSON MP
READING EAST

See our latest Annual Report **here** (/images/documents/CAP-Annual-Report-2019-WEB.pdf)

Sign up (<https://mailchi.mp/3a6a41820893/heres-the-latest-news-from-community-alcohol-partnerships-7916825>) to our newsletter

Download answers to FAQs about CAP **here**
(/images/documents/FAQs_17_Sept_18.pdf)

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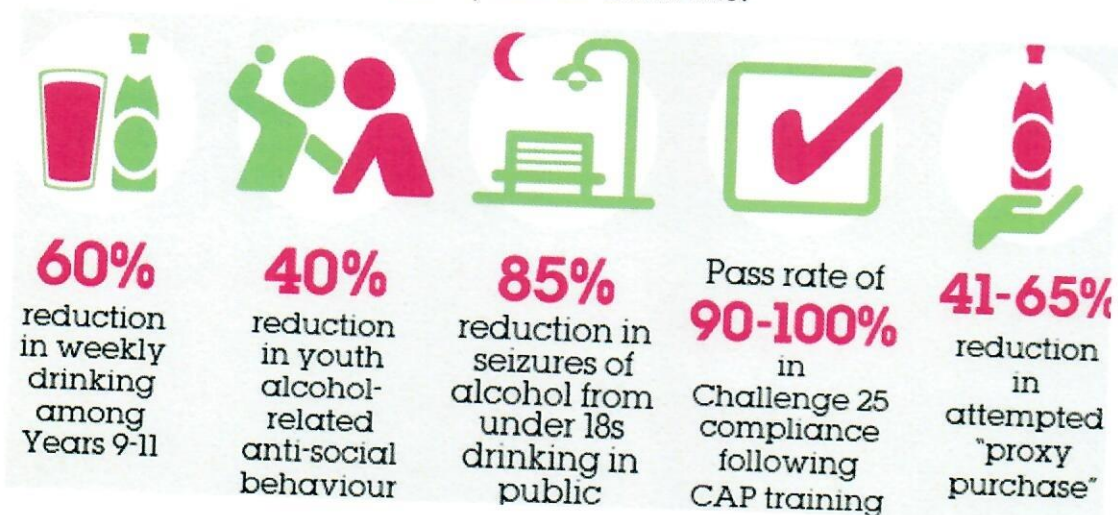


Our Impact

One of CAP's great strengths is its flexible, adaptable model, which can be tailored to fit the needs of any community. The examples here show the varied approaches CAPS take to tackling alcohol harm to young people – and the impact they are having in their communities.

There is an emerging body of evidence – both from the five independent evaluations commissioned by CAP and the self-evaluation reports that all schemes are required to produce – that CAP helps to reduce alcohol-related crime and disorder and the acquisition of alcohol by under-18s. In recent years we have also seen significant reductions in weekly drinking among Years 9-11 in CAP schools.

Typical improvements in the key measures in 2018:



Lancaster CAP – building a safe and strong community

The Bulk Ward estate in Lancaster is one of the most deprived areas in the North West of England, where underage drinking has been a long-standing issue. Lancaster CAP has worked closely with the community to change attitudes and behaviour, resulting in real improvements to the well-being of young people and residents. Working from its base at the Ridge Community Centre, there is very clear evidence that the CAP is having an extremely positive impact: reducing underage drinking, improving the health and well-being of residents and creating a real sense of community in the area.

An 80% reduction in anti-social behaviour in Longtown

Longtown CAP has brought about a hugely impressive 80% reduction in anti-social behaviour locally. Its success has come from focussing on both the supply and the demand side of underage drinking – working closely with retailers to raise standards and engaging with young people, getting them involved with the campaign and building their trust. The CAP held five engagement nights with young people to give their views and then set about fundraising to renovate a room at the community centre that they could use, and for a paid worker to run sessions with them.

Todmorden CAP - two years on

Before the launch of Todmorden CAP in 2016 there was an increase in reports of minor crime, anti-social behaviour and youth related nuisance. One of the primary focuses of the CAP has been working with young people in the area, targeting underage and proxy purchasing and highlighting the dangers of alcohol. By working closely together, the partnership has had a significant impact on the community and brought about further positive schemes such as the hugely successful pub watch – something that all licensees proactively take part in to keep their customers safe.

Working with young people in Reading

In 2016, Reading CAP was independently evaluated through Arcola Research, which highlighted its particular success in raising awareness of alcohol harm; education; reducing alcohol sales to young people and providing training for retailers to ensure compliance with legal requirements. A summary of the evaluation can be read here ([/images/CaseStudies20/Reading-CAP-Summary-Report-of-Evaluation-FINAL.docx](#)).

Anti-social behaviour drops by 62% in Mile End

Mile End CAP tackled underage drinking by giving young people new employment opportunities and leisure activities, following residents' concerns about problem behavior in the area. The CAP also stepped up work with local schools and youth centres to raise awareness about substance misuse issues and youngsters from the borough's youth council carried out test purchasing of alcohol so trading standards could enforce against retail outlets selling alcohol to anyone underage. Read more here (</images/EvaluationReports/Tower-Hamlets-CAP-Evaluation-2017-Summary.pdf>).

'Working with CAP has helped partners to engage with the licensing trade to greatly reduce the sale of alcohol to young people.'

IVAN WOOD

DURHAM CONSTABULARY

See our latest Annual Report **here** (</images/documents/CAP-Annual-Report-2019-WEB.pdf>)

Sign up (<https://mailchi.mp/3a6a41820893/heres-the-latest-news-from-community-alcohol-partnerships-7916825>) to our newsletter

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MENU

NSPCC

Overview

Our national charity partnership with the NSPCC - working together to keep kids safe

NSPCC

Our charity partnership with the National Society for the Prevention of Cruelty to Children (NSPCC) has already raised £3 million since launching in 2017. Since then, we have built a fantastic relationship with the charity, and we are thrilled to announce the extension of our NSPCC partnership to support their Childline service, founded by Dame Esther Rantzen.

It's now time to switch the focus over to our next challenge, as we aim to raise £2 million in support of NSPCC's life-changing service which helps to ensure no child goes unheard. The Childline service is a place for any child to turn to, whatever difficulty they're facing.

Childline needs support, now more than ever. With school closures, children and young people may suffer from increased levels of isolation, leading to further anxiety or mental health problems. They can talk to a Childline counsellor via online chat or over the phone, as well as get access to a whole range of support options on the Childline website. Whether a young person is struggling with mental health issues, bullying, or problems at home, Childline is always there for them.

Together, with the money raised through our partnership with the NSPCC, we aim to recruit 937 Childline volunteer counsellors, enable over 77,700 counselling sessions and provide over 2 million visits to the Childline website to provide children with online support in the next two years.



Discover the story of The Cloud and The Rainbow, read by Sam Faiers

Hear from Dame Esther Rantzen, the Founder of Childline



Read it here

RAINBOW TRAIL

Together with our charity partner the NSPCC, we've joined The Rainbow Trail to support children's mental and emotional health. Keep a look out for our special billboards at stores across the country, featuring rainbow pictures submitted to us from talented Lidl'uns.



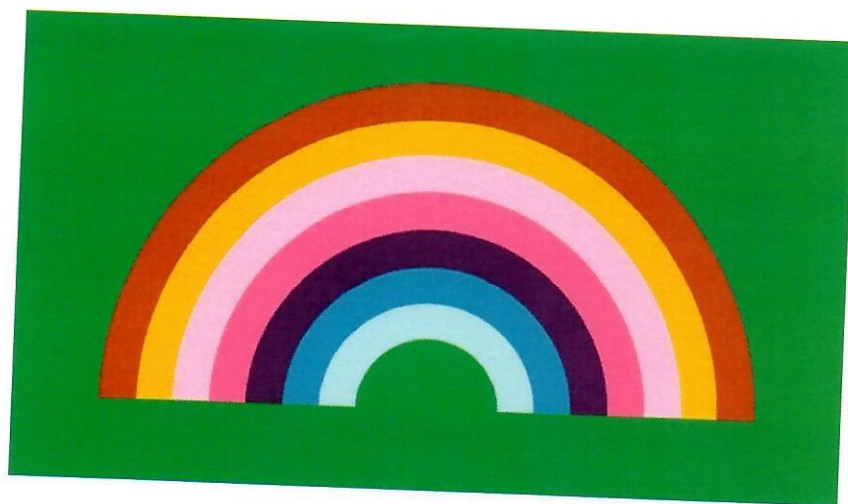
MENU

Rainbows send a message of hope at a time when things may be tougher for children and young people suffering with their mental and emotional health, and home is not a safe place for every child. We want to let children know that the NSPCC's Childline service is still there for them.

Please keep sharing your children's pictures with us on social. Tag us using @LidlGB and include #LidlRainbowChallenge on both Twitter and Instagram.

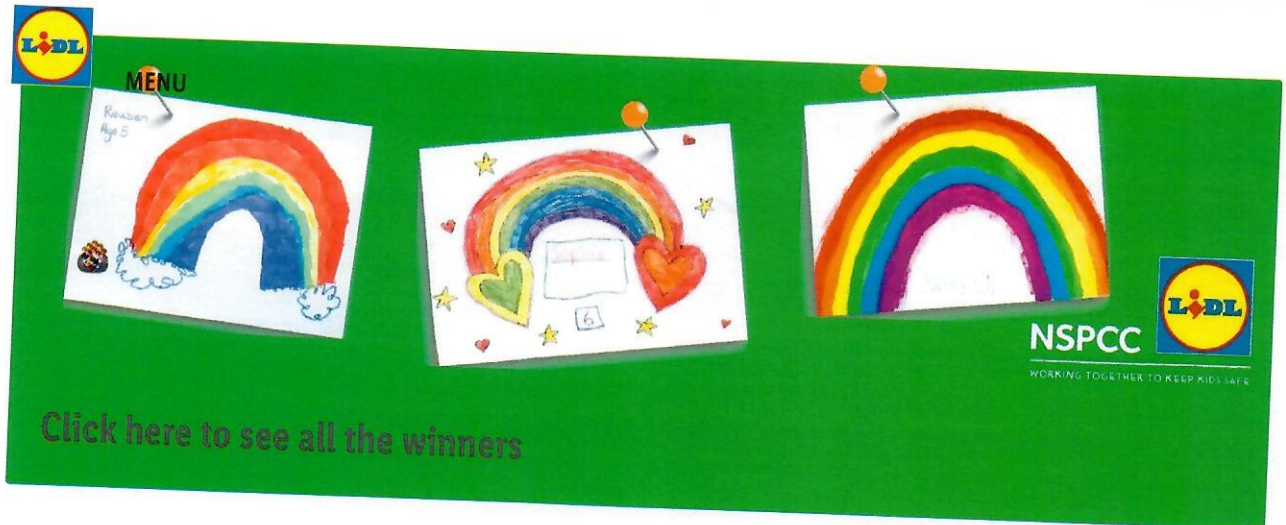
We've committed to raising **£2 million over 2 years** to support the NSPCC's vital Childline service. This comes at a time of unprecedented demand with children reaching out to Childline worried about coronavirus. With schools closed, many vulnerable children are at risk.

To make a donation to help Childline to be there for children, [just click here](#)



The Rainbow Trail delivers messages of hope to children and raises awareness that Childline is still here during these challenging times. Bring a splash of colour and a message of hope to your windows, and download our rainbow templates below.

THE #LIDLRAINBOW CHALLENGE



NSPCC'S CHILDLINE SERVICE

**WHATEVER YOUR WORRY,
YOU CAN TALK TO US**

childline ONLINE, ON THE PHONE, ANYTIME
childline.org.uk | 0800 1111

Take a look at this video to find out more about the NSPCC's Childline service.

Find out more about NSPCC's Childline service

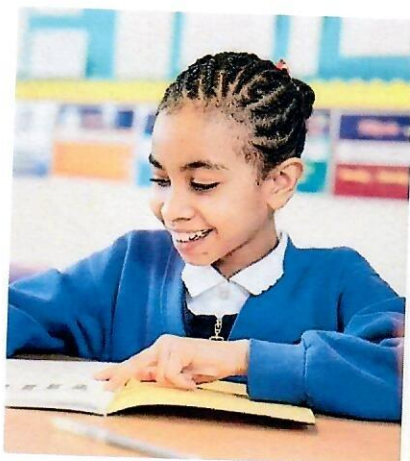
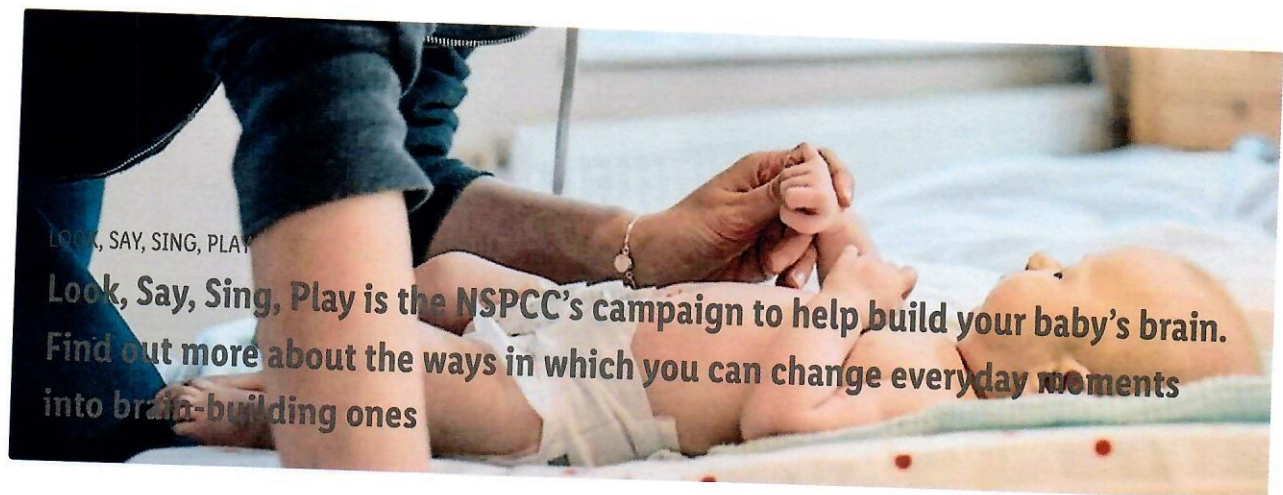


WE'VE RAISED £3M FOR THE NSPCC!

Over the last three years, we've have raised a massive £3 million to support the NSPCC through our charity partnership. This funding enabled the charity to reach 1 million children the 'Speak out. Stay safe' service, teaching primary school children to recognise the signs of abuse and neglect and who to turn to for help.

Since the partnership began in April 2017 we've been busy raising these vital funds in all sorts of fun and creative ways, such as climbing London's Gherkin tower, baking a huge amount of delicious cakes and going green for Halloween.

LOOK, SAY, SING, PLAY



Photography by Alex Grace.

FUTURE LEISURE LIMITED - 141 KILBURN HIGH ROAD, NW6 7HT

BRENT LICENSING COMMITTEE HEARING 8th JULY 2020

APPLICATION FOR GAMBLING ACT 2005 PREMISES LICENCE

1. Documents

- (a) Application for Gambling Act 2005 Premises Licence (submitted)
- (b) Local Area Risk Assessment (submitted)
- (c) Example front door and signage
- (d) Example entry sign
- (e) Gamcare Notice
- (f) Self-exclusion Guide
- (g) Social Responsibility Charter
- (h) Policies and Procedures
- (i) Think 25 Arcade Poster
- (j) Staying in Control Leaflet
- (k) Staying in Control Poster
- (l) Think 25 Poster
- (m) Gambling Intervention Guide
- (n) Safeguarding in Gambling

2. Background

1. This is an application for a Gambling Act 2005 Premises Licence for an Adult Gaming Centre at
141 Kilburn High Road, NW6 7HT.

2. The applicant is Future Leisure Limited which is an independent company owned by Gavin Tresidder who is an experienced operator of Adult Gaming Centres. Future Leisure Limited are a member of BACTA (British Amusement Catering Trade Association) which is the trade association for amusements and gaming machines covering family entertainment centres, machine supplies for pubs, clubs and bingo halls as well as operators of Adult Gaming Centres.
3. Future Leisure Limited holds an operating licence issued by the Gambling Commission and all policies and procedures which promote the 3 licensing objectives set out in the Gambling Act 2005 are approved by the Commission and in preparing its policies and procedures, Future Leisure Limited also relies on BACTA's own policies and procedures.
4. This particular site has had the benefit of a Gambling Act 2005 premises licence as the premises was trading as a betting office operated by William Hill. This application will replace one type of Gambling Act 2005 premises licence, namely a betting office, with another, namely an Adult Gaming Centre.
5. The William Hill shop has been trading in this location since at least 1993, closed on 4 August 2019 and the licence was surrendered on 22 August 2019.
6. The premises traded with 14 additional conditions relating to CCTV, signage, Challenge 21 and the premises being manned by one member of staff until midday, thereafter a minimum of 2 persons until closing who shall leave together.
7. The William Hill shop occupied 141-143 Kilburn High Road. This application relates only to 141 Kilburn High Road and will therefore be half the size of the William Hill shop.

8. The nearest AGC is Cashino at 130 Kilburn High Road, which is 164 feet away. The next nearest AGCs are Palace amusements, 108 Kilburn High Road, City Slots 89 Kilburn High Road and Cookes at 40 Kilburn High Road. Only City Slots at 89 Kilburn High Road lies in the borough of Brent.
9. According to the Gambling Commission figures there are 92 betting shops in the Borough of Brent and 10 AGCs. This is an application for an AGC. Several who make representations refer incorrectly to betting offices and to B2 fixed odds betting terminals. These machines are permitted in betting offices, but not permitted in AGCs.
10. In practice, this application for a Gambling Act premises licence is not to provide an additional licence but a replacement licence for the William Hill shop, albeit without fixed odds betting terminals and a shop which is half the size.
11. There are many parts to the various representations which are not relevant to a Gambling Act 2005 application and should be disregarded by the Panel. These irrelevant submissions include, but are not limited to:
 - (a) The application brings no value to the community
 - (b) Employment to locals, business rates, tax paying contribution
 - (c) The street generally
 - (d) Demand for gambling premises
 - (e) Moral objections to gambling premises
 - (f) Shops selling useful things
 - (g) Street drinking
 - (h) Anti-social behaviour, not directly connected to the gambling premises
 - (i) Coronavirus

- (j) Any reference to crime which is not directly connected with evidence to gambling premises
- (k) Any reference to an AGC encouraging criminal behaviour without evidence
- (l) Social objections
- (m) Any alleged associated problems unconnected without evidence to an AGC.

12. The representations fail to acknowledge the Local Area Risk Assessment, policies and procedures operated by Future Leisure and specific staff training on promoting the licensing objectives and in particular protecting the vulnerable and keeping gambling free from crime.

13. There is no evidence whatsoever from the police connecting the gambling premises to crime and disorder and the local authority would expect to hear from the police and be guided by the police on matters of crime and disorder.

14. The application was served on all 8 Responsible Authorities and there are no remaining representations from any Responsible Authority. Only the Police made an initial representation and that was only to request conditions which the applicant agreed to fully. There is no submission from any responsible authority that these premises would be connected with crime and/or disorder or not protect the vulnerable.

3. The Adult Gaming Centre

15. The Adult Gaming Centre provides gaming machines for customers to use in the shop.

16. Adult Gaming Centres are lawful venues permitted under the Gambling Act 2005. The Gambling Act 2005 and its regulations specify the type of machine that can be used in the premises and in some instances specifies the number of particular types of machines.

17. An Adult Gaming Centre is not allowed to have fixed odds betting terminals.

4. Conditions

(a) Mandatory conditions.

- i. A notice must be displayed at all entrances to AGCs stating that no person under the age of 18 years will be admitted to the premises.
- ii. There can be no direct access between an AGC and any other premises licensed under the Act or premises with a family entertainment centre (FEC), club gaming, club machine or alcohol licensed premises gaming machine permit. (England and Wales only). There is no definition of 'direct access' in the Act or regulations, although licensing authorities may consider that there should be an area separating the premises concerned, such as a street or café, which the public go to for purposes other than gambling, for there to be no direct access.
- iii. Any ATM made available for use on the premises should be located in a place that requires any customer who wishes to use it to cease gambling at any gaming machine in order to do so.
- iv. The consumption of alcohol in AGCs is prohibited at any time during which facilities for gambling are being provided on the premises. Additionally in Scotland the sale of alcohol on the premises is specifically prohibited. A notice stating this should be displayed in a prominent place at every entrance to the premises.

(b) Conditions agreed with the Police (Paul Scott).

CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days and shall be made available to police and licensing officers if requested.

A CCTV camera shall be installed to cover

- a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions
- b) The areas of the premises to which the public have access (excluding toilets)
- c) Gaming machines and the counter area

An overt CCTV monitor to be installed, able to be seen by customers

CCTV shall be made available for the police viewing at any time with minimum delays when requested.

The following crime prevention measures shall be implemented:

- A time delay safe with deposit slot and anti-fishing mechanisms must be used at the counter till area
- Regular robbery awareness and cash handling training shall be given to all staff.

The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.

Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.

Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.

A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable from the ground floor cashier counter by staff.

All doors and windows shall remain closed during any licensable activity.

There shall be no pre-planned single staffing/lone working at any time.

There will be a minimum of **two** staff present at all times when the premises are open.

The licensee shall ensure that all seating within the premises are either secured to the floor or are weighted to prevent lifting.

A suitable intruder alarm complete with panic button shall be fitted and maintained.

A fire alarm and smoke detection system shall be installed.

The licensee will ensure that customer toilets are checked every hour for evidence of drug taking and alcohol consumption. Toilet checks are to be documents stating the time and member of staff who made the checks.

Toilet doors remain locked, fitted with a magnetic style-locking device and access given by staff only.

An incident log shall be maintained and made available on request to an authorised Local Authority officer or the Police, which will record the following:

- a) All crimes reported to the venue.
- b) Any complaints or incidents regarding crime and disorder.
- c) Refusals and banned customers.
- d) Any faults in the CCTV system.
- e) Any visit by a relevant authority or emergency service.

5. The Law

18. The applicant is aware that the Committee will of course receive legal advice from its legal adviser during the course of the hearing. However the law governing the consideration of this application is very clear and specific and different to the Licensing Act 2003 considerations.

19. Gambling Act 2005 section 1 sets out the licensing objectives as being:

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

20. The Gambling Act 2005 also sets out the principles to be applied by licensing authorities in exercising their functions under the Gambling Act 2005 which are different to the principles that would be applied in other licensing applications e.g. Licensing Act 2003 premises licence applications.

21. Gambling Act 2005 Section 153 principles to be applied:

- (1) 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 think of it -
 - (a) In accordance with any relevant code of practice;
 - (b) In accordance with any relevant guidance issued by the Commission under Section 25;
 - (c) Reasonably consistent with the licensing objective (subject to Paragraph (a) and (b)); and
 - (d) In accordance with the statement published by the authority under Section 349 (subject to paragraphs (a) to (c)).
- (2) In determining whether to grant a premises licence, a licensing authority may not have regard to the expected demand for the facilities which it is proposed to provide.
- (3) This section is subject to Section 166. (This relates to casino licences).

22. It can be seen from Gambling Act 2005 Section 153 that the legislation requires the licensing authority to “*aim to permit*” in so far as the application is “*reasonably consistent*” with the matters referred to in this section.

23. There is commentary in Paterson's Licensing Acts on the wording of Section 153 "What is the scope of this duty? It is suggested that there are 2 elements: first, it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But, the duty seems to go further than that. The verb "to aim" is defined by the OED as meaning "to calculate one course with a view to arriving (at a point); to direct one's course to make it one's object to attain...".
24. Paterson's continues "The most obvious way in which the authority will be able to exercise their powers in this way will be an imaginative use of their power to frame and impose conditions so as to overcome objections to the application which might in the absence of suitable conditions lead to the application being rejected."
25. The paragraph in Paterson's concludes "it is also necessary to recognise that the language of Section 153(1) stops short of being mandatory; "aim to permit" provides a strong steer to look favourably on an application, but no more."
26. The Gambling Commission guidance to licensing authorities makes it clear that in determining applications for premises licences, the Act explicitly sets out 2 principles that licensing authorities should not have regard to:
- Section 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.
 - Section 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".

- The guidance continues “licensing authorities should also be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences... An authorities decision cannot based on dislike of gambling or a general notion that it is undesirable to allow gambling premises in an area”.

6. Conclusion

27. The applicant has not had any issues at the other premises traded as Adult Gaming Centres by the applicant. The applicant promotes the licensing objectives in the other shops and will do so in this shop.
28. The applicant is an experienced operator with a range of policies, procedures and other operating controls that promote the licensing objectives , codes of practice and principles set out in Brent’s policy. There are additional measures proposed in this application in addition to those usually in place in Adult Gaming Centres.
29. There are no representations from the licensing authority, the Police or any Community Safety Team. No representation that this application is not consistent with or fails to promote the Licensing Objectives and The Gambling Act 2005.
30. The Licensing Committee is invited to conclude that the application is consistent with all matters referred to in Section 153 Gambling Act 2005 and in applying that section can properly grant the application.



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WELCOME TO ROYAL CASINO SLOTS

THE MANAGEMENT
RESERVE THE RIGHT TO
REFUSE ADMISSION

NO PERSON UNDER
18 YEARS OF AGE ALLOWED
ON THESE PREMISES



NO ALCOHOL TO BE
CONSUMED ON THESE
PREMISES


NO SMOKING

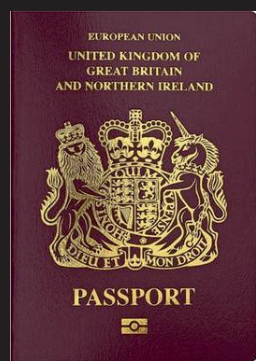


IT IS AGAINST THE LAW
TO SMOKE ON THESE
PREMISES

CHALLENGE



IF YOU ARE LUCKY ENOUGH TO
LOOK UNDER 25 YOU WILL BE
REQUIRED TO PROVE THAT
YOU ARE OVER 
WHEN YOU ENTER THIS PREMISES



ACCEPTED ID



FIRE ACTION

IF YOU DISCOVER A FIRE:

Sound the alarm and attack the fire if possible,
using the appliances provided, if not:

Leave by the nearest Exit,

DO NOT stop to collect personal belongings,

Close all doors on route,

DO NOT enter the building,

Assemble at Outside Iceland

Ensure that the Fire Brigade has been called

IF YOU HEAR THE FIRE ALARM:

Leave by the nearest Exit,

DO NOT stop to collect personal belongings,

Close all doors on route,

DO NOT enter the building,

Assemble at Outside Iceland

Ensure that the Fire Brigade has been called

WELCOME



We want your visit to be as comfortable as possible. If anything is not up to our usual standards please advise a member of our customer service team who'll be happy to help



Gambling should be fun and we urge you to enjoy our products in a safe and responsible manner. If gambling is causing you a problem contact Gamcare for independent support and advice on 0808 8020 133



We pride ourselves on offering the very best machines, environment and service possible. If you are dissatisfied for any reason, please contact the Duty Manager in the first instance. Alternatively we welcome feedback at feedback@rcslots.co.uk

CUSTOMER NOTICE

The Company wish to clarify to all customers the following information

1. Only one person per machine.
2. Players may actively play multiple machines which are situated side-by-side, not for example at opposite ends of the premises.
3. All payouts over £10 must be witnessed by a member of staff.
4. Non playing persons will be asked to leave the premises.
5. The Company does not accept “held credits” on any machine for more than a period of 10 minutes.
6. A machine may be “reserved” for a maximum of 15 minutes, unless otherwise agreed by the Site/Duty Manager or Supervisor in charge.
7. Customers playing multiple machines may be asked to relinquish one (or more) at the Site Manager’s discretion.
8. Cameras or any recording equipment are not to be used on these premises.
9. The Company cannot be held responsible for any personal property brought into or left on these premises.

CUSTOMER NOTICE



THESE PREMISES ARE GUARDED BY
24 HOUR CCTV FOR THE DETECTION
AND PREVENTION OF CRIME AND FOR
THE SECURITY OF OUR CUSTOMERS

PROMOTIONS TERMS & CONDITIONS

CASH MATCH

Cash Match is subject to an equivalent customer spend. The cash value is matched. Staff will match the value of the customer deposit using cash. Offer/promotion may be restricted to specific machines. The offer does not vary according to machine stake. Complimentary Cash Match is at the discretion of the Venue Manager.

STAMPER CARDS / COLLECTOR CARDS / SCRATCH CARDS

Stamper Cards are valid in the participating venue only (unless otherwise stated). Only one stamper card is permitted per customer (unless otherwise stated). No purchase necessary.

