



## Alcohol and Entertainment Licensing Sub-Committee – Supplementary 2

**Thursday 17 October 2024 at 10.00 am**

Members Suite - 4th Floor, Brent Civic Centre,  
Engineers Way, Wembley, HA9 0FJ

Please note that this meeting will be held in person with members of the Sub-Committee required to attend in person.

**The press and public are also welcome to attend this meeting in person. Please note the meeting is not scheduled for live webcast**

### Membership:

#### Members

Councillors:

Ahmed (Chair)  
Long (Vice-Chair)  
Mahmood

#### Substitute Members

Councillors:

Ahmed, Ethapemi, Hack, Hylton, Lorber, Mahmood,  
Rajan-Seelan

**For further information contact:** Devbai Bhanji, Governance Assistant  
Tel: 020 8937 6841; Email: [devbai.bhanji@brent.gov.uk](mailto:devbai.bhanji@brent.gov.uk)

For electronic copies of minutes and agendas please visit:  
[Council meetings and decision making | Brent Council](#)

### **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 <b>Application for a Bingo Premises Licence by Merkur Slots UK Ltd Ltd for the premises known as Merkur Slots, 67 High Street, NW10 4NS, pursuant to the provisions of the Licensing Act 2003</b>	1 - 378

**Date of the next meeting:**            **Date Not Specified**



Please remember to ***SWITCH OFF*** your mobile phone during the meeting.

This meeting room is not accessible to Members of the Public. Please ring Devbai Bhanji on 020 8937 6841 who come and collect you.

This page is intentionally left blank

## Merkur Slots UK Limited Operational Standards

### THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

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

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

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

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

# Merkur Slots UK Limited

## Operational Standards

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

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

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

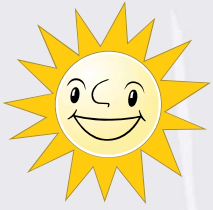
All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

# WORKING TOGETHER



Accredited by the Global  
Gambling Guidance Group

## THE MERKUR FAMILY



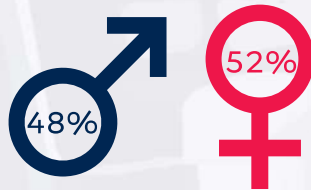
## PART OF THE MERKUR GROUP

### A Strong Partner For More Than 60 Years



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

MERKUR Casino UK employs over 2,000 people over 3 Bingo Clubs, over 230 High Street gaming centres and 3 Family Entertainment Centres under two main brands.



**52% of employees are female**  
**48% of employees are male**

MERKUR Slots is the main UK brand. Our venues represent the very best in terms of exciting 'slot gaming' entertainment through delivering to our customers the latest in venue product and atmosphere. These venues are known for their highly trained teams and first class face to face service.

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



**337**

# MYTHBUSTERS

## We Are Not Betting Shops

MERKUR Casino UK is one of the UK's largest operators of High Street Adult Gaming Centres (AGCs) and High Street bingo venues. AGCs are often, unfortunately, put into the same category as betting shops. This is because there is a widespread misunderstanding of how AGCs operate and who our customers are. We want to address these misconceptions and demonstrate that a new AGC on your local high street is a good thing. Public concerns surrounding betting shops were largely due to the presence of Fixed Odds Betting Terminals (FOBTs). Our venues do not offer these types of machines. Our machines offer low stakes ranging from 10p to a maximum of £2, plus a variety of bingo products are also available. These machines have been around for many, many years.

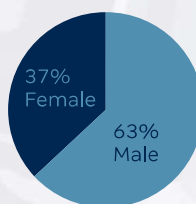


Our AGCs and High Street bingo venues are where people come to spend their spare change, have a game of bingo and enjoy their favourite pastime in convenient locations.

The market on the high street has evolved with venues now providing electronic bingo tablets.



Our machines operate at low stakes.



Our venues appeal to all ages with our membership gender database split of 63% male / 37% female.



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

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





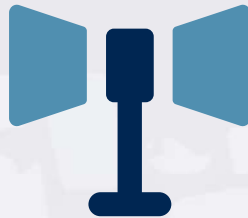
## OUR OPERATION

### We Are Not Noisy Neighbours

Whilst we sit within the leisure sector, noise levels are very low and limited from our venues. We currently operate 24 hours in over 150 venues.



Our machines generate low levels of noise.



We do not have tannoy systems that you find in seaside amusement centres.



We only play background music like at any other high street shop.



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



We do not offer or serve alcohol in our AGC premises.

Our customer base after midnight is predominantly the local entertainment workforce and shift workers who like to relax after their busy shifts.

**339**



Customers tend to visit on their own or in couples. We rarely see large groups.



**Think 25  
Messaging**



# RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

## We Are Not A Problem

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

### GAMBLING COMMISSION

MERKUR Casino is regulated by the Gambling Commission and Licensing Authorities

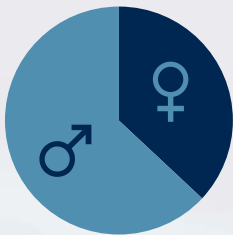


We provide complimentary refreshments, teas and coffees, to customers and do not sell alcohol. Our staff will not allow anyone into the premises who appears to be intoxicated.



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

Our venues appeal to all ages with our membership gender database split of 63% Male / 37% Female



We are subject to regular independent test purchases and are consistently above the average leisure industry pass rate.

**340**

# SOCIAL RESPONSIBILITY MEASURES IN PLACE

## In Venue

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



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



& Dedicated Learning & Development Team and National training

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



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



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

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



Our Category B3 machines support safer gambling by having time and limit settings available to customers.. **341**



## Compliance



## Training Centre



## Online Training





## Machine Messaging



## Customer Interaction Training



# SOCIAL RESPONSIBILITY MEASURES IN PLACE

## All Levels

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



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



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



MERKUR Casino UK received the international certificate of accreditation from the Global Gambling Guidance Group (G4). Our MERKUR 360 programme showcases how we are continually improving our social responsibility commitments throughout all levels of the business. We have appointed a Safer Gambling Manager role to support safer gambling initiatives.

MERKUR Casino UK also engages with the [Bingo Association](#), [Bacta](#) and [Gambling Business Group](#) bodies.



- Senior Manager representation from MERKUR Group.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Safer Gambling Committee.
- Operations Director and Head of Compliance are Directors.
- Head of Compliance is a member of the Safer Gambling Committee.

# BENEFITS TO THE HIGH STREET



## Benefits for your High Street include:



Over 90% of new MERKUR Slots venues occupy former vacant units.



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



Linked trips with other shops helping to support other businesses.



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



Increased footfall to the High Street.



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

**343**

# COMMUNITY & CHARITY

## MERKUR Initiative

Supporting Local Charities and Good Causes



Amongst other charities, some of your donations have helped:



MERKUR Casino UK has raised in excess of  
£1.4 million for good causes since 2005

### Please contact us

For press enquiries:

email [martha@sourcemc.co.uk](mailto:martha@sourcemc.co.uk)

phone +44 (0) 7796 614137

MERKUR Casino UK

Matrix House

North Fourth Street

Milton Keynes

Mk9 1NJ

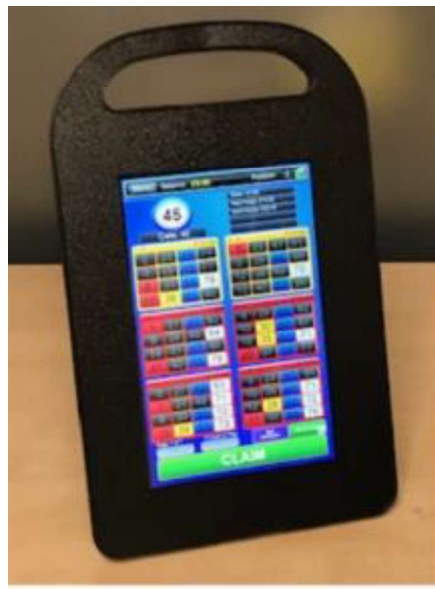
**344**

phone 01908 351200

email [info@merkur-casino.com](mailto:info@merkur-casino.com)



# G-TAB Bingo

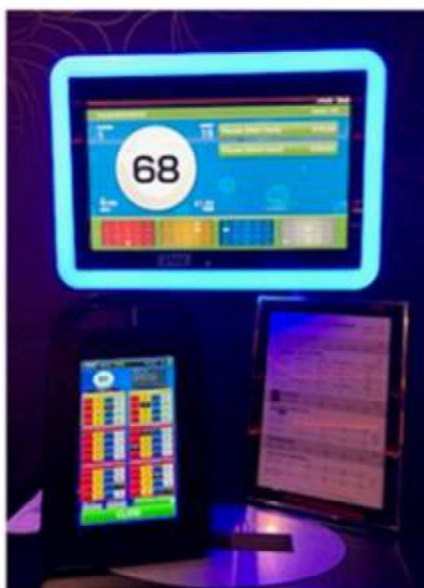


**Bringing Traditional Bingo  
to the High Street**

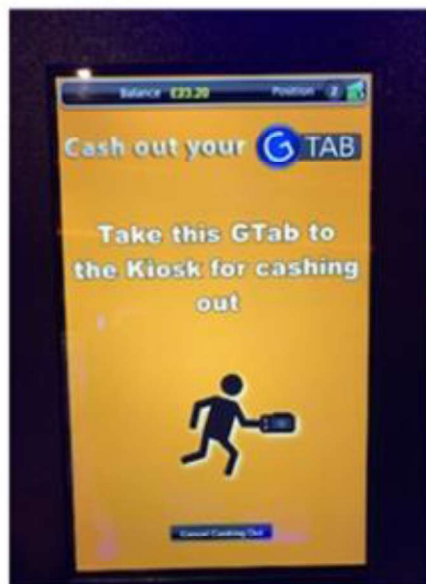
G-Tab is a multi-purpose gaming device offering live link Bingo Games, Bingo Variant Games and participation in the National Bingo Game which is played twice daily. Bingo tablets are bingo machines that provide games of both remote and non-remote bingo with remote bingo being the linked games operated via WiFi and the internet on licensed premises. Complies with the appropriate Gambling Commission Technical Standards and Machine Guidance.

## Standalone Tablet Terminal

Bingo numbers announced and shown live on the top display



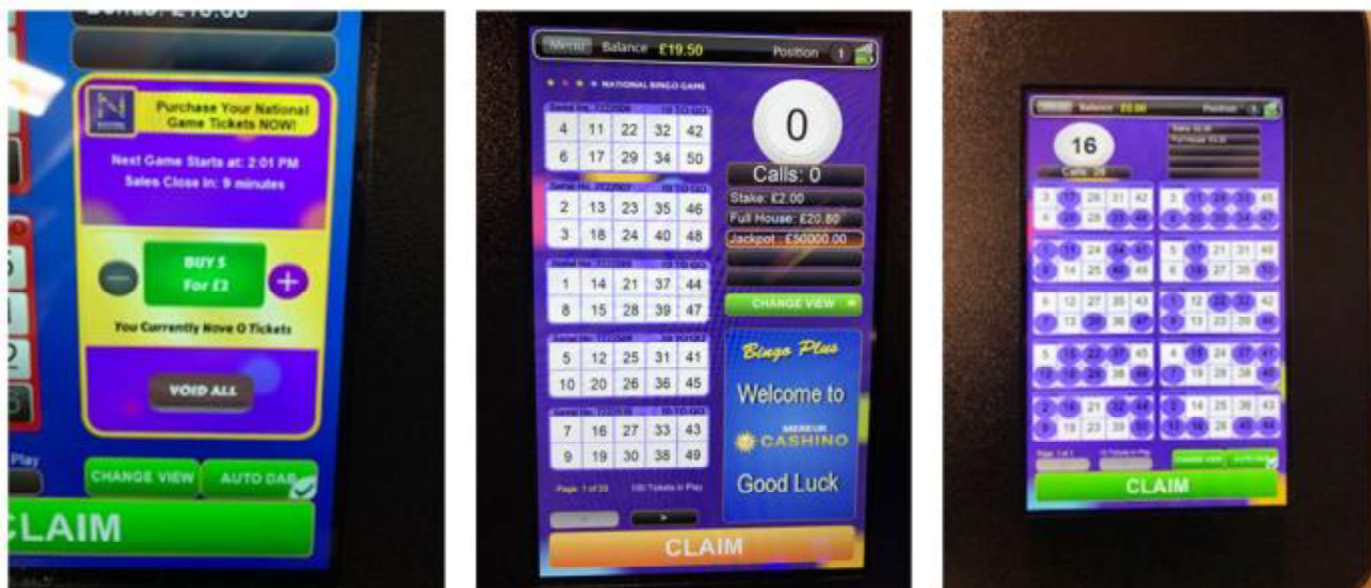
Charges to play clearly displayed



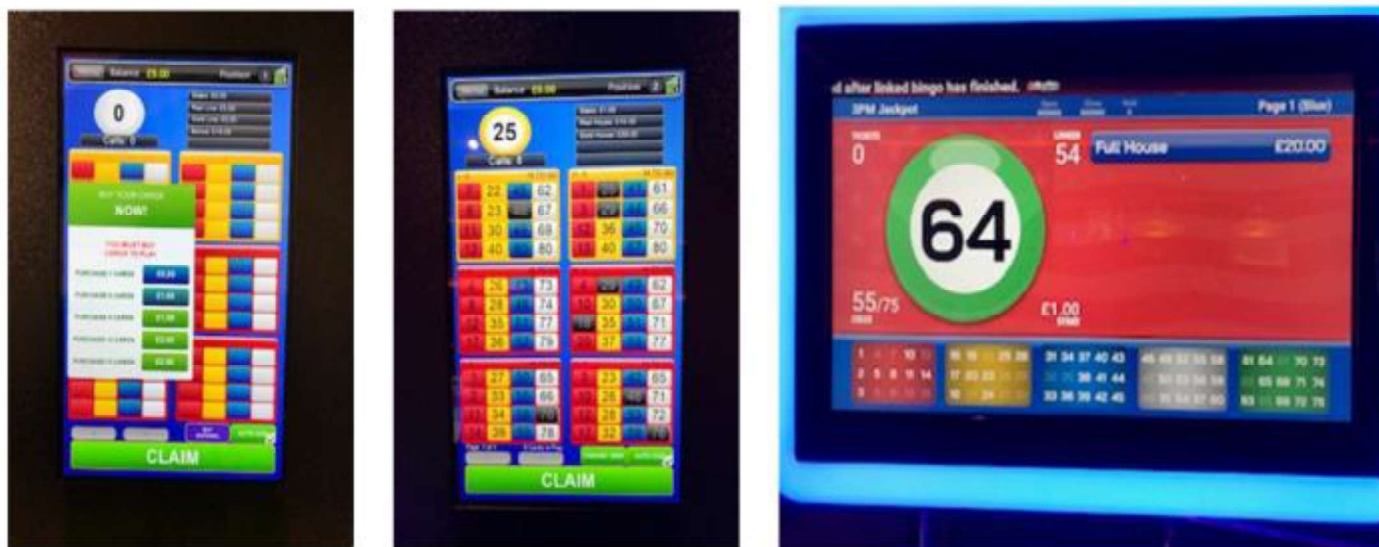
Customers cannot stake-up once game has commenced

**“Making all traditional forms of Bingo like ‘Shutter Bingo’ played at the sea-side or ‘main-stage’ Bingo played in Clubs available”**

**National Bingo Game**, linked to all Bingo Clubs (such as Mecca and Buzz) played twice daily (2pm and 7pm) at £2.00 for 5 tickets, maximum tickets 100 per position, making £40 maximum stake which is within the Bingo Association guidelines. Prize money including the National Jackpot is based on the number of cards in play, including bonus lines and is clearly displayed on the main display caller's unit, prior to the game commencing and on the individual tablets throughout the game.



**Live Link Bingo** played throughout the day from 50p for 3 cards, maximum 15 cards per position, making maximum stake of £2.50 per game. The prize money, based on number of cards in play, including bonus lines is clearly displayed on the main display caller's unit, prior to the game commencing, and on the individual tablet throughout the game.

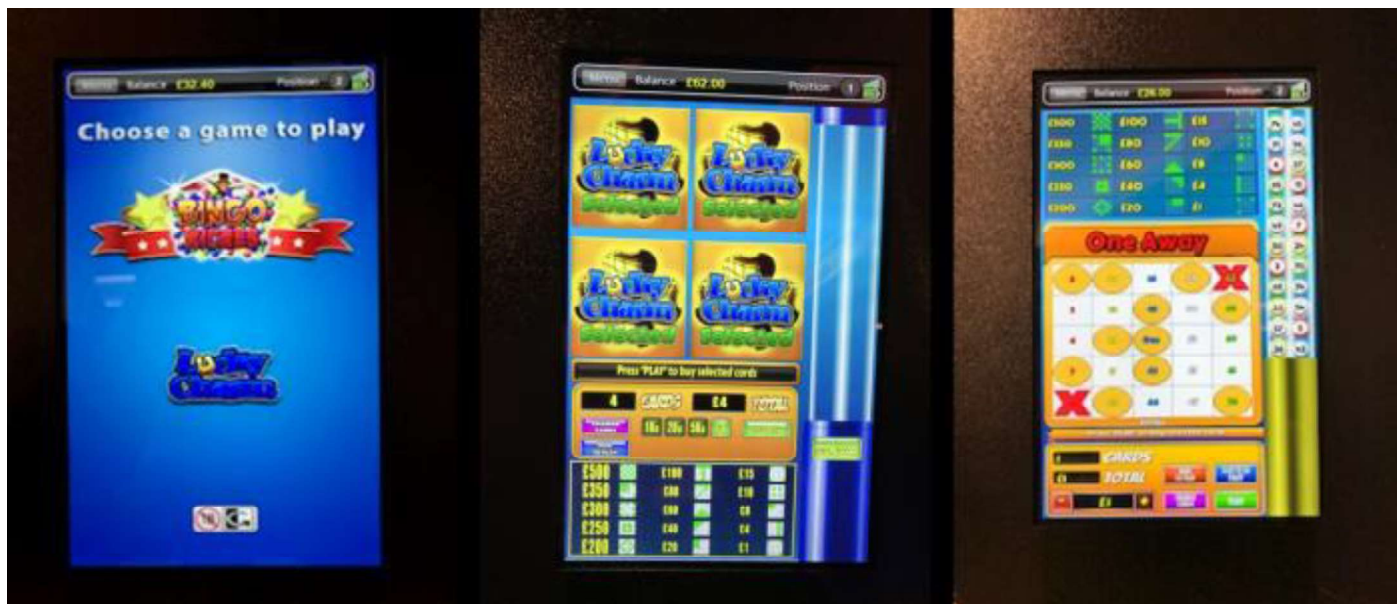


**Bingo Variant (BV) Games** are available 9:00 till midnight. The game of bingo stands alone on the tablet and does not connect via remote communication to a server or link to games across premises.

**Bingo Riches:** play from 10p (25p/50p/£1 options) per card, maximum 4 cards, so maximum stake £4 per game, with 24 bingo balls drawn and marked off various patterns to give a varied winplan, maximum prize £40 on 10p stake.



**Lucky Charm:** play from 10p (20p/50p/£1 options) per card, maximum 4 cards, so maximum stake £4 per game, with 24 bingo balls drawn and marked off various patterns to give a varied winplan, maximum prize £50 on 10p stake.



### Low stake games:

The device also offers the player a choice of games which can be played from as little as 5p (maximum £1) a game all of which comply with Cat C technical standards.

## Why:

The responsibility for an individual's gambling is their own. The responsibility to exercise a duty of care is that of the operator. MERKUR Slots (MERKUR Casino) recognises that for a very small minority of its customers, gambling can become addictive. MERKUR Slots recognises that gambling addiction can lead to a range of issues, both for the individuals and their families. As a result of this, MERKUR Slots have a social responsibility to act positively in relation to sensible and safe gambling.