PRIZE AND CASH DRAWS / RAFFLES

Customers can participate in prize and cash/raffles when collecting prize draw or raffle tickets through venue visits (one per day per customer) and/or through other promotions as advertised. Customers must be in the venue at the time of the draw/raffle to qualify for a prize (Unless otherwise stated).Where cash alternatives are offered instead of prizes the cash amount may be less than the recommended retail price (RRP). Management reserve the right to cancel/postpone or “rollover” the draw to an alternative day when insufficient customers attend or where the winning customer is not present.

GENERAL

Management reserve the right to amend the conditions or cancel any promotion, at any time, without prior notice or explanation. Management can refuse entry to the premises or participation in any promotion without explanation.

Customers must sign and provide necessary personal details (depending on promotion) else promotion becomes valid i.e Cash Match, raffles, etc.

Fraudulent activity will result in exclusion from the promotion and or premises.

Where competitor cash match promotions are active, proof of competitor promotions may be required.

Customers are prohibited from collecting a bank sum from a machine where the sum, or part sum of the bank is funded by a promotion.

In the event of a gaming transaction dispute please speak to a member of staff for full details of our Alternative Dispute Resolution (ADR) Service.

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GamCare offers advice, information and practical help over the phone or online.

Call free:
0808 8020 133
www.gamcare.org.uk

You can post messages on the online Forum, chat online or talk to an Adviser who can let you know about local support, including counselling services, and sources of advice about related issues, like debt.

GamCare provides free counselling to help you explore and consider the situations relevant to your gambling in a safe, confidential environment.

To find out more, call the **National Gambling Helpline**, operated by GamCare, and speak to a specially trained Adviser. They'll listen, they won't judge you, and your conversation is confidential.

Help and advice

If you are concerned about your gambling, or someone else, don't keep it to yourself. Talk to us, a friend or relative that you trust. You can also seek help and advice from your GP or the following agencies:

Gamblers Anonymous

A support fellowship for problem gamblers.
www.gambleranonymous.org.uk

Gam-Anon

Support for friends and families affected by problem gambling.
www.gamanon.org.uk

Gordon Moody Association

A residential treatment centre for problem gamblers.
www.gordonmoody.org.uk

Citizen's Advice

Free, independent and confidential advice and information.
www.citizensadvice.org.uk

StepChange Debt Charity

Free advice on problem debt, based on what's best for you.
0800 138 1111
www.stepchange.org

National Debtline

Free, independent and confidential advice on money and debt problems.
0808 808 4000
www.nationaldebtline.co.uk

PayPlan

Free, confidential advice on resolving debt problems.
0800 280 2816
www.payplan.com

Samaritans

Confidential, emotional support for anyone in crisis.
116 123
www.samaritans.org.uk

Let's keep it fun...

Helping you to stay in control of your gambling



National Gambling Helpline
Call free: 0808 8020 133
www.gamcare.org.uk



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Bacta Self-Exclusion Services Application

USER MANUAL GUIDE

Purpose of the document

This document describes the bacta self-exclusion services application. Each section below describes and showcases specific functionality and provides instructions on how to use the application.

This document is intended to guide Supervisor and User access level to use the application.

The application is always accessible at url: <https://www.bacta-selfexclusion.org.uk>

Contents






PURPOSE OF THE DOCUMENT	2
1. PRESENTATION OF THE SOLUTION	4
1.1 Brief description	4
1.2 Descriptive Icons	4
1.3 Support	4
2. CONNECTING TO THE APPLICATION	4
2.1 Address	4
2.2 Authentication	4
3. STRUCTURING OF THE APPLICATION	6
3.1 Layout	6
3.2 Functionalities	6
4. ADD/UPDATE SITES	7
5. ADD / UPDATE USERS	10
6. DATA CUSTOMISATION	12
7. ADD EXCLUSION	13
8. PHOTO GALLERY	15
9. RECORD BREACH	17
10. REINSTATE EXCLUSION	19
11. FORGOT PASSWORD	21

1. PRESENTATION OF THE SOLUTION

1.1 BRIEF DESCRIPTION

The bacta Self-Exclusion Services Application is an online portal used to exclude customers from their and other operator AGCs / MSAs.

1.2 DESCRIPTIVE ICONS

	Edit Record
	Add New Record
	Delete Record / Close Window
	Save Record
	Cancel Changes

All Mandatory fields in the application are marked with *

1.3 SUPPORT

For any support request please contact bacta.

2. CONNECTING TO THE APPLICATION

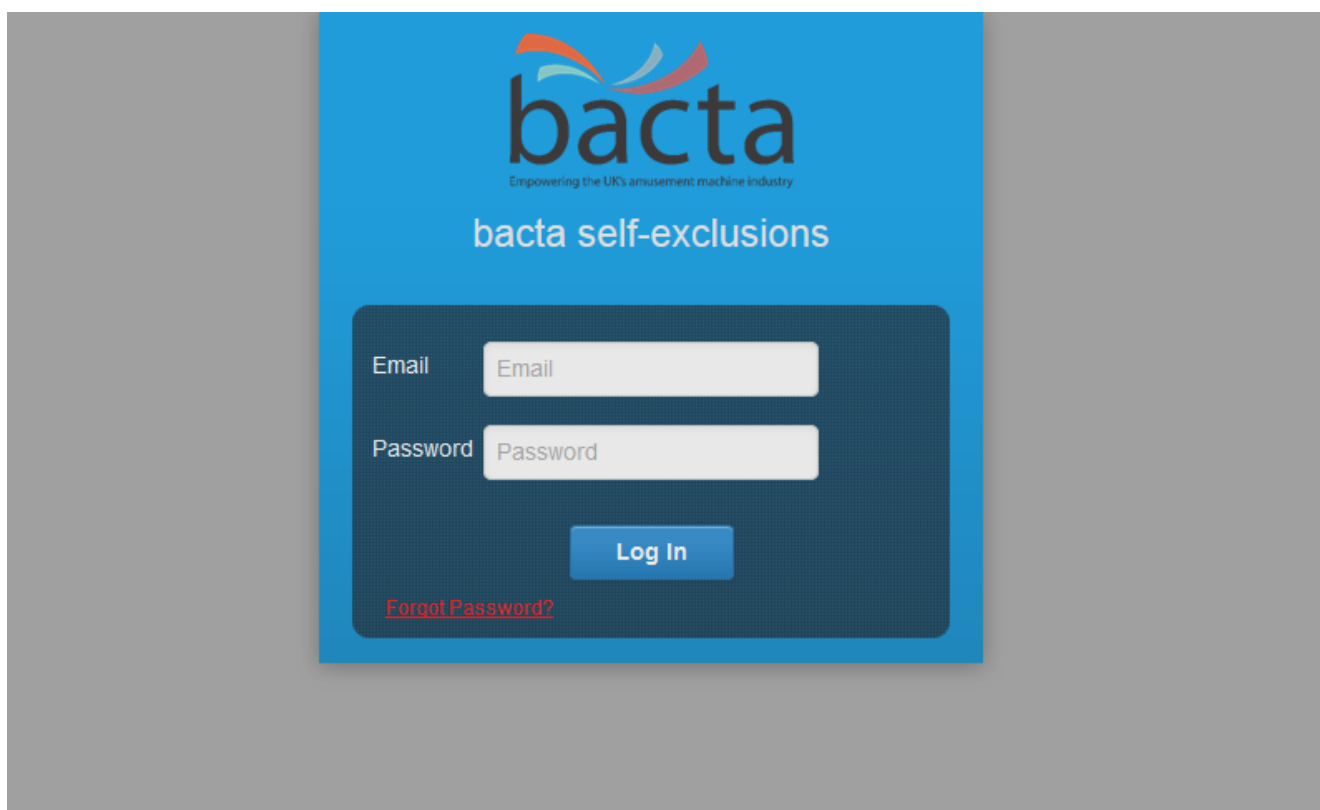
2.1 ADDRESS

You must connect to the application using the following address:

<https://www.bacta-selfexclusion.org.uk>

2.2 AUTHENTICATION

For Authentication user should enter their registered email id for the user name and password.

A screenshot of the Bacta self-exclusions login interface. It features a blue header with the Bacta logo and the text "bacta self-exclusions". Below this is a dark blue login box containing two input fields labeled "Email" and "Password", a "Log In" button, and a red link labeled "Forgot Password?".

bacta
Empowering the UK's amusement machine industry

bacta self-exclusions

Email

Password

[Log In](#)

[Forgot Password?](#)

If the access is unauthorized an error message is displayed in red.

When you have signed the T&C's with bacta Self-Exclusion Services Ltd (BSESL) a Supervisor user account is created for your organisation and you will be informed of the login credentials.

At the time of first login you will be prompted to change the temporary password provided by bacta.

Change Password

Password Expired / You changed password externally

Current Password:

New Password:

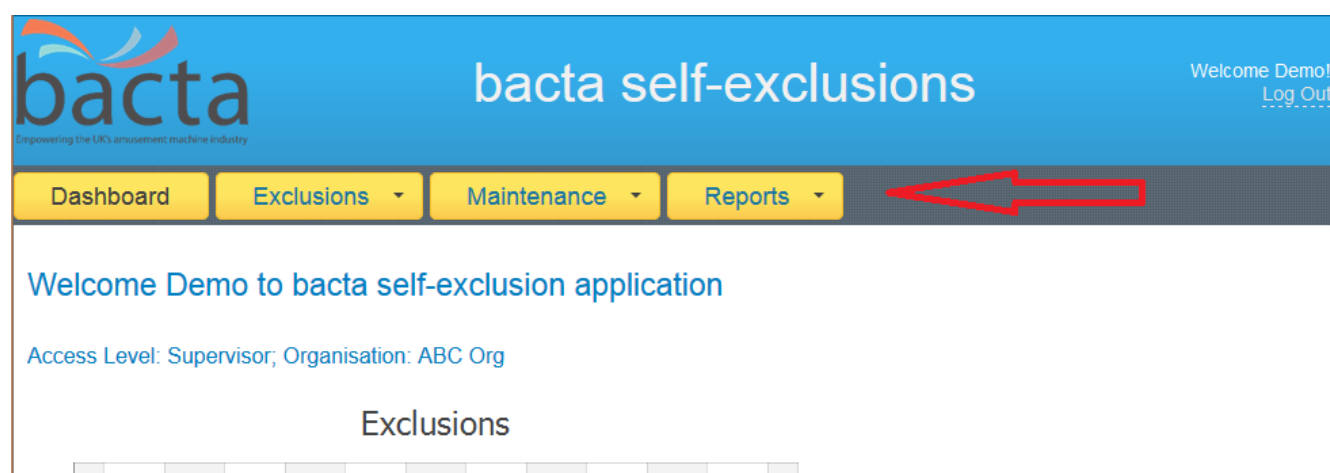
Confirm New Password:

[Change Password](#)

3. STRUCTURING OF THE APPLICATION

3.1 LAYOUT

All modules of the application can be accessed from the top menu. Based on your access level the menu will show more or less items.



3.2 FUNCTIONALITIES

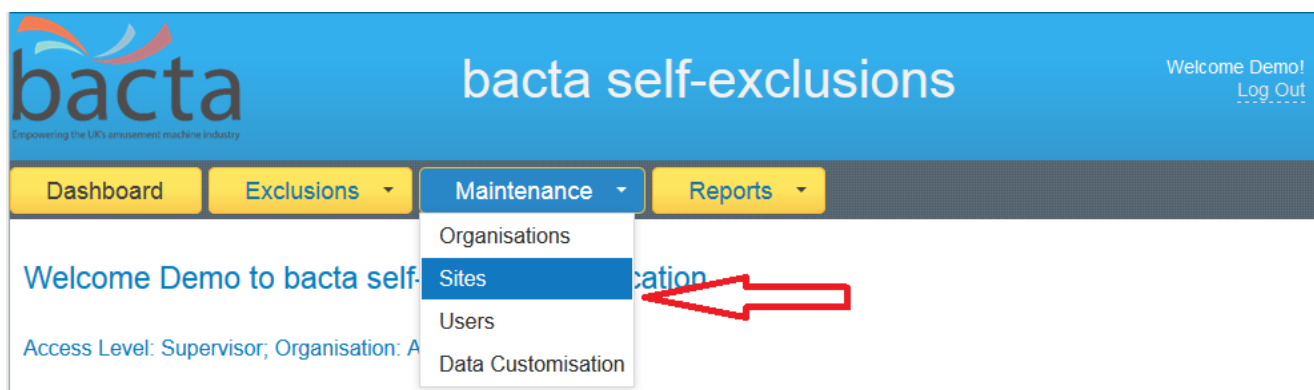
The functionalities that will be described in this document are:

- Maintenance
 - Add/Update Sites
 - Add/Update Users
 - Data Customisation
- Exclusions
 - Adding New Exclusion
 - Recording Breach
 - Reinstatement
 - Photo Gallery
- Reporting
- Forgot Password

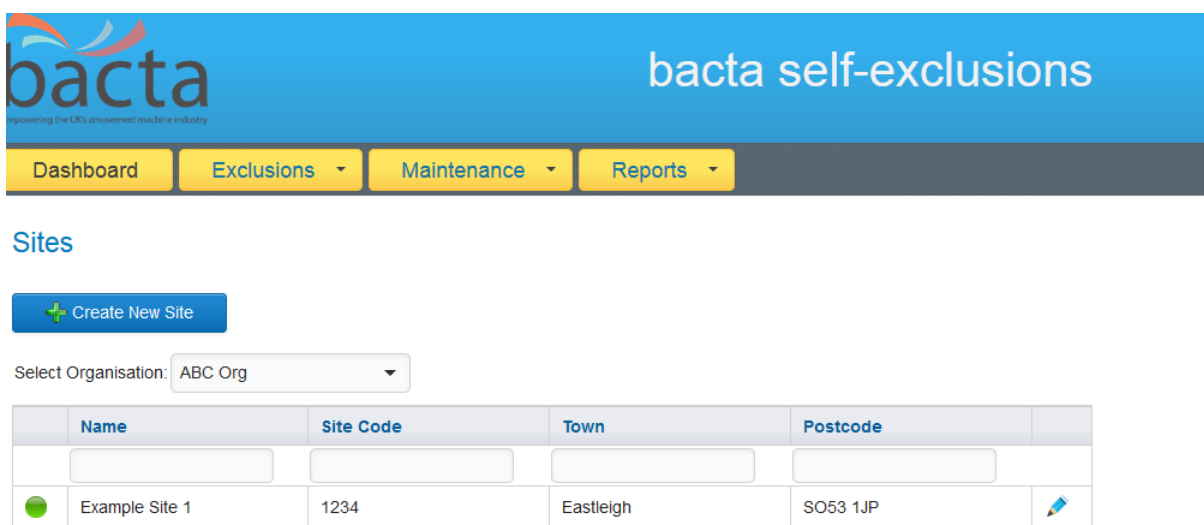
4. ADD/UPDATE SITES

Only Supervisor users can add / update site information for their organization

STEP 1: Navigate to Maintenance > Sites in the top menu of the application



STEP 2: The screen will now show a list of all sites that have been added for your organizations



STEP 3: Click on the button "Create New Site"




STEP 4: Enter the details of the site in the form displayed

New Site

[← Back to Sites List](#)

Details	Address	Opening Times
Site Name*: <input type="text" value="Example Site 2"/>	Postcode*: <input type="text" value="SO53 1JP"/>	Sunday: <input type="text"/> To <input type="text"/>
Site Code*: <input type="text" value="1122"/>	Address 1*: <input type="text"/>	Monday: <input type="text"/> To <input type="text"/>
Organisation*: <input type="text" value="ABC Org"/>	Address 2: <input type="text"/>	Tuesday: <input type="text"/> To <input type="text"/>
Site Type*: <input type="text" value="AGC"/>	Address 3: <input type="text"/>	Wednesday: <input type="text"/> To <input type="text"/>
Location Code*: <input type="text"/>	Town/City*: <input type="text"/>	Thursday: <input type="text"/> To <input type="text"/>
Status*: <input type="text" value="Open"/>	County: <input type="text"/>	Friday: <input type="text"/> To <input type="text"/>
Region Code: <input type="text"/>		Saturday: <input type="text"/> To <input type="text"/>
District Code: <input type="text"/>		

 Save

When you enter the postcode, a pop up will display a list of addresses for the postcode entered. Select the address of your site and click on the button "Use Selected Address". On doing so, the address will be populated automatically.

- Site Code is the unique reference of your site used within the organisation. If you do not have one please enter a unique code like 1, 2, 3 etc for all site you need to add.
- Location code is mandatory for MSA Organisation Sites
- Region Code can be used if you would like your supervisors to have access only to certain sites. More details can be found in the Add User section

Enter all your site information and click on save button. On successful save, the browser will display the success message. If not an error message is displayed by highlighting the fields that require correction. You will need to hover on the icon to see the error relating to the field

STEP 5: Add any site contacts by clicking on Add new contact button. When new exclusions are added and if the exclusion is in the site vicinity then an alert email will be sent out to these contacts.

Update Site Details

[← Back to Sites List](#)

Details

Site Name*:

Site Code*:

Organisation*:

Site Type*:

Location Code*:

Status*:

Region Code:

District Code:

Address

Postcode*:

Address 1*:

Address 2:

Address 3:

Town/City*:

County:

Opening Times

Sunday: To

Monday: To

Tuesday: To

Wednesday: To

Thursday: To

Friday: To

Saturday: To

Site Contacts





Title	First Name	Surname	Position	Email	Telephone	Mobile
No contacts found for this site.						

To Update Site Details:

- Navigate to Maintenance > Sites
- In the listing screen click on the edit icon

Sites

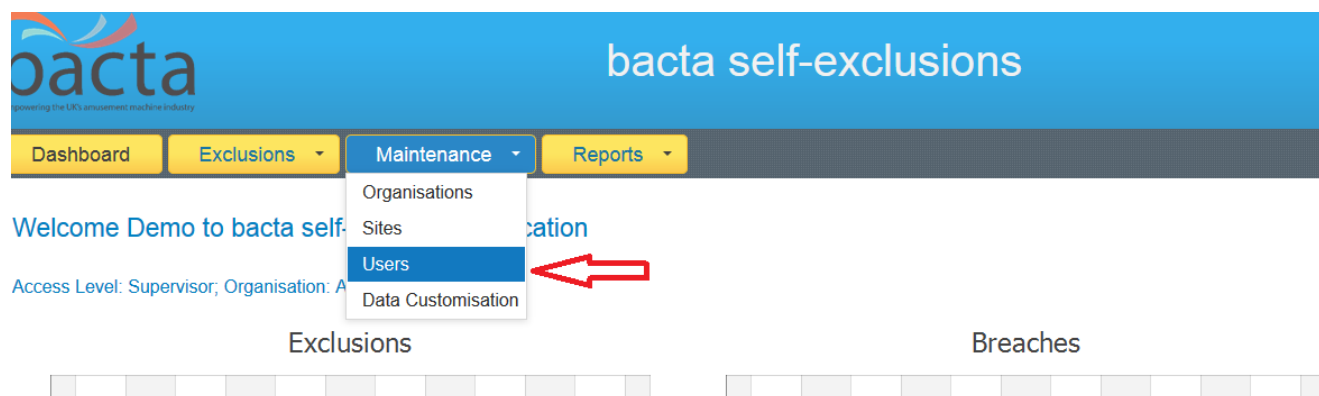
 Select Organisation:

	Name	Site Code	Town	Postcode	
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	
	Example Site 1	1234	Eastleigh	SO53 1JP	
	Example Site 2	1122	Eastleigh	SO53 1JP	

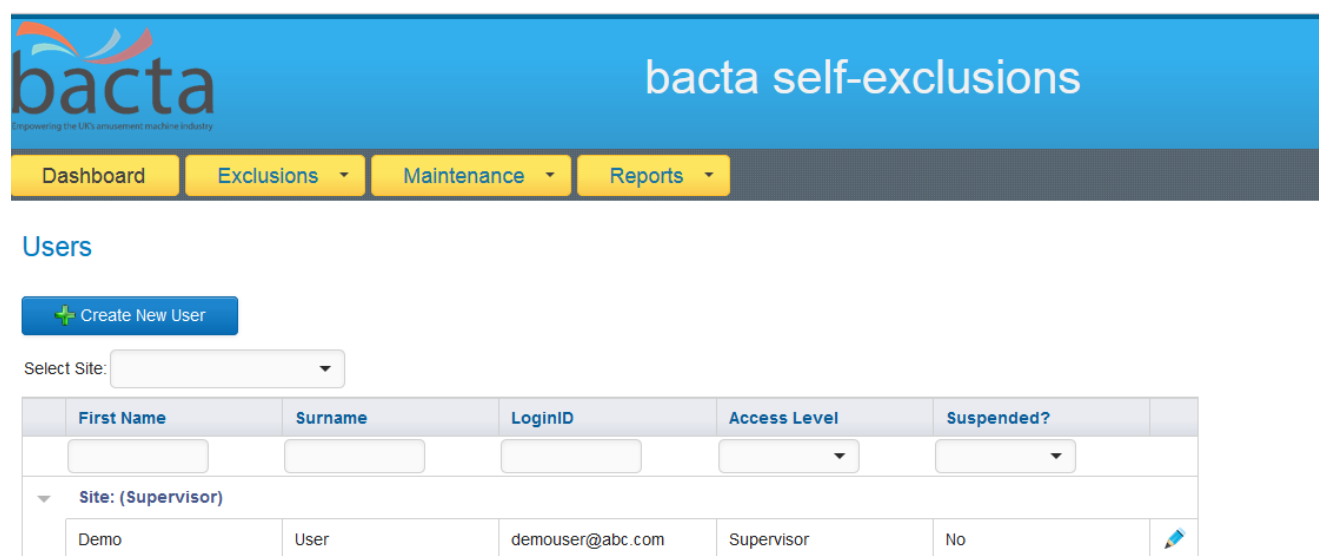
5. ADD / UPDATE USERS

Only Supervisors can add other users.


STEP 1: Navigate to Maintenance > Users in the top menu of the application



STEP 2: The screen will now show a list of all users that have been added for your organizations / Sites. This listing will be shown only to supervisors. If you have only 'User' access level then the screen will display your user account information rather than the listing screen.



STEP 3: Click on the button "Create New User"



STEP 4: Enter the details of the user in the form displayed

Details

Title*:	<input type="text"/>	First Name*:	<input type="text"/>
Surname*:	<input type="text"/>	Access Level*:	User <input type="text"/>
Organisation*:	ABC Org <input type="text"/>	Site*:	<input type="text"/>
Email*:	<input type="text"/>	Delegate Email*:	<input type="text"/>
Telephone*:	<input type="text"/>	Mobile:	<input type="text"/>
Position*:	<input type="text"/>	Region Code:	<input type="text"/>
Suspended*:	No <input type="text"/>		

Login Details

Username*:	<input type="text"/>	Password:	<input type="text"/>
Confirm Password:	<input type="text"/>		

Features

<input type="checkbox"/> Add Self-Exclusion	<input type="checkbox"/> Record Breach
<input type="checkbox"/> Reinstatement	<input type="checkbox"/> Photo Gallery

Reports

<input type="checkbox"/> Excluded Customer Photo Gallery	<input type="checkbox"/> Excluded Customers List	<input type="checkbox"/> Self-Excluded Breaches List
<input type="checkbox"/> Self-Exclusion Breaches Volume	<input type="checkbox"/> Excluded Customers Volume By Week	<input type="checkbox"/> Lapsed / Reinstatements Volume

 Save

NOTES:

- Supervisors will be able to set up other users with access level either Supervisor or User.
- For User access level, it is mandatory to select the site as well
- Email is the user name for the user account
- Delegate Email should be the email of higher authority in the organisations who can monitor the alerts and user account for this user.
- Region code can be used only for Supervisor user account. When used, the user will be able to see only the sites with matching Region Code as described in the earlier section.
- The Password has to be 6 to 10 characters with at least one uppercase, one lowercase alphabet and one number.
- Select all the features that the user can do when logged in
- Select the reports that a user can have access to.

Enter all information and click on save button. On successful save, the browser will display the success message. If not an error message is displayed by highlighting the fields that require correction. You will need to hover on the icon to see the error relating to the field.


To Update User Details:

- Navigate to Maintenance > Users
- In the listing screen click on the edit icon

Users

[+ Create New User](#)

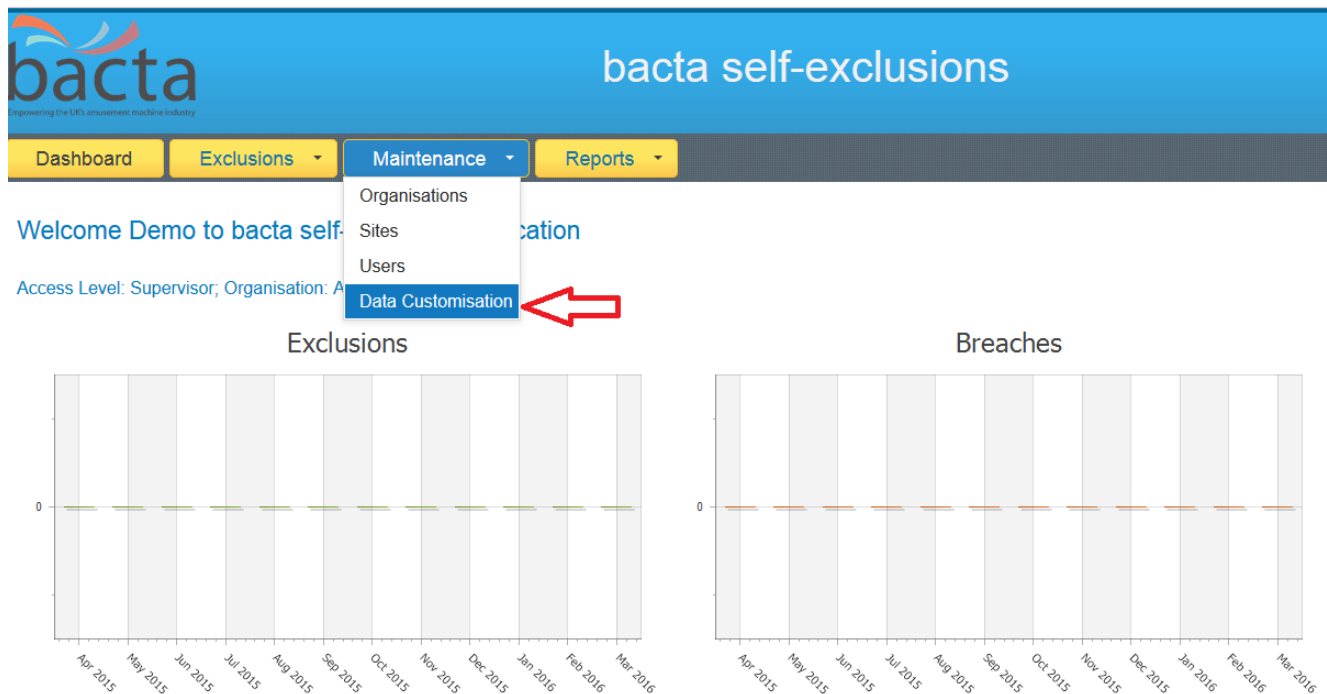
Select Site:


First Name	Surname	LoginID	Access Level	Suspended?	
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	
▼ Site: (Supervisor)					
Demo	User	demouser@abc.com	Supervisor	No	

6. DATA CUSTOMISATION



Only Supervisors set the customisation of the fields that need to be displayed / mandatory when entering a self-exclusion.

STEP 1: Navigate to Maintenance > Data Customisation in the top menu of the application





STEP 2: In the listing screen, set which ever field you would like display/hide or to make mandatory/non-mandatory by clicking on the edit icon 

Example 1: Setting Birth Date As Non Mandatory

- a) Click on the Edit icon 
- b) Set Mandatory to No
- c) Click on Save icon 

On doing so, when entering an exclusion the user will not be prompted to enter Birth Date. The field is completely optional to be used by the user.

Example 2: Setting Birth Date Not To Display

- a) Click on the Edit icon 
- b) Set Display to No (Mandatory field automatically changes to No and is not editable)
- c) Click on Save icon 

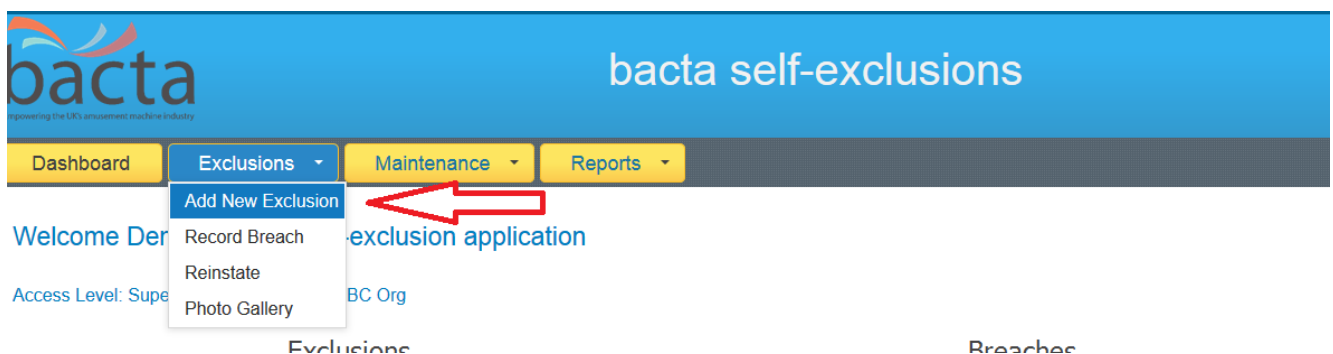
On doing so, the birth date field is not displayed in the exclusion form and hence this information cannot be recorded for the exclusion.

Follow the same process for the other fields you wish to display or not and which you wish to make mandatory or not.

7. ADD EXCLUSION

This feature is available only if the user account is enabled to use this feature.
To add a new exclusion:

STEP 1: Navigate to Exclusions > Add New Exclusion



STEP 2: Enter all exclusion details in the form displayed

New Exclusion

Customer Details

Title*: Gender:


First Name*: Surname*:

Birth Date*: Mobile*:

Telephone*: Email*:

Car Reg*: Other Info*:

Photo

 Add/Change Photo

- Passport Style
- Full Face in View
- Head & Shoulders

Customer Address

Postcode*: Line 1*:

Line 2*: Line 3*:

Town/City*: County*:

Exclusion Details

Start Date*: Period In Months*:

Exclusion Reason*:



Exclude From	Exclude	Plan to Exclude
Bingo	<input type="checkbox"/>	<input type="checkbox"/>
Casino	<input type="checkbox"/>	<input type="checkbox"/>
Betting Shop	<input type="checkbox"/>	<input type="checkbox"/>
Online	<input type="checkbox"/>	<input type="checkbox"/>

Exclusion Zone

Organisation*: ABC Org

Site*:

Radius*:

 List  Map

Declaration

ID Check*: ☐ Email Confirmation*:

T&C*: ☐ I CONFIRM MY SELF-EXCLUSION*: ☐

Signature*:

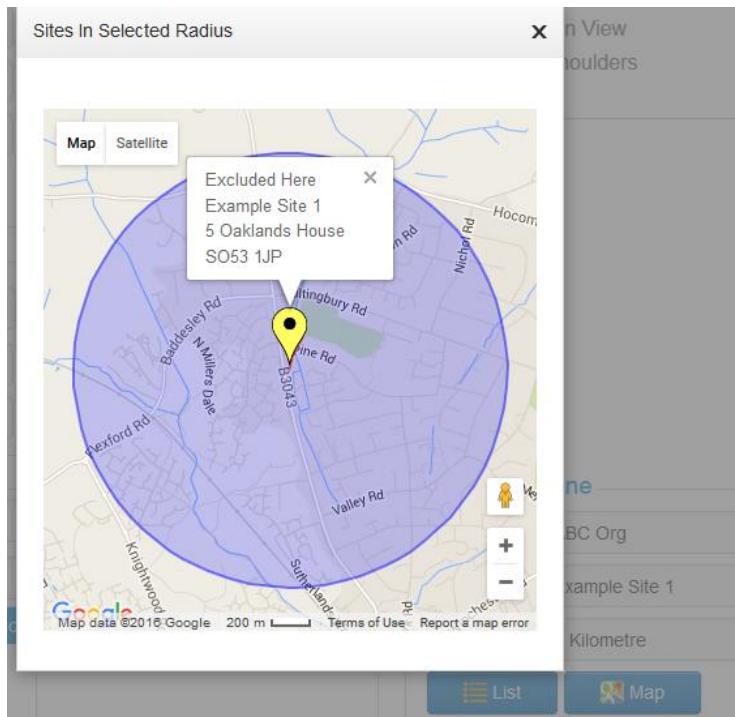
 Redo Signature

 START EXCLUSION

 Print

NOTES:

- When postcode is entered a pop up is shown with all address for that postcode. You can either select an address from the list or enter the address manually.
- Use the map/list button to see which all sites the user will be excluded from



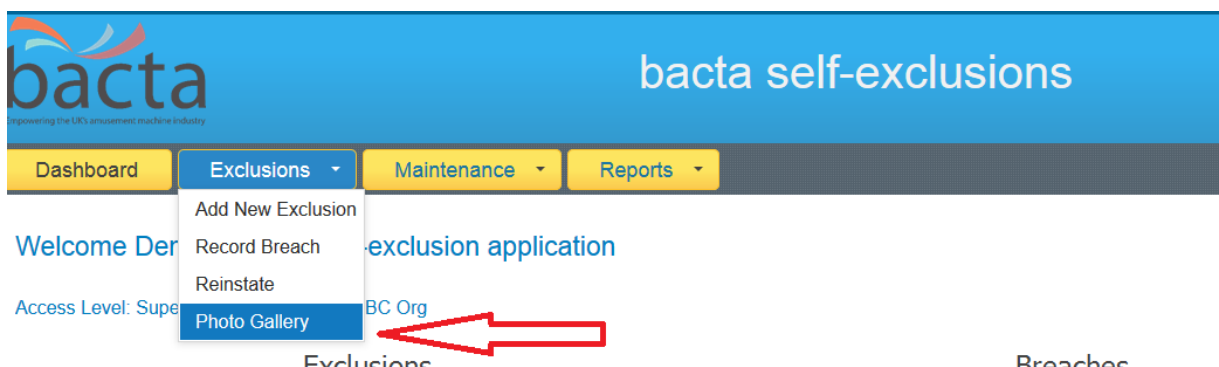
- To write the signature on a tablet, just click on the signature panel and draw your signature pattern
- To write the signature on personal computer, move the mouse cursor into the signature panel, right click (do not release the click) and draw a pattern.
- Use the print button to view a printable form of the exclusion with Terms and Conditions. You can even export the document to PDF/XLS format. Please see reporting section to use these tools

Enter all information and click on Start Exclusion button. On successful save, the browser will display the success message. If not an error message is displayed by highlighting the fields that require correction. You will need to hover on the icon to see the error relating to the field.

8. PHOTO GALLERY

This feature is available only if the user account is enabled to use this feature. All excluded customer photos for your site can be viewed in this screen

Photo Gallery can be accessed from Exclusions > Photo Gallery



All excluded customer photos at your site will be displayed for 'User access level'. For supervisors, you need to select the site and click on Go button.

Excluded Customers Photo Gallery

Organisation: Site: Sort Order:



You can view more information about the excluded customer by clicking on the name/reference displayed on the photo. A screen will pop up as shown below. You can do further actions to Record Breach / Reinstate / Print all information about the exclusion.



Mr Lion Zoo

Ref: 5J2643L6I4
Building 1000
Lakeside North Harbour
Western Road
Portsmouth
PO6 3EZ
HAMPSHIRE
07885151910
lion@zoo.com
Exclusion: 24/03/2016 - 24/11/2016
Site: Example Site 1, SO53 1JP

Click on the Close button to view the gallery back.

NOTES:

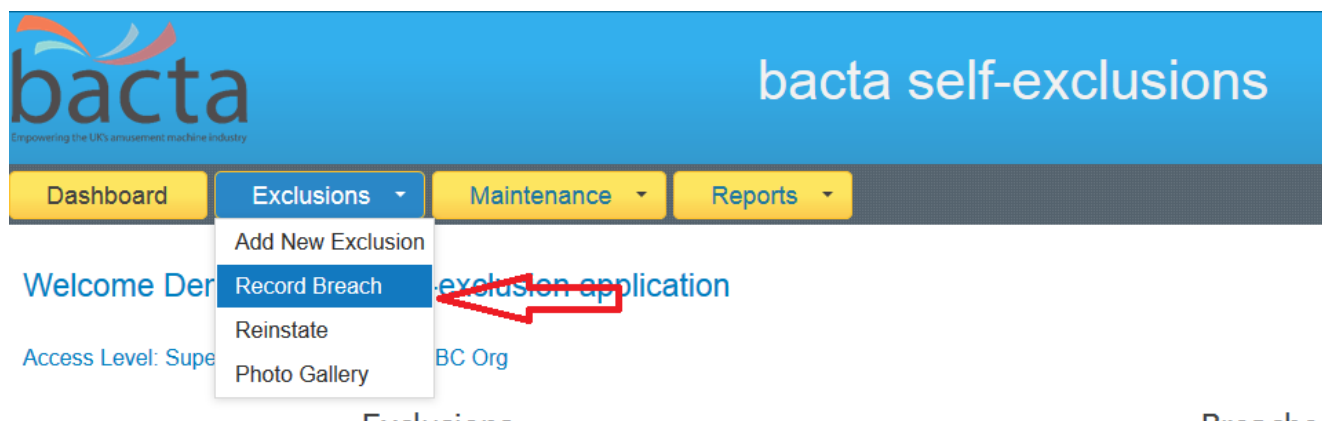
- Any new up to 5 days will be shown in green back ground colour in the gallery
- Any exclusions with breaches will be highlighted with red border in the gallery
- Any exclusions in the hiatus period will be shown in blue back ground colour in the gallery. Users can then reinstate this customer if they wish to do so.
- It is possible to sort the gallery items by Most Recent / Location (Nearest first)/ Surname (A – Z)
- Detailed information is only available to Supervisors

9. RECORD BREACH

This feature is available only if the user account is enabled to use this feature.

IMPORTANT: A breach can be recorded from the photo gallery as described in the earlier section or from the top menu as described below

STEP 1: Navigate to Exclusions > Record Breach



STEP 2: Search for the exclusion either by using reference number or by details

Search Exclusions to Record Breach

Search By Reference


Self-Exclusion Reference:

OR

Search By Details

Surname: Birth Date:

Postcode: Mobile:




Ref: 5J2643L6I4
Mr Lion Zoo
Building 1000
Lakeside North Harbour
Western Road
Portsmouth
PO6 3EZ
HAMPSHIRE
07885151910
lion@zoo.com
Exclusion: 24/03/2016 - 24/11/2016
Site: Example Site 1, SO53 1JP

If the exclusion is in your vicinity, then the exclusion is displayed as above.

STEP 3: Click on the record you wish to record as a breach. Then click on the Record Breach button.

STEP 4: The Application provides you with a form on which to record the breach.

Record Breach



Ref: 5J2643L6I4
Mr Lion Zoo
Building 1000
Lakeside North Harbour
Western Road
Portsmouth
PO6 3EZ
HAMPSHIRE
07885151910
lion@zoo.com
Exclusion: 24/03/2016 - 24/11/2016
Site: Example Site 1, SO53 1JP

Breach Details

Organisation*:

Site*:

Breach Date*:

Breach Time*:

Duration*:

Played*:

Breach Details:

Enter the details and click on the Record Breach button. On successful save, the browser will display the success message. If not an error message is displayed by highlighting the fields that require correction. You will need to hover on the icon to see the error relating to the field.

Now when you navigate to the photo gallery you should be able to see a red border on the customer photo as below:

Excluded Customers Photo Gallery

Organisation: Site: Sort Order:

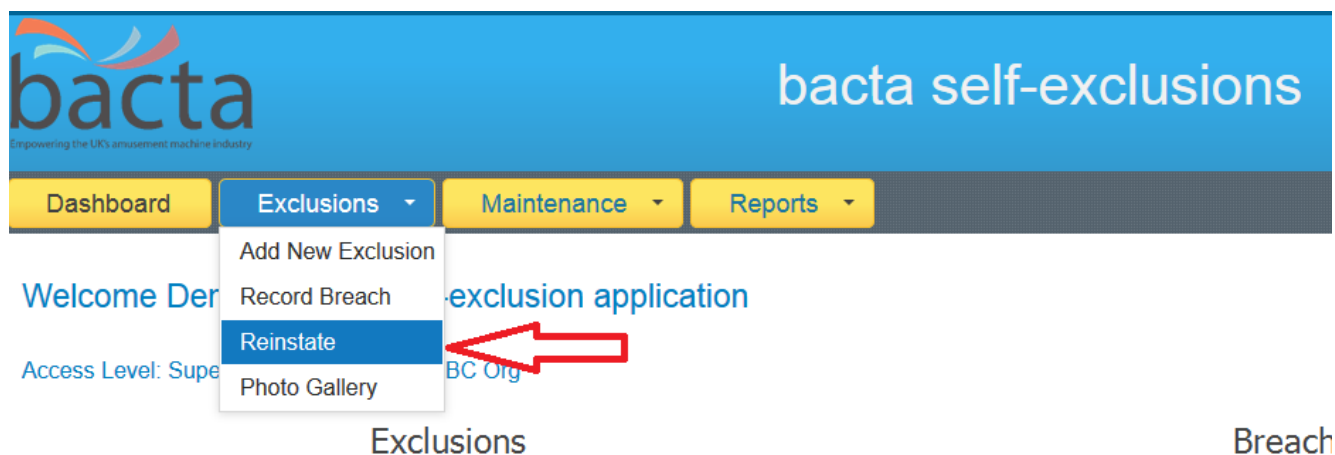


10. REINSTATE EXCLUSION

This feature is available only if the user account is enabled to use this feature.

IMPORTANT: A Reinstatement can be recorded from the photo gallery as described in the Photo Gallery section or from the top menu as described below

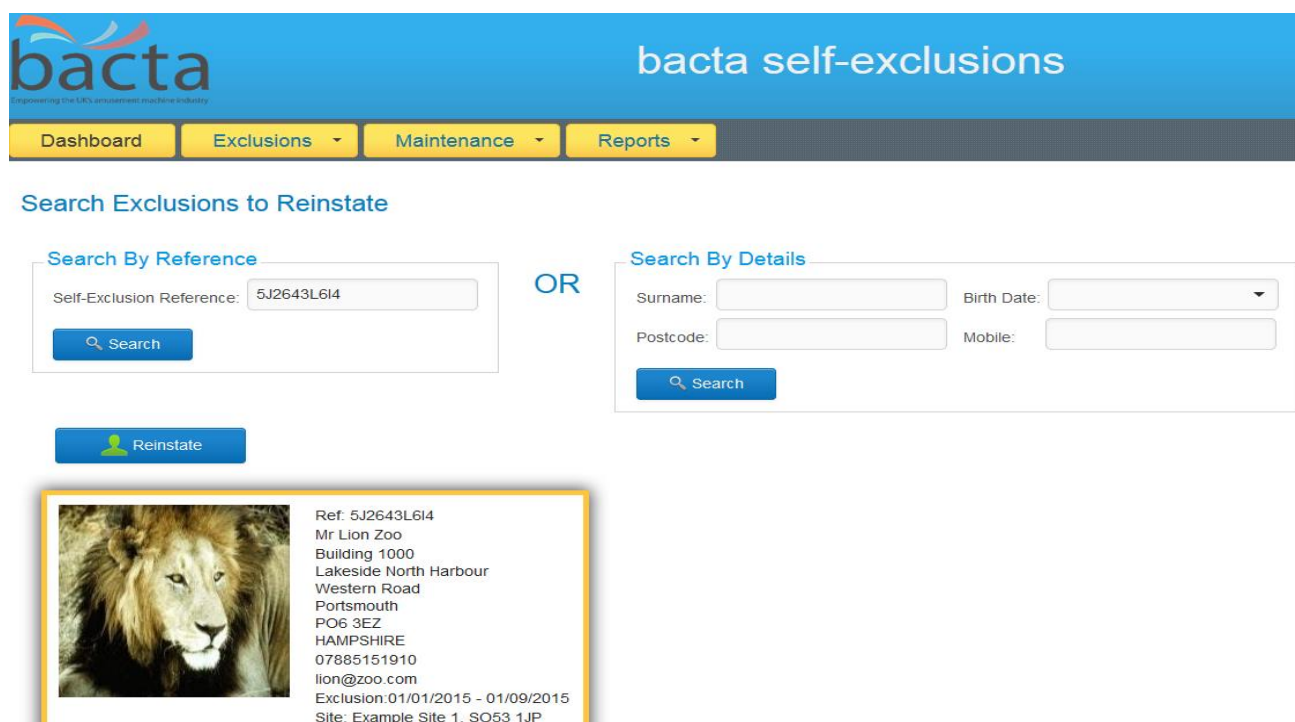
STEP 1: Navigate to Exclusions > Reinstatement



STEP 2: Search for the exclusion either by using the reference number or by details


If the exclusion is in your vicinity and is in the hiatus period, then the exclusion is displayed.

STEP 3: Click on the record you wish to Reinstatement. Then click on Reinstatement button.



STEP 4: The Application provides you with a form on which to record the reinstatement details.

Reinstate Self-Exclusion



Ref: 5J2643L6I4
Mr Lion Zoo
Building 1000
Lakeside North Harbour
Western Road
Portsmouth
PO6 3EZ
HAMPSHIRE
07885151910
lion@zoo.com
Exclusion: 01/01/2015 - 01/09/2015
Site: Example Site 1, SO53 1JP

Reinstatement Details

Organisation*:

Site*:

Considered Implications of Gambling Again?* ☐

Understand 24 hour cooling off period?* ☐

Interview Mode*:

Interview Date*:

Reinstatement Date:

Reason for Reinstatement:

Interviewed By

First Name*:


Surname*:

Declaration

Receive Email Confirmation? ☐

I CONFIRM MY REINSTATEMENT* ☐

Signature:

 Redo Signature

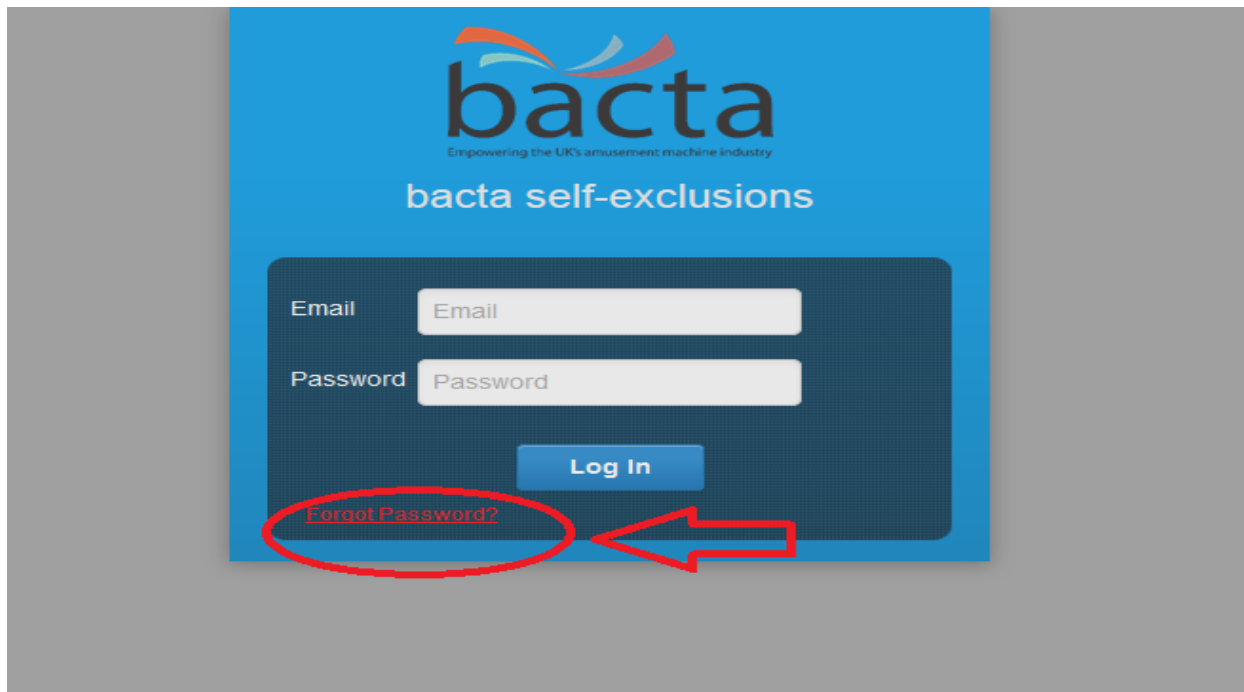
Enter the details and click on the Reinstatement button. On successful save, the browser will display the success message. If not an error message is displayed by highlighting the fields that require correction. You will need to hover on the icon to see the error relating to the field.

Now when you navigate to photo gallery this exclusion will no longer be displayed

LAST BUT NOT THE LEAST: ALWAYS LOG OUT FROM THE APPLICATION

11. FORGOT PASSWORD

If you forget your password click on the Forgot Password link in the login screen.



Then enter your login email address and your bacta organisation reference number. Click on Email me new password. The new temporary password will be sent to you.

When you login with this new temporary password you will be forced to change your password for the first time.

NOTE: Other than this the user password will expire every 60 days. When you login, you will be forced to change your password

End of document

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SOCIAL RESPONSIBILITY CHARTER AND CODE OF PRACTICE

2018

1. Introduction

Bacta represents the British amusement machine industry. This includes seaside amusement arcades, inland Adult Gaming Centres, suppliers to pubs, bingo halls and clubs and amusement machine manufacturers. There are about 350,000 amusement machines of one kind or another sited in the UK. Of these 132,000 are gaming machines with stakes ranging from 2p to £2. Higher stake machines in Licensed Betting Offices or Casinos are not covered by this Charter. The British amusement machine industry is integral to the UK's entertainment, hospitality and leisure sector and already offers high levels of effective staffing, monitoring and supervision to protect those vulnerable to gambling-related harm. We employ a dedicated team of compliance officers to assist members in complying with the Gambling Commission's Licence Conditions and Codes of Practice.

Bacta is both committed to Social Responsibility and committed to sustainable growth across each sector represented by its members.

Bacta entered into partnership with GamCare in 1997, drawing up a unified social responsibility code and jointly evaluating compliance thereafter by the introduction of a training, assessment and certification package. This Charter embodies that work into a series of commitments to which the Association's membership is pledged to uphold.

For most people gambling is fun and an integral part of the British leisure scene. British amusement premises have millions of visitors every year; customers in pubs and clubs enjoy billions of machine plays a year. Our commercial objective is to offer a modern and diverse range of gambling products for an exciting and enjoyable experience in the safest environments.

We recognise that for some people gambling can become a problem which affects the gambler and the people closest to them.

Though the incidence of problem gambling in the UK is among the lowest in the world, the industry is not complacent: we accept our responsibility to *all* our customers.

Providing responsible gambling is a dynamic process that evolves alongside changes in gaming products, monitoring technologies, and public attitudes and expectations of gambling.

Customers who play in amusement centres and other licensed premises are served by trained staff in a highly regulated industry to ensure that gambling is closely and expertly supervised. A small percentage of customers gambling can find that they have a problem so we operate a range of social responsibility measures including provision of information regarding responsible gambling, staff training, detailed licence condition policies and procedures and voluntary self-exclusion schemes to help customers who perceive they might be at risk to help themselves. We also support research, education and treatment by donating financial contributions. We keep what we do under constant review.

Our members who supply machines are also licensed to do so and take steps to inform and educate their customers about social responsibility. Our manufacturers are also all licensed to make and sell gaming machines.

This Charter is one of the ways the industry seeks to ensure it is achieving high levels of social responsibility.

2. Our Values

Bacta and its members adhere to the following set of values:

- Ethical
- Sustainable
- Modern
- Professional
- Partnering
- Open and Transparent

It is therefore incumbent upon Bacta and its members to place social responsibility at the heart of what we do to meet the three Licensing Objectives contained in the 2005 Gambling Act:

- a. preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
- b. ensuring that gambling is conducted in a fair and open way, and
- c. protecting children and other vulnerable persons from being harmed or exploited by gambling.

Bacta and its members will mediate decisions through appropriate regard to social responsibility obligations, which will be based on regular risk assessment against the LCCP and this Charter. We believe this will make us a better organisation and better businesses.

3. Executive Commitment

We, the Chief Executives/owners of Bacta member companies, accept ownership of the licensing objectives and commit to delivering gambling products responsibly while continuing to innovate and grow our businesses.

We commit to increase the visibility of the ways in which we put in place social responsibility and demonstrate its effectiveness.

This Social Responsibility Charter and Code of Practice will be reflected in the way we run our businesses, the care we take in offering and marketing our products and by the resources we devote to this initiative. As business leaders we are proud to continue making social responsibility a precondition to profitability.

4. Our commitments in detail

Some responsible gambling measures are required by law and regulatory requirements; others have evolved as good practice or are conditions of being a bacta member. For example:

- Premises Licence Conditions
- Licence Conditions & Codes of Practice
- Trained staff
- Accreditation by bacta or a relevant third party
- Evaluation of Compliance
- Alternative Dispute Resolution (ADR)
- Age-verification testing

Bacta members commit to adhere to the following pledges (numbers in brackets refer to the Division of bacta to which the commitment applies):

Pledge 1 Putting the Customer at the heart of what we do

The Licence Conditions and Codes of Practice (LCCP) Social Responsibility Code requires us to ensure all our employees are regularly trained and aware of our obligations to our customers and to our regulators. Bacta has developed a national system of social responsibility training and compliance with the LCCP.

It is a condition of membership that members comply with this Social Responsibility Charter. We commit to make its provisions a central part of our business. (1,2,3,4)

Pledge 2 Informed customers and trained employees

We will ensure that gambling on amusement machines is both delivered and physically supervised by well-trained and experienced staff, skilled in customer interaction and identifying problem gambling issues, and reacting appropriately. (1,3)

We will ensure, through trained staff, that our customers are informed about our obligations under this Code. We will help our customers maintain and improve where appropriate the actions they take on social responsibility. (2,4)

Pledge 3 Accreditation

Validating our confidence in our own customer care measures is important to us.

Bacta certifies all its members to ensure that they are compliant with the law and LCCP. We will ensure that this is the minimum we will achieve in order to comply with this Code. (A copy of the Bacta accreditation check list is attached at Appendix A) (1,3)

Pledge 4 Self-exclusion

We will utilise the Bacta self-exclusion scheme (or equivalent) to ensure those customers who wish to address their gambling-related problems have an easy-to-use way of excluding themselves from our premises. (1,3)

Pledge 5 Promoting and supporting research, education and treatment

We recognise the importance of providing support for people who have problems associated with gambling.

As a condition of Bacta membership, we will make an appropriate financial contribution of not less than 0.1% of our company's GGY to research, education and treatment of problem gamblers. (1,2,3,4)

Pledge 6 - Using our technology

As manufacturers we will ensure that responsible gambling objectives are fundamental to design innovation and we will always follow the Gambling Commission Technical Standards. (4)

Pledge 7 Making sure young people are excluded from adult only premises and adult only machines

Trained staff will do everything they can to ensure that anyone under the age of 18 is prevented from entering adult only premises or adult only areas or playing adult only machines. We operate as a minimum a rigorous 'Challenge 25' policy and display clear signs prohibiting entry by people under the age of 18.

It is a condition of Bacta membership that all relevant members conduct age verification testing at least once per year and if requested share the results with the Gambling Commission. Bacta has its own internal age-verification test programme available for use by members.

We will continuously monitor our age verification performance and will immediately rectify any shortcomings that we identify. (1,3)

We will encourage our customers to put in place policies, procedures and evaluation protocols to ensure no one under the age of 18 plays adult only machines for example in pubs or clubs (2).

Pledge 8 Helping people to gamble responsibly

We provide information both directly and indirectly, about responsible gambling in a range of ways depending upon the type of premises and the best way to communicate to our customers.

We will continuously review our provision of information to our customers to ensure it is readily available, easily understood and effective, whether in electronic or physical form and where appropriate can be taken away from the premises. (1,2,3,4)

Pledge 9 Not bringing the industry into disrepute

We will behave in relation to government officials, other bacta members and to our customers in a way that does not bring the industry or bacta into disrepute. (1,2,3,4)

Pledge 10 Safe-guarding of children. young people and the vulnerable

In addition to our legal obligations, we will put in place policies and procedures to ensure that children, young people and the vulnerable are safe-guarded from any potential harm. (1,2,3,4)

We will ensure that no unaccompanied school children are allowed on our premises during school hours. (1)

Pledge 11 Amusement Device Inspection Procedure Scheme (ADIPS)

All manufactures, distributors and operators of children's rides will ensure compliance with the Amusement Devices Inspection Procedures Scheme (1,2,4)

Pledge 12 Quality Premises

Operators will ensure that their premises are well kempt and in a state of good maintenance and repair. (1,3)

Pledge 13 Evaluation

We will evaluate as appropriate new business, product or process initiatives within our business for their impact on our customers and in particular for gambling products in relation to their potential to increase or decrease the risk of gambling-related harm.