## Best Result:

All employees are aware of the importance of following policies and processes which relate to gambling related compliance and social responsibility. MERKUR Slots is operated in line with its licencing conditions and codes of practice at all times. Employees work together to ensure that the three licencing objectives are met.

## Worst Result:

Employees are not aware of Company compliance policies and processes which are in place to protect customers. MERKUR Slots is not operated in line with the three licencing objectives, its licencing conditions and the codes of practice, leaving MERKUR Slots at risk of its operating license being withdrawn.

## The three licensing objectives:

- Keep crime out of gambling
- Ensure that gambling is conducted in a fair and open way
- Protect children by preventing their entry to MERKUR Slots and avoiding potential exposure to gambling. Protecting the vulnerable from being harmed or exploited by gambling.

## What

- Employees must complete all required compliance training before being allowed to work with customers in any MERKUR premises.
- It is the responsibility of employees to remain up to date with their compliance training, via the relevant training platforms.
- While employees are expected to keep track of their own ongoing compliance training, ultimately it is the responsibility of the Venue Manager to ensure that all employees are correctly trained and up to date with compliance training.
- Employees must always follow compliance policies and processes which are found in the MERKUR Slots Compliance and Social Responsibility folder.
- The Venue Manager must have read and understood the Venue License Conditions.
- The Venue Manager must have read and understood the Local Area Risk Assessment.

## When:

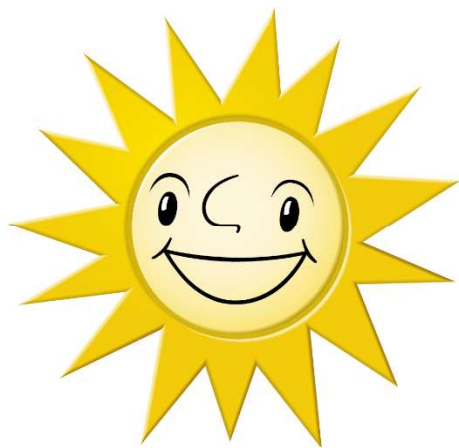
- All employees of MERKUR Slots (and MERKUR Casino) retain the responsibility of ensuring that the business operates in line with compliance rules and regulations, at all times.

## **Related/Supporting Documents:**

- Compliance and Social Responsibility Folder

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

- Venue Manager
- Cluster Manager
- Area Manager
- Operations Director
- Head of Compliance



**MERKUR**  

---

**SLOTS**

# Compliance and Social Responsibility

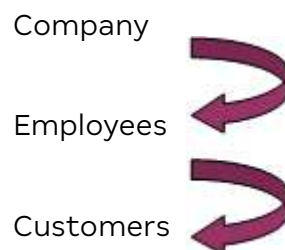
No.	Title	Version
1.	Social Responsibility Statement	December 2023 V1
2.	LCCP – Licence Conditions and Code of Practice – April 2024	April 2024
2.1	Licence-conditions-and-codes-of-practice-for- Arcades – April 2024	April 2024
2.2	Licence-conditions-and-codes-of-practice-for- Bingo – April 2024	April 2024
3.	Powers of Gambling Commission Enforcement Officers	January 2024 V1.1
4.	The Three licensing Objectives	January 2024 V1.1
5.	Keeping Crime out of Gambling	January 2024 V1.1
5.1	Money Laundering	January 2024 V1.1
5.2	Keeping Alcohol & Drugs Out	January 2024 V1.1
5.3	Dealing with Aggressive Customers	January 2024 V1.1
6.	Ensuring Gambling is conducted fairly and openly	January 2024 V1.1
6.1	Complaints Procedure	January 2024 V1.1
6.1.1	MERKUR Slots Complaints	January 2024 V1.1
6.2	Marketing and Promotions	January 2024 V1.1
7.	Protecting children and vulnerable from gambling harm or exploited by gambling	January 2024 V1.1
7.1	Access to gambling by children and young persons	January 2024 V1.1
7.1.1	Proof of Age document	January 2024 V1.1
7.1.2	The Proof of Age Standards Scheme (PASS)	January 2024 V1.1
7.2	Employment of children or young persons	January 2024 V1.1
7.3	Customer Interaction	January 2024 V1.1
7.3.1	Customer-Interaction-Formal-Guidance-Remote-July-2019	July 2019 V1.0
7.4	Self-Exclusion	January 2024 V1.1
7.4.1	Self-Exclusion Terms & Condition	January 2024 V1.1
7.4.2	Self-Exclusion Manual Request form	January 2024 V1.1
7.4.3	UK Self-Exclusions Scheme	January 2024 V1.1
8.	IHL SMART Tablet – Quick Guide	January 2024 V1.1
9.	Acronyms and Abbreviations	January 2024 V1.1
10.	Premise Licences	January 2024 V1.1
11.	Local Area Risk Assessment	January 2024 V1.1
12.	Powers of Local Authorities – premise inspections	January 2024 V1.1
12.1	BINGO Premise Inspection Guide (example)	October 2019
12.2	AGC Premise Inspection Guide (example)	October 2019
12.3	FEC Premise Inspection Guide (example)	October 2019
12.4	Licensed FEC Premise Inspection Guide (example)	January 2018

## STATEMENT OF INTENT

The responsibility for an individual's gambling is their own. Merkur Casino UK, operating the brands Merkur Slots and Merkur Bingo, recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

## WHAT IS SOCIAL RESPONSIBILITY?

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



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

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

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

These are to:

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

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

## **COMPANY**

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

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

- Socially Responsible procedures including Self Exclusion
- 'Think 25' policy.

## **EMPLOYEES**

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

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

The above documentation includes comprehensive coverage of the following: -

- Safer Gambling Policy.
- Social Responsibility procedures.
- 'Think 25' policy.

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

- Customer care.
- Conflict management.
- Social responsibility.

In addition, employees will receive refresher training every 6 months.

## CUSTOMER

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

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


- Citizens advice <https://www.citizensadvice.org.uk>
- Gamble Aware <https://www.begambleaware.org>
- GamCare <https://www.gamcare.org>
- GamesAid <https://www.gamesaid.org>
- Gam-Anon <https://www.gam-anon.org>
- Gamblers Anonymous <https://www.gamblersanonymous.org.uk>
- Gordon Moody Association <https://www.gordonmoody.org.uk>
- Action for Children Charity <https://www.actionforchildren.org.uk>
- National Debtline <https://www.nationaldebtline.org>
- Betknowmore UK <https://www.Betknowmore.org>
- YGAM (Young Gamers & Gamblers Education Trust) <https://www.YGAM.org.uk>
- Leeds Community Gambling Service (via Gamcare)

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

- Social Responsibility Policy.
- Safer Gambling Policy.
- 'Think 25' policy.



Irina Ruf  
Chief Executive Officer



Mark Schertle  
Chief Operating Officer



Egemen Coskun  
Chief Financial Officer

On-line LCCP can be found:

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/online>

## Online LCCP

The LCCP split up into 3 parts, each with separate sections. These sections detail the requirements licensees must meet to hold a Gambling Commission licence.

Version effective from 1 April 2024

<a href="#">Open all</a>	
1. <a href="#">Operating licence conditions</a>	<a href="#">+</a>
2. <a href="#">Code of practice provisions</a>	<a href="#">+</a>
3. <a href="#">Personal licence conditions</a>	<a href="#">+</a>

## 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.

### **LCCP 14.1.1 – Access to Premises**

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

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

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

## RIGHTS OF GAMBLING COMMISSION ENFORCEMENT OFFICERS

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

Please refer to the training section where you will find the Compliance Training document to be used for training purposes. Our online Litmoss Training platform hosts Essential of Compliance & Social Responsibility, Age Verification and Safeguarding Children & Vulnerable modules, all with an online knowledge check to be completed every 6 months by all employees.

## PROCEDURE

Visits by Gambling Commission Enforcement Officers may be pre-arranged or unannounced, however, in all circumstances the employee must ask for identification from the visitor to establish that they are a Gambling Commission Enforcement Officer.

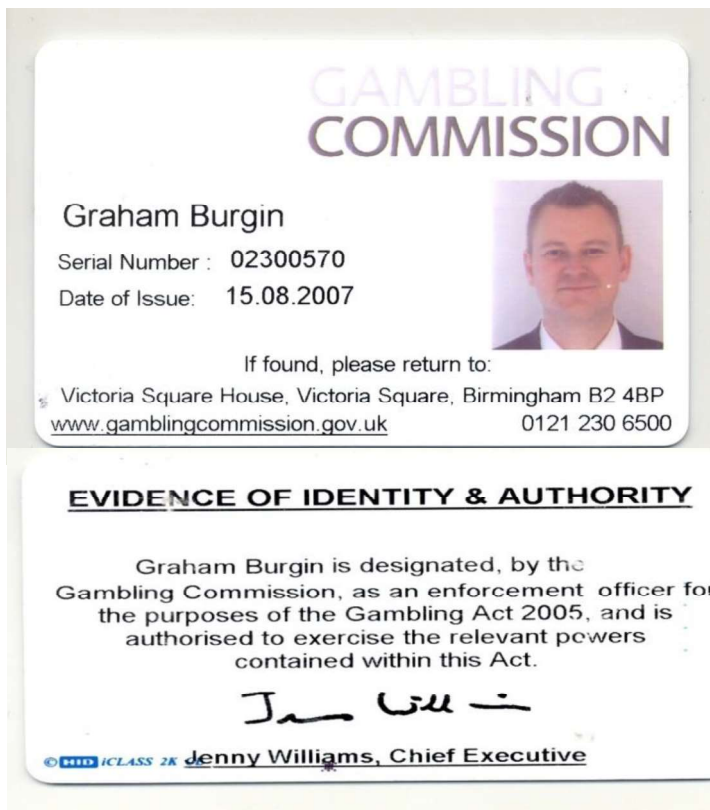
The visitor must also be requested to sign into the visitor's logbook.

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

The Enforcement Officer may remove copies of documents as required.

Any visits by a Gambling Commission Enforcement Officer must be reported to your Area Manager and Amanda Kiernan, Head of Compliance - any supporting documents/visit reports to be copied to [Compliance\\_UK@merkur-casino.com](mailto:Compliance_UK@merkur-casino.com)

### Gambling Commission Sample ID



**Front of card** Contains the Following:

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

**Back of card** contains the following:

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

## **THE 3 LICENSING OBJECTIVES**

### **1. Keeping crime out of gambling**

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

### **2. Ensuring gambling is conducted fairly and openly**

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

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

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

## KEEPING CRIME OUT OF GAMBLING

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

## INTRODUCTION

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

LCCP 12.1.1 - Anti-money laundering - Prevention of money laundering and terrorist financing.

New obligations in respect of money laundering were imposed by the Proceeds of Crime Act 2002 (the "POCA") and the Money Laundering and Terrorist Financing Regulation 2017 ("the Regulations"). This legislation broadens the definition of money laundering and increases the range of activities caught by the statutory control framework. As of 10th January 2020, new money laundering regulations came into force. The regulations are applicable to the Licence Conditions & Codes of Practice (LCCP). Whilst our venues/sector is considered "Low Risk", this does not mean that there is "no risk" within our trading sectors.

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

## MONEY LAUNDERING DEFINITION

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

## MONEY LAUNDERING POLICY

Brands operating under Merkur Casino UK are 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.

Merkur Casino UK has detailed a Money Laundering Policy available to all employees on MyMERKUR and has appointed a designated Money Laundering Reporting Officer

(MLRO), Mrs. Amanda Kiernan. Email: [AKiernan@merkur-casino.com](mailto:AKiernan@merkur-casino.com)

The deputy MLRO is – Mark Wells. Email: [mwells@merkur-casino.com](mailto:mwells@merkur-casino.com)

All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions. **All venues** need to report any suspicious cash transactions **of any** note denomination value, including stained/dyed notes, and foreign coins to the value of **£50 during one machine empty or cash collection**. These incidents should be reported using the “(AML) ANTI MONEY LAUNDERING” app available on the Smart tablet. An automated alert will be sent to the Money Laundering Reporting Officer 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 Money Laundering Reporting Officer as soon as possible. Because of the importance attached to the process, notification should normally take place immediately by telephone or, where that is not possible, by any other expedient means, including automated alerts of the “(AML) ANTI MONEY LAUNDERING” report available on your SMART tablet. Where there is suspicion of any type of potential money laundering incident CCTV images (if available and relevant) should be retained securely.

All incidents should be reported to your line Manager.

The Money Laundering Reporting Officer 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 where available).
- Promo ticket transactions.
- GeWeTe payouts exceeding £1k approval.
- Customer refunds due to machine malfunctions.
- Money removed from machines (net takings where available). Where gross takings and net takings information is not available the operation will provide an explanation to the Commission
- Ticket In Ticket Out (TITO) vouchers from machines in arcades can be used for money laundering. Vouchers can be cashed in at a later date and criminals will use a range of outlets to disguise the origin of funds.

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

At Merkur Slots we have clear rules on the consumption of alcohol and guidelines to manage individuals found to be under the influence of excessive alcohol consumption or use of drugs.

It is the duty of all licensed premises to create a safe and secure environment for their customers and to take steps to promote the below licensing objective:

- Keeping crime out of gambling.

It is therefore vital that all licensed premises remain vigilant when it comes to illegal drugs.

## **INDIVIDUALS UNDER THE INFLUENCE OF ALCOHOL/DRUGS ON ENTRY**

In all venues, individuals who are deemed to be under the influence of excessive alcohol or drugs must be prevented from entering. Employees are trained to identify the potential signs of someone who is under the influence of excessive alcohol or drug use.

## **PROCEDURE**

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

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

All incidents should be recorded fully on the Smart Tablet Incident App and, where appropriate as an Interaction/Conversation on Maxim.

## **ALCOHOL CONSUMPTION ON SITE**

### **Slots Venues**

Alcohol is not available for purchase or offered free in any Slots venue and customers must not bring alcohol onsite to be consumed.

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

## WHAT CAUSES AGGRESSION AND VIOLENCE?

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

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

## WHAT ARE SOME OF THE CAUSES OF VIOLENCE?

There are two aspects to consider:

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

## IDENTIFYING AN AGGRESSIVE OR VIOLENT PERSON

There are tell-tale signs, so the key thing is to observe the customer discreetly whilst going about your duties. This way you will spot a change in demeanour or behaviour. These are some of the signs that can help in predicting the likelihood of imminent violence:

- Muscles tensed?
- Facial expression?
- Agitated?
- Pacing about?
- Withdrawn on approach?
- Voice - change of pitch/tone; insults; obscenities, threats?
- Sweating?
- Breathing - increase in respiration?
- Tearful?

## PROCEDURE

Quite simply whenever there is an incident you should adopt the HEAT approach:

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

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

- Be alert and consider if you need further assistance.
- Control your behaviour in body language, feelings, and expression.
- Avoid eyeball to eyeball confrontation.
- Relieve the tension by adopting a calm approach.
- Speak and stand calmly but always remain balanced and ready to move.
- Consciously lower pitch and volume of voice.
- Speak clearly and slowly and do not stop talking because the other person does not answer.
- Try to get the person talking.
- Listen to what the person says and how it is said.
- Try to identify the source of concern and offer help if possible.
- Try to distract the person from the immediate cause of concern by changing the course of conversation – buy time to think, to plan, to obtain assistance.
- Understanding and kindness, simple human values which are often overlooked in today's society, can have a marked effect on the outcome of such cases.
- Do not argue!
- Do not give orders.
- Never make promises you cannot keep.
- Do not disagree unless necessary.
- Do not make threats that cannot be carried out or offer rewards for what started out as unlawful or improper conduct.

During conversation with the person being confronted use expressions such as:

- "I know you have a problem",
- "I know you are upset",
- "I believe you when you say something is wrong."
- Remember.... Keep your voice at a calm, even level.

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

- Always consider if you need further assistance from a colleague if the person becomes abusive in their language or behaviour they should be asked to leave immediately.

(Remember to refund their stake money). If they refuse to leave, then assistance from management or the police should be sought.

## **PREVENTING EMPLOYEES FROM BEING ABUSED**

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

At no time should employees intervene physically in the removal of an individual from a site. All incidents should be fully recorded on the Smart Tablet Incident log and, where appropriate as an Interaction/conversation on Maxim.

## **DE-ESCALATION TRAINING**

To support employees in dealing with an aggressive customer Merkur Slots has a programme of de-escalation training which is rolled out to all senior Slots employees.

## Ensuring Gambling is conducted Fairly and Openly

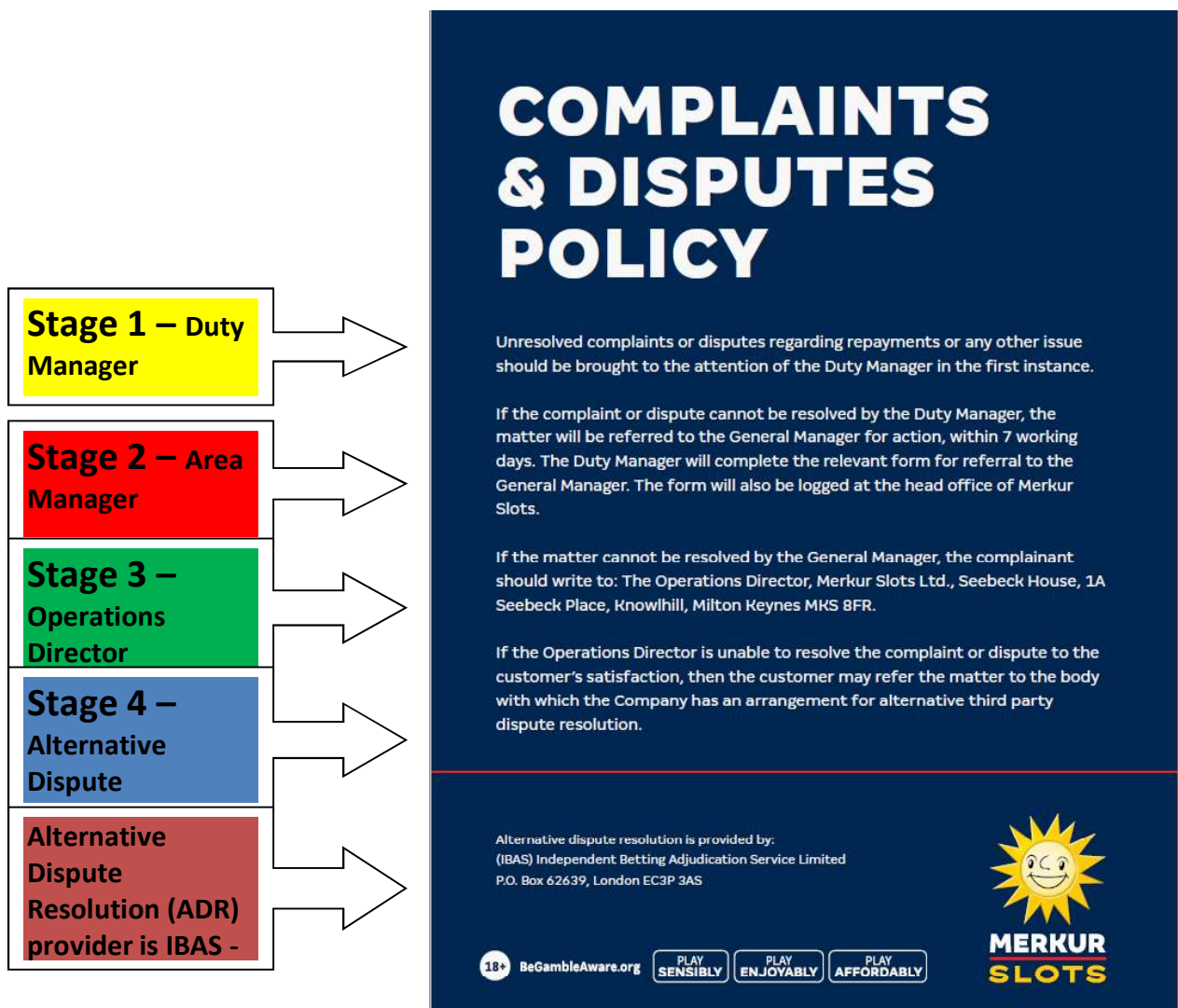
MERKUR Slots have to ensure the terms we offer with regards to our business practices are fair and transparent to our customers and as Licensees we must comply with the Consumer Rights Act 2015. This means ensuring our machines and marketing are promoted in a fair and open way.