5. Summary

1. We will make this Charter central to our business
2. We will inform our customers and train our staff
3. We will seek accreditation for what we do with bacta certification as a minimum
4. We will ensure that customers who wish to self-exclude can do so easily
5. We will make an appropriate financial contribution to Research Education and Treatment
6. We will use our technology power of technology where we can to help us manage our social responsibility obligations
7. We will do everything we can to ensure no one under the age of 18 plays a machine or enters premises from which they are prohibited
8. We will help people gamble responsibly through the provision of appropriate information/interventions
9. We will not bring the industry into disrepute
10. We will safe-guard children and young people
11. We will adhere to the ADIPS
12. We will ensure we operate a quality environment
13. We will evaluate what we do.

Bacta will monitor, amend and update this Charter from time to time.

6. Failure to Comply

Bacta members who fail to comply with the terms of this Charter will be subject to the Disciplinary Procedure attached at Appendix B

APPENDIX A – BACTA’S PREMISES EVALUATION CHECK LIST

Premises Signage

	Yes (tick)	No (tick)	N/A (tick)	Notes
No Under 18s				
No Alcohol				
No Smoking				
BACTA Membership				

Machine Signage

No Under 18s				
GamCare				
Category Labels				
Legacy Labels				

Posters (P) & Leaflets (L)

Stay in Control (P)				
Stay in Control (L)				
Proof of Age Scheme				
Think 21/25 Material				

Licences

Premises Licence				
Operating Licence				
Personal Licence				
Link Licence				

Forms

Self-Exclusion				
Complaints & Dispute				

Policy & Procedure Documents

Access by C & YP				
Access by G C				
Advertising				
Employment of C & YP				
Customer Interaction				
Fair & Open				
Signposting Information				
Money Laundering				
Self-Exclusion				

Logs

	Yes (tick)	No (tick)	N/A tick)	Notes
Attempts to Gamble C & YP				
Customer Interaction				
Police Assistance				
Self-Exclusion				
Staff Training				

Entitlement

B3 Numbers				
Stakes & Prizes				

Misc.

Age Verification Tests				
Contribution to RET				
Notifying Key Events				
Regulatory Return				
Knowledge of MLO				
Advertising Practice				
Payment of MGD				
ADR Entity				
Licensing Objectives				
Attractive to Children				
Supervision				
Self-Exclusion Scheme				
Return to Player (%)				
Responsibility for 3 rd Parties				
Register of Machines				

Risk Assessment Documents

Local Risk				
Money Laundering				

Registrations

ADR Entity				
Self-Exclusion Scheme				
Age Verification Testing				
Primary Authority				

Administration

Company	
Address	
Division	
Representative	
Telephone Number	
Email Address	
Date	
RCO	
Reference Number	
Compliant	
Report Issued (Y/N)	
Certificate Issued (Y/N)	

Notes

APPENDIX B – CHARTER DISCIPLINARY PROCEDURE

1. Should any individual or company wish to allege that a member of Bacta has failed to comply with the requirements of this Charter they should in the first instance write to the Chief Executive of Bacta at its Head Office detailing the nature of the alleged breach.
2. The Chief Executive will in so far as is possible in the circumstances seek to establish the facts of the allegation within 15 working days from receipt of the written allegation and then put the allegation to the company against whom the breach is alleged.
3. The member Company concerned will respond to the allegation within 15 working days and may accept the validity of the alleged breach and agree with the Chief Executive a course of action to rectify the breach and to ensure it does not re-occur. The member may alternatively reject the allegation.
4. Where the company accepts the validity of the alleged breach, the agreed course of action will be communicated in writing to the individual or company alleging the breach within 15 working days.
5. Should the individual or company alleging the breach be dissatisfied with the agreed course of action, they may appeal the decision within 15 working days from receipt of the letter detailing that action by writing to the Chief Executive of Bacta stating that they wish to appeal. The matter will then be referred to the Bacta Social Responsibility Committee which will within 15 working days from the date of receipt of the appeal by the Chief Executive select from amongst its number a panel of three individuals who have no connection to the case or any conflict of interest arising from it. The panel will meet within 20 working days from its selection to consider the appeal.
6. On hearing the appeal the panel shall take such further evidence as it sees fit either in person or in writing and its decision whether to allow the appeal or dismiss it will be final.
7. Where the appeal is allowed the panel will detail the action the member against whom the allegation was made must take to rectify the breach and may require further undertakings related to the breach to be made.
8. If, following step 4 above, the company rejects the validity of the alleged breach of the Charter, the matter will be referred to the Bacta Social Responsibility Committee within 15 days of receipt of the notice from the company that they do not accept the validity of the alleged breach, and the process described in paragraph 6 will be followed.
9. All members of the Bacta Social Responsibility Committee undertake to declare any conflict of interest or perceived conflict of interest before any panel is selected to hear any allegations made under this Charter.



TOOLKIT FOR

POLICY & PROCEDURE

SYSTEMS

AGCs & FEC ADULT AREAS

COMPREHENSIVE GUIDE TO LCCP

REQUIREMENTS

VERSION 16 – July 2016
EFFECTIVE AS AT 31st OCTOBER 2016



GAMBLING ACT 2005
Licence Conditions and Codes of Practice
Adult Gaming
&
Licensed Family Entertainment Centres
Policy Procedure Documents, Logs, Forms & Records

Source of Reference
Gambling Commission
Gambling Codes of Practice
Consolidated for all forms of gambling
July 2016

2016 July
Version 16: Update 1

Introduction

Your Operating Licence is subject to certain conditions and codes of practice (LCCP) that must be complied with to protect your licence.

Codes of practice are either:

- **social responsibility code** provisions which **must be adhered to** by all licence holders

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.

- **ordinary code** provisions – these do not have the status of licence conditions but failure to take account of them can be **used as evidence in criminal or civil proceedings**.

There are four types of licence condition, and they have different status in law, but you need to comply with them all:

- General licence conditions can be applied by the Gambling Commission to an individual operating licence or a class of operating licence (for example, all AGC operating licences).
- Individual licence conditions can be applied by the Gambling Commission to an individual operating licence. They are likely to address matters concerning an individual operator and their activities.
- Conditions imposed by the Secretary of State may be applied to a class of operating licence using statutory instruments (amendments to the law).
- Statutory conditions imposed by the Gambling Act 2005 may be applied to a class of operating licence.

This toolkit is designed to incorporate the conditions for licensees to ensure compliance with any relevant social responsibility provision of a code of practice issued by the Gambling Commission and is applicable to:

Gaming Machine General: Adult Gaming Centre Licences, and Gaming Machine General: Family Entertainment Centre Licences

All key requirements necessary to ensure compliance are incorporated but it is important that you also refer to the most up-to-date LCCP version published by the Commission, currently:

<http://www.gamblingcommission.gov.uk/PDF/LCCP/LCCP-sector-summary-for-arcades.pdf>

It is absolutely right that licensees themselves should determine how to apply LCCP requirements when formulating their company policies and procedures and how to assimilate into operational systems. This toolkit suggests policy and procedure documents that incorporate requirements, together with a series of logs for the necessary recording of incidents. In addition, there are suggested procedures and forms for dealing with and recording complaints and disputes, suspicious monetary transaction and other relevant matters.

The toolkit is amended from time to time, reflecting changes made to LCCP by the Commission, therefore it is imperative that operators ensure they have the most up-to-date version, currently:

PS/2016/Oct31/v16 01

The version reference is printed at the bottom left corner of the cover page and repeated on each page of the toolkit. All previous versions are not fit for purpose and should be deleted from files and systems.

The toolkit is principally intended for licensees and senior management. A staff training booklet - more appropriate for junior members of staff who interface with customers - is available separately from bacta.

Additional documents available from bacta

- 1. Local Risk Assessment**
- 2. Money Laundering Risk Assessment**

INDEX

	Page(s)
COVER PAGES	1 - 2
INTRODUCTION	3 – 4
INDEX	5 - 7
POLICY DOCUMENTS	
Access to Gambling by Children and Young Persons.....	8
Age Verification Testing	9
Access to Premises by the Gambling Commission’s Enforcement Officers	10 - 11
Advertising Standards and Marketing	12
Customer Interaction	13
Employment of Children and Young Persons	14
Fair and Open Practice and Dispute Resolution	15
Information on how to Gamble Responsibly and Help for Problem Gamblers	16
Money Laundering, Cash Handling & Suspicious Transactions	17 - 18
Self-Exclusion	19 - 20
LOGS	
Attempts by Children and Young Persons to Gamble	21
Customer Interaction	22
Incidents Requiring Police Assistance	23
Self-Exclusion	24
Staff Training Summary	25
STAFF RECORD OF TRAINING DOCUMENTS	
Access to Gambling by Children and Young Persons	26
Access to Premises by the Gambling Commission’s Enforcement Officers	27
Advertising Standards and Marketing	28
Customer Interaction	29
Employment of Children and Young Persons	30

Fair and Open Practice and Dispute Resolution	31
Information on how to Gamble Responsibly and Help for Problem Gamblers	32
Money Laundering, Cash Handling & Suspicious Transactions	33
Self-Exclusion	34 - 35

FORMS & STATEMENTS	Page(s)
The Licensing Objectives	36
Principal Concepts	37
Complaint Policy & Procedure Document and Terms & Conditions.....	38 – 40
Complaint Form	41 - 42
Record of Complaints & Disputes	43
Record of Suspicious Monetary Transactions	44
Self-Exclusion Form	45
Self-Exclusion Review Form	46

EVALUATIONS	
Questionnaires	47 - 54

CODE PROVISIONS	
Responsibility for Third Parties (Code Provision 1.1.2)	55

GENERAL CONDITIONS	
Qualified Persons	56
Personal Licences	57 - 58

KEY EVENTS	
Operator Status	59
Relevant Persons and Positions	59 - 60
Financial Events	60
Legal or regulatory proceedings or reports.....	60 - 61

Gambling Facilities	61 - 62
Other Reportable Events	62
GENERAL & REGULATORY RETURNS	62
 PROTECTION OF CUSTOMER FUNDS	
Disclosure to Customers	63
 PAYMENT	
Cash and Cash Equivalents, Payment Methods and Services	63
Provision of Credit by Licensees and the use of Credit Cards	63
 REPORTING SUSPICION OF OFFENCES	 64
 RESPONSIBLE PLACEMENT OF DIGITAL ADVERTS	 64
 APPENDIX A	
Gaming General Terms and Conditions (Customer Notice)	65
 APPENDIX B	
Guide to the bacta Self-Exclusion Services Scheme	66 - 70
 APPENDIX C	
System Checklist ,.....	71 – 72
 OPERATOR NOTES	 73

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

It is illegal for any person who is under 18 years of age to be permitted entry to an Adult Gaming Centre or Adult Gaming Area.

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

- Our policies and procedures with regard to age restriction take into account the structure and layout of our gambling premises so as to prevent access to gambling by children and young persons, and that our facilities do not appeal to children and young persons.
- Clear and prominent signage is placed at the entrance(s) to our Adult Gaming Centre(s) and adult area(s) stating that it is illegal for persons under the age of 18 years to enter and for the Company to permit entry.
- 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 Adult Gaming Centre(s) or Adult Gaming Area(s).
- Any person known to be under 18 years of age is refused entry.
- Any person who appears to be under 18 years of age, and has not previously provided satisfactory proof to the contrary, is asked to provide appropriate identification when it comes to the attention of staff and before an attempt to gamble. *Members of staff are trained to 'think 21' as a minimum.*
- 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. *Incidents involving suspected forged documents 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. Citizencard); a driving licence (including a provisional licence) with photograph, 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 adult area(s) and gamble are brought to the attention of the Duty Manager immediately and recorded as an entry on a log retained on the premises for this purpose. *Details of entry to include date, time, identity of the individual if known - or detailed description if unknown – member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence. Log to be countersigned by the 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 where they have been identified as gambling in AGCs or adult-only areas, and are not permitted to retain any monetary prize.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference; the original being retained on the employee's personnel file. Staff training policy covers all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and refresher training is carried out at appropriate intervals.

Company:

Registered Address:

Date:

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

AGE VERIFICATION TESTING

Companies in Operating Licence fee category C or higher, whereby they are permitted to operate sixteen (16) or more AGCs, or sixteen (16) or more licenced FEC premises.

- It is a requirement to conduct ongoing age verification testing or take part in collective age verification testing programs so as to provide reasonable assurance that policies and procedures to prevent underage gambling are effective.
- It is a further requirement that the results of age verification tests carried out by the Company are provided to the Gambling Commission.

Companies in Operating Licence fee category A & B, whereby they are only permitted to operate up to fifteen (15) AGCs, or up to fifteen (15) licenced FECs.

- It is a requirement that Licensees should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling, for example through collective test purchasing programs, and be able to explain their approach.

It is a condition of bacta membership that age verification tests are carried out by all AGC licensees, and that the results of testing are shared with the Commission.

Bacta's protocol for age verification testing is accredited by a Unitary Authority (Reading Borough Council).

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

ACCESS TO PREMISES BY THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures:

The Company acknowledges its obligation to ensure that staff openly co-operate with the Gambling Commission in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises contained under Part 15 (S.303 to S.326) of the Gambling Act 2005 (refer to page 2 of this document) and that:

- The Company must provide the Gambling Commission with any information that the Commission would reasonably need to be aware of in exercising its regulatory functions or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code of practice provision having the effect of a licence condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating Licence.
- The Company must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as:
 - (i) the numbers of people making use of the facilities and the frequency of such use;
 - (ii) the range of gambling activities provided by the licensee and the number of staff employed in connection with them; and
 - (iii) the licensee's policies in relation to, and experience of, problem gambling.
- The Company must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time, and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

Company:

Registered Address:

Date:

PART 15

Members of staff are to co-operate at all times with the Commission's enforcement officers in the proper performance of their compliance functions.

The officers' rights of entry to premises are contained in Part 15 of the Act which deals with inspection (Sections 303 to 326). A constable, enforcement officer or authorised person under the Act may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed. A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed (Section 306). Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating licence or premises licence is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating licence (Section 307).

Entry may also be made to assess the likely effects of activity when application has been made for a premises licence. A constable or enforcement officer may require the holder of an operating licence to produce, within a specified period, a copy of the authorisation (Section 316). Failure to comply without reasonable excuse to a request to produce a copy of the authorisation may result in an offence and be liable on summary conviction to a fine not exceeding level 2. Section 317 sets out powers of the constable, enforcement office or authorised person and include inspection of any part of the premises or any machine on anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions. Section 20 provides that the power of inspection must be exercised only at a reasonable time. The enforcement officer or authorised person must provide evidence of his identify and authority (Section 321). Section 323 provides that a constable, enforcement officer or authorised person may use reasonable force to enter a premises. Section 326 provides that it is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

GAMBLING ACT 2005
Licence Conditions and Codes of Practice
ADVERTISING STANDARDS AND MARKETING

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedure

All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). We ensure that our marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008), including 'free bet' offers, do not amount to or involve misleading actions or misleading omissions within the meaning of those regulations.

We adopt the general principles that our advertising is:

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

Specifically, we ensure that:

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

Marketing and Promotion

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

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

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

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

Company:

Registered Address:

Date:

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

CUSTOMER INTERACTION IN RELATION TO IDENTIFYING CUSTOMERS WHO MAY BE SUSCEPTIBLE TO GAMBLING HARM

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

The Company makes use of all relevant sources of information to ensure effective customer interaction and decision making in relation to identifying possible gambling disorders; equally to identify at-risk customers who may not be displaying obvious signs of problem gambling, and in respect of customers designated 'high value' or 'VIP'. We work together with other operators to share experience and deliverance of good practice through bacto.

If members of staff have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager is to be informed at the earliest available opportunity. Indicative behaviour may include signs of distress, agitation, aggression, intense mood swings, hysteria, remorse and perhaps even damage to property and violence or the threat of violence to staff or other customers.

Notwithstanding any initial urgent action taken to deal with the customer's behaviour, the Duty Manager is required thereafter to observe the individual and make a judgement 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 have the process of self-exclusion explained for consideration.

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.

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.*

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 future customer interaction or where it has been ruled out where otherwise it would have taken place. The interaction is conducted between the appointed manager and the customer in a confidential and meaningful manner.

Members of staff are aware of the appointed Manager who is specifically designated to deal with requests for self-exclusion, and are aware of where customers can be directed for confidential advice should they be directly approached for assistance.

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

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

Company:

Registered Address:

Date:

GAMBLING ACT 2005
Licence Conditions and Codes of Practice
EMPLOYMENT OF CHILDREN AND YOUNG PERSONS

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

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

- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on Adult Gaming Centre licensed premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence.

All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.

It is strict Company policy that:

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

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

Company:

Registered Address:

Date

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

FAIR AND OPEN PRACTICE ~ COMPLAINT AND DISPUTE RESOLUTION

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Complaints Procedure

The Company is committed to providing a high quality, accessible and responsive service to customers and the local community. However, dissatisfied customers may communicate a complaint to us either verbally or in writing. All complaints are taken seriously, investigated thoroughly and handled in a confidential manner. If the complaint cannot be resolved to the satisfaction of both parties on site, a copy of our written procedure for dealing with complaints, together with a complaint form, is supplied to the complainant at the earliest opportunity together with the name and status of the Company representative delegated to deal with the complaint.

Complainants should provide us with a comprehensive description and nature of the complaint; whether it is an original complaint, or where the outcome of a previous complaint was found unacceptable, and their name and postal address including a contact telephone number.

A 'complaint' means a complaint about any aspect of the Company's conduct of the licensed activities, and a 'dispute' is any complaint which:

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

In the first instance, the Company will endeavour to resolve the complaint to the satisfaction of both parties within fifteen working days. Should this not be possible we will explain why and provide a date by which the complainant can expect a full response.

In the event of a complaint relating to the outcome of a customer's gambling is unable to be satisfactorily resolved between the Company and the complainant, the complainant will be given contact details of an Alternative Dispute Resolution (ADR) entity.

- Complainants also have the means and opportunity of submitting their own version of events.
- The dispute is investigated in full by the ADR entity.
- Both parties are notified in writing of the review outcome with suggestions of a resolution if appropriate.
- This procedure may, but need not, provide for the ADR entity's resolution of the dispute to be binding on both parties.

The Company is obliged to keep a record of all complaints and disputes, other than those considered to be trivial, including all disputes referred to the ADR entity that are not resolved at the initial stages of the complaints procedure. There is a requirement to submit reports of the outcome of disputes referred to the ADR entity to the Gambling Commission at intervals determined by the Commission either by the ADR entity or by the Company.

The Company is satisfied that the terms on which gambling is offered are not unfair within the meaning of the Consumer Rights Acts 2015 and is compliant with those terms.

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

Company:

Registered Address:

Date:

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

INFORMATION ON HOW TO GAMBLE RESPONSIBLY AND HELP FOR GAMBLERS WITH PROBLEMS

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Stay in control advice

Without breaching the principle that customers are responsible for their own gambling, the nature of the activity suggests that they should be reminded of the need to exercise caution. Accordingly, signage in the form of an appropriate number of posters or other appropriate means is displayed on our premises:

- Giving clear guidance that in order to keep gambling a fun social activity the customer needs to 'stay in control'.
- Drawing attention to further information, such as leaflets that are available on the premises.
- Indicating sources of help such as the National Gambling Helpline operated by GamCare.
- Large enough and written in language so as to be easily seen and understood.
- Prominently displayed.
- Maintained in a clean and tidy condition, preferably within a glass fronted frame.

Advertising sources of help

At the core of exercising a duty of care is the principle of assisting customers who may wish to express concern about their gambling. This tenet is drawn to the attention of customers on our premises in the following ways:

- The prominent display of 'Responsible Gambling' or 'Stay in Control' information.
- There are holders or racks containing leaflets in appropriate places that emphasise the need to keep gambling under control and where to seek help should anyone be concerned about their own or a family member's gambling. These leaflets are available to be taken away from the premises without the necessity of having to ask for them.
- The leaflets are available at all times for customers to take discreetly without having to ask a member of staff, and are located in the gambling area either near to exit doors, ATMs or toilets. We endeavour to maintain an effective stock control system to ensure that such leaflets are always available to supply. Signposting Information may also be made available through the use of links for online or smart technology.
- Details of GamCare, giving the National Helpline telephone number is inscribed on all appropriate categories of gaming machines.

Protecting those who seek assistance

Responding to someone who admits to having a problem with their gambling is a delicate matter that has to be timely and needs to be approached sensitively. It is our policy that:

- rules and procedures relating to a policy of responding to problem gamblers are clearly formulated and incorporated into our day-to-day operation;
- at least one member of staff who has been trained to deal with situations that might require a response is on duty at any one time, or available without undue delay;
- a positive response including communicating sources of help and the possibility of self-exclusion is offered to any customer who admits to having lost control of their gambling;
- the facility of a self-exclusion policy for customers who wish to voluntarily self-exclude themselves from these premises, and other premises offering the same style of gambling in the locality, that stipulates a minimum exclusion period of six months - with a further 24-hour 'cooling off' period thereafter;
- we draw to the attention of relatives who express concern about a family member's gambling the options available to that person should they wish to address the extent of their gambling;
- members of staff do not collude with customers when asked to lie on their behalf, and
- where services are marketed in one or more foreign languages, we make available information on how to gamble responsibly, access to help, guides to the playing of any game, and a summary of the contractual terms on which gambling is offered in that, or those, foreign languages.

Company:

Registered Address:

Date:

GAMBLING ACT 2005
Licence Conditions and Codes of Practice
MONEY LAUNDERING, CASH HANDLING AND SUSPICIOUS TRANSACTIONS

Introduction

As part of its procedures for compliance with the requirements in respect of the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, the Company takes into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the proceeds of Crime Act 2002 – Advice for operators (excluding Casino operators)*.

Money Laundering Definition

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. 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.

Policy

- The Company 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.
- The Company has appointed a Designated Money Laundering Officer (MLO)
- All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions to the MLO for the purpose of informing the relevant authorities.

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 MLO 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.
- No discussion will take place with colleagues as confidentiality is paramount.
- The MLO will determine whether or not to submit - online or otherwise - a suspicious activity report (SAR) to the National Crime Agency (NCA) and will maintain records of all notifications received detailing the method of verification used to identify the suspected person.

Cash Handling

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

- (i) Monetary stakes introduced to machines (gross takings),
- (ii) Money introduced to re-float machines
- (iii) Token transactions
- (iv) Customer refunds due to machine malfunctions.
- (v) Money removed from machines (net takings)

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 this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

Company:

Registered Address:

Date:

Anti-Money Laundering

Prevention of money laundering and terrorist financing

Licence Condition 12.1.1

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.

As part of their procedures for compliance with the requirements in respect of 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)*.

HM Treasury has decided to exempt all gambling sectors from the EU 4th Anti-Money Laundering Directive with the exception of non-remote and remote casinos.

This means that only remote and non-remote casinos will have to comply with the new Money Laundering Regulations which will be introduced in June 2017.

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

SELF-EXCLUSION

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

Whilst most customers are able to enjoy and control their gambling, this Company recognises its duty of care to those who cannot. Accordingly, we provide a self-exclusion process for those customers who seek to prevent their own access to our premises and others in the locality offering a similar style of gambling as defined by the premises licence.

- When a customer has requested that they be refused entry to our premises, the customer and the appointed manager will formally acknowledge and document the request on a self-exclusion request form, or directly on the web-based AGC national self-exclusion scheme. This will be preceded by a meaningful discussion about the terms and conditions applicable to the scheme and will include other options available to assist a person having a gambling disorder, including being signposted to counselling and support services. A copy of the terms and conditions will be signed by the excluder as acknowledgement of understanding and consent. Customers are given the opportunity of discussing self-exclusion in private where possible.
- Photo identification and signature of the excluder is required for self-exclusion agreements except where an alternative means of identification is at least as effective. Photographs, preferably of the passport style, should be full-faced and a good likeness both initially and throughout the duration of the self-exclusion agreement.
- The Duty Manager will offer the exclusion for a minimum duration of not less than six months, nor more than twelve months; the customer thereafter may request to extend the length of the self-exclusion for one or more further periods of at least six months, reliant on the Company's ability to manage longer agreements. The Company will not allow the excluder admittance to the premises during the term of the self-exclusion agreement, and will have in place procedures for preventing self-excluded individuals from gambling during the period of the self-exclusion agreement including taking into account the internal structure and layout of the premises.
- It is made clear to the customer that they may not revoke the self-exclusion during the agreed period and that if found either in the gambling area or attempting to gamble they will be asked to leave. Members of staff are trained to be alert to self-excluded individuals attempting to breach agreements and instances of them getting another person to gamble on their behalf. It is a requirement that staff regularly pay heed to self-exclusion agreement records that are currently active (particularly photographs) in order to stay alert to the identity of those excluded in the locality of the premises.
- Self-excluders have the opportunity of also excluding from other premises owned by the Company without necessarily having to enter areas licenced for gambling. Where the self-exclusion agreement is extended to other Company's premises we will consider any specific requests made by a customer in setting the bounds of the exclusion area.
- The Company will offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling we offer, the ability to exclude from facilities for the same kind of gambling offered in our 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. In addition, the Company is participating in the possible development of a multi-operator self-exclusion scheme that will apply to all styles of gambling.
- A self-exclusion log is maintained on the premises for recording detail of those currently excluded in addition to records stored digitally.

- Those self-excluded will be removed from any marketing databases held by this Company within two days of receiving the completed self-exclusion form, but we will take all reasonable steps to prevent details being knowingly sent as soon as practicable.
- At the end of the self-exclusion period, the exclusion will remain in place for a further six months, unless the customer takes positive action in order to gamble again.
- At the end of the exclusion period, the Duty Manager and customer will, together, review the terms of agreement either by telephone or in person. The review process is recorded on a self-exclusion review form.
- Where a customer chooses not to extend the self-exclusion and makes a positive request to begin gambling again, the customer is offered a 24-hour 'cooling off' period before being allowed access to the gambling facilities.
- Customers are given the opportunity to discuss self-exclusion in private where possible.
- The Company retains self-exclusion records for the length of the agreement plus a further 6 months.
- Members of staff are trained both on induction and refresher sessions thereafter in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

Company:

Registered Address:

Date:

Company:

Site Address:

Site Ref:

Serial No.

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GAMBLING ACT 2005*Licence Conditions and Codes of Practice***Attempts by Children and Young Persons to enter an Adult Gaming Centre or Adult Gaming Area to Gamble**

Note: This log is used where it is established that a person, known to be under the age of 18 years, enters an adult gaming centre or adult gaming area, and attempts to gamble therein. Instances where proof of age has been sought by staff, and verified as being over 18 years, may be recorded for other purposes on a 'customer refusal register.'

Date	Time	Circumstances including at what stage the young person was asked for Identification	Identity or Description	Action, outcome & preventative measures adopted	Member of Staff requesting Identification	Duty Manager Informed (signature)
Page 182						

TO BE RETAINED ON THE PREMISES To be used in conjunction with the Company's policy and procedure concerning 'Access to Gambling by Children & Young Persons'.

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

Customer Interaction in Relation to Identifying Customers who may have a Gambling Disorder or the Potential of Developing Difficulty with their Gambling

To be completed in circumstances when a customer has either requested information on who to contact for help with a gambling disorder, or where a member of staff considers it appropriate to interact with a customer who is showing signs of distress associated with their gambling, or where it is suspected that a customer's gambling style is no longer under control. It should also be recorded where interaction has been subsequently ruled out, where otherwise it would have taken place.

An entry should also be made where an approach has been made by a relative or friend of a customer considered by them to be experiencing difficulties with their gambling.

Date	Time	Circumstances including signs of distress or where it is suspected that a customer's gambling is no longer in control.	Identity or Description of Customer	Limited Exposure Offered (Y/N)	Referred to GamCare (Y/N)	Self-Exclusion Explained (Y/N)	Notes of outcome including where interaction has been ruled out.	Duty Manager Informed (signature)
Page 183								

TO BE RETAINED ON THE PREMISES To be used in conjunction with the Company's policy and procedure concerning 'Customer Interaction'.

Company:

Site Address:

Site Ref:

Serial No.

/

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

Incidents Requiring Police Assistance

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

TO BE RETAINED ON THE PREMISES

To be used when police are called to the premises to assist the licensee whether they attend or not.

Company:	Site Address:	Site Ref:	Serial No. /
GAMBLING ACT 2005 <i>Licence Conditions and Codes of Practice</i>			

SELF-EXCLUSION LOG FOR RECORDING DETAIL IF NO IMMEDIATE ACCESS TO THE BACTA WEB-BASED SCHEME

Ref	Name	Start Date	Attempts to Enter Date(s)	Attempts to Gamble Date(s)	Preventative Measures Deployed	End Date	'Cooling off' (Y/N)	Resumed Gambling Y/N
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								

TO BE RETAINED ON THE PREMISES

To be used in conjunction with the Company's policy and procedure concerning 'Self-Exclusion'.

Company:	Site Address:	Site Ref:	Serial No. /
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PS/2016/Oct31/v16/01

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

SUMMARY OF STAFF TRAINING

Management and Staff, as appropriate, declare that they have read and understood the following documents, are fully aware of Company policy and procedures and their own respective requirements in relation to them:

- | | |
|---|---|
| 1. Access to Gambling by Children and Young Persons | 6. Fair and Open Practice and Dispute Resolution |
| 2. Access to Premises by the Gambling Commission's Enforcement Officers | 7. Information on how to Gamble Responsibly and Help for Gamblers with problems |
| 3. Advertising Standards and Marketing | 8. Money laundering, Cash handling & Suspicious Transactions |
| 4. Customer Interaction | 9. Self-Exclusion |
| 5. Employment of Children and Young Persons | |

Interval not to exceed 7 days

Tick against relevant Policies

Name	Position	Joining Date	Training Date	Signature	Leave Date	1	2	3	4	5	6	7	8	9

TO BE RETAINED ON THE PREMISES

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

ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

It is illegal for any person who is under 18 years of age to be permitted entry to an Adult Gaming Centre or Adult Gaming Area.

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

- Our policies and procedures with regard to age restriction take into account the structure and layout of our gambling premises so as to prevent access to gambling by children and young persons, and that our facilities do not appeal to children and young persons.
- Clear and prominent signage is placed at the entrance(s) to our Adult Gaming Centre(s) and adult area(s) stating that it is illegal for persons under the age of 18 years to enter and for the Company to permit entry.
- 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 Adult Gaming Centre(s) or Adult Gaming Area(s).
- Any person known to be under 18 years of age is refused entry.
- Any person who appears to be under 18 years of age, and has not previously provided satisfactory proof to the contrary, is asked to provide appropriate identification when it comes to the attention of staff and before an attempt to gamble occurs. *Members of staff are trained to 'think 21' as a minimum.*
- 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. *Incidents involving suspected forged documents 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. CitizenCard); a driving licence (including a provisional licence) with photograph, 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 adult area(s) and gamble are brought to the attention of the Duty Manager immediately and recorded as an entry on a log retained on the premises for this purpose. *Details of entry to include date, time, identity of the individual if known - or detailed description if unknown – member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence. Log to be countersigned by the 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 where they have been identified as gambling in AGCs or adult-only areas, and under-18s are not allowed to retain any monetary prize.

Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file. Staff training policy covers all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and refresher training is carried out at appropriate intervals.

I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.

Signed:

Name: (please print) **Date:**

Company: **Position:**

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

ACCESS TO PREMISES BY THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures:

The Company acknowledges its obligation to ensure that staff openly co-operate with the Gambling Commission in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises contained under Part 15 (S.303 to S.326) of the Gambling Act 2005 (refer to page 2 of the Company policy document) and that:

- The Company must provide the Gambling Commission with any information that the Commission would reasonably need to be aware of in exercising its regulatory functions or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code of practice provision having the effect of a licence condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating Licence.
- The Company must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as:
 - (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 number of staff employed in connection with them; and
 - (c) the licensee's policies in relation to, and experience of, problem gambling.
- The Company must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time, and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.

Signed:

Name: (please print) **Date:**

Company: **Position:**

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

GAMBLING ACT 2005
Licence Conditions and Codes of Practice
ADVERTISING STANDARDS AND MARKETING

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedure

All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). We ensure that our marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008), including 'free bet' offers, do not amount to or involve misleading actions or misleading omissions within the meaning of those regulations.

We adopt the general principles that our advertising is:

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

Specifically, we ensure that:

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

Marketing and Promotion

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

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

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

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

I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.

Signed:

Name: (please print) **Date:**

Company: **Position:**

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

CUSTOMER INTERACTION IN RELATION TO IDENTIFYING CUSTOMERS WHO MAY BE SUSCEPTIBLE TO GAMBLING HARM

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

The Company makes use of all relevant sources of information to ensure effective customer interaction and decision making in relation to identifying possible gambling disorders; equally to identify at-risk customers who may not be displaying obvious signs of problem gambling, and in respect of customers designated 'high value' or 'VIP'. We work together with other operators to share experience and deliverance of good practice through BACTA.

If members of staff have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager is to be informed at the earliest available opportunity. Indicative behaviour may include signs of distress, agitation, aggression, intense mood swings, hysteria, remorse and perhaps even damage to property and violence or the threat of violence to staff or other customers.

Notwithstanding any initial urgent action taken to deal with the customer's behaviour, the Duty Manager is required thereafter to observe the individual and make a judgement 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 have the process of self-exclusion explained for consideration.

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.

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.*

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 future customer interaction or where it has been ruled out where otherwise it would have taken place. The interaction is conducted between the appointed manager and the customer in a confidential and meaningful manner.

Members of staff are aware of the appointed Manager who is specifically designated to deal with requests for self-exclusion, and are aware of where customers can be directed for confidential advice should they be directly approached for assistance.

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

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

I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.

Signed:

Name: (please print) **Date:**

Company: **Position:**

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

EMPLOYMENT OF CHILDREN AND YOUNG PERSONS

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

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

- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on Adult Gaming Centre licensed premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence.

All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.

It is strict Company policy that:

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

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

I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.

Signed:

Name: (please print) Date:

Company: Position:

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

FAIR AND OPEN PRACTICE ~ COMPLAINT AND DISPUTE RESOLUTION

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Complaints Procedure

The Company is committed to providing a high quality, accessible and responsive service to customers and the local community. However, dissatisfied customers may communicate a complaint to us either verbally or in writing. All complaints are taken seriously, investigated thoroughly and handled in a confidential manner. If the complaint cannot be resolved to the satisfaction of both parties on site, a copy of our written procedure for dealing with complaints, together with a complaint form is supplied to the complainant at the earliest opportunity together with the name and status of the Company representative delegated to deal with the complaint.

Complainants should provide us with a comprehensive description and nature of the complaint; whether it is an original complaint, or where the outcome of a previous complaint was found unacceptable, and their name and postal address including a contact telephone number.

A 'complaint' means a complaint about any aspect of the Company's conduct of the licensed activities, and a 'dispute' is any complaint which:

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

In the first instance, the Company will endeavour to resolve the complaint to the satisfaction of both parties within fifteen working days. Should this not be possible we will explain why and provide a date by which the complainant can expect a full response.

In the event of a complaint relating to the outcome of a customer's gambling is unable to be satisfactorily resolved between the Company and the complainant, the complainant will be given contact details of an Alternative Dispute Resolution (ADR) entity.

- Complainants have the means and opportunity of submitting their own version of events.
- The dispute is reviewed in full by the ADR entity.
- Both parties are notified in writing of the review outcome with suggestions of a resolution if appropriate.
- This procedure may, but need not, provide for the ADR entity's resolution of the dispute to be binding on both parties.

The Company is obliged to keep a record of all complaints and disputes, other than those considered to be trivial, including all disputes referred to the ADR entity that are not resolved at the initial stages of the complaints procedure. There is a requirement to submit reports of the outcome of disputes referred to the ADR entity to the Gambling Commission at intervals determined by the Commission either by the ADR entity or by the Company.

The Company is satisfied that the terms on which gambling is offered are not unfair within the meaning of the Consumer Rights Act 2015 and is compliant with those terms

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

I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.

Signed:

Name: (please print) **Date:**

Company: **Position:**

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

INFORMATION ON HOW TO GAMBLE RESPONSIBLY AND HELP FOR GAMBLERS WITH PROBLEMS

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Stay in control advice

Without breaching the principle that customers are responsible for their own gambling, the nature of the activity suggests that they should be reminded of the need to exercise caution. Accordingly, signage in the form of an appropriate number of posters or other appropriate means is displayed on our premises:

- Giving clear guidance that in order to keep gambling a fun social activity the customer needs to 'stay in control'.
- Drawing attention to further information, such as leaflets that are available on the premises.
- Indicating sources of help such as the National Gambling Helpline operated by GamCare.
- Large enough and written in language so as to be easily seen and understood.
- Prominently displayed.
- Maintained in a clean and tidy condition, preferably within a glass fronted frame.

Advertising sources of help

At the core of exercising a duty of care is the principle of assisting customers who may wish to express concern about their gambling. This tenet is drawn to the attention of customers on our premises in the following ways:

- The prominent display of 'Responsible Gambling' or 'Stay in Control' information.
- There are holders or racks containing leaflets in appropriate places that emphasise the need to keep gambling under control and where to seek help should anyone be concerned about their own or a family member's gambling. These leaflets are available to be taken away from the premises without the necessity of having to ask for them.
- The leaflets are available at all times for customers to take discreetly without having to ask a member of staff, and are located in the gambling area either near to exit doors, ATMs or toilets. We endeavour to maintain an effective stock control system to ensure that such leaflets are always available to supply. Signposting Information may also be made available through the use of links for online or smart technology.
- Details of GamCare, giving the National Helpline telephone number is inscribed on all appropriate categories of gaming machines.

Protecting those who seek assistance

Responding to someone who admits to having a problem with their gambling is a delicate matter that has to be timely and needs to be approached sensitively. It is our policy that:

- rules and procedures relating to a policy of responding to problem gamblers are clearly formulated and incorporated into our day-to-day operation;
- at least one member of staff who has been trained to deal with situations that might require a response is on duty at any one time, or available without undue delay;
- a positive response including communicating sources of help and the possibility of self-exclusion is offered to any customer who admits to having lost control of their gambling;
- the facility of a self-exclusion policy for customers who wish to voluntarily self-exclude themselves from these premises, and other premises offering the same style of gambling in the locality, that stipulates a minimum exclusion period of six months - with a further 24-hour 'cooling off' period thereafter;
- we draw to the attention of relatives who express concern about a family member's gambling the options available to that person should they wish to address the extent of their gambling;
- members of staff do not collude with customers when asked to lie on their behalf, and
- where services are marketed in one or more foreign languages, we make available information on how to gamble responsibly, access to help, guides to the playing of any game, and a summary of the contractual terms on which gambling is offered in that, or those, foreign languages.

I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.

Signed:

Name: (please print) **Date:**

Company: **Position:**

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

GAMBLING ACT 2005
Licence Conditions and Codes of Practice
MONEY LAUNDERING, CASH HANDLING AND SUSPICIOUS TRANSACTIONS

Introduction

As part of its procedures for compliance with the requirements in respect of the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, the Company takes into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the proceeds of Crime Act 2002 – Advice for operators (excluding Casino operators)*.

Money Laundering Definition

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. 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.

Policy

- The Company 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.
- The Company has appointed a Designated Money Laundering Officer (MLO)
- All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions to the MLO for the purpose of informing the relevant authorities.

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 MLO 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.
- No discussion will take place with colleagues as confidentiality is paramount.
- The MLO will determine whether or not to submit - online or otherwise - a suspicious activity report (SAR) to the National Crime Agency (NCA) and will maintain records of all notifications received detailing the method of verification used to identify the suspected person.

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),
- Money introduced to refloat machines
- Token transactions
- Customer refunds due to machine malfunctions.
- Money removed from machines (net takings)

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 this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.

Signed:

Name: (please print) **Date:**

Company: **Position:**

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

SELF-EXCLUSION

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

Whilst most customers are able to enjoy and control their gambling, this Company recognises its duty of care to those who cannot. Accordingly, we provide a self-exclusion process for those customers who seek to prevent their own access to our premises and others in the locality offering a similar style of gambling as defined by the premises licence.

- When a customer has requested that they be refused entry to our premises, the customer and the appointed manager will formally acknowledge and document the request on a self-exclusion request form, or directly on the web-based AGC national self-exclusion scheme. This will be preceded by a meaningful discussion about the terms and conditions applicable to the scheme and will include other options available to assist a person having a gambling disorder, including being signposted to counselling and support services. A copy of the terms and conditions will be signed by the excluder as acknowledgement of understanding and consent. Customers are given the opportunity of discussing self-exclusion in private where possible.
- Photo identification and signature of the excluder is required for self-exclusion agreements except where an alternative means of identification is at least as effective. Photographs, preferably of the passport style, should be full-faced and a good likeness both initially and throughout the duration of the self-exclusion agreement.
- The Duty Manager will offer the exclusion for a minimum duration of not less than six months, nor more than twelve months; the customer thereafter may request to extend the length of the self-exclusion for one or more further periods of at least six months, reliant on the Company's ability to manage longer agreements. The Company will not allow the excluder admittance to the premises during the term of the self-exclusion agreement, and will have in place procedures for preventing self-excluded individuals from gambling during the period of the self-exclusion agreement including taking into account the internal structure and layout of the premises.
- It is made clear to the customer that they may not revoke the self-exclusion during the agreed period and that if found either in the gambling area or attempting to gamble they will be asked to leave. Members of staff are trained to be alert to self-excluded individuals attempting to breach agreements and instances of them getting another person to gamble on their behalf. It is a requirement that staff regularly pay heed to self-exclusion agreement records that are currently active (particularly photographs) in order to stay alert to the identity of those excluded in the locality of the premises.
- Self-excluders have the opportunity of also excluding from other premises owned by the Company without necessarily having to enter areas licenced for gambling. Where the self-exclusion agreement is extended to other Company's premises we will consider any specific requests made by a customer in setting the bounds of the exclusion area.
- The Company will offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling we offer, the ability to exclude from facilities for the same kind of gambling offered in our 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. In addition, the Company is participating in the possible development of a multi-operator self-exclusion scheme that will apply to all styles of gambling.
- A self-exclusion log is maintained on the premises for recording detail of those currently excluded in addition to records stored digitally.

- Those self-excluded will be removed from any marketing databases held by this Company within two days of receiving the completed self-exclusion form, but we will take all reasonable steps to prevent details being knowingly sent as soon as practicable.
- At the end of the self-exclusion period, the exclusion will remain in place for a further six months, unless the customer takes positive action in order to gamble again.
- At the end of the exclusion period, the Duty Manager and customer will, together, review the terms of agreement either by telephone or in person. The review process is recorded on a self-exclusion review form.
- Where a customer chooses not to extend the self-exclusion and makes a positive request to begin gambling again, the customer is offered a 24-hour 'cooling off' period before being allowed access to the gambling facilities.
- Customers are given the opportunity to discuss self-exclusion in private where possible.
- The Company retains self-exclusion records for the length of the agreement plus a further 6 months.
- Members of staff are trained both on induction and refresher sessions thereafter in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.

Signed:

Name: (please print) **Date:**.....

Company: **Position:**

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.

GAMBLING ACT 2005

The Licensing Objectives

- To prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
- To ensure that gambling is conducted in a fair and open way.
- To protect children and other vulnerable persons from being harmed or exploited by gambling.

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

PRINCIPAL CONCEPTS

Statement

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Licensing Objectives

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

Policy and Procedures

We put into effect policies and procedures intended to promote socially responsible gambling that includes making an annual financial contribution for education and research into the prevention and treatment of gambling-related harm, the development of harm prevention measures and the treatment of those with gambling related disorders.

- We operate an on-going training program for staff to ensure awareness and compliance of our social responsibility and other statutory requirements. Individual written policies and procedures are in place and adhered to in respect of:
 - (a) Access to Gambling by Children and Young Persons
 - (b) Access to Premises by the Gambling Commission's Enforcement Officers
 - (c) Advertising Standards and Marketing
 - (d) Customer Interaction
 - (e) Employment of Children and Young Persons
 - (f) Fair and Open Practice and Dispute Resolution
 - (g) Information on how to Gamble Responsibly and Help for Problem Gamblers
 - (h) Suspicious Monetary Transactions and Cash Handling
 - (i) Self-Exclusion
- We operate our business with integrity, due care and diligence with necessary systems in place to combat crime and disorder. Written policies and procedures are in place concerning the handling of cash and cash equivalents designed to minimise the risk of crime, such as money laundering and the avoidance of illicit credit.
- Conflicts of interest between the Company and our customers are managed transparently and fairly, and, where complaints related to the outcome of gambling are not resolved to the satisfaction of both parties, we will refer the complainant to an approved alternative dispute resolution (ADR) entity.
- Gaming machines comply with the Gambling Commission's technical standards; exhibit the applicable maximum stake and monetary prize levels, and the chances of winning. Gambling general terms and conditions are displayed.
- We do not provide credit in connection with gambling nor participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.
- We seek to prevent systematic or organised money lending between customers on the premises, and staff are trained to be alert to such practice, and to report any instances of substantial money lending to the Duty Manager should they become aware of such instances.
- It is prohibited to consume alcohol on our premises.

Company:

Registered Address:

Date:

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

Customer Complaints

Terms & Conditions

Policy & Procedure

These are the Company's Terms and Conditions by which customer complaints are dealt with. Also included is the Company's policy and procedure document and complaint form. Copies of the complaint procedure and form are available on site for the benefit of customers making a complaint about the outcome of their gambling where the complaint has not been resolved on-site in the initial stages.

A 'complaint' means a grievance about any aspect of the licensee's conduct of the licensed gambling activities, and should be raised with the company as follows:

- The complaint should initially be raised with an available member of staff at the venue at the time of the incident giving cause for complaint. **Stage 1**
- If the member of staff approached is unable to deal with the complaint or the matter is not resolved to the customer's satisfaction, then it should be directed to the duty manager at the venue at the earliest opportunity. **Stage 2**
- Should the matter still not be resolved, the customer will be provided with a copy of the policy & procedure document, together with a complaint form that should be completed by the customer and submitted to the Company for consideration by a director or appointed senior manager. **Stage 3**
- If the matter remains unresolved, the customer should be referred to an alternative dispute resolution (ADR) entity with whom the Company has registered. The complaint will not be considered by the ADR entity unless:
 - **the matter relates to the outcome of the complainant's gambling transaction; and**
 - **it is not resolved during the three-stage complaint procedure as outlined above.**

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

The Company will ensure that:

1. information about the complaint procedure is set out in these terms and conditions;
2. such information is readily accessible on our gambling premises to be taken away;
3. information includes details of how to make a complaint to the Company and the identity and contact details of the person deputed to handle the complaint;
4. the information names the ADR entity to whom disputes can normally be referred and, where necessary, details of any limitation on the nature and subject matter of disputes with which a particular ADR entity deals.
5. customers are given a copy of the complaint policy and procedure document on request or on making a complaint; and
6. all complaints are handled in accordance with the procedure.

Should the Company refer a complaint to ADR entity other than one in respect of which contact details were given in accordance with 1 to 6 above it will, at the same time as making the reference, inform the Commission of the reference and reason for selection of the ADR entity concerned.

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

The Company arranges for a copy of the decision on, or a note of the outcome of, each dispute referred to an ADR entity to be provided to the Commission, either by the ADR entity or by the Company. This information is provided in such format and within such timescale as the Commission may from time to time specify.

The Company also arranges for any outcome adverse to the Company of any proceedings taken against the licensee (in whatever jurisdiction) by a customer in relation to a gambling transaction to be notified to the Commission as a key event; but excluding proceedings allocated to the County Court small claims track or equivalent in jurisdictions outside England and Wales.

Under no circumstances are members of staff put in physical danger nor will they be subjected to abuse. If a customer is threatening, then that person will be offered the complaint policy & procedure document together with a complaint form, and be referred to the Company's strict policy of 'No Abuse'. If the customer continues to be threatening the circumstances will be treated in accordance with a disturbance on the premises, and the person will be asked to leave, and the police contacted to assist if necessary.

Which complaints are covered?

A complaint, in the context of the LCCP, means a complaint solely about the conduct of the Company's activities. A dispute means a complaint which has not been resolved by the operator's complaints procedure to the satisfaction of both parties, and relates to the outcome of a gambling transaction.

Responsibility of the Employer.

The Company has a written procedure in place to:

- advise employees of the name of the appointed person who is to be contacted about complaints;
- ensure that all complaints are handled in accordance with the procedure throughout the investigative process;
- have arrangements in place for reference by a customer of a dispute to an alternative dispute resolution service for disputes (an 'ADR entity'); and
- maintain a record of all complaints, and those that evolve into disputes. All instances where the complaint is referred to an ADR entity will also be recorded together with the outcome.

Responsibility of the Employee

Members of staff not authorised to deal with complaints, or where the customer is not satisfied with the initial outcome, will ensure that:

- the complainant is informed of the name of the appointed Company representative who will deal with the complaint, together with the appropriate contact details of that person;
- the complainant is issued with the Company's complaint policy & procedure document and complaint form;
- the circumstances are recorded as contemporaneous notes as soon as possible following the incident and the notes are signed, dated and timed by the member of staff dealing. The notes are to be comprehensive and a true record of events, and
- members of staff, unless properly authorised by the Company, are not allowed to voice their own opinion as to the merits or otherwise of a complaint. Procedure is strictly adhered to.

Complaint Procedure

The Company endeavours to provide a high quality service to its customers and members of staff are trained how to deal with complaints at the initial stage. However, if you believe that things have gone wrong and your complaint was not resolved to your satisfaction at our premises, then please inform us as we take such reports seriously.

The Company will review your complaint and will be dealt with by:

(name)..... who is (job title)

at (address).....

.....

Email Address:

How to make a complaint

- Complaints, which we will deal with confidentially, should be submitted in writing, by letter or e-mail.
- The attached form should be used to record and submit complaints.
- Give as much detail as possible including details of independent witnesses and any other relevant information in order to assist the Company in the investigative process.

What happens next?

The Company will investigate and provide a full explanation of what we have done within **15 working days** of receiving a complaint. If this is not possible we will explain why and give a date by which a full response can be expected.

If you are not satisfied with our response

If you are still not satisfied with our response to the complaint, you may consider writing to an alternative dispute resolution (ADR) entity requesting that the matter be reviewed, enclosing all previous correspondence relating to the complaint including the original complaint form. The ADR entity will acknowledge receipt of your correspondence without undue delay and, after review, inform you of its findings and recommendations, usually within **60 days**. The review process is thorough and based upon the information that both parties and other independent sources provide.

This Company is registered with the following ADR entity:

Name of ADR Entity: **bacta ADR Service**

Email Address: enqs@bactaadrservice.org.uk

Website: www.bactaadrservice.org.uk

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

It is highly recommended that you visit the ADR entity's website (as above) so that you are fully aware of the procedural rules and other related information.

Complaint Form

CUSTOMER

Name:

Address:

..... Postcode

Daytime Telephone No .:

E-mail address:

Signature: Date:

Is this an initial complaint or a follow up to a previous incident?

.....

.....

VENUE WHERE COMPLAINT OCCURRED

Reference (if known):.....

Company:

Name of Premises:

Address:

.....

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

.....

.....

Date of Incident:

Time of Incident:

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

.....

.....

.....

Name and Category of Gambling Machine subject of complaint:

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

Appointed Manager dealing: (Mobile Number)

Details of action to resolve taken by Company:

Complainant referred to ADR Entity (Y/N);(date)

Company Complaint Policy & Procedure Document given to Complainant(Y/N):(date)

RECORD OF COMPLAINTS

[illegible]

To be retained on Site Company:

Site Reference:

Serial No. /

Record of Suspicious Monetary Transactions

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

To be retained on Site

Company:

Site Reference:

Serial No. /

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

SELF-EXCLUSION REQUEST FORM FOR RECORDING DETAIL IF NO IMMEDIATE ACCESS TO WEB-BASED BACTA SCHEME

Site Name:

Site Address:

Customer Name:

Customer Date of Birth:

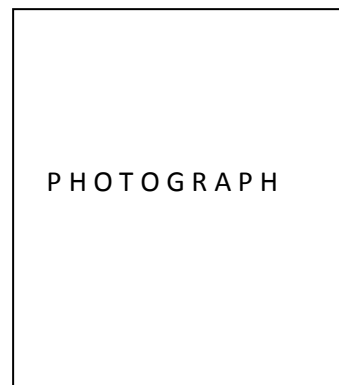
Customer Address:

.....

Customer Postcode:

Customer Email Address:

Customer Mobile Number:



I request that I be refused entry to

for ***an initial period of 6 months (minimum) or *a period of *..... months (no more than 12 months)**
from the date of signing, and acknowledge that I am not allowed to rescind my self-exclusion during this period.

The arrangement will be reviewed by both parties thereafter. **Delete as applicable*

If I attend the premises set out in this agreement during the term of this exclusion and am identified by staff, I will be requested to leave the premises forthwith.

I acknowledge my responsibility in ensuring adherence to this agreement and hereby sign to the effect that I have read, understood and agree to the company's Terms & Conditions.

I acknowledge the Company, its employees and agents have no liability or claims arising from my voluntary use of the gambling facilities provided.

I have provided a photograph of myself to assist in the application of this request.

Signed: (Customer)

Witnessed: (Appointed Manager) Date:.....

SELF-EXCLUSION LOG REFERENCE No.

Note for Customer: If you would like further advice or assistance, you may like to consider contacting the confidential National Gambling Helpline, operated by GamCare on **0808 8020 133**.

This form must be retained on site for the duration of the self-exclusion period and a copy given to the customer. Members of staff interfacing with customers should reacquaint themselves with the details of this self-exclusion, especially the photograph, on a regular and frequent basis.

Company:

Site Reference:

Serial No. /

GAMBLING ACT 2005

SELF-EXCLUSION REVIEW FORM FOR RECORDING DETAIL IF NO IMMEDIATE ACCESS TO THE BACTA WEB-BASED SCHEME

Company:

Site Name:

Site Address:

Post Code:

Customer Name:

Customer Date of Birth:

Customer Address:

Post Code:

Review of self-exclusion agreement on: (date)

Customer's Decision:

.....

Signature: (Customer) Date:

Signature: (Appointed Manager) Date:

Request to resume access and gambling following the self-exclusion period.

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

Signature: (Customer) Date:

Signature: (Appointed Manager) Date:

To be retained on Site

Company: Site Reference: Serial No. /

GAMBLING ACT 2005
Licence Conditions and Codes of Practice
COMPLIANCE EVALUATION

Section 1 - Observation

Company:.....

Site: **Date:** **Time:**

Please circle either 'Y' (yes) or 'N' (no) as appropriate

- | | | | |
|-----|--|----------|----------|
| 1. | Are age restriction signs displayed prominently at the entrances to Adult Gaming Centers, (AGCs) clearly stating that it is illegal for persons under the age of 18 years to enter the premises or, equally prominent with the same clear message, at the entrances to adult gaming areas within a Licensed Family Entertainment Centre (Lic. FECs)? | Y | N |
| 2. | Are entrances to AGCs and/or adult gaming areas appropriate so as not to attract children or young persons from entering? | Y | N |
| 3. | Are the entrances to AGCs or adult gaming areas effectively monitored, controlled and supervised taking into account the structure and layout of the premises so as to ensure that age restriction is adhered to? | Y | N |
| 4. | Are the barriers separating different licensed premises within the parameters of one 'building' of a solid construction, including the unlicensed areas separating different licensed premises? | Y | N |
| 5. | Are 'Stay in Control' posters prominently displayed, preferably framed, so as to be easily seen and read by all customers? | Y | N |
| 6. | Are 'Stay in Control' leaflets available in a dedicated rack, preferably below a 'Stay in Control' poster and discretely accessible to customers without the need to be asked for, and available for taking away? | Y | N |
| 7. | Are approved 'Proof of Age' application forms readily available for distribution, or are alternative and suitable schemes adopted to assist with compliance of age restriction policy? | Y | N |
| 8. | Do advertising, marketing and promotional notices comply with advertising standards? | Y | N |
| 9. | Is the Premises Licence clearly displayed (summary is sufficient)? | Y | N |
| 10. | Is the Company registered for MGD? | Y | N |
| 11. | Are machines correctly and clearly labeled according to category of machine? | Y | N |
| 12. | Are 'No Alcohol' signs clearly displayed? | Y | N |
| 13. | Are 'No Smoking' signs clearly displayed? | Y | N |

- | | | | |
|-----|--|----------|----------|
| 14. | Is the operation fully compliant with gaming legislation and other regulatory requirements, e.g. only the correct category of gaming machines provided on site; stake and prize levels appropriate for the type of premises; correct number of machines? | Y | N |
| 15. | Is the National Gambling Helpline telephone number on all categories of machines? | Y | N |
| 16. | Are labels displayed on gaming machines (with the exception of Category 'D' machines located in Licensed FECs) stating that under 18s are prohibited from playing? | Y | N |

Comment:

Please comment on all instances where 'N' is circled, giving a full explanation and what measures are to be adopted so as to comply with requirements.

.

GAMBLING ACT 2005
Licence Conditions and Codes of Practice
COMPLIANCE EVALUATION

Section 2 - Management

Company:.....