LCCP 7.1.1 - Fair and transparent terms and practices.

Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015. Licensees must comply with those terms.

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

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



# COMPLAINTS & DISPUTES POLICY

At MERKUR, we aim to provide our customers with the very best high street venue experience. We appreciate that sometimes things may not meet our high standards.

Our teams in venue will aim to resolve the issue for you there and then. We have a four stage process to resolve your issue.

- Stage 1: In the first instance your issue will be escalated to the Duty Manager to discuss with you.
- Stage 2: If the Duty Manager is unable to resolve the issue, they will advise you of this and the matter will be referred to the Area Manager for action. We understand a timely response is essential to your experience and our aim is to contact you within 7 days.
- Stage 3: If the matter requires further attention, it will then be referred to the Operations Director. We hope at this point we can reach a satisfactory outcome and you can continue to enjoy our venues.



Stage 4: If your complaint is solely relating to betting or gambling activity, and after our internal complaints process you are unhappy with our resolution, you can submit in writing to the independent third-party alternative dispute resolution provider: IBAS (Independent Betting Adjudication Service).

**IBAS (Independent Betting Adjudication Service)**  
**P.O.Box 62639**  
**London**  
**EC3P 3AS**

If you wish to contact us directly, the quickest way to do this is via our online Customer Care:



<https://customercare.merkurcasinouk.com/>

Here you can find help if anything has affected your experience, submit feedback, and manage the status of your complaint.

Alternatively, you can reach us:

- In writing:

**Customer Care,**  
**MERKUR Casino UK,**  
**Second Floor,**  
**Matrix House,**  
**North Fourth Street,**  
**Milton Keynes**  
**MK9 1NJ**

- By phone:

**01908 351265** (Please note this an automated phone service)

Version 2.0



## POLICY

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

- LCCP 5.1 Rewards and Bonuses
- 5.1.1 – Rewards and Bonuses – SR Code
  - 5.1.6 – Compliance with advertising codes
  - 5.1.9 – Compliance with industry advertising codes
  - 5.1.11 – Direct electronic marketing consent

## COMPLIANCE

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

We adopt the general principles that our advertising is:

- Legal, decent, honest and truthful.
- Prepared with a sense of responsibility to consumers and to society.
- Respectful to the principles of fair competition generally accepted in business.
- Not intended to bring advertising into disrepute.

Specifically, we ensure that:

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

## MARKETING AND PROMOTION

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

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

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

## PROCEDURE

All Marketing and Promotions must be compliant.

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

- Operations Director
- Head of Compliance
- Marketing Manager

## **Protecting children and vulnerable people from being harmed or exploited by gambling**

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

LCCP 3 - Protection of Children and Other Vulnerable Persons  
(SRCP 3.2.3, 3.2.5, 3.3.1, 3.4.1, 3.5.6) and (OCP 3.2.4, 3.2.6, 3.5.2, 3.5.7, 3.6.2, 3.6.5, 3.6.6, 3.8.2)

## 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. It is illegal for any person who is under 18 years of age to be permitted entry to any Licensed Premises.

LCCP 3 – Protection of Children and Other Vulnerable Persons (SRCP 3.2.3, 3.2.5, 3.3.1, 3.4.1, 3.5.6) and (OCP 3.2.4, 3.2.6, 3.5.2, 3.5.7)

## PROCEDURE

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

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

## **ACCEPTABLE PROOF OF AGE DOCUMENTS INCLUDE**

### **MILITARY ID CARD**



### **ANY IDENTIFICATION CARRYING THE 'PASS' LOGO**



### **DRIVING LICENCE WITH PHOTOCARD**



### **PASSPORT**



The law states that licensees must only accept Identification which:

1. The ID contains a photograph from which the Individual can be identified
2. Clearly states the Individuals date of birth
3. Is valid
4. Is legible and has no visible signs of tampering or reproduction

# The Proof of Age Standards Scheme (PASS)

The UK's national proof of age accreditation scheme, endorsed by the Home Office, the National Police Chiefs' Council (NPCC) and the Security Industry Authority (SIA).

Every card that carries a PASS hologram will have been issued by a provider who has been through a stringent application and accreditation process which examines the procedures they adopt to check and verify identity.

The PASS Scheme accredits seven national and local suppliers of PASS hologrammed cards; two have ceased trading but are valid for the duration of the card.

 <p><a href="https://www.citizencard.com/">https://www.citizencard.com/</a></p>	 <p><a href="https://www.oneid4u.co.uk/">https://www.oneid4u.co.uk/</a></p>	 <p><a href="https://www.totum.com/proof-of-age-id-card">https://www.totum.com/proof-of-age-id-card</a></p>
 <p><a href="https://www.bracknell-forest.gov.uk/e-card/apply-e-card">https://www.bracknell-forest.gov.uk/e-card/apply-e-card</a></p>	 <p><b>11-26</b> <a href="https://young.scot/the-young-scot-card">https://young.scot/the-young-scot-card</a></p>	
 <p><a href="https://www.milton-keynes.gov.uk/highways-and-transport-hub/bus-and-taxi/bus-passes-and-cards/all-in-1-mk-card-junior-concessionary-travel-scheme">https://www.milton-keynes.gov.uk/highways-and-transport-hub/bus-and-taxi/bus-passes-and-cards/all-in-1-mk-card-junior-concessionary-travel-scheme</a></p>	 <p><a href="https://www.myidcard.co.uk/">https://www.myidcard.co.uk/</a></p>	
 <p>Scheme ended in 2021. Existing cards should be accepted anywhere in the UK.</p>	 <p>Validate UK ceased trading. Existing cards should be accepted anywhere in the UK.</p>	

## 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.

LCCP 3 – Protection of Children and Other Vulnerable Persons (OCP 3.6.2, 3.6.5, 3.6.6)

## COMPLIANCE

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

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

## IT IS STRICT COMPANY POLICY THAT:

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

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

#### LCCP 3.4.1 – Premises-based customer interaction

The company has a detailed Safer Gambling Policy for Slots Venues which supports and expands on the procedure detailed in the MERKUR Slots Compliance Manual.

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

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

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

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

Customer interaction consists of the following 3 parts:

## PROCEDURE

**PART 1 – Identify and observe** – behaviour or activity you have spotted or something the customer tells you.

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

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

**REMEMBER** reporting an Interaction is **NOT** the same as reporting an Incident. An Interaction is a conversation with a customer in regard to their gambling behaviour.

Conversations that have been had with a customer, are not just to be recorded at the point that signs of Gambling Harm have been observed,

they should be a record of the customer's journey with MERKUR as part of Customer Service rounds.

Recording what is considered 'usual' behaviour, will allow all employees to understand when a change is taking place, and interact with and record the conversation at a point before a customer starts to exhibit more severe behaviour.

The above 3 parts may include the following:

- Members of staff are trained as part of their 3-month induction process in the understanding of, and the strict adherence to this policy and accompanying logs.
- In addition to induction training, Safer Gambling Interaction and Evaluation, workshops are held with all senior management, managers, and supervisors within the Slots venues, to ensure they are fully aware of their responsibility in the monitoring and evaluation of Interaction/Conversations which take place in the venue.
- All Customer Interaction/Conversations must be logged on the Smart Tablet and are evaluated by a member of management with additional information or follow up conversation requested should it be felt insufficient information has been recorded.
- Recording a 'general' conversation that has taken place with a customer, in the course of an employee's normal customer Service role, will enable future monitoring and Interaction/Conversations to take place with any customer who starts to show a change in behaviour – whether this is visit frequency, pattern of play or length of time spent in the venue etc.
- For Machine players, machine hosts are trained to observe behaviour and have an Interaction/Conversation with customers where they observe changes in usual behaviour or signs of Gambling Harm.
- All employees are aware of those customers that are frequent visitors or deemed to be regular players. That monitoring and interaction needs to take place with these customers during their visits. An interaction may lead to the Duty Manager having to intervene or take appropriate action, possibly using the Machine Administration Reconciliation System (MARS), which provides the data to review the spend/play on most machines, for those customers deemed to be potentially at risk. Appropriate action would then be taken on a player-by-player basis.
- Behaviors that may be a result of a customer suffering from Gambling Harm may include intense mood swings, aggression, hysteria, remorse, excessive

ATM use, excessive time and money spent, damage to property, violence, or the threat of violence to staff or other customers.

- Employees are aware of where customers can be directed for confidential advice should they be approached by them for help or when they identify signs of gambling harm. This includes the Staying in Control information leaflet which includes GamCare Helpline.
- Employees are trained to guide customers through the process of self-exclusion if they consider a customer is at risk and/or where a customer requests self-exclusion information, this will be fully explained, and T&Cs provided to the customer.
- The Duty Manager may consider refusing service or barring the customer from the premises and, in extreme situations involving aggressive behaviour, contact police for assistance. Any interaction that results in an incident of this type, whether police attend or not must be recorded on the SMART Incident App on IHL tablet.
- If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts employees or other customers in potential danger, the Duty Manager will implement the Company's procedures for dealing with antisocial situations.

# Customer interaction – formal guidance for remote gambling operators

## Formal guidance note under SR Code 3.4.1

---

### 1 Introduction

- Your regulatory responsibilities
- How to use this guidance
- How the Commission will use this guidance

### 2 Identify

#### **Identify – what we expect you to do**

- Identifying the right customers
- Understanding the impact of gambling harms
- Using the right indicators for your business
- Affordability and a customer's personal circumstances
- Vulnerability
- Spotting harmful gambling
- The role of staff

#### **Identify – questions to consider**

### 3 Interact

#### **Interact – what we expect you to do**

- Interacting with the customer
- Tailoring messages for your customers
- Offering help and support
- The role of staff
- Keeping records

#### **Interact – questions to consider**

### 4 Evaluate

#### **Evaluate – what we expect you to do**

- Understanding the impact of individual interactions
- Evaluating the effectiveness of the approach
- The role of staff

#### **Evaluate – questions to consider**

### 5 Summary of research and information

# 1 Introduction

## Your regulatory responsibilities

- 1.1** All licensees are required to interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling, as set out in Social Responsibility Code 3.4.1 of the Licence Conditions and Codes of Practice (LCCP).

### **Social responsibility code provision 3.4.1 (From 31 October 2019) Customer interaction**

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

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

- 1.2** A requirement to LCCP with effect from 31 October 2019 requires licensees to take into account the Commission's guidance on customer interaction. This guidance is structured along the three key outcomes operators will be expected to meet: to **identify – interact – evaluate**.

- 1.3** This guidance sets out why customer interaction is a requirement, makes our expectations clear, and suggests ways you could meet them. This includes learnings from research and some ways that gambling operators have found worked for them and their customers.

## How to use this guidance

- 1.4** The purpose of this guidance is to share knowledge based on research, current practice and lessons learned in order to support licensees in determining how they can meet the outcomes. It sets out why customer interaction is important and makes our expectations clear. Not all of the content of the guidance will be relevant to all operators, but licensees must take it into account and be able to demonstrate how they have done so.
- 1.5** Following the guidance is no guarantee that all customers experiencing or at risk of harm will be identified. The guidance is not the only source of information which operators should use to help them develop their own

processes, and licensees should also keep up to date with published research and other sources.

## **How the Commission will use this guidance**

- 1.6** For compliance and enforcement purposes, we will expect licensees to demonstrate how their policies, procedures and practices meet the required outcomes. This can be through implementing relevant parts of the guidance or demonstrating how and why implementing alternative solutions equally meet the outcomes.
- 1.7** Our understanding of gambling harms and how they manifest is constantly evolving, so for the purposes of raising standards, protecting consumer interests, and preventing harm to consumers, we will update and re-issue guidance where new evidence or risks emerge which may have a meaningful impact on how the outcomes can be met.

## **2 Identify**

### **Identifying the right customers**

- 2.1** You need to know:
- the types of markers and behaviours that could indicate harm relevant to online gambling, and
  - how to spot when those indicators should trigger an interaction.
- 2.2** You need to put together what you know about the customer, with the relevant indicators of harm, to decide whether you need to interact. More knowledge about what to look for, with effective processes for monitoring customer behaviour, can mean quicker and better-informed decisions.
- 2.3** Some indicators of harm, such as high staking behaviour, can look similar to VIP and high-value customer activity. Even if you think the customer can afford it, they may still be experiencing gambling harms. Your enhanced contact with your VIPs means you have many opportunities to get to know them well and make better informed decisions.

#### **Identify – what we expect you to do**

- Use a range of indicators relevant to your business. Do not rely on financial indicators alone. You should use realistic thresholds and trigger points, and remember that not every customer who is experiencing or at risk of harm will trigger every indicator.
- Monitor customer activity so that you are able to interact early and quickly. Invest in systems and staff to manage your customer interaction process effectively.
- Monitor customer accounts from the time that they are opened.
- Make sure your process keeps pace with any increase in demand – through growth, mergers or other internal changes.

- Train your staff to know their roles and responsibilities, and ensure they are supported and able to act promptly when they spot or are alerted to indicators of harm. This includes your VIP teams.
- Aim to minimise the risk of harm for customers, whatever time of day they play, as well as for new customers.
- Take safer gambling seriously for *all* customers, including VIPs, and not let commercial considerations override customer protection. This means your VIP customers get the same level of protection as your other customers.
- Make meaningful records of all interactions with customers. Make these records available to staff and use them to aid decision-making. This should also take place in circumstances where an interaction has been ruled out e.g. because the customer is displaying signs of agitation.
- Even if you think your sector is “lower risk”, *all* forms of gambling present risks and you should understand the prevalence of gambling harms for the type of gambling products you offer and implement appropriate processes.
- Actively promote and encourage the use of gambling management tools to all customers, and in particular where you have carried out a customer interaction. [Research \(Behavioural Insights Team, 2018\)](#) has shown that reducing friction in applying a gambling management tool leads to increased numbers taking it up.

## Understanding the impact of gambling harms

- 2.4** In 2018, the Gambling Commission published [research \(Wardle et al 2018\)](#) on understanding the full range of gambling harms and the impact this can have on society. This research defined gambling harms as ‘*the adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society*’. This can include loss of employment, debt and crime – gambling harms can also have detrimental impacts on physical and mental health and relationships, and at its worst, gambling can contribute to loss of life through suicide.
- 2.5** Gambling harms cannot be solely measured in terms of finance and resources. This is why we expect you to use a range of indicators in order to identify customers who may be experiencing harms.

## Using the right indicators for your business

- 2.6** Change compared with previous gambling activity is a general trigger for customer interaction. Building up your knowledge of your customers is key to helping you spot changes in their behaviour.
- 2.7** You should use a range of indicators based on research, experience and shared practice. The [PWC remote gambling research \(2017\)](#) identified some account and play indicators, but they are not a definitive list. Your list should include:
- a. Time and spend indicators:** amount and frequency of time and deposits, time of day (according to [research \(PWC 2017\)](#), a higher

percentage of overnight gamblers were found to be problem gamblers, than during other times of day), increasing length of sessions or escalation in deposit levels, large losses.

- b. Account indicators:** cancelled withdrawals, failed deposits, multiple or more expensive payment methods, pre-loaded cards and e-wallets which could indicate gambling with money the customer does not have.
- c. Use of gambling management tools:** changing deposit limits, trying to 'switch off' the reverse withdrawal option to prevent re-staking prior to withdrawal, previous self-exclusions, frequent or repeated use of the time out facility or previous customer interactions.
- d. Customer-led contact:** information or hints from customers, frequent complaints about not winning, requests for bonuses following losses, or talking about the negative impacts of their gambling.
- e. Play indicators:** chasing losses, erratic betting patterns, gambling on higher risk products or unusual markets or outcomes on which the customer is unlikely to have been able to make an informed choice. People who bet in-play may place a higher number of bets in a shorter time period than people who bet in other ways, as in-play betting offers more opportunities to bet ([Gambling Commission, In play betting position paper 2016](#)). Some studies have shown that placing a high number of in-play bets can be an indication that a customer is at an increased risk of harm from gambling.
- f. A 'big win' or a windfall:** [research shows](#) (Parke and Parke 2017) high staking following a win could hide or even lead to harmful behaviour. Suddenly having more money than usual can lead to increasing staking, which can lead to harms not associated with wealth or resources.

### **Affordability and a customer's personal circumstances**

- 2.8** Historically, gambling operators have not systematically considered customer affordability when developing their customer interaction policies. Many have used deposit or loss thresholds as a main or sole prompt for a customer interaction, but these have often been set at levels that were inappropriately high, in comparison to the average amount of money that the majority of people have available to spend on leisure activities. This has led to a number of examples of customers spending more than they could afford, and this not being identified sufficiently early, as seen in much of the Commission's compliance and enforcement [casework](#) since 2017.
- 2.9** Operators should aim to identify those experiencing or at risk of harm and intervene to try to reduce harm at the earliest opportunity. Reliance on deposit or loss thresholds that are set too high will result in failing to detect some customers who may be experiencing significant harms associated with their gambling. It is therefore imperative that threshold levels are set appropriately.

- 2.10** Open source data exists which can help operators assess affordability for their GB customer base and improve their risk assessment for customer interactions. Thresholds should be realistic, based on average available income for your customers. This should include the [Office of National Statistics publications](#) on levels of household income.
- 2.11** In considering these thresholds, you should be aware of the difference between 'disposable income' and 'discretionary income' which refers to the amount left *after* living costs are taken into account, but it does still include many other unavoidable costs. Most people would consider it harmful if they were spending a significant amount of their discretionary income on gambling.

## **Vulnerability**

- 2.12** Life events or changes to an individual customer's circumstances may mean that a person becomes more or less vulnerable to experiencing gambling harms. Those circumstances could include bereavement, loss of income or other factors (see below). It will not always be obvious or clear to an operator when such events have occurred, but knowing your customers, and ensuring staff ask questions when there are potential signs of vulnerability, will help to determine whether those individual circumstances present an increased risk.
- 2.13** As part of 'know your customer' and developing customer interaction policies and procedures, operators should consider the factors that might make an individual more vulnerable to experiencing gambling related harm. Factors include:
- **Personal and demographic:** if the individual is experiencing poor physical or mental health, physical or cognitive impairment, suffering side effects from a brain injury or medication or has an addiction.
  - **Situational:** if the individual is experiencing financial difficulties, is homeless, is suffering from domestic or financial abuse, has caring responsibilities, experiences a life change or sudden change in circumstances.
  - **Behavioural:** if an individual has a higher than standard level of trust or high appetite for risk.
  - **Market related:** if an individual is engaged in an activity which is highly complex; that they have a lack of knowledge and/or experience of the market.
  - **Access:** if an individual has difficulty accessing information because of poor literacy or numeracy skills, knowledge, dyslexia.
- 2.14** We have seen examples through our casework of customers who should have received some interaction but did not, including customers who were particularly vulnerable, and more susceptible to experiencing gambling harms.