Site: **Date:**..... **Time:**

Manager: **Length of Service:**

Please circle either 'Y' (yes) or 'N' (no) as appropriate

- | | | |
|---|----------|----------|
| 1. Are you aware of, and understand, the three licensing objectives? | Y | N |
| 2. Are you aware of procedures on how to respond to 'authorised persons' who properly identify themselves on the premises. | Y | N |
| 3. Are the following Licence Conditions and Codes of Practice written policy and procedure documents fully understood and available for inspection? | | |
| • Principal Concepts | Y | N |
| • Access to gambling by children and young persons | Y | N |
| • Access to premises by the GC's Enforcement Officers | Y | N |
| • Advertising standards and marketing | Y | N |
| • Customer interaction | Y | N |
| • Employment of children and young persons | Y | N |
| • Fair and open practice and dispute resolution | Y | N |
| • Information on how to gamble responsibly and help for those with problems | Y | N |
| • Money laundering, cash handling and suspicious transactions | Y | N |
| • Self-exclusion | Y | N |
| 4. Are the following logs up-to-date and available for inspection? | | |
| • Attempted child or young person entry | Y | N |
| • Customer interaction | Y | N |
| • Incidents requiring police assistance | Y | N |
| • Self-exclusion | Y | N |
| • Staff training summary | Y | N |
| 5. Are the following systems in place to demonstrate staff training and awareness of Company policies and procedures? | | |
| • Written policy and procedure records signed by staff | Y | N |
| • Complaints and dispute resolution records | Y | N |
| • Training attendance certificates | Y | N |

6. Can the Company demonstrate robust risk assessment of age-verification and restriction by regularly conducting test purchases or other satisfactory and appropriate methods?	Y	N
7. Is age restriction policy strictly adhered to, and are members of staff effectively trained in its implementation?	Y	N
8. Are members of staff aware that it may be construed to be an act of 'gross misconduct' should they knowingly allow persons under the age of 18 years to enter an Adult Gaming Centre or adult gaming area(s) within a Licensed FEC, and is this a clause included in their contract of employment?	Y	N
8. Has a 'proof of age' scheme been adopted, and are approved application forms available?	Y	N
9. Are customers not inappropriately encouraged to play on gaming machines?	Y	N
10. Is there is a policy in place that precludes staff colluding with customers who ask them to lie on their behalf?	Y	N
11. Is it company policy to allow customers to change coins back to notes?	Y	N
12. Are relevant staff members trained to respond positively to customers who exhibit distress, say they have a problem with their gambling, or wish to be self-excluded?	Y	N
13. Is it accepted that the initial minimum period for self-exclusion is not less than 6 months, nor more than 12 months and are you aware of the requirement of implementing a 24-hour 'cooling off' period thereafter?	Y	N
14. Are all members of staff who interface with customers familiar with the AGC sector self-exclusion web-based scheme and know what to do if a self-excluded person attempts to enter the gaming area or attempts to gamble before the period of the self-exclusion agreement expires?	Y	N
15. Do stock control procedures ensure that 'Stay in Control' leaflets are always in the rack(s) and that a reserve supply is always available?	Y	N
16. Are you aware of how to order new stocks of 'Stay in Control' leaflets and posters?	Y	N
17. Are you aware of the requirements relating to advertising, marketing and promotions?	Y	N
18. Are copies of self-exclusion request forms retained on site and readily available for supply should the web-based system fail for any reason?	Y	N
19. Are all members of staff aware of requirements concerning young Persons who may be employed by the Company?	Y	N

20. Can you demonstrate that annual financial contributions (RET) are being paid to GambleAware or other appropriate care agencies?	Y	N
21. Are you aware of the requirement to submit an annual regulatory Return to the Gambling Commission, and what information is required?	Y	N
22. Are you aware of procedures necessary under money laundering laundering regulations, and has the Company appointed a designated money laundering officer (MLO)?	Y	N
23. Has the Company participated in a recognised social responsibility awareness course?	Y	N
24. Are you aware that stakes must be returned to under-18s who have gambled in AGCs and adult areas and that they are not permitted to retain any monetary prize paid out?	Y	N
25. With regard to customer complaints and disputes, do you have a written policy and complaint form available to be handed to a complainant, and have you registered with an approved ADR entity?	Y	N
26. Are you aware of the importance of ensuring the ongoing process of staff training in respect of adhering to the requirements of the LCCP, and the need to train new members of staff if when they are recruited to the Company?	Y	N
27. Are you aware of your obligations to inform the Gambling Commission should there be any 'key event' changes to your Operating Licence?	Y	N
28. Has a Local Risk Assessment Document been written and is it available on site for Inspection if requested?	Y	N
29. Has an Anti-Money Laundering Risk Assessment been written and is it available on site for the benefit of staff and inspection if requested?	Y	N

Comment:

Please comment on all instances where 'N' is circled, giving a full explanation and what measures are to be adopted so as to comply with requirements.

.

GAMBLING ACT 2005
Licence Conditions and Codes of Practice
COMPLIANCE EVALUATION

Section 3 - Members of Staff

Company:

Site:..... **Date:**.....**Time:**

Member of Staff:**Length of Service:**

Please circle either 'Y' (yes) or 'N' (no) as appropriate

1. Do you have a good understanding of the following Licensing Conditions and Codes of Practice written policies and procedures where they are relevant to your particular duties?

- | | | |
|---|---|---|
| • Access to gambling by children and young persons | Y | N |
| • Access to premises by the GC's Enforcement Officers | Y | N |
| • Customer interaction | Y | N |
| • Employment of children and young persons | Y | N |
| • Fair and open practice and dispute resolution | Y | N |
| • Information on how to gamble responsibly | Y | N |
| • Money laundering | Y | N |
| • Self-exclusion | Y | N |

2. Are you aware of and understand the content and maintenance of the following logs?

- | | | |
|---|---|---|
| • Attempted child entry | Y | N |
| • Customer interaction | Y | N |
| • Incidents requiring police assistance | Y | N |
| • Self-exclusion | Y | N |
| • Staff training summary | Y | N |

3. Do you understand the systems in place to demonstrate staff training and awareness of the following Company policies and procedures?

- | | | |
|--|---|---|
| • Written policy and procedure records signed by staff | Y | N |
| • Staff training summary sheet | Y | N |
| • Complaints and dispute resolution records | Y | N |

- | | | |
|--|---|---|
| 4. Is age restriction policy known to you and applied? | Y | N |
|--|---|---|

- | | | |
|---|---|---|
| 5. What 'Proof of Age' scheme is in use and are you aware of where the application forms are located? | Y | N |
|---|---|---|

- | | | |
|---|---|---|
| 6. Are you instructed that customers are not inappropriately encouraged to play on gaming machines? | Y | N |
|---|---|---|

7. Are you aware that you must not collude with customers who ask you to lie on their behalf?	Y	N
8. Are you aware that it is an act of 'gross misconduct' if you knowingly allow a person under the age of 18 years to enter an Adult Gaming Centre or adult gaming area(s) within a FEC?	Y	N
9. Do your instructions permit that a customer may change coins back into notes?	Y	N
10. Are you aware of what your actions should be if you were to be approached by a customer who asks for help to deal with a gambling problem to do with themselves or with a relative or friend?	Y	N
11. Do you know which member of staff has been appointed by the Company to supervise 'customer interaction' and 'self-exclusion' issues?	Y	N
12. Are you aware of what behavior might be characteristic in a person whose gambling is out of control, and what your actions should be if you observe a customer displaying such behavior?	Y	N
13. Are you aware that the Company offers a web-based self-exclusion scheme for customers who are experiencing difficulties with their gambling; that the minimum period of self-exclusion is 6 months and that excluders can also be excluded from other company premises offering a similar style of gambling in the locality, and have you been shown and understand the guide to the self-exclusion scheme?	Y	N
14. Are you aware of the requirement of a 24-hour 'cooling off' period following a term of self-exclusion?	Y	N
15. Are you aware of what your actions must be should a self-excluded customer enter the gambling area or attempt to gamble during the course of their self-exclusion period?	Y	N
16. Are you aware that 'Stay in Control' leaflets should always be available in the racks, and where replacement stock is stored?	Y	N
17. Are you aware of where the self-exclusion request forms are kept in the event that the web-based scheme cannot be accessed?	Y	N
18. Do you know what your actions must be when a Gambling Commission enforcement officer or other authorized person enters the premises?	Y	N
19. Are you aware of the employment limitations with regard to children and young persons employed by the Company?	Y	N
20. Are you aware of procedures required under the money laundering regulations and who the Company appointed MLO is?	Y	N
21. Have you received LCCP training?	Y	N

22. Are you aware that stakes must be returned to under-18s who you have identified as having gambled in the AGC (or adult area) and that they are not permitted to retain any monetary prize?	Y	N
23. Are you aware of the company's policy in dealing with complaints and disputes and where written copies of this policy and complaint forms are kept?	Y	N
24. Do you know what the three Licensing Objectives are?	Y	N
25. Do you feel that you have received sufficient training in what is expected of you in respect of knowledge and implementation of gambling law requirements?	Y	N
26. Do you have copy of the staff training booklet provided by bacta and have you Completed the training modules?	Y	N
27. Have you been shown and understand the local risk assessment and money Laundering risk assessment documents?		

Comment:

Please comment on all instances where 'N' is circled, giving a full explanation and what measures are to be adopted so as to comply with requirements.

.

Responsibility for Third Parties

Licensees must take responsibility for third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities and 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.

Notes:

- The Commission is not interested in cleaning activities etc unless that has an impact on the licensed activities.
- Operators must also build in terms to those contracts to enable termination of the contract when things go wrong.
- There can be dispute resolution procedures which apply when these termination clauses are invoked.

Qualified Persons

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 X 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 X.
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.

PERSONAL LICENCES

1. Subject to 6 and 7 below, licensees must ensure:
 - 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
 - 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. The Commission makes explicit the approach that the head of compliance will not normally occupy (without Commission approval) any other specified management office, such as head of marketing. This LCCP requirement does not apply to small scale operators
 - 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.

Key Events

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 occurrence.

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 holders

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 10 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.

Gambling facilities

25. 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.
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
- 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
- a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company. 1 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

Other Reportable Events

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 events:

- 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 outcome.
- 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.

General and Regulatory Returns

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.

Protection of Customer Funds

Disclosure to Customers

Licence condition 4.2.1,

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 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.

Payment

Cash and cash equivalents, payment methods and services

Licence condition 5.1.1

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 minimize 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.

Provision of Credit by Licensees and the Use of Credit Cards

Licence Condition 6.1.1

1. Licensees must neither:
 - a. provide credit themselves in connection with gambling; nor
 - b. participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

Reporting Suspicion of Offences

Licence Condition 15.1.1

2. 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.

Responsible Placement of Digital Adverts

Licence Condition 16.1.1

1. Licensees 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.

Customer Notice

Gaming General Terms & Conditions

These Terms and Conditions (the “Generic Terms”) apply to all gaming transactions entered into on these premises (the “Premises”) *except for Promotions which are covered by separate terms and conditions available on the premises.*

Any gaming transactions entered into on the premises shall be between the customer taking part in the particular transaction (the “Customer”) (1) and
(the “Company”) (2)

In these General Terms, the terms/conditions/rules displayed on the particular gaming machine are referred to as the “Specific Terms”.

Customers are strongly advised to read the Specific Terms. By entering into any gaming transaction by use of the particular gaming machine, the Customer shall be deemed to have read and accepted the Specific Terms applying.

Minimum and maximum stakes and maximum prizes/wins are those displayed on the gaming machine in the Specific Terms.

Members of staff have no authority to vary or amend the General Terms or the Specific Terms and any assistance or advice offered by them in relation to any gaming transaction shall be without prejudice to that position.

In the event of a disputed outcome to any game, the Company complaint procedure will apply, a copy of which is available from a member of staff or from the Company at the address below:

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APPENDIX B - GUIDE TO THE BACTA SELF-EXCLUSION SERVICES SCHEME

INTRODUCTION

In 2015, the Gambling Commission revised the Licence Conditions and Codes of Practice. As part of that revision, the way in which the gambling industry is expected to handle those customers who wished to self-exclude was changed.

Whereas previously operators simply self-excluded a customer in ways dependent upon the gambling premises, the change requires operators to offer self-excluders the opportunity to self-exclude from other premises offering similar gambling facilities in the locality. Self-exclusion lasts between six and twelve months but can be extended by the self-excluder.

The relevant section of the LCCP can be found at: <http://www.gamblingcommission.gov.uk/pdf/Latest-LCCP-and-Extracts/Licence-conditions-and-codes-of-practice.pdf>

What this means in practice is that an AGC has to allow someone to also self-exclude from other AGCs nearby without the excluder having to visit them.

Bacta has worked with a software company to build a web-based application that will allow this process to be automated. The scheme is administered via a separate company called Bacta Self-Exclusion Services Ltd (BSESL).

This software allows operators to input details of a self-excluder and then tell other operators nearby that a particular person has self-excluded and that they will need to stop them entering the premises should they try. Attempted breaches of a self-exclusion can also be recorded on the system. The system uses a radius from the post code of the AGC to determine which other AGCs are notified.

The scheme is for use by those operators who possess an Adult Gaming Centre premises licence. A separate scheme is available for those using a bingo licence. Details of that scheme are available from the Bingo Association.

Motorway Service Areas (MSAs) that operate AGCs use this scheme but self-excluders will be able to select individual service areas or multiple service areas on particular motorways or A roads, rather than using a radius from a postcode.

A self-excluder wishing to exclude themselves from High Street AGCs and from AGCs on Motorway Service Areas, need to do so separately.

A separate guide to the software package has been produced and is available from bacta.

It is important to emphasise that self-exclusion is a last resort for an individual who wishes to stop gambling. It is one of the tools available to them to help. Operators have a duty of care towards those who wish to self-exclude and should seek to point those individuals to other self-exclusion schemes operated by other gambling sectors, as well as to care agencies and helplines such as GamCare or GambleAware.

BRIEF DESCRIPTION OF THE SCHEME

- a. In order to offer the scheme to customers, operators need to register with BSESL by signing a contract that sets out the nature of the service BSESL is providing and the obligations BSESL and operators must fulfil.
- b. A login and password to the system is provided and operators need to upload details of their company and their sites onto the system.
- c. Operators need to give relevant members of staff their own login and password.
- d. Operators are able to customize the software to suit their businesses.

- e. Once the registration process is complete the operator is able to upload details of any self-excluder using a screen for that purpose.
- f. The screen requires key information to be provided.
- g. It is necessary to upload a copy of a photograph of the self-excluder.
- h. It is also necessary to obtain consent from the self-excluder to their details being used for the purposes of ensuring they are self-excluded from the premises from which they choose to be excluded.¹
- i. Once the details of the self-excluder have been uploaded, namely their photograph and details of from where they wish to be excluded (either using a radius from a post code in the case of AGCs or individually in the case of MSAs), the system alerts the operators of those other premises that someone has excluded themselves from the source premises.
- j. Those operators then have to access the system and implement whatever procedures they have in place to ensure that person cannot enter the premises. For example, at an MSA vehicle number plate recognition can in some circumstances alert staff that a person who has self-excluded is coming on site. AGCs may simply use staff recognition.
- k. For people who do not wish to visit an AGC or MSA operators should provide a contact telephone number to the relevant person within their organization who can then fill in the details of the self-excluder remotely. Acceptance of the Terms and Conditions needs to be given by the self-excluder in writing, either by post or by hand.
- l. All records can be printed off and stored securely by the operator.
- m. When a self-exclusion period comes to an end, the person who has self-excluded has to visit the AGC from which they originally excluded themselves either to extend their self-exclusion or to notify the operator that they wish to start gambling again. A screen needs to be completed and an alert to other operators is generated so everyone is aware that the self-exclusion agreement has come to an end. There is a 24-hour cooling off period before this can become active.
- n. A self-excluder that does not notify the operator that they either wish to gamble again or that they wish to extend their self-exclusion period will automatically be deleted from the system after six months from the end of the self-exclusion period they originally selected. Again, an alert is generated at that time by the system to all relevant operators advising that the particular self-excluder is no longer on the database and staff no longer need to be aware of their potential to enter the premises.

¹ The information about a self-excluder is likely to be regarded as “sensitive personal data” under the Data Protection Act. As a result the Act requires additional safeguards in the processing and securing of that data, which would extend to a person’s photograph. Policies and procedures within the company to do this should be written down and understood by members of staff. Further advice is given under the FAQ Section of this Guide but please note that it is ultimately your responsibility to ensure that you are complying with the Data Protection Act.

THE ROLE OF STAFF

The role of members of staff interfacing with customers is crucial in the successful implementation of the self-exclusion scheme. It is expected therefore that staff will be well versed in the necessary conversations that need to be had with those wishing to exclude and the way to have them.

It is nevertheless important to remember that in all cases a safety-first policy must be adopted; staff members should never put themselves, customers or colleagues at risk.

This might be when a particular customer has become agitated or potentially violent. Staff members should not put themselves in a position where they are alone with an individual whether on site or off site. If necessary, they should ensure another member of staff is present to witness that no inappropriate behavior occurs.

Staff must be told that it is imperative that they behave at all times in a way that does not jeopardize the confidentiality of the information about an individual that they have been given either as the member of staff handling the self-exclusion or as a member of staff policing the system.

Here are some do's and don'ts around sensitive personal information of this kind:

- Limit staff access to the data to those who need to enforce the self-exclusion scheme.
- Do not allow anyone to remove self-exclusion data from the premises or to refer to any individuals opting into the scheme outside of an immediate and necessary work context.
- If staff members attach a photograph of a self-excluder to the wall in the office, make sure it cannot be seen by any members of the public (e.g. if the door is opened).
- Treat as gross misconduct the sharing of any personal data with any third party.
- Obtain independent verification that your business is operating in compliance with data protection and privacy laws.
- Members of staff should never use their own mobile devices to take photographs of self-excluders.

TERMS AND CONDITIONS

The terms and conditions, to which every self-excluder needs to understand and agree to, is provided to operators separately. These T&Cs are designed to minimise liability in the event that someone who has self-excluded successfully enters your premises undetected and gambles, and claims damages from you for not properly exercising your duty of care to keep them from the premises and any damages they may be seeking as a result.

This does not mean that operators can ignore the need for robust and proper policies and procedures to enforce a self-exclusion. That is a key requirement of the LCCP and is contained in the terms and conditions BSESL has with operators. If policies and procedures are not sufficiently robust, an excluder could be successful in an action irrespective of the fact they have signed a copy of the standard terms and conditions.

Some scheme members may wish to amend the self-excluder terms and conditions. They do so at their own risk. Whatever BSESL's contract with you requires, should you amend the standard terms then you must include what we regard as certain minimum or mandatory conditions. BSESL cannot warrant that the self-excluder terms and conditions will meet the Gambling Commission's requirements nor that they will protect you from all claims. You need to obtain your own legal advice before using the self-excluder terms and conditions.

Operators are recommended to keep and store signed copies of the terms and conditions.

FREQUENTLY ASKED QUESTIONS

Do High Street bingo operators have to join the BSESL scheme?

Operators that have a bingo licence have to use the Bingo Association self-exclusion scheme. That scheme does not exclude someone from AGCs. To do that they will need to initiate a separate self-exclusion using the BSESL self-exclusion scheme for AGCs

Why are the details of people deemed sensitive information?

The processing of personal data is both defined and regulated by the Data Protection Act. You will need a registration in any case with the Information Commissioner (www.ico.org.uk) if you process any personal data. Most companies will be registered already.

In addition there is another category of personal data which is called sensitive personal data and is defined as any data fulfilling certain requirements, such as data relating to medical conditions. Given that self-exclusion potentially relates to problem gambling it should be treated as sensitive data. This means operators must ensure that they have robust policies and procedures in place to ensure that data relating to self-excluders is not used for any other purpose than ensuring the self-exclusion is effective. Also, the data must not be disclosed to those that are not involved in making the self-exclusion effective. All members of staff must understand this.

Operators must make sure that they remove access to the system by any member of staff that leaves their employ.

How do Holiday Parks deal with self-exclusions?

If a self-excluder is going on holiday to a holiday park and wishes to self-exclude from the AGC(s) on the Holiday Park whilst there, they should contact the Park direct to ensure that for the duration of their holiday they are prevented from entering the AGC. Each Holiday Park will have to devise appropriate arrangements to give effect to the self-exclusion in light of their unique circumstances.

I am having trouble registering a self-exclusion. Is there anyone I can call?

In the first instance please call 0207 730 6444.

What should I do if I notice someone attempting to breach their self-exclusion?

Firstly, the person attempting to breach should be approached to remind them that they have self-excluded from the premises and you are bound to ask them to leave the premises. Again, safety must come first and if a situation escalates then company procedures should be followed.

All attempted breaches should be recorded on the BSESL system. A form is available on the system for this purpose. You will also need to record this on your self-exclusion incident log.

What if someone won't agree to sign the terms and conditions or have their photograph taken?

Simply put, the system cannot be used and they cannot be self-excluded from premises in the locality. You can continue to self-exclude them from your premises in the usual way if that can be arranged under your existing system.

What if someone comes to an MSA in a friend's car

Whilst number plate recognition can be used by MSA's to identify a self-excluder's car if that information has been provided, it clearly will not identify a friend's car. The use of number plate recognition technology is not part of the BSESL scheme but provides a potential tool MSA operators can use to help them, alongside other procedures, to prevent a self-excluder from entering the AGC located at the MSA.

APPENDIX C – SYSTEM CHECKLIST

Premises Signage

	Yes (tick)	No (tick)	N/A (tick)	Notes
No Under 18s				
No Alcohol				
No Smoking				
BACTA Membership				

Machine Signage				
Under 18s				
GamCare				
Category Labels				
Legacy Labels				

Posters (P) & Leaflets (L)

Stay in Control (P)				
Stay in Control (L)				
Proof of Age Scheme				
Think 21/25 Material				

Licences

Premises Licence				
Operating Licence				
Personal Licence				
Link Licence				

Forms

Self-Exclusion				
Complaints & Dispute				

Policy & Procedure Documents

Access by C & YP				
Access by G C				
Advertising				
Employment of C & YP				
Customer Interaction				
Fair & Open				
Signposting Information				
Money Laundering				
Self-Exclusion				

Logs

	Yes (tick)	No (tick)	N/A tick)	Notes
Attempts to Gamble C & YP				
Customer Interaction				
Police Assistance				
Self-Exclusion				
Staff Training				

Entitlement

B3 Numbers				
Stakes & Prizes				

Misc.

Age Verification Tests				
Contribution to RET				
Notifying Key Events				
Regulatory Return				
Knowledge of MLO				
Advertising Practice				
Payment of MGD				
ADR Entity				
Licensing Objectives				
Attractive to Children				
Supervision				
Self-Exclusion Scheme				
Return to Player (%)				
Responsibility for 3 rd Parties				
Register of Machines				

Risk Assessment Documents

Local Risk				
Money Laundering				
Guide to bacta SE Scheme				

Registrations

ADR Entity				
Self-Exclusion Scheme				
Age Verification Testing				
Primary Authority				

OPERATOR NOTES:

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Who can help?

If you feel you are in difficulty with your gambling or know someone who is and would like to help: Call the national helpline operated by GamCare

0808 8020 133
or chat online at
www.gamcare.org.uk

GamCare is the national centre for information, advice and practical help regarding the social impact of gambling. Their helpline is run by trained staff who can offer counselling, information and advice to problem gamblers, family members and to friends of gamblers.

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GAMBLE RESPONSIBLY



STAYING IN CONTROL

THE GOLDEN RULES OF PLAYING FRUIT MACHINES



**Playing machines is buying fun,
NOT investing money**

Only play with money you can AFFORD to lose

Set LIMITS on how much you will spend

Playing within your means can be FUN and exciting

**Spending outside your means can create
PROBLEMS for yourself and others**

bacta



CALCULATING THE RISK

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

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

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

For these players gambling ceases to be fun

Their life can be dominated by gambling



PROBLEM GAMBLING

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

Gambling becomes a problem when you:

Gamble until all your money has gone

Borrow or steal money to continue gambling

Gamble to chase your losses

Neglect other interests, family and friends to gamble



CHECKING IT OUT

Someone who thinks they might have a gambling problem
should ask themselves if:

They lose time from education or work because of gambling

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

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

They gamble until their last pound has gone

They borrow to finance their gambling

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

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

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



STAYING IN CONTROL

Whenever you play machines it is wise to remember that:

You are buying entertainment, not investing your money

You should only spend money you can afford to lose

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

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

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

Playing within your means is likely to be fun and exciting

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

You shouldn't play to escape from worries or pressures

STAYING IN CONTROL

THE GOLDEN RULES OF PLAYING FRUIT MACHINES



**Playing machines is buying fun,
NOT investing money**

Only play with money you can AFFORD to lose

Set LIMITS on how much you will spend

Playing within your means can be FUN and exciting

**Spending outside your means can create
PROBLEMS for yourself and others**

If you feel you are in difficulty with your gambling or know someone who is and would like to help: Call the national helpline operated by GamCare 0800 8920 133 or chat online at www.gamcare.org.uk



GamCare is the national centre for information, advice and practical help regarding the social impact of gambling. Their helpline is run by trained staff who can offer confidential, anonymous and advice to problem gamblers, family members and to friends of gamblers.

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Remember we are obliged to ask for
proof of age - it's a legal requirement

Think 25



Don't be afraid to ask any
customer for proof of age

Always ask NEW visitors
to your site for proof of ID

Failure to identify
under-age customers can
result in disciplinary
or legal action and YOU,
not only the Company,
being fined

**FIRST STAGE
ASK THEIR AGE**

bacta
The Betting and Gaming Council

www.bacta.org.uk

If you feel you are in difficulty with your gambling or know someone who is and would like to help, call the national helpline operated by GamCare 0800 9000 100 or chat online at www.gamcare.org.uk

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BRIEF INTERVENTION GUIDE

Addressing risk and harm related to gambling



GambleAware



ACKNOWLEDGEMENTS

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Disclaimer

The Guidelines in this document should not be considered exhaustive, exclusive or a substitute for individualised care and treatment decisions.

Access

Copies may be obtained electronically via infohub.gambleaware.org

CONTENTS

Introduction to the Guide	3	Important considerations	22
Who is the Brief Intervention Guide for?	3	Cultural considerations and brief intervention	22
Sections within the Guide	3	Overcoming potential barriers to brief intervention	22
What is Brief Intervention?	4		
Why offer brief intervention?	5	Responding to family and affected others	24
Brief intervention is part of the spectrum of effective responses	5	Resources for family and affected others	24
Brief intervention evidence base	5	The 5-Step Method	24
Key concepts in screening and brief intervention	6	Brief intervention requirements at an organisational level	26
Screening as a basis for brief intervention	6	Project initiation	26
Before offering brief intervention	8	Consulting within the organisation	28
Preparation	8	Project planning	28
The knowledge base	9	Implementation	30
Training	9	Ongoing improvement	30
How to provide brief intervention	10	References	31
Elements of brief intervention: FRAMES	10	Appendix 1	32
Motivation and brief intervention	11	Lie/Bet Questionnaire	32
Bring together the stages of change and a motivational response	12	The NODS/CLiP Short Problem Gambling Screen	32
Stages of brief intervention at a glance	13	Problem Gambling Severity Index	33
Introduce the subject	14	Appendix 2	34
Screen	15	Organisations that provide help and advice	37
Provide feedback and brief advice	16		
Listen for readiness and confidence	18		
Provide further intervention (as appropriate)	20		

INTRODUCTION TO THE GUIDE

Who is the Brief Intervention Guide for?

The **Brief Intervention Guide** has been developed as a resource to assist workers to provide brief intervention to address risks and harms related to problematic gambling. Additionally, it is a resource to assist organisational leaders to set up and implement the processes necessary to support workers to provide brief intervention.

The **Brief Intervention Guide** is aimed at professionals who do not specialise in the treatment of gambling problems. Within the terms of this Guide, the term “brief intervention” refers specifically to an intervention carried out by professionals not from the problem gambling treatment sector.

The Guide aims to clarify what brief intervention is, where brief intervention sits in the spectrum of intervention and to address a lack of guidance available to those working in social and criminal justice settings, for example social workers, employment advisers, probation officers, community workers, counsellors, GPs, nurses and psychologists. The Guide is also likely to be useful for others working in primary care and other health settings.

Sections within the Guide

The first six chapters of the **Brief Intervention Guide** focus on practical ‘how to’ instruction aimed directly at the worker providing the intervention, building on their overall professional values, knowledge and skills. There is an assumption that the worker undertaking the intervention is bound by an appropriate code of ethics.