## Spotting harmful gambling

- 2.15** How you monitor activity depends on your business. Larger operators with more active customers will need comprehensive systems, which could include a mix of automated and manual processes, and should draw on all available sources of data to give a comprehensive picture of the customer's gambling. Options for spotting harmful gambling include:
- In-play real time monitoring to identify harmful behaviour as it occurs.
  - Daily reports on activity.
  - Chatroom monitoring and moderation.
- 2.16** The right information can mean better and quicker decisions. You should aim to integrate your systems so that staff have a more complete picture of the customer's activity, and this includes records of previous customer interactions.
- 2.17** Unmonitored overnight gambling carries an increased risk. [Remote gambling research \(PWC 2017\)](#) found that the highest risk customers were much more likely to gamble overnight than non-problem gamblers. Some operators have full 24-hour dedicated safer gambling monitoring and support, so that customers have the same level of protection overnight as during the day. Another option could be more training and extra responsibilities for customer service staff or chat hosts to provide that support.
- 2.18** Because VIP customers can also experience gambling harms, it is good practice to carry out a safer gambling check when upgrading a customer to VIP status, and to keep this under review. You should also use these opportunities to carry out checks for AML. This could also help you to support customers who have had major wins.

## The role of staff

- 2.19** It is important that all staff receive training so that they are aware of the signs that could indicate that a customer may be experiencing harms associated with gambling. This is not an exhaustive list, but you should ensure that:
- a. Staff are trained to identify the signs of harm and are able to refer back to documents that include the types of behaviour that may trigger customer interaction at an appropriate moment. Staff should know how to escalate a situation if they are unsure or require support.
  - b. Staff understand how indicators of harm could be displayed differently in VIP or 'high value' customers, and know how to spot the signs.
  - c. As a minimum, staff receive training at induction as well as refresher training.

### **Identify – questions to consider**

- *Are you curious about your customers?*
- *Are your indicators relevant to your products and customers?*
- *Do you rely too much on financial indicators like deposit levels or losses?*
- *Do you consider all types of vulnerability?*
- *How do you decide the right level of your thresholds? Do you set your thresholds based on the staff you have to manage the workload, or do you think about what is right for your customers?*
- *Do you take into account all relevant information, and act quickly?*
- *Do all appropriate staff have access to customer interaction records?*
- *How could you assess the risks around new customers? What can you find out about your customers? What protections could you put in place until you know enough about your customers?*
- *Can your monitoring process keep up with demand?*
- *Do you offer the same level of protection for all your customers, no matter how long they have been a customer, what time of day they play, or whether they are VIPs?*
- *Do you track customers across your different platforms and do enough to spot multiple customer accounts?*
- *Is staff training on customer interaction meaningful and engaging?*

## **3 Interact**

- 3.1** When you are concerned that a customer may be experiencing harm, acting early and quickly could help stop or prevent the harm worsening.
- 3.2** For some customers, making them aware of why you are concerned may be enough to prompt them to think and make a change. Some customers will need more support or advice.
- 3.3** Your interactions should have an outcome. Knowing what impact your interaction has had will help you support the customer and help to keep improving your approach. To achieve this, it is vital to keep good records and make them available to staff to inform decisions.

### **Interact – what we expect you to do**

- We expect you to be curious, and if you spot behaviour or vulnerabilities that could indicate harm, to act on it.
- Make all reasonable efforts to make contact and interact with a customer, and find out what impact your interaction had.
- You should choose the type of interaction based on the extent of the potential harm – from automated responses to human contact – and adapt your messaging to try to get the best outcome. You should trial and evaluate

different approaches to achieve this. **Importantly this may include refusing service or ending the business relationship.**

- Think about what information you should give the customer, such as describing the type of behaviour they display or practical help or support where appropriate.

## Interacting with the customer

**3.4** There are a number of ways for you to interact with your customers, including email, telephone calls, live chat or pop-up messages. The best way may depend on the circumstances:

- a. What you need to know from the customer, and what you already know about them.
- b. What information you want to give to the customer.
- c. How urgent it is to make contact.
- d. How many times you have already interacted with the customer.
- e. The outcome you want to achieve.

**3.5** A customer interaction has three parts:

- **Observation** – behaviour or activity you have spotted or something the customer tells you.
- **Action** – contact to prompt the customer to think about their gambling, for you to find out more, and an opportunity for you to offer information or support.
- **Outcome** – what you or the customer did next. In some cases, you may need to monitor the customer's gambling to spot any change which may prompt further action.

## Tailoring messages for your customers

**3.6** You may already target your marketing messages to different customers. You could also use insight about your customers, such as how the customer prefers to contact you, to decide the best way to interact with them about their gambling.

**3.7** [Industry-led research \(Revealing Reality 2017\)](#) shows that messages that get customers to think and make their own decisions based on the information they are given can be more effective than messages that seem to be 'nagging'. [Research \(Auer and Griffiths 2015\)](#) also shows that personalising feedback can also improve the impact it has on customers. You should test different types of messaging to see what works best.

## Offering help and support

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

- 3.9** It is good practice to suspend direct marketing to customers who show signs of harm so that you do not actively encourage them to keep gambling while you consider them to be experiencing or at risk of harm.
- 3.10** If you have difficulty making contact with a customer, you could suspend account access until you are able to interact with them.
- 3.11** A self-assessment questionnaire can help customers think about their own gambling. Their shared responses, alongside their gambling behaviour, can help both you and the customer work out the right kind of help and support they may need.
- 3.12** You will need to direct some customers to information about safer gambling, and/or suggest suitable gambling management tools. You might need to signpost them to sources of help and specialist support from organisations who deal with advice and treatment for problem gambling.
- 3.13** You will need to interact with some customers a number of times. Your records of previous interactions with customers will help you decide how to provide the right help and support.
- 3.14** Feedback from consumers shows that they often respond better to being informed about their behaviour and why, rather than being “told” what to do. But for some customers, and particularly if the behaviour continues to cause concern, you may need to take a more proactive approach. In some cases, you may need to take action for the customer, such as setting limits or refusing service by closing their account.

### **The role of staff**

- 3.15** You should ensure that your staff:
  - a.** understand the types of interaction that could take place and how to interact appropriately e.g. only need a brief intervention may be needed.
  - b.** know the type of help or support to offer, such as information, signposting customers to specialist support or the gambling management tools which are available. These may be the minimum required under the LCCP or the Remote Technical Standards, or tools you offer which go beyond minimum requirements.
  - c.** know the circumstances and process for refusing service to customers, such as by applying limits or closing an account.
  - d.** understand their respective responsibilities and who is designated to carry out customer interactions, if only certain staff members are authorised to interact.
- 3.16** Whilst training on the legislative framework is important, staff also need to be trained on the skills and techniques they need to help them carry out customer interactions, including what to do if a customer becomes distressed.

## Keeping records

**3.17** Good record keeping allows you to demonstrate when and why you have interacted with customers, and helps with ongoing monitoring of customers. You should:

- a. Keep records of all customer interactions, including where an interaction didn't take place, the reasons for this, and how it was followed up.
- b. Make use of and record all relevant sources of information to guide and deliver effective customer interactions, including your records of previous interactions.

**3.18** Good records should include:

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

**3.19** You should also record situations where an interaction was prompted but did not take place, and how you followed that up.

**3.20** In some cases, you will need to monitor the customer's gambling to spot behaviours which could indicate further harm.

### Interact – questions to consider

- *Where concerns arise, are you able to intervene early and engage with a customer?*
- *How do you decide the best way of interacting with a customer? Do you use different methods for different groups of customers?*
- *Do you tailor your method and message depending on the extent of the harm?*
- *Do you know if the customer received and acted on the information you gave?*
- *Have you allocated sufficient resources to be able to interact with customers early and effectively when you have concerns?*

## 4 Evaluate

**4.1** By evaluate, we mean to understand *impact* and *effectiveness* in two ways: did an individual customer interaction have a positive outcome for the customer, and does your overall approach to customer interaction work? To help with the latter, the Responsible Gambling Strategy Board (now known as the Advisory Board for Safer Gambling) published an evaluation protocol in 2016 for the industry to use when designing evaluations. More information on

evaluation and links to the evaluation protocol and other resources can be found via the [National Strategy to Reduce Gambling Harms](#) website.

### **Evaluate – what we expect you to do**

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

### **Understanding the impact of individual interactions**

- 4.2** In this context, by impact we mean *a change in the customer's gambling activity* which could be attributed to the interaction. An important part of this is whether the customer has understood the information or advice you gave.
- 4.3** Not every customer who receives an interaction will require active follow up, but many will. In these cases, follow up activity should be proportionate to the severity or extent of the harm being displayed. This approach will help you target your resources where they are most needed.
- 4.4** Understanding the impact of the interaction on the customer includes being able to look at and compare:
- the behaviour before the interaction.
  - the change in behaviour or prompt for the interaction.
  - how you interacted and what was said or done, and
  - what happened next.
- 4.5** Some ways to work out that impact include:
- a. Did the customer start using gambling management tools; independently or following your advice?
  - b. If you are tracking links from emails, did the customer click through to safer gambling information?
  - c. Was there a positive change in behaviour? Did the customer's gambling seem to change after the interaction?
  - d. You could also follow up and ask the customer whether they found the interaction helpful or not.
  - e. Is there a need for further or follow up action?
- 4.6** You may already quality assure individual customer interactions by spot-checking chat records and emails. As well as checking that customers are getting the right support, this can also identify staff development needs and

highlight good practice that you can share across your business and across the industry.

## Evaluating the effectiveness of the approach

**4.7** Records of interactions provide useful evidence of what types of indicators, methods of interacting and options for support work well for customers. They will help to inform an evaluation of the effectiveness of your overall approach to customer interaction. Good evaluation helps you to understand which aspects of your approach are the most effective at identifying the right customers, and the types of tools or support that work well to help customers manage their gambling in a way that works for them. The following measures could help to work out whether your approach is working well:

- Gambling management tools – increased take up and more customers sticking within their limits.
- Customer retention.
- Reduction in complaints.
- Numbers of customer interactions appear to be in line with the prevalence of gambling harm for the product (see below).

**4.8** Statistics which estimate the numbers of problem and ‘moderate risk’ gamblers are published regularly, based on the [combined health surveys in England, Scotland and Wales \(NatCen 2018\)](#). This data is broken down to gambling activity type, and by region, and can help you to work out the percentage of your customers you should be interacting with. When looking at the potential percentage of your customers who may be experiencing harm, remember to consider the percentage of gamblers participating in that activity and not the percentage of the adult population.

**4.9** Currently the only industry-wide quantitative measure of identifying and interacting with customers who may be experiencing harms associated with gambling is data on the numbers of customers who received an interaction, submitted to the Commission as part of [regulatory returns](#). We have clarified the definitions in regulatory returns to offer guidance on what should be included in a customer interaction (incident) log and make clearer what should be recorded. Your log should include as a minimum:

- the identity or other identifier of the customer involved
- the behaviour or activity that prompted the interaction
- the advice or support given, and
- the outcome of the interaction.

**4.10** Keeping your policies and procedures under review and up to date by taking into account research and industry best practice will help you to identify customers you should be interacting with, which will help you target your resources where they are most needed, in ways which may lead to better outcomes. You should also review your internal controls following the

publication of a regulatory settlement, to address any similar weaknesses which could exist in your own processes.

## The role of staff

**4.11** Your staff have an important role to play to understand whether your approach works, and as a minimum, you should:

- a. Ensure that staff make records of all customer interactions and use them to aid decision making. Such records should be used for evaluation purposes e.g. dip sampling for quality assurance purposes or to assess whether a customer changed their behaviour as the result of an interaction.
- b. Train staff to recognise when follow-up activity to an interaction is required.
- c. Ensure that staff use customer interaction records as a decision-making tool.
- d. Ensure that staff are properly supported in carrying out effective interventions.

### Evaluate – questions to consider

- *Do you know how many of your customers may be experiencing some level of harm associated with gambling?*
- *How do you know you are delivering positive outcomes for your customers?*
- *How could you improve on your policy and procedures? How do you plan to make improvements over time?*
- *How could you share your good practice with the industry?*

## 5 Summary of research and information

[Can behavioural insights be used to reduce risky play in online environments?](#)

(Behavioural Insights Team, 2018)

[A framework for measuring gambling related harms](#) (Gambling Commission, RGSB, GambleAware, 2018)

[Gambling Behaviour in Great Britain in 2016](#) (NatCen, 2017)

[Responsible Gambling: Collaborative Innovation](#) (Revealing Reality, 2017)

[Getting Grounded in Problematic Play](#) (Jonathan Parke and Adrian Parke, 2017)

[Remote Gambling Research](#) (PWC, 2017)

[Testing normative and self-appraisal feedback in an online slot-machine pop-up in a real-world setting](#) (Auer and Griffiths, 2015)

[Office for National Statistics household income data](#) (ONS, 2017)

Further information on research to inform action will be made available on [www.reducinggamblingharms.org](http://www.reducinggamblingharms.org)

July 2019

---

Making gambling fairer and safer

[www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

Whilst most customers are able to enjoy and manage their gambling, MERKUR Slots recognises it has a duty of care to those who struggle to manage their gambling and may be experiencing harm from gambling. Accordingly, we provide a self-exclusion facility for those customers that wish to request an exclusion for a fixed period of time, which is for a minimum of not less than 6 months, nor more than 12 months, with the customer, on request, having the option to extend one or more periods for a further 6 months each.

LCCP 3.5 – Self-exclusion

3.5.1 – Self-exclusion – non remote SR code

3.5.2 – Self-exclusion non-remote ordinary code

3.5.6 – multi-operator non-remote SR code

3.5.7 – multi-operator non-remote ordinary code

Self-exclusion social responsibility code provision 3.5.1 is a condition of our Operating Licence under the Licence Conditions and Codes of Practice – (LCCP). New regulations were implemented by the Gambling Commission (LCCP Self-exclusion 3.5.1) and as from 6th April 2016, all gaming operators must be part of a multi operator self-exclusion scheme, referred to as MOSES.

**If a customer wishes to self-exclude this can be actioned immediately by a member of the MERKUR Slots venue team via the Smart Exclusion App on the IHL Tablet.**

Please note you will need a Wi-Fi connection in order to access the Smart Tablet.

## **PROCEDURE – Using the Smart Exclusion Tablet**

When a customer has requested that they wish to be refused entry to our premises, the customer and the member of staff will formally acknowledge and document their request on the Smart Exclusion tablet. For further information please refer to the “Smart Exclusion User Guide” available at the venue.

### **Self-exclusion is sector specific: –**

- **AGC Licensed Premises** – 1km exclusion zone
- **BINGO Licensed Premises ‘Traditional Bingo Clubs’** – National exclusion zone.
- **BINGO Licensed Premises ‘High Street’** – 1km exclusion zone.

The premise licence is displayed on the Information Board at the venue entrance and details the premises as having a HIGH STREET BINGO or AGC License and lists any specific conditions attached to the license. The IHL tablet is set by default to the appropriate license. Employees will need to explain to all customers who wish to self-exclude, that it is sector specific and that they need to visit other establishments in their local area if they frequent other premises operating Bingo, AGC, Licensed Betting Shops and Casinos licenses, in order for them to self-exclude from ALL gambling premises.

**Please Note:** the employee dealing with the self-exclusion process should make the customer aware that if they self-exclude from a High Street Bingo Premise Licence, they will be self-excluded from all Traditional Bingo clubs in the UK.

The customer must be informed that this self-exclusion does not Include MERKUR Slots on-line (MERKURslots.com or MERKURcasino.com). The above is detailed in the Self-exclusion Terms & Conditions - the customer will receive a copy upon activation of their self-exclusion - a copy of these are held in the Compliance and Social Responsibility Manual.

The customer will be asked to assist us in applying the exclusion by allowing you to take an up-to-date photograph. The Smart Exclusion tablet has a built-in web cam for this purpose. You will be prompted by the on-screen instructions when to take a photo of the customer during the self-exclusion process. **A photo is a mandatory requirement. The photo should be taken of head and shoulders and must be forward facing - please ensure the background is light so the image is clear. Do not use a photo of a photo or ID document.**

The employee will confirm the customer's exclusion for a minimum period of not less than six months, nor more than 12 months.

**It must be made clear to the customer that they may not revoke the self-exclusion during this time and that they are entering a voluntary agreement.**

Once the customer has entered their electronic signature on the tablet and the self-exclusion is confirmed, the information will be retained on the tablet at the venue and an electronic notification will be sent to other relevant licensed premises.

Any customer held on the membership system that chooses to self-exclude will be removed from all marketing activity during their self-exclusion period.

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

Please note on the photo gallery,

- Exclusions which are live have no coloured border.
- Exclusions which are in the 6 months 'cooling off' period have a **RED** border. These photos will remain on the tablet for 6 months. If the customer does not return to gambling within the 6 months period, the photo will automatically disappear and be archived (with the exception of Traditional Bingo Clubs who retain the details for a longer period of time unless the customer reinstates).
- Exclusions in the 24 hours 'cooling off period have a **BLUE** border. This will be visible for customers who have reinstated and wish to resume gambling and will disappear after the 24-hour period.

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

A red rectangular button with the text "REPORT BREACH" in white capital letters.

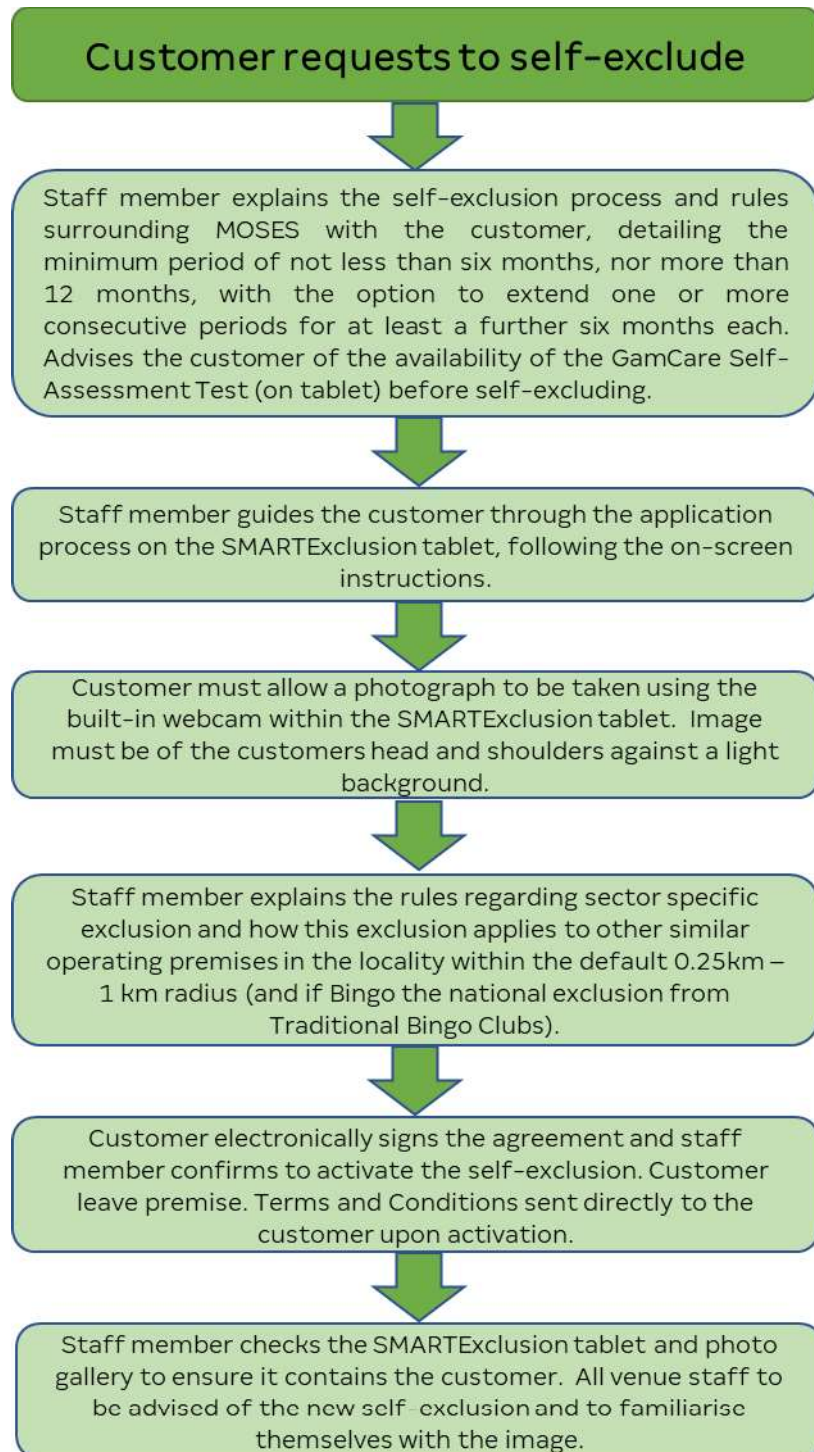
When the self-exclusion period ends, a customer has the option to return to gambling. **The customer should return to the venue where they originally self-excluded from, to complete the re-instatement process on the tablet.** This button will be visible on the tablet only after the end date of the self-exclusion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