The final chapter, **Brief intervention: requirements at an organisational level**, outlines the key steps that organisations need to undertake in order to support brief interventions being implemented in a service. This section is aimed at managers, leaders and others who are responsible for an organisation.

Appendix 1 lists readily available gambling screening tools.

What is Brief Intervention?

Brief intervention has many definitions in research literature and practice guidelines. In this Guide, brief intervention refers to:

“A short, purposeful, non-confrontational, personalised conversation with a person about an issue related to gambling.”

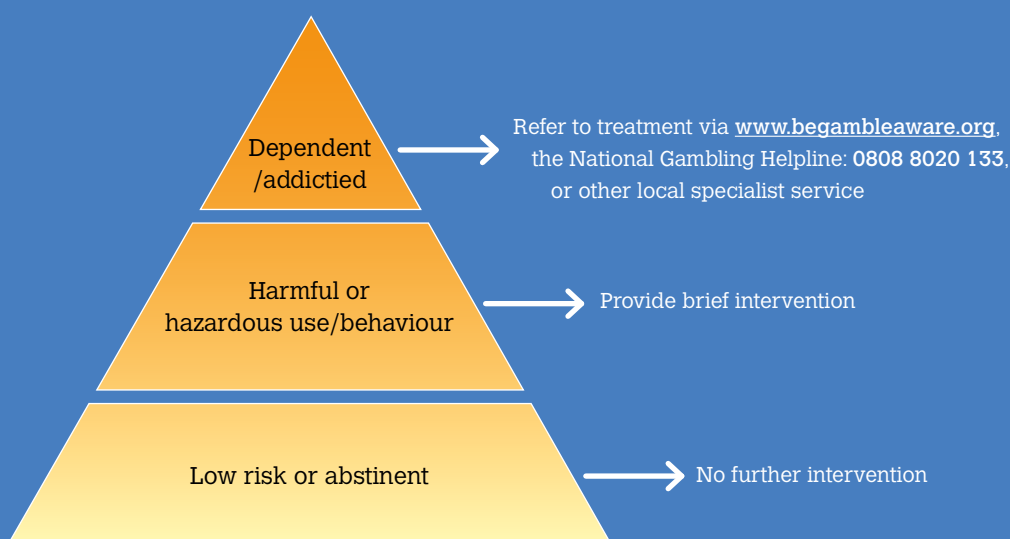
The purpose is to support the person to think about their behaviour, assisting them to make a connection between their behaviour and any associated risks and harms (adapted from NHS Health Scotland, 2009).

From there, the nature of the intervention depends on the level of risk and/or harm and the person's readiness to change.

The key word here is brief. Brief intervention generally takes as little as 5 to 15 minutes. This does not take into account the time that is needed to establish rapport and engagement with the person before a brief intervention is carried out. Failing to engage with the person will undermine the effectiveness of the brief intervention.

Brief intervention is most effective for people whose behaviour is hazardous or harmful, in other words people who are at risk of developing or people who are experiencing current harm related to gambling. Brief interventions are not designed to treat people who are dependent or addicted, although they are considered to be useful to improve motivation to seek more intensive treatment. Those people with more severe problems are likely to benefit from more comprehensive assessment and intervention and the role of the brief intervention worker is to refer this group of people to specialist treatment services for further assessment. Levels of harm and corresponding intervention types are shown in Figure 1 overleaf.

Figure 1. Level of risk/harm and corresponding intervention types



Source: Adapted from Substance Abuse and Mental Health Services Administration (2007)

Why offer brief intervention?

Problematic gambling often contributes to other problems such as financial, employment, health, family-related and legal issues. In other words, the issues people present with in social, justice and health service settings may often be linked to gambling. Brief intervention provided in these service contexts can have a significant positive impact for service users and can enhance the benefits of the services being provided.

Harms from gambling

Problematic gambling directly affects an estimated 430,000 people in Britain, with a further 1,985,000 deemed as being at risk of developing a gambling problem. An estimated 5-8 other people are affected by someone else's gambling problem. This makes gambling a significant social issue.

- > Gambling can be related to poor health (Petry et al., 2005; Morasco et al., 2006)
- > Gambling can be related to employment problems (Reed in Partnership, 2016)
- > Gambling can be related to family problems (Holdsworth et al., 2013)
- > Gambling can be related to criminal activity (Banks, 2013)
- > People experiencing gambling problems may be over-represented in certain groups, e.g. young men, some minority ethnic groups.

Brief intervention is part of the spectrum of effective responses

The risks and harms from gambling may go undetected for many people despite their contact with health and social services. Brief intervention provided in generalist settings is a key component within an effective spectrum of responses. It is particularly important in those settings where the prevalence of problems is known to be high, for example in criminal justice service settings. To effectively tackle the risks and harms related to gambling these problems must become the business of all social, justice and health services.

Brief intervention evidence base

Research indicates that brief intervention can be both effective and efficient for those with hazardous or harmful substance use and/or gambling problems. The evidence supporting brief intervention is strongest in relation to primary health settings and alcohol use, however evidence to support the effectiveness of brief intervention for gambling is emerging and beginning to provide guidance for further development (Petry et al, 2008; Abbott et al., 2013; CADTH, 2015; Neighbors, et al., 2015) There is growing support for brief intervention to be provided in other non-health settings, such as criminal justice and social work settings (Bliss & Pecukonis, 2009; Brown, Newbury-Birch, McGovern, Phinn & Kaner, 2010; Hopkins & Sparrow, 2006; McGovern, Newbury-Birch, Deluca & Drummond, 2012).

Additionally more guidance and tools are emerging which focus on providing brief intervention to address a wider range of issues (McQueen et al., 2015; Orr et al., 2015; Mitchell et al., 2015).

KEY CONCEPTS IN SCREENING AND BRIEF INTERVENTION

Screening as a basis for brief intervention

Brief intervention is generally provided after a screening process has been undertaken. The results of a screening process provide an opportunity for a service user to consider the effects of gambling on their lives, depending on the scope of the screening.

Screening is not assessment or diagnosis. It is a structured process that provides an indication that a problem may exist and, depending on the tool or questions used, an indication of the potential severity of the problem. The results of a screening process assist the worker to determine whether intervention is required and the level of intervention that is likely to be of most benefit to the person (see Table 1 below).

A screening result that indicates a potential problem should be followed up with a brief intervention, referral to a specialist service or with a more detailed assessment of the problem potentially identified.

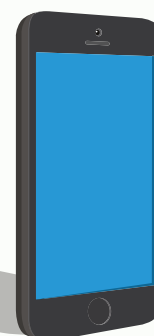


Table 1: Screening result and level of intervention

Screening result	Level of intervention
No problem indicated	Provide positive affirmation. Offer information to support continued no/low risk
Hazardous or harmful use/behaviour indicated	Provide brief intervention
Possible dependence or addiction indicated	Advise need for specialist treatment and refer to specialist

Screening can occur in variety of ways, from asking simple questions to administering a screening tool. The selection of screening method depends on the purpose or focus of the brief intervention, the population being screened, and the setting in which screening takes place. Some screening tools can be self-administered; others are administered by the worker in a collaborative interview style. A standardised screening tool provides more accurate information for the person being screened and can be particularly useful for a generalist who does not have specialist knowledge. A list of commonly used screening tools is provided in Appendix 1.

Most screening tools and brief intervention resources have been designed for use within a specific context. For example, in a general health setting it may be feasible to screen opportunistically for a range of potential health issues and to provide brief intervention or further assessment for those issues that the service user is willing to discuss further. Alternatively an organisation may decide to screen separately for gambling as this is more likely to be prevalent within the population served and/or is more feasible in the service context. Information to guide selection of screening tools is provided in the **Brief intervention requirements at an organisational level** chapter of this guideline.

BEFORE OFFERING BRIEF INTERVENTION

Preparation

For the worker embarking on brief intervention it is essential to ensure that approval and support from the organisation is in place. Commitment at organisational governance and management levels is essential to support workers to provide brief intervention.

Once organisational policy, systems and processes are in place minimum preparation requirements for the worker include:

- > Familiarity with the selected screening process or processes.
- > Understanding of the selected brief intervention systems and processes, including those for referring to specialist assessment and treatment.
- > Having the resources needed to support brief intervention, these include self-help materials, handouts, reference materials and a list of local providers for when referral is indicated. (See Box 1).
- > Practice screening and providing brief intervention.
- > Knowing who to consult regarding any problems that are encountered, e.g. line manager support where appropriate.

Box 1: Resources for brief intervention

The GambleAware website has helpful information and a range of self-help material, including printable leaflets targeted at identifying a problem, preparing to change, gambling triggers, warning signs etc. More substantial self-help booklets are also available. There is also material aimed to support family and friends who are concerned about someone else's gambling. This material is available at: www.begambleaware.org



The knowledge base

It is not necessary to be an expert in gambling to provide brief intervention. A basic understanding of risks and harms and a working knowledge of simple interventions to reduce harm, including referral options, are the essential requirements. Those providing brief intervention for harmful use of gambling need to know basic facts about the effects that harmful gambling can have on the individual and their family and friends, steps that those at risk of, or experiencing, gambling-related harm can take to reduce the risk (e.g. self-exclusion, limit setting) and knowledge of specialist agencies to refer people with significant problems to.

Key information is available at the website listed in Box 1 adjacent, and is also included in Appendix 2.

Training

Training in brief intervention is recommended. Evidence consistently suggests that training increases the rate at which brief intervention is provided (Johnson, Jackson, Guillaume, Meier & Goyder, 2010). There are a number of training providers offering short courses in brief intervention and motivational interviewing. Addiction studies courses at graduate and postgraduate level include screening, brief intervention and motivational interviewing. There are also online training courses and videos available.

It is important to check out whether the training offered is sufficiently aligned with the workers and/or organisation's aims and approach.

HOW TO PROVIDE BRIEF INTERVENTION

Elements of brief intervention: **FRAMES**

Regardless of the approach to brief intervention, there are key elements that apply in all contexts. These can be summarised by the acronym **FRAMES**:

F**EEDBACK**: about personal risk or level of current harm, as indicated by the screening process.

R**ESPONSIBILITY**: responsibility for choices and change sits with the person. It is not the role of the professional to confront or persuade. Respect the person's autonomy.

A**DVICE**: increase the person's awareness of the costs and consequences of their behaviour and provide advice to support positive change.

M**ENU**: outline options or strategies to support positive change; help with goals and action planning if appropriate to the person.

E**MPATHY**: listen and reflect; maintain rapport; use an empathic communication style.

S**ELF-EFFICACY**: convey optimism and strengthen the person's self-belief in their ability to change.

FRAMES does not describe stages of brief intervention. The elements in **FRAMES** are not presented in order. Rather, **F**, **A**, and **M** describe **WHAT** is provided in brief intervention; **R**, **E** and **S** describe **HOW** brief Intervention is provided (NHS Scotland, 2009).

The elements in **FRAMES** can be applied to working with young people (Christie, 2008).

Motivation and brief intervention

It is useful to have an understanding of the 'stages of change' model and motivational interviewing as a background to providing brief intervention (Prochaska & DiClemente, 1983). However it is important not to be overly concerned with assigning people to a stage of change and applying specific motivational techniques. Having a general understanding of the stages of change can help the worker listen for readiness to change and ensure that their response is in step with the person.

Applying the broad principles of motivational interviewing (see Box 2 below) can enhance motivation to change. Attempting to persuade and argue for change can be ineffective and counter-productive. A person who doesn't see their behaviour as problematic is unlikely to respond to ideas about changing the behaviour. When the worker is out of step with the person resistance is a likely outcome. While responsibility for change sits with the person the worker is responsible for engaging the person and maximising their opportunity to consider change.

There are three broad elements of motivational interviewing that are helpful in brief intervention:

- > **Collaboration** (rather than confrontation): the process is undertaken in partnership. The views and experiences of the person are central. Both the person and the worker have expertise to share. The process involves mutual understanding. The person is a primary resource in finding answers and solutions.
- > **Evocation** (drawing out rather than imposing ideas): the worker's role is to draw out the person's ideas, goals, plans and skills to make positive change. These are not imposed. The person presents the arguments for change.
- > **Autonomy** (rather than authority): the power for change rests with the person. The person determines what and how change will occur.

Box 2. Key Principles of Motivational Interviewing

Express Empathy: show acceptance and develop rapport. Ambivalence to change is normal. The worker listens to and accepts what is important to the person. Empathy and rapport make space for gentle challenge.

Develop Discrepancy: Change is motivated by a perceived discrepancy between a person's current behaviour and their important personal goals and values.

Roll with Resistance: Resistance is a signal for the worker to respond differently. Avoid arguing for change.

Support Self-efficacy: If a person believes they can change, the likelihood of change occurring is greatly increased. A person's belief in the possibility of change is an important motivator.

Source: Adapted from Miller and Rollnick (2012).

Bring together the stages of change and a motivational response

A guide to the stages of change (adapted from NHS Scotland, 2009) and associated motivational responses are provided in Table 2 below. Brief intervention is usually focused on people who are in Pre-contemplation, Contemplation and Preparation.

Table 2. Stages of change and motivational responses

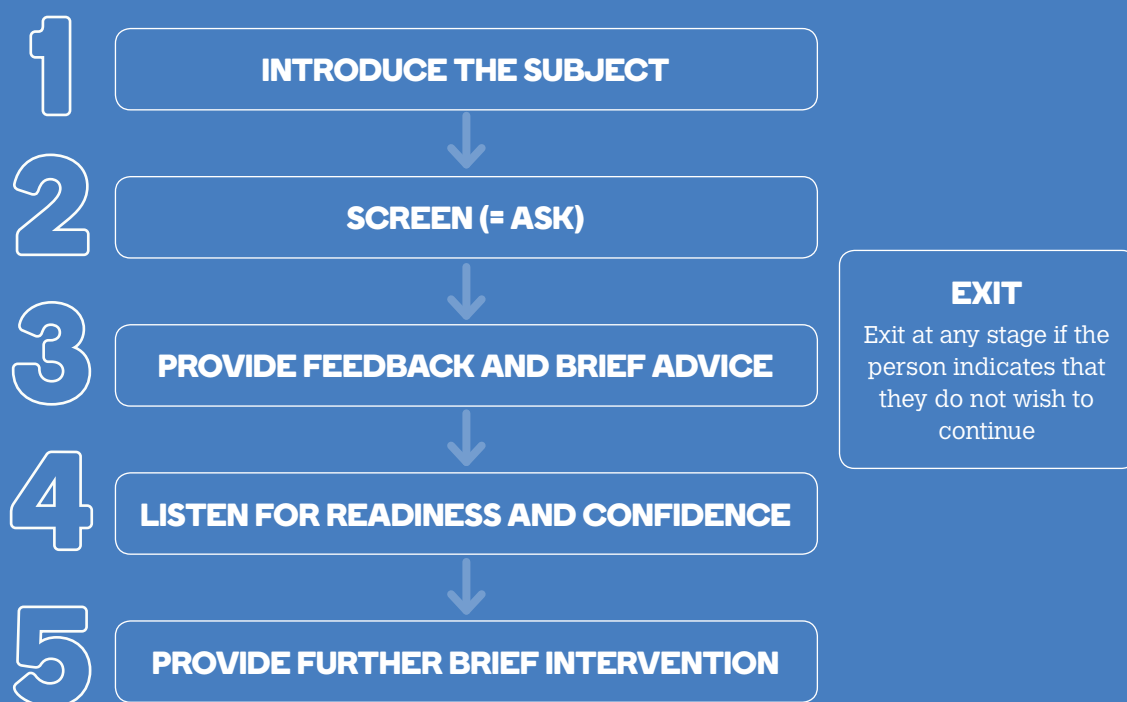
Stage	Response
Pre-contemplation – not thinking about change; don't see a problem "My brother gambles and he hasn't got any problems, it's no big deal"	Work towards engendering motivation Provide information and advice (with permission) on the benefits of change
Contemplation – thinking about change; maybe I have a problem; ambivalent "Sometimes I think about all the money I spend in casinos"	Enhance motivation Explore concerns, explore benefits of change
Preparation/decision making – actively planning change "I want to stop."	Provide menu of options Build confidence
Action – making changes, new behaviour not yet established "I haven't been to a bookies for eight days. Self-exclusion is helping."	Build confidence Affirm success
Maintenance – new behaviour established "I get nervous when I go out with my friends, I might just have a drink and then place a bet without even thinking."	Build confidence Assist with problem solving and planning
Relapse – return to patterns of old behaviour "I blew it."	Build confidence Enhance motivation

For further information on Motivational Interviewing the Motivational Interviewing website is a good start. This is available at: www.motivationalinterviewing.org

Stages of brief intervention at a glance

The key stages of brief intervention are shown in Figure 2 below.

Figure 2. Stages of brief intervention



Source: Adapted from Center for Substance Abuse Treatment (1999)

Each stage of brief intervention is outlined in some detail below. Objectives, actions and examples corresponding to each action are provided. Relevant elements of FRAMES are shown for each stage.

Examples are provided as simple scripts that the worker can adapt to suit their own style and context. The stages, objectives and actions are provided as a guide only. In practice some may blend and overlap. It may not be necessary to follow each action or stage for every person.

Tips are provided for each stage as a further aid.

Where appropriate, specific tips are provided for working with young people. Those working within youth service settings or within youth focussed roles are encouraged to use a resource which is tailored specifically for working with young people.



Introduce the subject

In a general setting, where a person is not expecting to talk about gambling etc., introducing the subject can be the biggest hurdle for the worker. Several examples are provided below to cover a range of options for different circumstances. The key is for the worker to be clear, confident and relaxed in talking about these issues and to normalise the process.

OBJECTIVES

- > **To respectfully obtain consent to explore specific behaviour/s**
- > **To maintain rapport and convey empathy, regardless of the person's decision to consent or not**

Responsibility sits with the person

Empathy: listen and reflect; maintain rapport

Actions	Examples
Ask permission to talk about the behaviour	<p>"Would it be ok to have a quick discussion about gambling? We like to cover this with all of our clients. It's an opportunity to have a think about how gambling fits in to your life. Do you gamble at all?"</p> <p>"While we're discussing what you like to do with your free time, could we talk about gambling?"</p> <p>"You've mentioned that you were arrested for a crime related to gambling. Could we talk a bit more about where gambling fits in for you?"</p> <p>"You sound a bit worried about how much you've been gambling lately? Could we talk a bit more about that?"</p> <p>"We're trying to improve our service and offer people a bit more. We're offering screening for a range of things - including gambling. Are you interested in finding out more; it only takes a few minutes?"</p>
Explain your role in relation to the behaviour/s to be explored	"If you are interested we can work through a few quick questions. We use a process called a gambling screen. The screen provides you with your personal result. What you do with that information is your choice."
Clarify confidentiality issues	"We have already discussed confidentiality but I just want to restate that this discussion will be confidential, in the same way as any other information about you."
Reinforce and respect the person's choice	<p>"It's up to you."</p> <p>"What do you think you might want to do next?"</p> <p>"It is your choice whether you want to take up this opportunity."</p>

TIPS

- > Your own values and behaviour are not the focus and should not interfere with your efforts to support people to reduce harm from gambling.
- > When working with people of cultures other than your own ensure that you convey respect for cultural difference. Use cultural support and expertise to assist in providing an effective service. Pay attention to cultural norms in relation to rapport building. Taking the time to effectively engage with people and building a trusting relationship will increase the likelihood of being able to provide an effective intervention.
- > With young people: It is generally important to develop rapport before you introduce the issues i.e., by talking about topics other than gambling. Clarity about confidentiality is especially important to develop trust.

2

Screen

OBJECTIVES

- > **To gather personalised information about potential levels of risk or harm resulting from selected behaviours**
- > **To determine whether intervention could be useful**
- > **To determine the level of intervention that is indicated**

Responsibility sits with the person

Empathy: listen and reflect; maintain rapport

Action	Example
Administer the screening tool OR Ask screening questions	"This is the screening questionnaire. Shall we work through the questions together?" "This is the gambling questionnaire. It will give you an indication about whether gambling might be causing problems for you." "Do you gamble?" "How soon after you wake up do you usually check your betting account?"
Score the screening tool	"What we do now is look at your responses and total them up. One of the good things about this is that it's an objective measure – a bit like a blood test."

TIPS

- > Be familiar and comfortable with the screening questions and/or tools.
- > Defer screening when other needs are clearly more immediate, for example, the person is highly agitated, in need of urgent medical attention etc.
- > Emphasise the objective nature of the tool.
- > Be sensitive to literacy levels and adjust accordingly e.g. work through the tool with the person.
- > Be sensitive to language issues where English is not the person's first language. Ensure this does not become a barrier.
- > **If the person says no or changes their mind mid-way through the process respect their choice and exit the brief intervention process.** Consider whether it could be an option to revisit the issue at a later date and if so flag this as your systems allow.
- > With young people: Use a screening tool or process that has been validated for use with young people, for example The Substances and Choices Scale (SACS) available at www.sacsinfo.com.

3

Provide feedback and brief advice

OBJECTIVES

- > **To provide personalised information about levels of risk and harm (the screening results and interpretation of these)**
- > **To facilitate reflection and review of behaviour**
- > **To provide tailored advice to assist with reducing risk and/or harm**

Feedback: about personal risk or level of current harm, as indicated by the screening process

Responsibility sits with the person

Advice: provide advice

Empathy: listen and reflect; maintain rapport

Actions	Examples
Review screening data in collaboration with the person	"The PGSI score shows that your gambling is unlikely to cause problems."
Check for level of risk/harm:	If your circumstances change, say you are planning to buy a house, then it might be helpful to stop gambling."
hazardous, harmful or dependent	"The screening test suggests that you are gambling at a harmful level."
Give personalised brief advice (as appropriate)	This means there are risks for your mental health, your finances, and potentially for your family relationships. The best thing you can do is to try to stop gambling. There would also be other immediate benefits. I know it is not an easy thing to do. There are a number of options that could support you to stop."
Note: encourage referral to specialist service where there is a need for further assessment	<p>"Given your result, there would be significant benefits if you were to cut down on gambling."</p> <p>"Your score shows that your gambling is well above normal participation levels for someone your age and gender. This is worth getting checked out further and it's likely to be linked to some of the issues you're facing right now. I recommend that you see a specialist for an assessment to find out more. I can arrange for you to contact the National Gambling Helpline or [insert local service name]. There is no charge for the service. At a minimum you will get some more information. What you do with it will be up to you."</p>

TIPS

- > Brief intervention can stop at this point if there is insufficient time to provide any further intervention.
- > Check in with the person about how they are finding the process. Make space for them to ask questions.
- > If the person becomes withdrawn, argumentative or resistant take this as a sign to back up. Avoid arguing and/or persuading, avoid presenting reasons for change, maintain rapport and simply reflect back what the person is saying to you.
- > If there are indications of dependence or addiction recommend and support referral for further assessment or more intensive assistance.
- > If there are indications of other health problems, including mental health problems, recommend and support referral to appropriate services.
- > With young people: look for opportunities to provide positive feedback, focus on their strengths and achievements as much as possible. Avoid the discussion becoming overly problem-saturated (Christie, 2008a).

4

Listen for readiness and confidence

OBJECTIVES

- > To check out the person's readiness to change their behaviour
- > To support consideration of the connection between behaviour, risk and/or harm

Feedback: about personal risk or level of current harm

Responsibility sits with the person

Empathy: listen and reflect; maintain rapport

Self efficacy: convey optimism about their ability to change.

Action	Example
Check out how the person is responding	<p>"What are your thoughts about the screening result?"</p> <p>"It's a lot to take in. Are you surprised about your score?"</p> <p>"I know you weren't necessarily expecting to be looking at this today, but I wonder what you think about how gambling fits in with some of the other issues that have brought you here today?"</p>
Explore readiness to make changes:	<p>"What are your thoughts at this point? Are there any concerns that you have?"</p>
Does change seem to be worthwhile to the person?	<p>"Have you considered cutting down on your gambling?"</p> <p>"Can you think of any benefits if you were to stop gambling?"</p>
Are they confident about their ability to change?	<p>"What connections do you see between your gambling and the stresses in your life right now?"</p>
Try to elicit change talk	<p>"On a scale of 1-10, if 1 is not ready at all and 10 is totally ready, how ready are you to make changes to your gambling?... What are some of your reasons for giving this rating?" OR "why did you rate 5 instead of 3?"</p>



<p>Reflect the person's views on change back to them</p>	<p>Person is not indicating readiness to change</p> <p>"Thanks for agreeing to check out your gambling. It sounds like right now you can't see any benefits in cutting back on your gambling? If you decide you want to talk about this again, you can let me know. Would it be all right if we talk about it again in a few months' time to see if anything has changed for you?"</p> <p>"From what you're telling me, it sounds as though you are not interested in stopping gambling right now. Would it be useful to talk about some ways to put limits in place to try to reduce the impact of your gambling?"</p> <p>Person is ambivalent about change</p> <p>"So, if I'm hearing you correctly, you can see that cutting back on gambling would help keep you out of trouble but you can't see your friends letting you get away with it. How do you think things will turn out for you?"</p> <p>"What are the pros and cons with your gambling?"</p> <p>"On balance would it be worth having a go at stopping?"</p> <p>"What are some things that could help you stop?"</p> <p>"What are some of the barriers that might prevent you from limiting your gambling?"</p> <p>Person wants to change, lacks confidence</p> <p>"You want to stop gambling but you've tried many times and it hasn't worked out. You just don't think you can manage to do it. Would you be interested in looking at some strategies to help with this?"</p> <p>"What would need to happen for you to become more confident to make a change?"</p> <p>"What would be helpful to you at this point?"</p> <p>"You said that you stopped gambling for a short time about a year ago? How did you achieve that? Could you use some of the same strategies that were successful then to help with cutting down on gambling now?"</p>
--	---

TIPS

- > Avoid arguing, persuading and/or presenting reasons for change and maintain rapport.
- > Respect the person's views and don't assume that the intervention has not been helpful if they choose to close the subject.
- > Remember responsibility for change sits with the person themselves.
- > Encourage the person to explore and articulate their own reasons for change.
- > Listen carefully for what the person is prepared to work on at this time and focus on that.
- > Use the readiness scale/ruler to quickly elicit change talk. Available at [www.adultmeducation.com/downloads/Readiness-to-Change TOOL.pdf](http://www.adultmeducation.com/downloads/Readiness-to-Change_TOOL.pdf)
- > With young people: don't discount or minimise the young person's experiences of the good things about gambling. Let them talk about the good things before gently guiding/inviting them to explore the downsides. Avoid coming up with the downsides, let the young person tell you from their own experience.

5

Provide further intervention (as appropriate)

OBJECTIVES

- > **To facilitate reflection and review of behaviour**
- > **To support change if the person is seeking change**

Feedback: about personal risk or level of current harm

Responsibility sits with the person

Empathy: listen and reflect; maintain rapport

Menu of options: outline options or strategies

Self efficacy: convey optimism about their ability to change

Action	Example
For people who are considering change or wanting support to change, select an appropriate approach (one or more):	Provide information: focus on the benefits of change: “Would you like more information? I have a leaflet here that you could take home. It might be interesting to read about some of the benefits other people have experienced after cutting back.”
Provide information	Facilitate goal setting and explore menu of options: “Could you consider setting yourself a goal in relation to gambling?”
Goal/s and Menu of options	“What are some changes that you are interested in trying out?”
Build confidence	“Would it be helpful to look at some options that have been helpful for other people? There are some effective strategies available to help people stop gambling, such as letting a loved one take care of your finances for a while or self-exclusion. It could be helpful to look at whether any of these are worth trying for you.”
Enhance motivation	“There are lots of options for cutting down on gambling, you are the best judge of what is likely to work for you. Would it be helpful to talk about some ideas and then, if you want to, set a goal for yourself to try out?” “It sounds like the smartphone gambling is your main concern because it is impacting on your family time. We could explore some practical options and you could make a plan, then if you think it's worth a go you could try it out. If it doesn't work out we could look at some other ideas next time we meet.”

TIPS

- > Keep it personalised, relevant and achievable. The change goal must be something that is worthwhile and “doable” for the person. Avoid the lure of encouraging goal setting that does not meet these criteria.
- > Encourage the person to come up with their own strategies and/or explore in detail how strategies will fit into the person's situation. People are more likely to try things out if they come up with their own ideas.
- > Spend time looking at a range of options. It is important to convey that there is more than one way to address issues and improve situations. This helps generate self-efficacy.
- > Listen carefully for what the person is prepared to work on at this time and focus on that.

IMPORTANT CONSIDERATIONS

Cultural considerations and brief intervention

Throughout the process of screening and brief intervention workers are encouraged to be mindful of the social and cultural context of the people they are working with. Effective engagement, assessment and goal setting may be affected by a person's 'ethnocultural identity'. The way a person might identify themselves and 'see the world' may impact on the ways they might express distress; the way in which they might perceive problems or solutions and/or their communication styles. Workers have an important role in ensuring that the people they are working with understand information well enough to be able to make informed choices or decisions. Clients may have poor literacy. This may mean giving some thought to how screening information is interpreted and communicated. Comprehension may be improved by putting it into a relevant context as well as considering the content of any message.