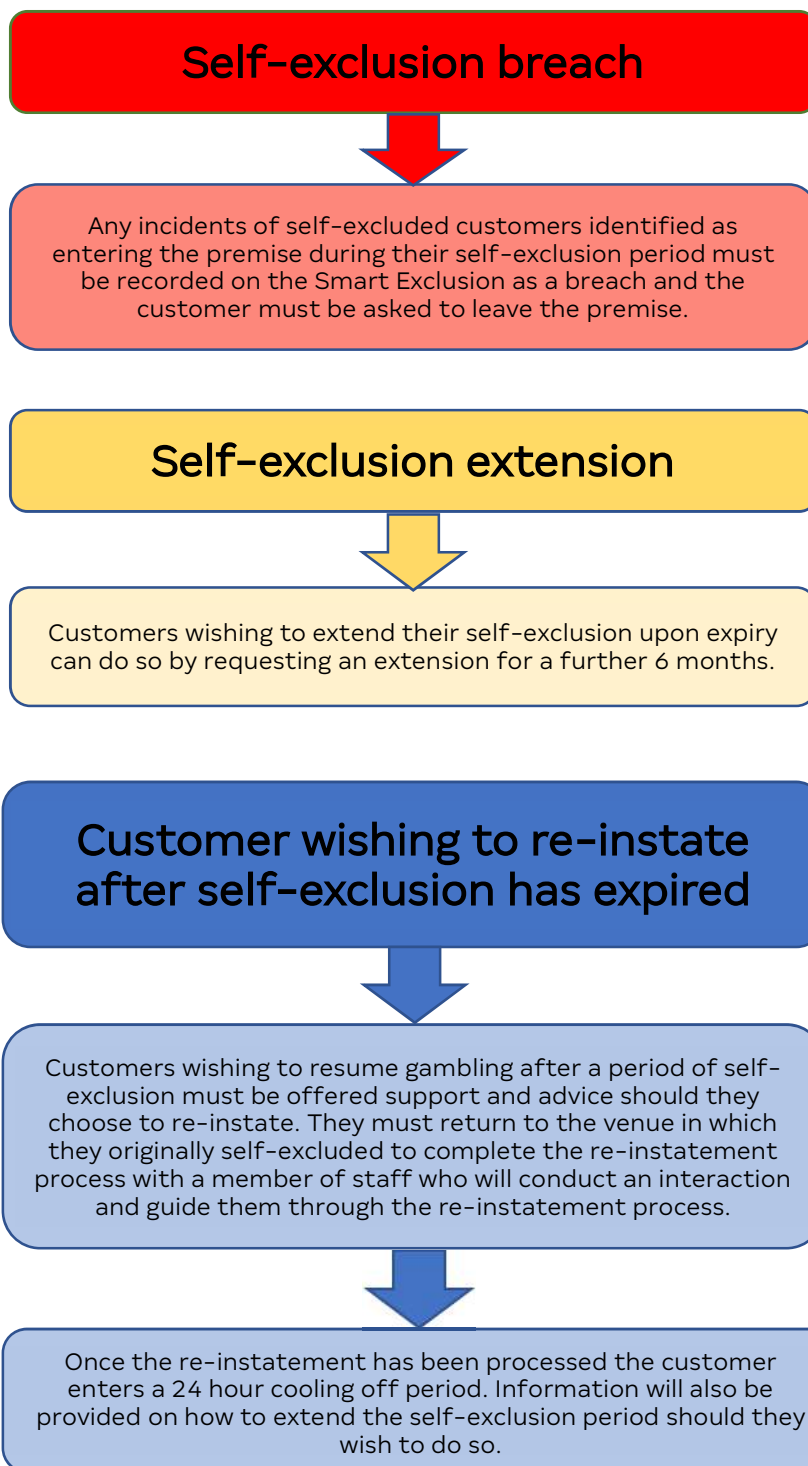
A green rectangular button with the text "REINSTATE CUSTOMER" in white capital letters.

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

A yellow rectangular button with the text "EXTEND EXCLUSION" in black capital letters.

## SELF EXCLUSION PROCEDURE FLOWCHART





For full operating instructions for the Smart Exclusion tablet please refer to the Smart Exclusion User Guide available in the Compliance Manual at your venue.

## **TABLET - STAFF TRAINING**

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

First Name: **dummy**

Last Name: **test**

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

## **Smart Tablet malfunction**

If for any reason your Smart Tablet is unavailable for use due to malfunction, please contact IT Support immediately who will investigate and resolve the issue.  
[ITSupport@MERKUR-casino.com](mailto:ITSupport@MERKUR-casino.com)

Should a customer wish to self-exclude and your tablet is not available due to malfunction please complete the Manual Self-Exclusion request form with the customer and send immediately to [Compliance\\_UK@merkur-casino.com](mailto:Compliance_UK@merkur-casino.com) a member of Compliance will contact the customer for an image and ID Verification to activate the self-exclusion.

Smart Tablet theft – please contact IT Support immediately who will ensure the tablet is deactivated and a replacement arranged.

# Terms and Conditions

---

Welcome to SmartEXCLUSION – Please note, if you selected to be excluded from an Adult Gaming Centre (AGC), High Street, MSA/Airport or Holiday park or Bingo High Street or Holiday Park then your exclusion data is currently shared with the operators using SmartEXCLUSION. A list of Operators and their trading names can be found here [Operator listing \(/operator\\_listing\)](#). There may be other operators in the chosen exclusion zone(s) who are not signed up to the scheme.



## The AGC Industry Self-Exclusion Scheme - SmartEXCLUSION

Anyone wishing to engage in self-exclusion from gambling premises does so of their own volition. By engaging in the self-exclusion process, self-excluders are agreeing to abide by the terms and conditions of that process hereunder;

1. The self-excluder will determine which gambling premises they wish to be self-excluded from.
2. The self-exclusion system will notify all other venues selected by the self-excluder of their inclusion.
3. The self-excluder will determine how long the self-exclusion period lasts; between a minimum of 6 x months and a maximum of 12 x months.
4. Once the self-exclusion request is registered with SmartEXCLUSION, the excluder cannot terminate the self-exclusion before the selected date of expiry.
5. Self-exclusion will continue to be effective for a further 6 x months after the selected expiry date unless the self-excluder informs the SmartEXCLUSION system at the end of the core expiry period that they no longer wish to be self-excluded. If and when they do, a 24 hour 'cooling off' period will elapse before reinstatement can become effective and gambling activity can take place again.
6. During the self-exclusion period employees working in the selected gambling premises will endeavour to identify all self-excluders and prevent them from breaching their self-exclusion, but this cannot be guaranteed. If a self-excluder successfully and/or purposely gains access to gambling premises from which they have self-excluded there is no responsibility or obligations upon the operators of that premise for any actions of the self-excluder whilst on those premises.
7. In the event that a self-excluder enters a selected gambling premise during the self-exclusion period they will be required to leave the premise immediately. Self-excluders in breach of these terms will, if necessary, be removed by the use of reasonable force.
8. The self-excluder can only be self-excluded from land bases premises and not from UK online gambling platforms. The self-exclusion scheme for online operators can be found at [www.gamstop.co.uk](http://www.gamstop.co.uk). By completing the self-exclusion via Gamstop the system will notify all online gambling companies licences in Great Britain of their inclusion. Any withdrawable funds will be returned to you following the online operator's policies.

SmartEXCLUSION includes a register of individuals who have chosen to self-exclude from entering specific gambling premises. In order to support the individual with their self-exclusion, staff working in those gambling premises need to be able to identify the excluder and to notify other selected gambling premises using the information they have provided.

1. The self-excluder will provide the following information, where applicable, to be recorded onto SmartEXCLUSION;
  - A passport style photograph, which can be taken at the point of self-exclusion in the premises.
  - Vehicle details including registration number.
  - Confirmation of home address
  - Mobile number or Email address



All self-exclusion registrations and the details provided will be recorded onto a database maintained by SmartEXCLUSION.

**405**

3. Personal details and a photograph will be kept by SmartEXCLUSION and used by selected participating AGC's to support the exclusion.
4. In order to support self-excluders to maintain their exclusion, photographs will be available and displayed on tablet devices in the selected premises to help with observation and detection. However, it is the sole responsibility of the self-excluder to refrain from entering any of the selected premises for the duration of the self-exclusion period.
5. The details of all self-exclusions will be retained by SmartEXCLUSION for a period of up to three years beyond the expiry of the self-exclusion period.
6. SmartEXCLUSION has a legal obligation to record and report all interactions with self-excluders, including breaches or attempted breaches. These records have to be made available to those gambling premises selected during registration, and also to the UK Gambling Commission.

**The Operators of SmartEXCLUSION and the gambling premises selected for the purpose of self-exclusion will take all reasonable steps to refuse admittance or otherwise prevent self-excluders from gambling. However, it is the responsibility of the self-excluder to ensure that they do not enter any gambling premises, or ask anyone to gamble on their behalf during the self-exclusion period.**

### Retention of Winnings

You acknowledge and agree that in the event that you breach or circumvent your self-exclusion request during your self-exclusion period you will not be entitled to receive winnings.

### Deposited Funds

If you have any funds deposited on any electronic device on the premises at which you have self-excluded, these will be returned to you in accordance with the operator's usual policies.

### Data Protection

I acknowledge that in order to process my request for self-exclusion I may be required to disclose personal details about me, including providing a photograph. I will be asked for sensitive personal data about my decision to self-exclude and the reason for reaching it. SmartEXCLUSION and its members may make use of NON personal data for the purpose of statistical analysis on problem gambling, which may be shared with governing bodies like the Gambling Commission and Responsible Gambling Trust. Neither SmartEXCLUSION nor its members will share or sell personal data to third parties.



## The Bingo Industry Self-Exclusion Scheme



### Your Commitment to Self-Exclusion

By requesting to proceed with the self-exclusion process, you agree to provide full and accurate personal details, now and in the future, to enable bingo operators who are members of The Bingo Association (BA) to prevent you from accessing and/or gambling on their premises. A list of premises which are part of this self-exclusion scheme can be found on The Bingo Association's website: [www.bingo-association.co.uk](http://www.bingo-association.co.uk) (<http://www.bingo-association.co.uk>)

Some members of The Bingo Association operate a self-exclusion scheme based on locality which may include other gambling sectors, these premises are identifiable on the list on the BA website.

The details relating to your self-exclusion and any image provided will be held on the BA's self-exclusion non-public secure database for the duration of your self-exclusion. Reasonable checks and safeguards will be undertaken to ensure that whilst you are self-excluded, you cannot access or gamble at any BA member premises.

Once you have requested self-exclusion, BA members will use all reasonable endeavours to comply with your self-exclusion request. However, by signing the self-exclusion agreement you also declare and accept that you are responsible for your actions and will not seek to circumvent your request to self-exclude by attempting to gain access to or gamble at any BA member premises or to use any online gambling service that you have similarly requested self-exclusion from during this application process.

Accordingly, the BA, the operator of the bingo premises at which you have submitted your request to self-exclude and all other members of the BA accept no responsibility or liability for any consequences or losses, however caused, that you may suffer or incur:

- If you continue to gamble
- If you have provided misleading, inaccurate or incomplete details
- If you successfully circumvent your self-exclusion

### Retention of Winnings

You acknowledge and agree that in the event that you breach or circumvent your self-exclusion request during your self-exclusion period you will not be entitled to receive winnings which may, at the discretion of the BA and/or the operator of the premises at which you breach your self-exclusion, be re-distributed to other players at the club or be given to a charity.

### Deposited Funds



**407**

If you have any funds deposited on any electronic device on the premises at which you have self-excluded, these will be returned to you in accordance with the Club's usual policies.

### Processing your request

The premises from which you self-exclude will take reasonable steps to promptly process your self-exclusion request and to notify the BA and other BA members of your decision. You should be aware however, that it may take up to seven days for other bingo companies to implement similar changes to their systems. You acknowledge and agree that neither the BA nor the premises from which you initiated your self-exclusion nor any other BA member will be held liable to you or any third party, if you successfully breach or circumvent your self-exclusion request or if any marketing material gets sent to you.

### Online Self-Exclusion

Self-Excluding in a Bingo licensed venue does not exclude you from UK online gambling sites. The self-exclusion scheme for online operators can be found at [www.gamstop.co.uk](http://www.gamstop.co.uk). By completing the self-exclusion via Gamstop the system will notify all online gambling companies licensed in Great Britain of their inclusion. Any withdrawable funds will be returned to you following the online operator's policies.

### Counselling and Support Services

Problem gambling information will be available to you at your self-exclusion interview. The BA also provides factsheets within The Bingo Association's Operators' Handbook with details of a selection of national counselling and support services. Please ask the Duty Manager of the premises where you self-excluded if you wish to receive these factsheets.

GamCare is the national association for gambling care, educational resources and training and provides information, advice and counselling to individuals, their family and friends, who have concerns about problem gambling. The Helpline number for GamCare is 0808 8020 133 (tel:08088020133) and their e-mail address is: [info@gamcare.org.uk](mailto:info@gamcare.org.uk) (<mailto:info@gamcare.org.uk>). Help can also be found on the gambleaware website: [www.gambleaware.co.uk](http://www.gambleaware.co.uk) (<http://www.gambleaware.co.uk>)

### Reinstatement

You will not under any circumstances be permitted to terminate your self-exclusion agreement before the end of the period that you have applied for. At the end of your self-exclusion period, including any extension to the period that you may subsequently make, the self-exclusion remains in place for a further six months unless you take positive action in order to gamble again. To do this, you must complete the Reinstatement Request Form. You may make this request at the end of your period of self-exclusion or at any time during the six month period following this. Once a request to reinstate has been received by a club, a 24 hour cooling-off period will be enforced.

If you do not request re-instatement, your period of self-exclusion lapses on the expiry of six months after your self-exclusion agreement ends. You may then be able to gamble again, should you choose. Nevertheless, some companies may additionally and independently ask you to formally request reinstatement if your self-exclusion has lapsed. No marketing material will be sent to you unless you request it as part of the reinstatement process.



I acknowledge that in order to process my request for self-exclusion I may be required to disclose personal details about me, including providing a photograph. I will be asked for sensitive personal data about my decision to self-exclude and the reason for reaching it. The BA and its members may make use of NON personal data for the purpose of statistical analysis on problem gambling, which may be shared with governing bodies like the Gambling Commission and Responsible Gambling Trust. Neither the BA nor its members will share or sell personal data to third parties.



**MANUAL SELF-EXCLUSION REQUEST FORM** (Only to be used should the SMART Tablet malfunction)

Site Name: .....

Site Address: .....

Customer Name: .....

Customer Date of Birth: .....

Customer Address: .....

.....

.....

Customer Mobile Number: .....

Customer Email Address: .....

Start Date: .....

I request that I be refused entry to the following MERKUR SLOTS venues:

.....

.....

.....

.....

for a period of 6 or 12 months\* (Customer to specify) \*..... (minimum six months/maximum 12 months)  
from the date of signing and acknowledge that I am not allowed to rescind my self-exclusion during this period.

I understand that I will be contacted within 24 hours to provide a photograph of myself and further ID verification for GDPR purposes to enable the self-exclusion to be activated.

Signed : ..... (Customer) Date: .....

Witnessed : ..... (Duty Manager) Date: .....

Upon completion of the above verification this self-exclusion application will be entered onto our IHL SMART Exclusion system and the Terms and Conditions of the self-exclusion agreement will be sent directly to confirm activation.

You will be contacted within 24 hours by a member of the Compliance department to complete your self-exclusion if you have not been contacted within 24 hours contact us via MERKUR Customer Care  
<https://customercare.merkurcasinouk.com/index.php>

Once the term has elapsed (minimum 6 months/maximum 12 months), the customer needs to inform the Duty Manager that they wish to re-instate. The customer must then wait a further 24 hour period before they are permitted to gamble.

**OFFICE USE ONLY**

**Instructions: To be completed by the Duty Manager:**

- Hand a copy of this completed form to the customer
- Scan/email a copy to the Head of Compliance
- DO NOT obtain photographs or retain copies of ID documentation
- The original copy must be retained securely then shredded once Self-Exclusion is active on the SMART Tablet

# Free Multi Operator/National Self-Exclusion Schemes

This page provides a brief explanation of the multi operator gambling self-exclusion schemes that are available for free to people in Great Britain.



## Online Gambling (via websites/apps)

GAMSTOP helps you put controls in place to restrict your online gambling activities. Once registered, you will be prevented from using any gambling websites and apps run by companies licensed in Great Britain, for a period of your choosing.

[www.gamstop.co.uk](http://www.gamstop.co.uk)

## Land Based Gambling (in premises)



### Betting Shops

Call the MOSES help line to self-exclude from multiple bookmakers in your area.

**Freephone: 0800 294 2060**

[www.self-exclusion.co.uk](http://www.self-exclusion.co.uk)



### Casinos

SENSE self-exclusion programme offers self-exclusion from all licensed land based casinos in Great Britain. Register in person anytime at a casino venue or to enrol by email contact

[info@sensescheme.com](mailto:info@sensescheme.com)

[www.sensescheme.com](http://www.sensescheme.com)



### Bingo Premises

The Bingo Industry Self-Exclusion Scheme (BISES) offers self-exclusion from all licensed land-based bingo premises across Great Britain. You can register either in-person at a licensed bingo venue or by telephoning the venue directly.

[www.bingo-association.co.uk/self-exclusion](http://www.bingo-association.co.uk/self-exclusion)



### Adult Gaming Centres/High Street Arcades/ Motorway Service Areas/ Family Entertainment Centres

If you want to self-exclude from one or more Adult Gaming Centres, High Street Arcades, Motorway Service Areas and Family Entertainment Centres with age-controlled sections in your area for up to 12 months, you can do so in person at the venue, by telephoning the venue or by telephoning BACTA on 020 3930 9769 Monday to Friday between 9am and 5pm.

[www.bacta.org.uk/self-exclusion](http://www.bacta.org.uk/self-exclusion)



### High Street Bingo/Motorway Service Areas/Holiday Parks

If you would like to self-exclude from High Street Bingo premises, Adult Gaming Centres, or both at once, you can do so using SmartEXCLUSION. This is easy to do in person at a premises or by calling our support line on 0844 884 3433.

[www.selfexclusion.com](http://www.selfexclusion.com)

## SOCIAL RESPONSIBILITY & CODES OF PRACTICE LOGS



**Age Verification app** – all ID checks for customer(s) you suspect being under the age of 25 are to be recorded on the tablet (remember we operate a Think 25 policy).



**SmartINTERACTION app** – If you are approached by a customer, or you instigate a conversation with regards to “AT RISK” customers who may have a **gambling problem**, if you offer a “Staying In Control” Leaflet, and discussions regarding self-exclusion, you need to record the incident on the tablet.



**SmartINCIDENT App** – the app should be used to record all incident types 1-6 as listed below. You can view this information by selecting “View Incidents” and “Incident Type” on the tablet.

Listed below are the incident types on the tablet. Further information can be recorded by selecting the drop-down box.

Incident Types:

1. Incident relating to aggressive behavior.
2. Incident relating to barred or previously barred customer.
3. Incident relating to alcohol.
4. Incident relating to drugs.
5. Incident relating to disturbance inside / outside / near premises.
6. Venue Staff Training (Training Only).



**SmartEXCLUSION** On the Smart tablet, is to be completed if a customer wishes to self-exclude. Ensure all staff check the tablet daily at the start of each shift to familiarise themselves with any new photos which will appear in the top left-hand corner of the photo carousel for new self-excluded customers, as the tablet will update automatically each day! Please refer to the Self Exclusion Policy page 7.4 in the Compliance folder for staff training information.

A copy of all User Guides for the tablet are available in your Venue Floor Folder for reference purposes.

You can also view and download these documents on Upskill > Knowledge Base > Categories.

ACRONYM ABBREVIATION	MEANING	COMPLIANCE & SOCIAL RESPONSIBILITY DEFINITION
ADR	ALTERNATIVE DISPUTE RESOLUTION	If we are unable to resolve a customer complaint internally within our organisation, we would use the services of a "Alternative Dispute Resolution" provider. (See details below regarding our ADR provider IBAS).
AML	ANTI MONEY LAUNDERING	As a company we have to have procedures and policies in place to prevent anti money laundering and terrorist financing within our business. A new electronic AML button is now available on the IHL Tablet for reporting incidents of £50 or more of stained notes/dyed notes/foreign coins.
AML OFFICER	ANTI MONEY LAUNDERING OFFICER	Our Licence conditions and codes of practice state that we have an appointed Anti Money Laundering Officer. The appointed officer is: AMANDA KIERNAN Email: akiernan@merkur-casino.com
BCAP	BROADCAST COMMITTEE OF ADVERTISING PRACTICE	As a company we have to comply with the advertising codes of practice issued by the Broadcast Committee of Advertising Practice. The code applies to the way in which we advertise gambling facilities and services. We are not allowed to use images of a child or young person and no-one who is, or appears to be, under the age of 25 years of age. This includes being compliant with what we broadcast on electronic TV screens which are installed in some venues.
CAP	COMMITTEE OF ADVERTISING PRACTICE	As a company we have to comply with the advertising codes of practice issued by the Committee of Advertising Practice. The code applies to the way in which we advertise gambling facilities and services. We are not allowed to use images of a child or young person and no-one who is, or appears to be, under the age of 25 years of age.
IBAS	INDEPENDENT BETTING ADJUDICATION SERVICES	IBAS are the external company who provide " <a href="#">Alternative Dispute Resolution</a> " (ADR) services, whereby we are unable to resolve a customer complaint. Details are available on the Complaints & Disputes Policy leaflet available in your Compliance folder/staff area. Address details: Independent Betting Adjudication Services, P.O. Box 62639, London, EC3P 3AS
LCCP	LICENCE CONDITIONS & CODES OF PRACTICE	All UK licensees have to abide by the rules and regulations of the Licence Conditions & Codes of Practice. The document is issued by the Gambling Commission who regulate the UK Gaming industry. New regulations have to be sanctioned by Central Government and the "Department of Culture Media & Sport" (DCMS) and agreed with the Gambling Commission.
MOSES	MULTI OPERATOR SELF EXCLUSION SCHEME	Multi Operator Self Exclusion Scheme came into effect on 6th April 2016. UK gaming operators have to use the scheme to allow customers to self-exclude from gaming premises. The scheme is sector specific i.e. AGC, Bingo, Licensed Betting Office and Casinos.
POCA	PROCEEDS OF CRIME ACT (2002)	Proceeds of Crime Act 2002 allows the authorities to enforce the law and prosecute criminals whereby criminal activity such as money laundering is taking place in gaming establishments. The authorities have the power to prosecute criminals which could lead to heavy fines and imprisonment!
TITO	TICKET IN TICKET OUT	TITO technology allows a player to insert cash into a machine to commence play. They then have the option to collect the credited amount, which is printed via a ticket. The ticket can be inserted into another machine with TITO, or redeemed for cash at a cash redemption machine or cash counter.

All venue have a Premises Licence which allows them to operate machines and Bingo, if it is a Bingo licence. A copy of the licence must be displayed at the front of the venue on the Information Board.

Licenses are issued by the Local Authority Licensing Department.

All premise licences contain 'mandatory licence conditions' detailing how the premise must be operated and some may contain 'special conditions' such as opening hours specific to that premise.

It is the Manager's responsibility to adhere to the conditions applied to the premise licence.

All venues must have a Local Area Risk Assessment (LARA), produced as part of the Initial Licence Application, or for venues opened before 2017, as part of the requirement introduced by the Gambling Commission.

#### LCCP 10.1 – Assessing Local Risk

The LARA is unique to the venue and surrounding area and must record any local risks that are relevant to the venue operation.

The LARA must be reviewed annually and updated in-line with any changes in and around the surrounding area. Any changes to the identified risks in the local area must be communicated to the Compliance Department.

[Compliance\\_UK@merkur-casino.com](mailto:Compliance_UK@merkur-casino.com)

The LARA must be made available to any Local Authority, Gambling Commission or Police Officer upon request.

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.

Under the Statutory powers of inspection under the Gambling Act 2005 (information note 2017) local authority authorised personnel are lawfully permitted to enter our venues to deal with legal compliance and to investigate suspected offences.

*Inspect gambling: Under s.307 authorised persons may enter a premises if they reasonably suspect that facilities for gambling are being provided, are about to be provided, or have been provided on the premises. Similarly, an authorised person may enter to determine whether an operating or premises licence is held in respect of the provision of facilities for gambling, and to determine whether facilities are being, will be or have been provided in accordance with the terms and conditions of an operating licence or premises licence.*

The Company acknowledges its obligation to ensure that employees co-operate with the Local Council Authority Compliance Officers in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises.

- Local Authorities will conduct premise inspections, these may be announced or unannounced visits.
- Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating license or premises license is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating/premise license.
- The powers of a compliance officer or authorised person can include inspection of any part of the premises or any machine, anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions.
- The appointed Manager will be informed immediately a Local Authority Compliance Officer identifies himself on the premises and will attend to the Officer without undue delay. Staff will co-operate at all times with the Compliance Officer.
- The enforcement officer or authorised person must provide evidence of his identify and authority.
- The visitor must also be requested to sign into the visitor's logbook.
- It is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

It is essential the below are in place at all times:

- Premise Licence on display.
- Local Area Risk Assessment (LARA) available – any significant changes within your local area should be reported to [AKiernan@merkur-casino.com](mailto:AKiernan@merkur-casino.com).
- B3 machine ratios are maintained at all times and machines are available for use.
- BACTA or Bingo Association Certificates. Please contact [AKiernan@merkur-casino.com](mailto:AKiernan@merkur-casino.com).

Examples of Premise Inspection templates can be found in the Social Responsibility and Compliance Manual.

12.1 Bingo Inspection Guide

12.2 AGC Inspection Guide

12.3 FEC Inspection Guide

12.4 Unlicensed FEC Inspection Guide

Any visits by a Local Authority Compliance Officer must be reported to your Area Manager and Amanda Kiernan, Head of Compliance – any supporting documents/visit reports to be copied to [Compliance\\_UK@merkur-casino.com](mailto:Compliance_UK@merkur-casino.com)



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

## Inspection guide – Bingo

Premises name and address	
Premises person(s) present	
Authorised Officer(s)	
Signature of Authorised Officer(s)	
Date and time of the assessment	
	Please tick sections completed
1. Pre-Assessment	
2. Visual Assessment	
3. Operator Policies - Protection of Children	
4. Operator Policies – Customer Interaction	
5. Additional Questions	
6. Action Points	

### 1) Pre-assessment





Establishing compliance with these provisions may require prior knowledge/ preparation


<p><b>1.1) Relevant when assessing policies for preventing Under Age Gambling (SRCP 3.2)</b>  <b>(England and Wales only) Has the operator formed a Primary Authority partnership with another Local Authority? If so, who is the Primary Authority?</b></p>	<p>Primary Authority Name:</p>
<p> If the operator has agreed a National Inspection Plan or primary authority advice in place, officers do not need to review policies and procedures relating to age verification. However, they are encouraged to ask questions/ test knowledge to check that children are protected from being harmed or exploited by gambling.</p>	
<p> A list of current Primary Authority Partnerships relating to gambling operators is available on the Gambling Commission website</p>	
<p><b>1.2) Reviewing the following documents may be useful when preparing for an assessment:</b></p> <ul style="list-style-type: none"> <li>• <b>The premises licence and any attached conditions</b></li> <li>• <b>The premises plan attached to the licence</b></li> <li>• <b>The operator's Local Risk Assessment (if a copy has been submitted to you)</b></li> </ul>	

## 2) Visual Assessment




Compliance with these provisions can usually be established through a visual assessment, but may require further information from staff members

<b>2.1) Gaming Machines in Gambling Premises (SRCP 9.1.1)</b>			
<b>Could a customer be reasonably expected to recognise that the premises is licensed for bingo?</b>	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<b>Are there substantive facilities for non-remote bingo available in the premises?</b>	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<b>Is there appropriate supervision of gambling activities at all times?</b>	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<b>2.2) Plan (MC - SI 2007 / 1409/SSI 2007/266)</b>			
<b>Does the plan match the layout of the premises?</b>	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<div style="display: flex; align-items: flex-start;"> <div style="margin-right: 10px;"> </div> <div> <p>Plans must include: the boundary of the premises, external and internal walls, points of exit and entry (plus a description of where exit leads to and entry leads from). A variation application (s.187 of the Gambling Act 2005), along with an updated Local Risk Assessment, will be required if there has been a 'material change' to the layout since the licence was last issued.</p> </div> </div> <div style="display: flex; align-items: flex-start; margin-top: 5px;"> <div style="margin-right: 10px;"> </div> <div> <p>Any gaming machines authorised by the premises licence must be located within the licensed area shown on the plan.</p> </div> </div>			
<b>2.3) Premises Summary Display (MC – SI 2007 / 1409/SSI 2007/266)</b>			
<b>Is a summary of the premises licence displayed in a prominent place within the premises?</b>	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<b>2.4) Under 18 Notices (MC - SI 2007 / 1409/SSI 2007/266)</b>			
<b>Is there a notice stating that no person under the age of 18 is permitted to play bingo on the premises and is the notice displayed in a prominent place at every entrance?</b>	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<b>2.5) Rules of Variants of Bingo and Prize Gaming (SRCP 4 and MC - SI 2007 / 1409/SSI 2007/266)</b>			
<b>Are the rules about each variant of bingo and any prize gaming made available?</b>	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<b>Are the rules of each type of game available to customers within the premises by either displaying a sign, making leaflets or other written material available, or running an audio-visual guide prior to any game commencing?</b>			
<b>2.6) Admission Charge (MC - SI 2007 / 1409/SSI 2007/266)</b>			
<b>If there is an admission charge, is there a notice of this charge displayed in a prominent place at the principal entrance to the premises?</b>	Yes/ N/A	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<b>2.7) Notice of Other Charges (MC - SI 2007 / 1409/SSI 2007/266)</b>			
<b>If there are any other charges in respect of the gaming, is there a notice displayed at the main point where payment is made which sets out these charges?</b>	Yes/ N/A	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<div style="display: flex; align-items: flex-start;"> <div style="margin-right: 10px;"> </div> <div> <p>Notices of other charges must include the cost (in money) of each game card or set of game cards payable in respect of the game of bingo and the amount that will be charged by way of a participation fee. There should also be in the notice a statement that all/part of the participation fee may be waived at the discretion of the person charging it. This notice can be displayed in electronic form.</p> </div> </div>			

<p><u>2.8) Problem Gambling Materials (SRCP 3.3)</u>  <b>Is information readily available to customers on how to gamble responsibly and seek help in respect of problem gambling?</b>  Things to consider and evidence:</p>	<table border="1"> <tr> <td>Yes</td> <td>0</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Improvement Needed</td> <td>5</td> <td><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>10</td> <td><input type="checkbox"/></td> </tr> </table>	Yes	0	<input type="checkbox"/>	Improvement Needed	5	<input type="checkbox"/>	No	10	<input type="checkbox"/>
Yes	0	<input type="checkbox"/>								
Improvement Needed	5	<input type="checkbox"/>								
No	10	<input type="checkbox"/>								
<p>Is information displayed prominently on posters appropriate to the size and layout of the premises? <input type="checkbox"/></p>										
<p>Is information contained in leaflets that may be taken away or through the use of links for online or smart technology? <input type="checkbox"/></p>										
<p>Can information be obtained by customers discreetly? <input type="checkbox"/></p>										
<p><u>2.9) Lottery Tickets (MC - SI 2007 / 1409/SSI 2007/266)</u>  <b>Is the premises being used to sell tickets for a lottery?</b></p>	<table border="1"> <tr> <td>Yes</td> <td>10</td> <td><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>0</td> <td><input type="checkbox"/></td> </tr> </table>		Yes	10	<input type="checkbox"/>	No	0	<input type="checkbox"/>		
Yes	10	<input type="checkbox"/>								
No	0	<input type="checkbox"/>								
<p> The mandatory conditions attached to premises confirm that neither National Lottery products nor tickets in a private lottery may be sold on the premises. In England and Wales tickets for customer lotteries also cannot be sold. Operators can sell society lottery tickets subject to the society holding the relevant permission (an operating licence from the Commission if a large society lottery or a local authority registration if a small society lottery.)</p> <p>In some instances the operator may also require an External Lottery Manager licence from the Commission (for more detail see para 34.15 of the GLA 5th edition)</p>										
<p><u>2.10) Gaming Machines Available for Use</u></p> <p>Bingo premises licences in existence before 13 July 2011:</p> <p><b>Is the premises offering a maximum of 8 Category B3/B4 Machines or do Category B3/B4 Machines make up no more than 20% of the total number of machines?</b></p> <p>Bingo premises licences granted on or after 13 July 2011:</p> <p><b>Do Category B3/B4 Machines make up no more than 20% of the total number of machines?</b></p> <p>Premises can also offer any number of Category C and D machines</p>	<table border="1"> <tr> <td>Yes</td> <td>0</td> <td><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>10</td> <td><input type="checkbox"/></td> </tr> </table>		Yes	0	<input type="checkbox"/>	No	10	<input type="checkbox"/>		
Yes	0	<input type="checkbox"/>								
No	10	<input type="checkbox"/>								
<p> Gaming machine content can be made available on hand held bingo terminals and this will contribute to the total number of machines. However, for this to apply the devices must be 'available for use' i.e. if a player could take steps to use the device without the assistance of the operator.</p> <p> Stakes may be paid by cash or non-cash forms of payment, except that credit cards cannot be used directly or indirectly to pay for any gaming machine use. Debit cards may only be used as an indirect form of payment e.g. to purchase a token or smart card that is subsequently put in the machine. (SI 2007 / 2158 and SI 2007 / 2319).</p>										
<p><u>2.11) Gaming Machine Display Requirements SI 2007 / 2319 and SI 2007 / 2320</u>  <b>Do all gaming machines display:</b></p> <ul style="list-style-type: none"> <li>• What category it is?</li> <li>• The name and telephone number for assistance with problem gambling?</li> <li>• That the machine is not to be used by child/ young person unless it is a category D?</li> <li>• The percentage return to player?</li> </ul>	<table border="1"> <tr> <td>Yes</td> <td>0</td> <td><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>10</td> <td><input type="checkbox"/></td> </tr> </table>		Yes	0	<input type="checkbox"/>	No	10	<input type="checkbox"/>		
Yes	0	<input type="checkbox"/>								
No	10	<input type="checkbox"/>								
<p> The information above needs to be readily accessible by a person using the machine. It may be found on the machine cabinet or within the information shown on screen.</p>										
<p><u>2.12) ATM Location (MC - SI 2007/1409/ SSI 2007/266)</u>  <b>Is the ATM 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?</b></p>	<table border="1"> <tr> <td>Yes/ N/A</td> <td>0</td> <td><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>10</td> <td><input type="checkbox"/></td> </tr> </table>		Yes/ N/A	0	<input type="checkbox"/>	No	10	<input type="checkbox"/>		
Yes/ N/A	0	<input type="checkbox"/>								
No	10	<input type="checkbox"/>								

<b>2.13) Access Between Licensed Premises (MC - SI 2007/1409/SSI 2007/266)</b> <b>Is there direct access to the bingo premises from a premises with:</b> <ul style="list-style-type: none"> <li>• A casino premises licence</li> <li>• An adult gaming centre premises licence</li> <li>• A betting premises licence other than a track premises licence</li> </ul>	<table border="1"> <tr> <td>Yes</td> <td>10</td> <td><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>0</td> <td><input type="checkbox"/></td> </tr> </table>	Yes	10	<input type="checkbox"/>	No	0	<input type="checkbox"/>
Yes	10	<input type="checkbox"/>					
No	0	<input type="checkbox"/>					
<b>2.14) Hours of Operation (DC - SI 2007 / 1409/SSI 2007/266)</b>  No facilities for gambling shall be provided on the premises between the hours of midnight and 9am. This condition does not apply to making gaming machines available for use. <b>Is the premises compliant?</b>	<table border="1"> <tr> <td>Yes</td> <td>0</td> <td><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>10</td> <td><input type="checkbox"/></td> </tr> </table>	Yes	0	<input type="checkbox"/>	No	10	<input type="checkbox"/>
Yes	0	<input type="checkbox"/>					
No	10	<input type="checkbox"/>					
 If a variation to the hours of operation has been granted, this will be shown on the premises licence.							
<b>2.15) Christmas Day (GA05 Section 183).</b> The premises shall not be used to provide facilities for gambling on Christmas day. <b>Is the premises compliant?</b>	<table border="1"> <tr> <td>Yes</td> <td>0</td> <td><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>10</td> <td><input type="checkbox"/></td> </tr> </table>	Yes	0	<input type="checkbox"/>	No	10	<input type="checkbox"/>
Yes	0	<input type="checkbox"/>					
No	10	<input type="checkbox"/>					

<b>3) Operator Policies - Protection of Children</b> Establishing compliance will require viewing policies and discussion with staff members
---

<b>3.1) Policies for preventing Under Age Gambling (SRCP 3.2)</b>   In England and Wales please also check Primary Authority status before asking these questions (see section 1.1 above)  <b>Does the licensee have and put into effect policies and procedures designed to prevent underage gambling?</b>	<table border="1"> <tr> <td>Yes</td> <td>0</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Improvement needed</td> <td>5</td> <td><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>10</td> <td><input type="checkbox"/></td> </tr> </table>	Yes	0	<input type="checkbox"/>	Improvement needed	5	<input type="checkbox"/>	No	10	<input type="checkbox"/>
Yes	0	<input type="checkbox"/>								
Improvement needed	5	<input type="checkbox"/>								
No	10	<input type="checkbox"/>								
Things to consider and evidence when answering the question above:										
Are staff members trained on the prevention of underage gambling on induction to the company? <input type="checkbox"/>										
Is training regularly updated – can this be evidenced within staff training logs? <input type="checkbox"/>										
Are checks of age carried out on apparently underage customers? Can this be evidenced? <input type="checkbox"/>										
Is there a procedure in place for challenging any adult who may be complicit in allowing a child or young person to gamble?										
Are only suitable forms of I.D. accepted by the operator? (Driving Licence, Passport, Military I.D, PASS Logo I.D?) <input type="checkbox"/>										
Is there an awareness of the legal requirements on returning stakes and not paying prizes to underage customers? <input type="checkbox"/>										
Does staff training cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises? (GA05 sections 46 and 47) <input type="checkbox"/>										
<b>3.2) Test Purchasing (SRCP 3.2)</b> Larger Operators <ul style="list-style-type: none"> <li>• <b>Does the licensee conduct test purchasing or take part in collective test purchasing programmes?</b></li> </ul> Smaller Operators <ul style="list-style-type: none"> <li>• <b>Does the licensee monitor the effectiveness of their policies and procedures for preventing underage gambling?</b></li> </ul>	<table border="1"> <tr> <td>Yes</td> <td>0</td> <td><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>10</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Staff unable to answer/ Unknown</td> <td></td> <td><input type="checkbox"/></td> </tr> </table>	Yes	0	<input type="checkbox"/>	No	10	<input type="checkbox"/>	Staff unable to answer/ Unknown		<input type="checkbox"/>
Yes	0	<input type="checkbox"/>								
No	10	<input type="checkbox"/>								
Staff unable to answer/ Unknown		<input type="checkbox"/>								
 Smaller operators could monitor effectiveness through participation in collective test purchasing programmes.										
 A distinction between larger and smaller operators is made based on their operating licence fee category within SRCP 3.2. This information may not be available at the time of assessment. Please contact your local Gambling Commission Compliance Manager if clarification is needed.										