Overcoming potential barriers to brief intervention

There are a number of well identified barriers to the provision of brief intervention in generalist settings. The more prevalent of these are outlined below along with some suggestions as to how these barriers can be overcome or managed. These barriers and potential solutions relate to both the organisational level and the worker.

Causing offence: Both workers and organisational leaders are often concerned that service users, who are generally not expecting to be talking about these issues, may be annoyed or offended if they are asked about them. The evidence suggests that this is rarely the case (NHS Health Scotland, 2009).

Within the approach presented in this Guide all issues are raised with empathy and respect for the autonomy of the person and if a person does not want to engage in brief intervention then that choice should always be respected. Such an approach minimises perceptions of judgment and intrusiveness.

Workers are more likely to overcome their concern by actually providing brief interventions, seeing that service users are not offended and seeing the benefits brief intervention can provide. Organisational leaders can support and encourage workers to overcome any initial reservations by ensuring staff have access to training to build their skills and confidence. Leaders can also ensure that staff have access to ongoing supervision and support. Additionally, it is useful to set realistic targets for brief intervention in the early stages, recognising that it may take some time for staff to become sufficiently comfortable to more routinely introduce the subject etc.

The issue of coercion: In settings where service users are facing or undergoing legally imposed sanctions e.g. justice and some social service settings, workers can be concerned about imposing screening and brief intervention. It is important to note that the principles and stages of brief intervention do not change in these contexts. Respect for the autonomy of the person, empathy and collaboration are integral to brief intervention and help to ensure the intervention is not imposed.

Own behaviour and values: It is not uncommon for a worker who gambles to feel open to being judged as hypocritical when talking with others about these issues.

In this circumstance it is important that workers and organisational leaders are mindful that brief intervention is provided to assist service users to make informed choices. The worker's own patterns of use and behaviour are not relevant and should not be a barrier to providing brief intervention.

Using standardised screening tools and a structured approach to brief intervention will help to ensure that the worker's own values and choices do not prevent them from providing effective brief intervention to service users.

Outside of the scope of worker's role: Some generalists believe that providing brief intervention is outside of the scope of their role. This is understandable as many are not well informed about brief intervention or trained in providing it.

Organisational leaders have a role to play in overcoming this barrier by ensuring that workers are well informed and supporting them to learn about their potential role in brief intervention. It is important to stress that many people who are at risk of or experiencing harm will never see a specialist and brief intervention provided by a generalist may be of huge benefit to them. Increasingly it is recognised that the substantial harms that can arise from alcohol, tobacco, other drugs and gambling make these issues everybody's business. However it is important to consider professional boundaries carefully and to ensure that there is organisational support with approved processes, training and ongoing back up for the provision of brief intervention.

Competing priorities: The demands on time within a service environment may present one of the most significant barriers to brief intervention. It is common to hear workers and leaders comment on the burden of expectations placed on them to address a wide range of issues. This is a challenge for both the worker and the organisation and there is no simple answer. However, focus and commitment at all levels are required to implement and maintain brief intervention.

It is up to the organisation and the worker to determine what services can be provided within resource constraints.

RESPONDING TO FAMILY AND AFFECTED OTHERS

Resources for family and affected others

Many people are adversely affected by others' gambling. Sometimes these effects are identified in the course of health and social service delivery.

There is a range of resources available to assist families including self-help resources such as:

Concerned About Someone Else's Gambling. Produced by the Gambling Helpline for families seeking help with gambling issues. Available at: www.gamblinghelpline.co.nz/data/media/documents/Concerned_about_someones_gambling.pdf

The 5-Step Method

The 5-Step Method (Orford, Templeton, Patel, Velleman & Copello, 2007) for helping affected family members offers a simple and effective approach for responding to family members. It is a non-blaming approach to working with families and others affected by substance use or gambling. It can be delivered by a range of workers in a range of settings. The approach is designed to assist families to develop effective coping strategies and access effective social support.

The 5 steps are shown below and further explained adjacent.



Figure 3 The Five-Step method

- 1** Listen carefully to the experience of the family member/s to develop an understanding of how they are affected. Explore their concerns. Provide reassurance that others also have these experiences. Convey empathy and non-judgement.
- 2** Provide relevant information about substance use/gambling/addiction as relevant. Provide information about other relevant issues tailored to the concerns raised e.g. child care, financial assistance etc. Targeted information helps family members to gain a sense of having some control in their lives.
- 3** Explore coping responses. Research associated with the model has identified three broad coping responses:
 - > Engaged – Standing up to
 - > Tolerant – Putting up with
 - > Withdrawn – WithdrawingExplore the current responses and discuss what is effective and what is less effective? Explore alternatives.
- 4** Explore social support. Draw a network diagram to determine current support. Work on strategies to increase positive support and decrease negative support.
- 5** Explore further options for help and support. Check out further needs, provide information, refer as necessary and arrange follow up if required.

Research indicates that families from a range of cultures have found that brief intervention provided within the 5-Step model in a range of settings has helped them to:

- > Focus on their own needs.
- > Be assertive in communication.
- > Calm down and find different ways of dealing with frustration and anger.
- > Have a better understanding of the drinking /drug taking behaviour and the links with their own health.

(Orford et al., 2007).

BRIEF INTERVENTION REQUIREMENTS AT AN ORGANISATIONAL LEVEL

This section offers guidance to support effective planning, set up, implementation and monitoring of brief intervention within an organisational context. The guidance provided here is generic and will need to be tailored and adapted to the specific conditions within each organisational context.

Evidence suggests that organisational factors can limit or enable implementation of brief interventions (Johnson et al., 2010). Successful implementation of brief intervention programmes is more likely when the programme is championed at management and/or leadership level (McGovern et al., 2012). Commitment at organisational governance and management levels is essential to support workers to provide brief intervention.

The implementation of brief intervention within an organisation is best approached as a project.

Key steps in planning and implementing brief intervention for a large organisation are outlined below. The steps are set out in a chronological order, however in practice they are likely to overlap, particularly the second and third steps. In summary the steps are:

- > Project initiation
- > Consulting within the organisation
- > Project planning
- > Implementation
- > Ongoing improvement

Project initiation

Key actions at the outset include:

- > Developing a project brief (or charter) specifying goals, key objectives, deliverables, resources available, costs, risks and benefits of the project.
- > Assigning a project leader to manage and coordinate the implementation of brief intervention.
- > Determining if a project team is required to assist implementation (usually this is best, particularly in medium to large organisations) and if so assigning membership and roles.
- > Preparing an information sheet on brief intervention (see Box 3 below for suggestions on what to include).

Once these actions above are completed, the implementation of brief intervention should be announced within the organisation. Preferably the announcement is made by a senior person to indicate the importance of the project within the organisation.

The announcement can be made via email, staff bulletin, team meeting etc., depending on the organisational communication systems already in place and the size of the organisation.

After the project is announced provide an information sheet to all staff to begin the process of developing a shared understanding of brief intervention and fostering enthusiasm for the initiative.

Box 3. Inform and educate

Provide an information sheet for staff outlining the intention to develop a brief intervention initiative within the organisation, explaining what brief intervention is and why it is a worthwhile activity for the organisation i.e. how it will benefit service users. Ideally, this information is tailored to your organisation and sector.

The information sheet should cover the following:

A brief description of brief intervention (as provided in this Guide):

A clear definition, how brief intervention is delivered and who it is most effective for.

A statement emphasising the brevity of the intervention and that it is not addiction treatment.

The key reasons for offering brief intervention in your organisation, for example:

Information on the harms associated with gambling as these relate to the service user population.

Evidence for the effectiveness of brief intervention.

Information promoting the role of the generalist:

A clear message that brief intervention does not require significant or in-depth understanding of the issue/s and that the issues are everybody's business.

A statement emphasising that brief intervention will potentially provide significant benefit to service users who might otherwise miss out on assistance for their issues.

A brief statement regarding training and support.

Contact details of the project leader

Encouragement of questions, comments and ideas.

Consulting within the organisation

Ensure key people within the organisation are informed and involved as necessary. This is a process of both informing and gaining information from various perspectives about the organisational barriers and enablers to implementing brief intervention. Early input from key people can foster engagement and help identify both snags and shortcuts.

It is important that key people and groups within the organisation develop a common understanding of the project including what is likely to be expected of them, how they can contribute and how they will be supported to make their contribution.

Consulting can happen via meetings, telephone and email discussions, providing documents for feedback etc.

It is likely that the following people will need to be consulted with: team leaders, supervisors, trainers (if you have these in your organisation), front line staff likely to be providing brief intervention, human resources staff, IT people, administration staff etc.

In determining who to consult the following could be considered:

- > Who is most likely to be delivering brief intervention? Who are the leaders and supervisors of this group?
- > Is HR input needed?
- > Are there specific IT requirements?
- > How will records be kept? Who manages records for the service?
- > Will administrative processes need to be adjusted?
- > Are there any policy changes required?
- > Are there any accounting requirements e.g. invoicing for services provided?

Project planning

Develop a detailed project plan including objectives, structure, processes, milestones, key responsibilities, reporting and costs. A communications plan may be required as part of the overall plan.

The planning should incorporate the following key requirements specific to brief intervention:

- > The brief intervention approach and pathway: define this thoroughly i.e. the scope.
- > The screening tools (See Box 4 for further guidance on selecting screening tools).
- > The steps in the intervention and the timing of these within the business of the organisation.
- > Referral sources and resources that the organisation will use.
- > The population to be screened and any exclusions.

- > Policy and procedures for confidentiality and consent.
- > The personnel delivering brief intervention: key considerations will include feasibility within the role i.e. are service users likely to accept brief intervention from those in this role, time available, workload, knowledge, skills and attitudes.
- > Training and support requirements: specify requirements to enable personnel to understand and deliver brief intervention and integrate this into their role.
- > Administrative systems and IT requirements.
- > Data requirements (see Box 5 overleaf) including reporting, monitoring and ongoing quality improvement processes.
- > Review the plan with others in the organisation as relevant. Ensure sign off by senior management.

Box 4. Key considerations in selecting screening methods

The make-up of the population/group to be screened: what are the issues that this population may be experiencing?

Whether to screen for single issues or multiple issues: what is optimal given the needs of service users and the expertise and resources available within the service?

Setting: what is realistic in the service setting i.e. if office based then computer-based or pen and paper and more in-depth screening may be possible. If in the field (e.g. working with homeless population) there may only be opportunity to ask a couple of key questions with record keeping occurring at a later time.

Systems for responding to screening results: the level at which the organisation can respond to those whose screening results are positive and in particular those whose results indicate the potential for a significant problem is an important consideration in selecting a tool. Where workers have time and an ongoing relationship with the service user it may be optimal to use a tool that provides information about presence and levels of problem (e.g. AUDIT or ASSIST); where there is limited time a short screen such as AUDIT-C which focuses on the presence/absence of a problem may be more appropriate.

The time available to screen and provide intervention and any associated costs: what can the service optimally provide?

The expertise of the staff: what level of knowledge and skill is required to screen and respond appropriately based on the screening result?

The level of management support: is there management approval for the process? Do management support staff training and ongoing staff support?

Box 5. Data considerations for organisational monitoring

The following measures are suggested for monitoring brief intervention:

Number of service users in the brief intervention target population: i.e. the number of people that would be expected to be screened.

Percentage screened: i.e. the number of service users screened divided by the number in the target population. It is recommended that a realistic target is set initially.

Number and percentage of “positive” screens: i.e. the percentage of service users whose screening results indicate that intervention is required.

The percentage of “positives” receiving an intervention (including a subset of those who are referred for specialist intervention).

Source: Adapted from Higgins-Biddle, Hungerford, & Cates-Wessel (2009).

Implementation

- > Ensure the roll out of brief intervention is well notified to all relevant people in the organisation.
- > Provide regular communication to encourage, remind and support people at this early stage; for example, thanking people for their work in getting the project off the ground.
- > Ensure that help and support is readily available during the early implementation stage to increase uptake.
- > Actively monitor implementation and address any issues that arise.

Ongoing improvement

- > Gather and provide feedback regarding progress. It is useful to do this on an ongoing basis to keep up the momentum and embed the change in practice.
- > Review data and other feedback to determine improvements. Manage the requirements for embedding improvements.

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APPENDIX

Appendix 1

Lie/Bet Questionnaire

The Lie/Bet Questionnaire is a two question screening tool for pathological gambling, useful in determining if a longer screening tool or further assessment is appropriate.

Lie/Bet Questionnaire:

1. Have you ever had to lie to people important to you about how much you gambled?
2. Have you ever felt the need to bet more and more money?

Administer Lie/Bet Questionnaire:

"Yes" response to one or both items: Further assessment is needed. Refer to www.begambleaware.org or the National Gambling Helpline: 0808 8020 133

"No" response to both questions: No referral necessary for problem gambling services.

The NODS-CLiP Short Problem Gambling Screen

Have there ever been periods lasting 2 weeks or longer when you spent a lot of time thinking about your gambling experiences or planning out future gambling ventures or bets?

Yes ?/ No?

Have you ever tried to stop, cut down, or control your gambling?

Yes?/ No?

Have you ever lied to family members, friends, or others about how much you gamble or how much money you lost on gambling?

Yes?/ No?

If "Yes" to one or more questions, further assessment is advised refer via www.begambleaware.org or the National Gambling Helpline: 0808 8020 133

Problem Gambling Severity Index

When you think of the past 12 months, have you bet more than you could really afford to lose?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Still thinking about the last 12 months, have you needed to gamble with larger amounts of money to get the same feeling of excitement?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

When you gambled, did you go back another day to try to win back the money you lost?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Have you borrowed money or sold anything to get money to gamble?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Have you felt that you might have a problem with gambling?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Has gambling caused you any health problems, including stress or anxiety?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Still thinking about the last 12 months, have you needed to gamble with larger amounts of money to get the same feeling of excitement?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Have people criticized your betting or told you that you had a gambling problem, regardless of whether or not you thought it was true?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Has your gambling caused any financial problems for you or your household?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Have you felt guilty about the way you gamble or what happens when you gamble?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Total score:

The higher the score, the greater the risk that your gambling is a problem.

Score of 0: Non-problem gambling.

Score of 1 or 2: Low level of problems with few or no identified negative consequences.

Score of 3 to 7: Moderate level of problems leading to some negative consequences.

Score of 8 or more: Problem gambling with negative consequences and a possible loss of control

Appendix 2

This section highlights strategies that can be used by a person directly experiencing or at risk of gambling-related harm. Further information can be found at www.begambleaware.org.

The Money, Access, Time Triangle

An effective way to reduce or stop gambling is to put barriers in place that limit your ability to gamble – specifically barriers to Money, Access and Time. No barrier is infallible but if you have the right barriers they can certainly slow you down enough for you to take a look at what you're doing and decide whether or not you really want to do it.

Limit Access

- > Customers may self-exclude from gambling establishments (see below).
- > Avoiding places with a high density of betting shops or casinos can be helpful so take care to plan your route before heading out the door. A little planning goes a long way when it comes to avoiding unexpected triggers like the sight of a flashing casino sign.
- > If you're an online gambler you can add blocking software such as "betfilter" which will remove access to all gambling websites from your PC. Depending on which blocking software is used a password may be needed so ask for help from a friend or family member to set it up for you so you remain unaware of the password and unable to remove the software. If you gamble on a phone or iPad please contact your network provider to discuss the possibility of setting up parental controls to exclude gambling sites. If all else fails, you may need to consider the possibility of getting a low spec phone capable of making and receiving calls, and not having a computer for a while.
- > Think about times and places when you may be at your most vulnerable and ensure that someone you trust is either available at the end of the phone or able to be physically with you at these times. These could be times of emotional upset, or on pay days or anniversaries but looking at how you may be affected and planning for it can save you a lot of heartache.

Filling Time previously spent gambling

- > Explore the type of things that interest you and in particular things you can enjoy doing with friends or family members rather than seeking isolated pursuits. You may also want to look at projects you can undertake such as decorating a room or working on the garden.
- > Ensuring that you are engaging with a routine can be very helpful so include yourself in day to day tasks around the house so you feel like a valued part of family life.
- > Filling time with positive activities away from gambling can help you to feel productive and healthy and it can strengthen relationship bonds that have previously been neglected.

Money

- > Often the understanding of money and its value becomes warped whilst in the grip of a gambling addiction. Effective budgeting can restore an understanding of the value of money and it may also help to improve a negative financial situation brought on by gambling.
- > Ask a friend or family member to take control of your finances during the early stages of recovery. This can be done by giving away any debit or credit cards you may have (If you've memorised the card numbers be honest about that and get replacements before you hand them over). If you're budgeting effectively you'll be able to inform the person managing your finances of exactly how much you will need on any given day and receipts can be provided as evidence of your purchases.

Self-Exclusion

The following information is produced by the Gambling Commission, the body responsible for licencing gambling operators in Britain. It describes the role of licenced gambling operators in assisting people who no longer wish to gamble to exclude themselves for a defined period of time. Regulations may change and therefore readers may wish to consult up to date information at the following address:

www.gamblingcommission.gov.uk/for-the-public/Safer-gambling/Self-exclusion.aspx

If you think you are spending too much time or money gambling in an arcade, betting shop, bingo venue or casino, then ask staff for information about their self-exclusion scheme.

Self-exclusion is when you can ask a gambling company or operator to stop you from gambling with them for an amount of time. It usually lasts for at least six months. It is mainly used by people who think they have a problem with gambling and want help to stop. It is up to you to stick to a self-exclusion agreement with a gambling company, but the company should help you do that.

If you want to self-exclude from an online (remote) gambling company then you will need to contact each of the companies with which you hold an account. This can usually be done on the responsible gambling pages of the website.

If you are worried about online gambling then you can download a 'site blocker' such as Gamblock or Netnanny, which can block access to on line gambling sites. However there may be a charge for this.

Although I have self-excluded, my gambling operator has allowed me to gamble. What should I do?

A self-exclusion agreement may not always work properly and you might want to complain about this. Gambling operators must have a system they follow when a customer wants to complain. You should be able to find information on how to complain to the gambling operator on their website or by talking direct to a member of staff in the betting shop, arcade, bingo hall or casino where you have self-excluded.

If you wish to seek compensation from the operator because you feel that they haven't taken reasonable steps to prevent you from gambling then you will have to raise this as a civil matter through the courts.

The Gambling Commission's role is to make sure that the gambling companies follow the rules. Those rules include helping customers who want to stop gambling and have self-excluded. We will look into any concerns that that company may have broken the rules and investigate whether its self-exclusion system is working properly. If we think a company is not doing what it should, we have ways to make them improve. This can include, as a last resort, taking away the company's licence.

If you believe that the operator has broken the self-exclusion rules, we will need the following information:

- > When did you enter into the self-exclusion agreement?
- > How did you let the operator know you wanted to self exclude?
- > What did the operator give you to confirm that the self-exclusion was in place?
- > What period did you self-exclude for?
- > What date were you able to gamble even though you believe you had a self-exclusion agreement in place?
- > Can you provide details of any contact you have had with the operator since you gambled with them?

We will need your permission to contact the operator with your details but you should note that this will not be helping in getting your money back.

Limit setting

Most gambling operators will have facilities that allow you to set limits on the amount of time or money you spend gambling. Speak to a member of staff if you would like further information regarding limit setting.

Referring to specialist services

The National Gambling Helpline on 0808 8020 133 and www.begambleaware.org act as the first port of call for people affected by problem gambling. These services provide immediate advice and support, and from there people who need further help can be referred on to specialist services for further interventions.

ORGANISATIONS THAT PROVIDE HELP AND ADVICE

GAMBLEAWARE

begambleaware.org

A website that gives advice on gambling responsibly – this means making choices based on all the facts, and staying in control of how much time and money you spend.

NATIONAL GAMBLING HELPLINE:

0808 8020 133

CENTRAL AND NORTH WEST LONDON NHS FOUNDATION TRUST

www.cnwl.nhs.uk/cnwl-national-problem-gambling-clinic

Tel: 020 7534 6699 / 6687

Treats problem gamblers in England and Wales who are aged 16 and over. It assesses the needs of problem gamblers as well as those of their partners and family members, and offers evidence based treatments as well as interventions to assist with financial, employment, social and relationship difficulties.

GAM-ANON

www.gamanon.org.uk

Support to those affected by another person's gambling. A fellowship of men and women who are husbands, wives, relatives or close friends who have been affected by problem gambling.

GAMBLERS ANONYMOUS

www.gamblersanonymous.org.uk

A fellowship of men and women who have joined together to do something about their own gambling problem and to help other compulsive gamblers do the same.

GAMCARE

www.gamcare.org.uk

A registered charity that takes a non-judgemental approach to gambling, and a leading authority on the provision of information, advice and practical help in addressing the social impact of gambling.

GORDON MOODY ASSOCIATION

www.gordonmoody.org.uk
01384 241292

Provides residential treatment for severely addicted gamblers, as well as providing outreach support and internet counselling service.

CONSUMER SUPPORT:

CITIZENS ADVICE

www.citizensadvice.org.uk

Helps people resolve their legal, money and other problems by providing free information and advice, and by influencing policymakers.

DEBT SUPPORT ORGANISATIONS:

MONEY ADVICE SERVICE

www.moneyadviceservice.org.uk

An independent service, set up by government, to help people manage their money.

NATIONAL DEBTLINE

www.nationaldebtline.org

National helpline number: 08088 084000

Provides free confidential and independent advice on how to deal with debt problems.

STEPCHANGE DEBT CHARITY

www.stepchange.org
0800 138 1111

A debt advice organisation offering free, confidential and impartial debt help to anyone who needs it, available online 24 hours a day.

OTHER SUPPORT ORGANISATIONS:

SAMARITANS

www.samaritans.org
116 123

A 24 hours a day service providing confidential emotional support for people who are experiencing feelings of distress or despair, including those which may lead to suicide.

GambleAware is the leading charity in Britain committed to minimising gambling-related harm. As an independent national charity, GambleAware funds education, prevention and treatment services and commissions research to broaden public understanding of gambling-related harm. The aim is to stop people getting into problems with their gambling, and ensure those that do develop problems receive fast and effective treatment and support.

GambleAware
7 Henrietta St
London
WC2E 8PS

about.gambleaware.org
info@gambleaware.org
+44 (0) 20 7287 1994

GambleAware



Safeguarding Children and Vulnerable Adults

The Partnership Approach



Content

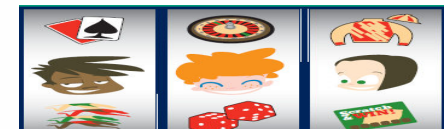
- Aims
- Who are the Vulnerable?
- Signs and indicators of risk?
- What can I do about it?
- Q & A

Introductions

Why we work in partnership

Mutual benefits of working together:

- protecting vulnerable people
- protecting local businesses
- community safety
- Legal and social responsibility
- Financial and reputational reasons



Aims of today's session

- To be able to identify signs of vulnerability and know what actions you could take to help!

What can make people vulnerable?

- Age (children, teenagers, elderly)
- Physical disabilities / sensory impairment
- Mental Health needs
- Capacity / Learning difficulties
- Communication difficulties
- Money issues
- Social problems
- Relationships
- Addictions
- Problem gambling

– *Can you think of any others?*

Spotting the signs: Indicators of vulnerability

Scenario 1

- Albert is a 68 year old man who is disabled and uses a walking stick
- He lives with his son and family, just around the corner from the betting shop.
- Every Thursday after drawing his pension he comes into the shop, to play on the FOBT and have a 'flutter' on the horses
- He likes chatting to the shop staff, who have noticed on a couple of occasions he has bruising on his wrists and face.
- Every week, before he leaves, he counts up his money before going home
- One day after losing £20 on the horses he becomes hysterical. He pleads with the shop staff, saying he daren't go home without the money as his son will be angry. He asks the shop assistant for a loan.

Scenario 2

- Sarah is a 45 year old professional
- She works at a Solicitor's office near to your city centre premises
- She calls into the shop most days to place a bet at lunchtime and again after work when she plays on the FOBTs. Often she smells of alcohol even during the work day
- She can become quite aggressive when she loses money but always keeps betting until she wins, or the shop closes
- She has now started nipping in during the morning when she does this she seems agitated, avoids eye contact with staff and leaves at high speed in her car

Scenario 3

- Jay is 15 years old
- He is known to the police and regularly truants from school to hang around with a group of 'undesirables' in the area
- He hangs around the shopping precinct near your premises a lot
- He is aggressive, rowdy and threatening to staff.
- He always looks unkempt and staff have seen him in winter, without a coat or jumper, scanning the pavement and bins looking for cigarette ends or food
- One day he is standing outside the shop talking to an older male. You notice Jay is wearing brand new designer jeans and a leather jacket.
- You see the older male point towards a car and he pushes Jay into the shop with his hand on the boy's shoulder. Jay is much quieter than usual.
- When staff ask Jay if he has any ID, the older male pushes Jay to one side and answers for him, saying 'he's with me I've come to collect'.
- Jay looks frightened as they leave the shop and you notice that a car picks them up outside, there are 2 other older men in the car.

Scenario 4

- Zoe always insists on organising the office sweepstake for the Grand National and the World Cup
- Now she's set up an office lottery syndicate

Scenario 5

- Dorothy is a 75 year old woman who visits the betting shop every morning after she has collected her newspaper and milk from the convenience store next door
- She is always sociable and loves chatting to the staff and having a cup of tea at the shop
- She lives alone and has no family
- She spends a couple of pounds every now and then on the FOBTs
- Lately staff have noticed that she has become forgetful and confused and she looks frail
- Last week she was coughing a lot and almost fell over, staff had to help her home
- This week, you notice that she has not been in for a couple of days

Scenario 6

- Trevor bets most days at the bookies and tells you he has recently started playing online poker at night
- He tells you that he and his wife frequently argue about money and that sometimes it 'gets out of hand'

Scenario 7

- Terry is one of your regular customers. He tells you that he has been approached by a young girl who offered him sex if he would give her money or cigarettes
- You have noticed that a group of 3 young females have started hanging around the shop after school each day. They arrive around 3.45pm and are wearing school uniform
- You check back on CCTV over the past week and see that the girls have been approaching a number of male customers, one of whom is recorded going away from the premises towards a car with a girl

Scenario 8

- Declan is a 20 year old student who recently started work at the betting shop
- After a few weeks, he begins arriving late to work in the morning and then starts taking odd days off sick
- One day he tells a colleague that he loves playing online poker after his flatmate has gone to bed, but he can't get up in the morning.
- He tells you that he's started on anti depressants and other medication to help him with his anxiety but he doesn't think its working
- You've noticed the smell of cannabis on his clothes

Scenario 9

- Debbie plays bingo every Friday night with 'the girls'
- Occasionally, she can't afford to go, so she borrows the money from her friend so as not to miss out

Scenario 10

- Darren is a 54 year old customer who has self excluded
- He has not been to the shop for 2 weeks
- One morning he enters the shop and demands to place a bet
- He is aggressive and shouting
- When he is refused, he storms out of the shop threatening to destroy the building and everyone in it, by setting the place on fire
- Darren has attempted this at another premises, in the past
- There are several customers in the shop, one of whom has left his toddler in a pushchair outside. The toddler is not being supervised by anyone.

Scenario 11

- Chen is an International student at Sheffield University
- He enjoys playing at the casino at the weekend
- He has started skipping lectures on Fridays and Mondays

Scenario 12

- Ash calls in the betting shop most days
- He uses several bank cards to place bets and occasionally disappears and comes back with more cash to play
- You overhear him on the phone telling his ex-wife he hasn't got enough money for child maintenance this month, but he has told you he's had a good win this week on the horses

What we can do!

- Interventions
- Reporting
- Recording: IRF (Incident Report Forms)
- Report to your Line Manager
- **Phone 999 if risk is imminent / assault happened or likely to**
- **Record and report concerns** to the police **101** and / or safeguarding - if a child ring 0114 2734855 or contact children's social care via the website <https://www.sheffield.gov.uk/caresupport/childfam/childrens-social-care/social-work.html>).
- **Safeguarding Adults Advice Line** (9am to 5pm, Monday to Friday) 0114 2736870. If your report is about a vulnerable adult ring 0114 2734908.
- **Signpost if safe to do so** – offer the domestic abuse helpline number 0808 808 2241 via a Sheffield Domestic Abuse Partnership contact card
- **Crimestoppers** – 0800 555 111 or online crimestoppers-uk.org and fill in the form
- **Protecting yourself:**
 - know your safeguarding policy
 - working to the code of conduct





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