<b>3.3) Under 18s Employment</b>		Yes	10	<input type="checkbox"/>
<b>Is the operator employing anyone under the age of 18 to carry out the functions shown below?</b>		No	0	<input type="checkbox"/>
<p><b>i</b> It is an offence to employ:</p> <ul style="list-style-type: none"> <li>a person under 18 to provide facilities for gambling (GA05 Section 51)</li> <li>a person under 18 to perform any function on the premises where gaming machines are sited or in connection with a gaming machine (GA05 Section 54)</li> <li>a person under 18 to perform any function on the premises where a premises licence has effect and where the gambling activity is being carried on (GA05 Section 53)</li> </ul>				
<b>3.4) Over 18s Gaming Machines Area (MC - SI 2007 / 1409/SSI 2007/266)</b>		Yes	0	<input type="checkbox"/>
<b>Where children/ young people are permitted to enter the premises, and category B or C gaming machines are made available for use on the premises, are the gaming machines:</b>		Improvement Needed	5	<input type="checkbox"/>
		No	10	<input type="checkbox"/>
Separated from the rest of the premises by a physical barrier to prevent access other than via an entrance designed to be the entrance? <input type="checkbox"/>				
Supervised at all times to ensure children or young persons do not enter the area? <input type="checkbox"/>				
Arranged so that the area can be observed by persons responsible for supervision or closed circuit television which is monitored? <input type="checkbox"/>				
<p><b>i</b> The gaming machines area must also have a notice at the entrance stating that no person under the age of 18 years is permitted to enter the area</p>				




**4) Operator Policies – Customer interaction/Protection of customers**  
Establishing compliance will require viewing policies and discussion with staff members

<b>4.1) Policies for Customer Interaction (SRCP 3.4.1)</b>		Yes	0	<input type="checkbox"/>
<b>Has the licensee put into effect policies and procedures for customer interaction where they have concerns that a customer may be at risk of or experiencing harms associated with gambling</b>		Improvement needed	5	<input type="checkbox"/>
		No	10	<input type="checkbox"/>
Things to consider and evidence:				
Are staff members trained on the protection of customers on induction to the company? <input type="checkbox"/>				
Is training regularly updated – can this be evidenced within staff training logs? <input type="checkbox"/>				
Are employees trained in recognising types of behaviour that may be indicative of being-at risk of or experiencing harms associated with gambling? <input type="checkbox"/>				
Are staff members trained to deal with customers showing signs of distress? <input type="checkbox"/>				
Does the licensee use all available sources of information to identify customers who may be at risk of or experiencing harm? <input type="checkbox"/>				
Is the licensee able to evidence that customer interaction has been undertaken in appropriate circumstances? <input type="checkbox"/>				
Do records show circumstances where customer interaction has been ruled out? <input type="checkbox"/>				
Are staff members able to talk about how a customer interaction has had a positive impact? <input type="checkbox"/>				

Is the licensee able to evidence that there is an evaluation process to understand the impact of customer interaction?			<input type="checkbox"/>
<u>4.2) Policies for Self Exclusion (SRCP 3.5)</u> <b>Does the licensee have and put into effect procedures for self-exclusion?</b> These procedures must include:	Yes	0	<input type="checkbox"/>
	Improvement needed	5	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
Employee induction and refresher training to ensure the system is enforced			<input type="checkbox"/>
A register of those excluded, with appropriate records (i.e. name, address)			<input type="checkbox"/>
Photo ID (or an effective alternative) and a signature			<input type="checkbox"/>
Signposting to counselling and support services			<input type="checkbox"/>
The removal of excluded persons found on the premises			<input type="checkbox"/>
Consideration of the premises layout - Is the premises appropriately supervised to ensure that customers adults are protected?			<input type="checkbox"/>
Minimum exclusion period of between 6 and 12 months with the option to extend for periods of at least 6 months			<input type="checkbox"/>
Following a period of self-exclusion, customers who make a request to begin gambling again must be given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person.			<input type="checkbox"/>
Removal of customer from marketing databases during period of exclusion			<input type="checkbox"/>
Policy to guard against self-excluded individuals using another person to gamble on their behalf			<input type="checkbox"/>
Informing staff of individuals who have breached agreements			<input type="checkbox"/>
<u>4.3) Multi-Operator Self-Exclusion Scheme (SRCP 3.5.6)</u> <b>Does the licensee offer the ability for customers to exclude from similar local venues through participation in a multi-operator exclusion scheme?</b>	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<u>4.4) Free and Discounted Alcohol (SRCP 5)</u> <b>If customers are offered free or discounted alcohol, is this linked to whether or when they begin or continue to gamble or made at times when they are participating in gambling activities?</b>	Yes	10	<input type="checkbox"/>
	No/ N/A	0	<input type="checkbox"/>
<u>4.5) Advising Employees on Socially Responsible Gambling (SRCP 7)</u> <b>Has the licensee ensured that employees involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and where to get help should their own gambling become hard to control?</b>	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>


## 5) Additional Questions

<b>5.1) Premises Licence Availability (GA05 s185)</b>  <b>Is the premises licence (including the premises plan) kept on the premises and available on request?</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">Yes</td> <td style="width: 15%;">0</td> <td style="width: 15%; text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>10</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	0	<input type="checkbox"/>	No	10	<input type="checkbox"/>			
Yes	0	<input type="checkbox"/>								
No	10	<input type="checkbox"/>								
<b>5.2) Reward Schemes – Terms and Conditions (SRCP 5)</b>  <b>Are the terms and conditions of any customer incentive or reward schemes clearly set out and readily available to customers?</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">Yes</td> <td style="width: 15%;">0</td> <td style="width: 15%; text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>10</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	0	<input type="checkbox"/>	No	10	<input type="checkbox"/>			
Yes	0	<input type="checkbox"/>								
No	10	<input type="checkbox"/>								
<div style="display: flex; align-items: flex-start;"> <div style="margin-right: 10px;"> </div> <div> <p>Things to consider:</p> <ul style="list-style-type: none"> <li>Marketing and advertising must not be misleading</li> <li>'Free bet' or 'bonus' offers must comply with the CAP/BCAP 'Guidance on the rules for gambling advertisements</li> <li>Terms and conditions must be made available for their duration of the promotion</li> <li>Staff members should be able to explain the terms and conditions of incentives and reward schemes offered to customers.</li> </ul> </div> </div>										
<b>5.3) Complaints and Disputes (SRCP 6)</b>  <b>Has the licensee put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair open and transparent manner?</b>  Things to consider and evidence:	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">Yes</td> <td style="width: 15%;">0</td> <td style="width: 15%; text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>Improvement needed</td> <td>5</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>10</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	0	<input type="checkbox"/>	Improvement needed	5	<input type="checkbox"/>	No	10	<input type="checkbox"/>
Yes	0	<input type="checkbox"/>								
Improvement needed	5	<input type="checkbox"/>								
No	10	<input type="checkbox"/>								
Can customers refer any dispute to an Alternative Dispute Resolution (ADR) entity if not resolved to their satisfaction within 8 weeks?										
Is dispute resolution free of charge for customers?										
Terms must not restrict the customer's right to bring court proceedings against the licensee. Terms may provide for the resolution to be binding on both parties if the customer agrees to a resolution with the assistance of an ADR.										
There must be clear and accessible information on how to make a complaint, the complaints procedure, timescales for responding and the escalation procedure.										
Policies and procedures must be implemented effectively and kept under review										
<div style="display: flex; align-items: flex-start;"> <div style="margin-right: 10px;"> </div> <div> <p>In this Code, 'ADR entity' means a person offering alternative dispute resolution services whose name is on the Gambling Commission's list of approved providers. The list is on the Commission's website and is updated from time to time.</p> </div> </div>										
<b>5.4) Local Risk Assessment (SRCP 10)</b>  <b>Can the operator evidence policies, procedures and control measures to mitigate risks identified within the Local Risk Assessment?</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">Yes</td> <td style="width: 15%;">0</td> <td style="width: 15%; text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>10</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	0	<input type="checkbox"/>	No	10	<input type="checkbox"/>			
Yes	0	<input type="checkbox"/>								
No	10	<input type="checkbox"/>								
<b>Has the operator taken into account relevant matters identified in the Licensing Authority's policy statement?</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">Yes</td> <td style="width: 15%;">0</td> <td style="width: 15%; text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>No</td> <td>10</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Yes	0	<input type="checkbox"/>	No	10	<input type="checkbox"/>			
Yes	0	<input type="checkbox"/>								
No	10	<input type="checkbox"/>								

5.5) Licensing Authority Conditions		Yes/ N/A	0	<input type="checkbox"/>
Is the premises adhering to any additional premises licence conditions?		No	10	<input type="checkbox"/>
	Licensing Authorities may have requested/ received further information relating to physical aspects of the premises during the application stage (for example: CCTV, supervision of gaming machines, floor staff location). The appropriateness of these arrangements can be checked at assessment.			
	Where a condition is attached to a premises licence to require door supervisors, if the Private Security and Industry Act 2001 means that they must be SIA registered then that also becomes a condition of the premises licence (GA05 Section 178).			
	Registration of S.I.A licence holders can be found at <a href="http://www.sia.homeoffice.gov.uk">www.sia.homeoffice.gov.uk</a>			
			<b>Assessment Score:</b>	
			...../ 320	

### 6) Action Points

Question Number	Issue/ Resolution

 'Assessment outcome letters' are available for you to use and can be downloaded from the LLEP website. Where possible please share this letter, or the notes shown above, with your Gambling Commission Compliance Manager.

## Why:

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

## Best Result:

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

## Worst Result:

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

## What:

- The CCTV system must be switched on and recording at all times
- Any faults with the CCTV System should be communicated to the Area Manager immediately, as well as the IT department
- CCTV should always cover: the front and rear exits, all machines, the offices and the GeWeTe. The CCTV should cover the inside of the GeWeTe when the door is open
- The CCTV should be checked daily to ensure its working correctly and the time and date are all correct
- Information in regards to the CCTV should never be disclosed to any 3rd parties
- Placing and adjusting of the cameras should only be completed by IT with authorisation from the Area Manager and Operations Director
- Records should be kept to show who has access to the CCTV password and username
- Decorations should be not placed in areas which obscure the CCTV camera's view
- The CCTV should be stored in a security cabinet
- The key to the security cabinet to be locked in the key cabinet

## When:

- The CCTV should be checked daily to ensure correct function

## Who:

- The Venue Manager has responsibility for the CCTV system being checked and fully functional
- The Area Manager is responsible for the placement/vision position of the camera

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

- Area Manager
- IT Department

## Why:

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

## Best Result:

All employees are aware of the potential of machine fraud and what to look out for. Machine fraud is reduced and Company revenue is protected.

## Worst Result:

Employees fail to identify fraud taking place, resulting in a loss of revenue. The employees responsible may be subject to disciplinary processes.

## What:

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

## When:

### Fraud may be taking place when

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

## Who:

- All employees have a responsibility for protecting the business from machine fraud
- The Area Manager should provide employees with photos of known fraudsters
- The duty manager should inform the security email address following machine fraud taking place – [Security@Merkur-Casino.Com](mailto:Security@Merkur-Casino.Com)

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

- Venue Manager
- Area Manager
- Operations Director

## **How:**

### **If you suspect that machine fraud is taking place either:**

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

### **Or:**

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

### **Following a fraud**

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

## Why:

Under the conditions of the Company's Gambling Commission Operating Licence and venue local authority Premise Licence all venues must ensure they are operating within the B3 Ratio regulation of the 20%\* rule for B3's and the Gambling Commission's guidance on 'Available for Use'.

\*There are exceptions for licenses issued prior to 13 July 2007 - The Gambling Commission states licensed AGC and bingo premises in existence before 13 July 2011 will enjoy so-called 'grandfather rights', entitling them to make available four (AGCs) or eight (bingo) category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater.

## Best Result:

All employees are aware of the importance of maintaining the correct machine ratio throughout all hours of operation, therefore ensuring the business remains compliant in relation to the machine ratio allowances.

## Worst Result:

Employees are not aware of the importance of maintaining the correct ratio. The business operates outside of the conditions of the operating licence, putting the operating licence at risk of being withdrawn.

## What:

- All machine ratio checks are to be completed on the Smart Tablet.
- If there is an issue with the machine ratio which needs to be addressed in order to remain compliant with the 20% rule; the duty manager at the time should refer to MARS to identify the lowest revenue B3 to switch off and the machine must remain switched off until the faulty machine is available for use.
- Venues must take into consideration where they have Tablets that account towards the B3 ratio, faulty tablets must be factored into the B3 ratio in exactly the same way as gaming machines and appropriate action taken with switching off B3's where applicable.

## When:

Checks must be completed when:

- Prior to a new venue opening its doors to trade for the first time
- A machine move has taken place
- A machine faults/failure occurs which results in the machine being not available for use/turned off
- After an engineer has fixed and faults on a machine and it is turned back on

## Available for use

Tablet and Handheld machines – the Gambling Commissions guidance on machines available for use means it is imperative that where the number of B3 machines takes into account any tablets and handheld machines that they are available for use at all times.

This includes:

- Switched on and working at all times
- Not kept under lock and key so available to the customer without assistance
- All staff fully trained on how they operate

If any tablet/handheld machine needs to be sent away for repair a B3 Ratio check MUST be completed to ensure the venue ratio is within the 20% rule, switching off B3's as appropriate. In addition to the circumstances above venues should be entering regular B3's ratio checks on the SMART Tablet.

**The Gambling Commission and/or Local Authority Compliance Officers may from time to time carry out venue inspections. One of their checks will be 20% ratio and they have the powers to review our licenses if we are found to be in breach.**

### **Who:**

- All venue employees hold responsibility for ensuring the 20% rule is maintained at all times of operation, however, the duty manager for any given shift holds ultimate responsibility.

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

- Venue Manager
- Cluster Manager
- Area Manager
- MERKUR Technical

## Why:

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

## Best Result:

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

## Worst Result:

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

## What:

- Employees should always carry a mobile panic alarm (MPA) or staff guard fob on their person while at work. (Ideally both should be carried)
- Activation of staff guard should be prioritised over using the MPA in circumstances which do not require immediate police attention
- Staff guard should be tested at least once per week – Recorded on MS141 (Note: it is recommended to test the system during times of higher customer numbers, as it makes the customers aware that staff have a communication link to a security service)
- Mobile Panic Alarms should be tested and recorded once per month MS116-V1 MPA test record
- **Employees should not be hesitant to use staff guard when there is a genuine reason – This is a service which MERKUR pay for.**
- Employees should be more thoughtful about using the MPA system, and should only activate it in times of imminent physical threat or robbery, or anything which police would usually be called for. This is a system which is linked directly to police. Inappropriate use of this device may lead to the venue losing the right to use it altogether.
- Staff guard and the MPA system should only be used if it is safe to do so – never endanger colleagues or customers during a situation arising when it would not be safe to active either system
- For static alarms ensure that the reset key is available at all times
- Some Venues have panic buttons on the intruder alarm – These will usually be found under the Service Desk and near the safe. These alarms require 2 red buttons to be pressed simultaneously which will trigger a silent alarm. These alarms will also work in the event of a network or power failure

## When:

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

## Who:

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

## Related / supporting documents:

- MS141 – Staff Guard Test Record

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

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

## How:

### Staff Guard Operation

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

#### IF YOU ARE IN IMMEDIATE DANGER, SAY:

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

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

If you say: "Stand By"

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

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

Say: "Stand down" once you no longer need assistance.



## How to make a test call:

Once per week a test call must be made:

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

The password is your venue name and number.

2. They will confirm the test and end the call

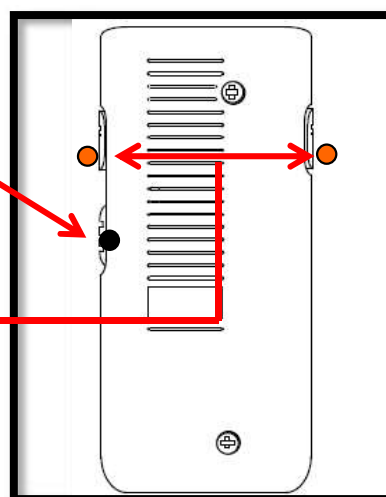


### Mobile Panic Alarms (MPA)

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

1. Slide the black button downwards to unlock the orange buttons
2. Press the two orange side buttons together

**The panic alarm does not work if you press only one button**  
**The black button should be kept in the locked position to prevent false activations**



### How it works:

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

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

## Why:

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

## Best Result:

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

## Worst Result:

Employees and customers do not observe the smoking policy, the customer experience is negatively affected and we are not compliant with the law.

## What:

- Smoking is strictly prohibited within venues
- Customers must not be allowed to smoke inside doorways or toilets
- Where possible there should always be a place to dispose of finished cigarettes
- Should the venue have no designated smoking area for customers, there should be steps taken to keep the front of the venue looking presentable at all times
- Vaping is allowed within our venues however these devices should not produce excess vapour
- Employees must not vape in the venue
- Employees who vape must take designated breaks to vape, as smokers do
- Employees who smoke must follow the employee smoking guidelines
- No smoking signs should be clearly displayed at the entrance

## When:

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

## Who:

- Smokefree laws are applicable to both employees and customers
- All employees are responsible for ensuring that these rules are followed at all times

## Related / supporting documents:

- Venue Manager
- Area Manager

## Why:

Lone working can present a number of issues; therefore, security precautions must be taken to ensure that risks to employees and the business are minimised. Employees should familiarise themselves with processes which must be followed when lone working, before commencing any period of planned/unplanned lone working.

## Best Result:

All employees adhere to the processes relating to lone working. The safety of the business, and more importantly employees and customers are improved as a result.

## Worst Result:

Lone working processes are not followed, which compromises the safety of employees and customers and impacts the security of the business.

## What:

### The DO's of lone working

- Employees to assess the risk of lone working between 10:00pm – 6:00am and make decision if a locked door policy should be used
- Do telephone the Venue Manager/Area Manager if you are unexpectedly left lone working between 08:00pm and 10:00pm
- Do telephone your designated lone working contact venue, if you are unexpectedly left working alone between 10:00pm and 6:00am
- Do telephone your designated lone working contact venue after 10:00pm to report any lone working between 10:00pm – 06:00am whether it is planned lone working or not
- Do ensure all customers remove any headgear such as baseball caps and crash helmets on entering the venue
- Do keep all emergency contact numbers to hand at all times
- Do remind yourself of the GeWeTe S.O.S code
- Do ensure that you carry a MPA (Mobile Panic Alarm) and/or staff guard fob
- Do ensure that all safes are locked
- Do keep all office doors locked
- Do ensure that all money is inside time delay safes
- Do ensure that all keys are stored inside time delay safes
- In the case of an emergency call 999

### The DON'Ts of lone working

- Don't leave the premises unattended at any time, except in the case of an emergency
- Don't undertake any maintenance involving electrics or heights within the venue
- Don't hesitate to contact a member of management using emergency contact procedures if you are in doubt about anything
- Never access the machines or the GeWeTe, but do escalate any issues to the Area Manager/Night Manager and explain the circumstances of the situation
- Don't attempt to activate the staff guard or MPA system if you feel it is unsafe to do so

## When:

- This document applies to all periods of lone working

## Who:

- This document is applicable to all employees during periods of lone working

## Related / supporting documents:

- Emergency contact details
- The DO's and DON'Ts of lone working

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

### During day time lone working

- Venue Manager
- Area Manager

### During night time lone working

- Night Manager (always first point of contact, unless the situation requires emergency services)
- Venue Manager (only contacted in cases of not being able to get through to the Night Manager)
- Cluster Manager (only contacted in cases of not being able to get through to the Night Manager and Venue Manager)
- Area Manager (only contacted in cases of not being able to get through to the Night Manager or Venue Manager)
- Operations Director (only contacted in cases of not being able to get through to the Night Manager, Venue manager or Area Manager)

## How:

Before commencing work in any venue when either lone working or 24 hour operation is in place the following process should be followed.

1. If lone working between the hours of 10:00pm and 6:00am contact your designated lone working contact venue.
2. Refresh your understanding of the lone working risk assessment which will be either displayed on the staff notice board or will be available for review within the venue.
3. Review the lone working / 24-hour operations "do's and don'ts" list.
4. Ensure that a telephone (landline or mobile) is available on the shop floor.
5. Employees should carry a portable panic alarm at all times.
6. All employees must be aware of emergency procedures and contact numbers to use in the event of an emergency

Employees must not attempt to move any machines or equipment during periods of lone working.

7. Employees must not attempt to conduct any maintenance on machines or the venue which puts you at risk whilst lone working
8. Employees must be aware of the checking in and keeping in touch procedures and contact another 24-hour venue within the area to let them know you are lone working.
9. Incidents of any kind are to be reported immediately to the night manager and then recorded on an incident report form MC65 at the earliest opportunity

**NEVER TAKE ANY PERSONAL RISKS WHICH MAY ENDANGER YOURSELF OR OTHERS**

## Revision History

Version	Revision Date	Revised by	Section Revised
1.0	January 2024	Gill Clulow – Safer Gambling Compliance Manager	New Document

Version	Section	Reason	Sign-off
1.0	All	New Document	Amanda Kiernan – Head of Compliance

## **CONTENTS**

### **1. INTRODUCTION**

- 1.1 Responsibility for the Document
- 1.2 Gambling Commission
- 1.3 Licence Conditions and Codes of Practice (LCCP)
- 1.4 Trade Associations (BACTA/Bingo Association)
- 1.5 The Compliance Team

### **2. REGULATORY FRAMEWORK**

- 2.1 Legal Background
- 2.2 Information Requirements and Access to Premises

### **3. FINANCIAL REQUIREMENTS**

- 3.1 Anti-Money Laundering and Counter Terrorism Financing

### **4. THE RISK BASED APPROACH**

- 4.1 Risk Based Approach for Safer Gambling

### **5. PROTECTION OF CHILDREN AND VULNERABLE PEOPLE**

- 5.1 Combatting Problem Gambling
- 5.2 Access to Gambling by Children and Young Persons
- 5.3 Gambling Management Tools and Responsible Gambling Management
- 5.4 Information
- 5.5 Customer Interaction
- 5.6 Self-Exclusion schemes
- 5.7 Employment of Children and Young Persons
- 5.8 Money Lending

### **6. FAIR AND OPEN PROVISIONS**

- 6.1 Fair Terms
- 6.2 Display of Rules

### **7. MARKETING**

- 7.1 Reward and Bonuses
- 7.2 Alcoholic Drinks
- 7.3 Promotion by Agents
- 7.4 Compliance with Advertising Codes
- 7.5 Other Marketing Requirements
- 7.6 Direct Electronic Marketing Consent

### **8. COMPLAINTS AND DISPUTES**

- 8.1 Alternative Dispute Resolution
- 8.2 Non-Gambling Related Customer Complaints

## **9. COMPANY EMPLOYEES**

- 9.1 Responsible Gambling Information for Employees

## **10. SENIOR MANAGEMENT RESPONSIBILITY**

- 10.1 Company Safer Gambling Obligations
- 10.2 Policies, Procedures and Controls
- 10.3 Safer Gambling Training

## **11. THE SAFER GAMBLING MANAGER**

- 11.1 Role of the Safer Gambling Manager
- 11.2 Standing of the Safer Gambling Manager

## **12. GAMING MACHINES IN GAMBLING PREMISES**

- 12.1 All Non-Remote Operating Licences

## **13. ASSESSING LOCAL RISK**

- 13.1 Local Area Risk Assessment

## **14. ONGOING MONITORING AND AUDITING**

- 14.1 Monitoring Techniques
- 14.3 Regulatory Compliance Audits

## **15. ANTI-MONEY LAUNDERING AND SAFER GAMBLING**

**APPENDIX A – Safer Gambling Interaction Process**

**APPENDIX B – Self-Exclusion Process**

## 1. INTRODUCTION

MERKUR Slots is fully committed to delivering the highest standards in relation to Safer Gambling (SG). This policy outlines robust and effective procedures which have been implemented to ensure compliance with the current regulations and standards.

This policy provides guidance and a systematic approach for the Company's employees to follow, to ensure that they fully understand both their own and the Companies responsibilities under the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), Gambling Commission/Wider Industry guidance/learning and the Company's own procedures. This policy is presented in an easy to read and understandable format which contains information on all relevant procedures and guidance relating to Safer Gambling (SG).

The latest version of this policy is available as a reference document and is available to all employees on MyMERKUR.

This policy extends to all employees, defined as: permanent, fixed term, temporary, third-party representatives, sub-contractors, agency workers, volunteers, interns, and agents engaged with the Company in the United Kingdom or Overseas.

It is the responsibility of all employees to ensure that they read and understand this policy and that they are familiar with its contents. Employees with personal licences (PML) are reminded that it is their responsibility to keep themselves updated with any changes in Gambling Legislation/Guidance or the LCCP. To keep up to date with Gambling Commission communications employees are recommended to subscribe for the fortnightly Gambling Commission e-bulletin/newsletter.

This policy does not form part of any employee's contract of employment and the Company can amend it at any time. Any employee who breaches this policy may face disciplinary action in accordance with the Company's disciplinary policy, which could result in dismissal for misconduct or gross misconduct. The disciplinary policy is available to view in the Employee Handbook

### 1.1 Responsibility for the document

The Head of Compliance has overall responsibility for the Company Safer Gambling Policy. This includes operational management of this policy and responsibility for Company Safer Gambling issues including reviewing, updating and the maintenance of Company Safer Gambling policies, procedures, and controls.

Any changes to this document will be devised and written by the Head of Compliance and/or the Safer Gambling Compliance Manager with approval from the Board. Changes and approval are to be recorded in the Revision History at the front of this document.

It is the responsibility of all Senior Employees and Managers to ensure that any changes to the Safer Gambling Policy are communicated and trained to all relevant employees at their site with training records updated accordingly.

The board will be advised of changes to the Safer Gambling Policy through the minutes of the Compliance Risk Monitoring Meetings and policy changes will be forwarded for review by Board Members with any comments documented in Compliance Risk Committee Meetings minutes.

## 1.2 Gambling Commission

The Gambling Commission was created under the provisions of the Gambling Act 2005 and is responsible for regulating the Gambling Industry within the United Kingdom. Three key regulatory goals underpin the Gambling Commissions activity, these regulatory goals are defined by the Gambling Act 2005 and are known as the Licensing Objectives. These Licensing Objectives are mandatory and are detailed below.

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

Where the Company or a licensed employee fail to uphold the licensing objectives, for example ignoring their Safer Gambling responsibilities or failing to comply with the Licensing Conditions and Codes of Practice (LCCP), the Gambling Commission will consider reviewing the company operator's licence and/or the individual employee's personal licence (PML) under Section 116 of the Gambling Act. Where failings are identified sanctions can result in penalties from a warning up to revocation under Sections 118 and 119 of the Gambling Act 2005 (the Company can also be subject to financial penalties under Section 121 of the Gambling Act).

## 1.3 Licence Conditions and Codes of Practice (LCCP)

The LCCP sets out the mandatory conditions (issued under Section 24 of the Gambling Act 2005) which the Company must meet to hold its operating licence. The latest LCCP revision is dated 12 September 2022; <https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp>

The LCCP is broken down into three parts; Operating Licence Conditions attached to operating licences (mandatory), the Code of Practice Provisions (social responsibility and ordinary provisions) and Personal Licence Conditions attached to personal licences.

The principal codes of practice are divided into Social Responsibility Code Provisions (SRCP) which are mandatory and Ordinary Code Provisions (OCP) which are considered best practice. The key Operating Licence Conditions (both AML and Safer Gambling/Social Responsibility) relating to MERKUR Slots are.

- Qualified persons and personal licences (1.1.1, 1.2.1 and 1.2.2).
- General Fair and Open Provisions (7.1.1).
- Prevention of money laundering and terrorist financing (12.1.1).
- Access to Premises (14.1.1).
- Reporting suspicion of offences (15.1.1, 15.1.3).
- Reporting key events (15.2.1, 15.2.2, 15.2.3)
- General and regulatory returns (15.3.1).
- Responsible placement of digital adverts (16.1.1).

The key Code of Practice Provisions (Ordinary and Safer Gambling) relating to MERKUR Slots are.

- General (OCP 1.1.1) and (SRCP 1.1.2).
- Protection of Children and Other Vulnerable Persons (SRCP 3.2.3, 3.2.5, 3.3.1, 3.4.1, 3.5.6) and (OCP 3.2.4, 3.2.6, 3.5.2, 3.5.7, 3.6.2, 3.6.5, 3.6.6, 3.8.2).
- Fair and Open Provisions (SRCP 4.1.1, 4.2.2).
- Marketing (SRCP 5.1.1, 5.1.6, 5.1.9, 5.1.11) and (OCP 5.1.8, 5.1.10).
- Complaints and Disputes (SRCP 6.1.1).
- Gambling Licensees' Staff (SRCP 7.1.2).
- Information Requirements (OCP 8.1.1).
- Gaming Machines in Gambling Premises (SRCP 9.1.2).
- Assessing Local Risk (SRCP 10.1.1) and (OCP 10.1.2).

#### 1.4 Trade Association – BACTA

As a responsible operator the Company are members of BACTA and as such are obliged to be committed to providing Safer Gambling and to provide confidence to the public, the Government, and the Gambling Commission, in the way the industry conducts its business. The trade association has created industry wide codes with the aim of understanding the importance of Safer Gambling. The key actions are outlined <https://www.bacta.org.uk>

#### 1.5 The Compliance Team

The Company has a Compliance Team who can be contacted by any employee by email – [Compliance\\_UK@merkur-casino.com](mailto:Compliance_UK@merkur-casino.com)

Head of Compliance/MLRO Nominated Manager  
Name: Amanda Kiernan – Email: [akiernan@merkur-casino.com](mailto:akiernan@merkur-casino.com)

Safer Gambling Compliance Manager  
Name: Gill Clulow – Email: [gclulow@merkur-casino.com](mailto:gclulow@merkur-casino.com)

Deputy MLRO  
Name: Merk Wells – Email: [mwells@merkur-casino.com](mailto:mwells@merkur-casino.com)

## 2. REGULATORY FRAMEWORK

### 2.1 Legal Background

The Company Safer Gambling Policy is based on the following.

- The Gambling Act 2005 ('the Act') – The principal legislation that is used to regulate the United Kingdom Gambling Sector,
- <https://www.legislation.gov.uk/ukpga/2005/19/contents>
- The Gambling Commission Licence Conditions and Codes of Practice ('LCCP') – The Code of practice provisions provide.

- mandatory obligations under the Social Responsibility Code Provisions (SRCP),
- <https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp>

The Company has further considered numerous sources when identifying and assessing the key risks to its licensed activities such as.

- Gambling Commission Safer Gambling Hub, <https://www.gamblingcommission.gov.uk/public-and-players/safer-gambling>
- Gambling Commission Compliance Hub, <https://www.gamblingcommission.gov.uk/licensees-and-businesses/compliance>
- Advisory Board for Safer Gambling <https://www.gamblingcommission.gov.uk/absg>
- Wider industry learning including Gambling Commission guidance and enforcement actions, <https://www.gamblingcommission.gov.uk/news>
- GamCare <https://www.gamcare.org.uk/>

## 2.2 Information Requirements and Access to Premises

The Company conducts its gambling operation in accordance with both the licensing objectives and LCCP and works with the Gambling Commission in an open and co-operative way. Information is submitted to the Gambling Commission as required through Key Events.

Employees will cooperate with Gambling Commission officials and are made aware of entry requirements for Gambling Commission Enforcement Managers under Part 15 of the Gambling Act 2005.

## 3. FINANCIAL REQUIREMENTS

### 3.1 Anti-Money Laundering

The Company has in place its Anti-Money Laundering and Prevention of Terrorist Financing Policy and a Money Laundering and Terrorist Financing Risk Assessment. The Company takes into account the Gambling Commission guidance.

The latest version of Company AML Policy & Procedure document is available as a reference document and is available to Company employees on MyMERKUR.

## 4. THE RISK BASED APPROACH

### 4.1 Risk Based Approach for Safer Gambling

The Company has in place its Safer Gambling Policy to comply with the LCCP and has in place proportionate policies, procedures, and controls to mitigate and manage effectively the Safer Gambling risks identified.

The LCCP imposes compulsory requirements and a breach can constitute a failure to apply the Licencing Objectives. However, within this regulatory framework of requirements, the Company has flexibility to devise policies, procedures and controls which best suit its assessment of the possible safer gambling risks faced by its customers. The LCCP require the establishment and maintenance of proportionate policies, procedures, and controls to mitigate and manage effectively the risks identified.

The required risk-based approach involves a number of discrete steps in assessing the most proportionate way to manage and mitigate the safer gambling risks faced by its customers. These steps require the Company to:

- Identify the Safer Gambling risks that are relevant.
- Design and implement appropriate policies, procedures, and controls to manage and mitigate these assessed risks.
- Monitor and improve the effective operation of these controls.
- Record what has been done and why.

The Company uses an amended three lines of defence model to ensure that Safer Gambling policies, procedures and controls are effectively communicated to its Employees, to provide oversight from the Manager, the Safer Gambling Compliance Manager and Senior Management to identify weaknesses and provide improvements and/or remedial actions/training where necessary.

Company Employees (including Duty Managers) make up the first line of defence and are responsible for the following.

- Implementing Safer Gambling policies, procedures, and controls in MERKUR Slots venues.
- The conducting and recording of age verification checks aligned to the company Think 25 policy.
- To ensure that all employees are aware of their responsibility in the conducting and recording of customer Interactions/Conversations.
- Any subsequent reporting following a request from the Compliance Department or the Manager.
- The monitoring of customers for signs of behavioral changes that may indicate they are beginning to show signs of gambling harm
- Carrying out Interaction/Conversations with any customers identified as spending at an above average level, in line with the Safer Gambling Interaction and Evaluation process.
- Processing and guiding persons wishing to self-exclude through the exclusion scheme.
- Conducting effective re-instatement interviews with people wishing to return to gambling after a period of self-exclusion has expired and ensuring ongoing monitoring upon.

The Manager and Area Manager make up the second line of defence and are responsible for the following.

- Ensuring that Safer Gambling policies, procedures and controls are implemented and followed at each MERKUR slots venue.
- Reviewing breaches of Safer Gambling policies, procedures, and controls (including such breaches as identified by the Safer Gambling Compliance Manager).
- Provide oversight and guidance/advice to employees in the first line of defence.
- Ensuring that any policy, procedure, or control updates have been communicated, trained (where required) and implemented in relation to Company Employees.
- The identification of any training needs or remedial actions in relation to employees (including conducting additional training for employees identified by the Safer Gambling Compliance Manager as having a specific need).
- Reviewing and evaluating Safer Gambling Interaction/Conversations completed to determine if the correct outcome was delivered.
- Processing and guiding persons wishing to self-exclude through the exclusion scheme.
- Conducting effective re-instatement interviews with people wishing to return to gambling after a period of self-exclusion has expired.

Senior Management (including the COO, CFO, Head of IT & Head of Marketing, Head of Compliance, Operations Director, and the Safer Gambling Compliance Manager) make up the third line of defence as members of the Compliance Risk Committee and are responsible for the following.

- Setting of the Company's Safer Gambling strategy, framework, and risk appetite.
- Ensuring that there is the correct balance between the Company's compliance obligations and commercial activity.
- Ensuring that the Company is compliant under the LCCP.
- Reviewing breaches of Safer Gambling policies, procedures, and controls.
- Reviewing any weaknesses in the Company's Safer Gambling policies, procedures and controls and the recommendations of any improvements or remedial action made by the Safer Gambling Compliance Manager.
- Providing oversight of Employees in the first and second lines of defence.
- Ensuring that any policy, procedure, or control updates have been communicated, trained (where required) and implemented in relation to Company Employees, Senior Management, and the Board by the Safer Gambling Manager.
- The review of any minutes of meetings and reports to the Compliance Risk Committee in relation to Safer Gambling compiled by the Safer Gambling Compliance Manager.
- The completion and submission of any minutes of meetings and reports to the Board in relation to Safer Gambling.

The Safer Gambling Compliance Manager is integral to each line of defence under the Company Safer Gambling framework. Outside of the specified role of the Safer Gambling Compliance Manager (detailed in Section 6 of the Company Safer Gambling Policy), the Safer Gambling Manager is responsible for the following as part of the three lines of defence.

- Ensuring that Safer Gambling policies, procedures and controls are implemented and followed by all Company Employees.
- Reviewing breaches of Safer Gambling policies, procedures, and controls (including those escalated at site level by the Manager).
- Provide oversight and guidance/advice to all Company Employees within each line of defence.
- The identification of any training needs or remedial actions in relation to Company Employees.
- The review of age verification and customer interaction records.

## **5. PROTECTION OF CHILDREN AND OTHER VULNERABLE PERSONS**

### **5.1 Combatting Problem Gambling**

The Company makes annual financial contributions to organisations approved by the Gambling Commission which between them deliver or support research into the prevention and treatment of gambling related harms, harm prevention approaches and treatment for those harmed by gambling (the full list of Gambling Commission approved organisations can be found at.

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/list-of-organisations-for-operator-contributions>

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

It is an offence under Section 47(1) of the Gambling Act 2005 to permit a child (those under the age of 16) or a young person (those aged 16 – 17) to enter a gambling premise.

The Company will therefore maintain a strict approach of challenging any person who appears to be under the age of 25 (which is a legal requirement in Scotland and considered best practice in England/Wales). Employees are required to either challenge a person who appears to be or who they believe under the age of 25 who is on Company premises or refer any such concerns/observations to a Duty Manager.

Any approved visitor or contractor employed by the Company to conduct works within the Company's licensed premises must be informed that they and, or their employees must be aged over 18 years and that they may be asked to provide verifiable age-related identification before entry is permitted.

If there is any doubt as to a person's age the person will not be permitted entry unless verifiable age-related identification is provided.

If a child or young person is accompanied by an adult, service is to be refused and both persons are to be denied entry or asked to leave. The incident is to be recorded on the IHL Smart Tablet.

If a child or young person gains access to Company premises and gambles, it is a legal requirement that only stakes (initial buy-in) are to be returned and under no circumstances are winnings or prizes to be paid. Any identified winnings will be considered forfeit and will be donated to a gambling charity. The incident is to be recorded on the IHL Smart Tablet.

The Company does not use any signage, promotions, or marketing materials for the purposes of gambling that would appeal to children or young people.

It is a mandatory licence requirement that the Company displays signage at each entrance stating that entry by a person aged under 18 is not permitted. Marketing materials, other information, equipment, or other decorative items must not obstruct the signage. The Manager has a responsibility to replace any signage that is worn or defaced without delay.

### **5.3 Gambling Management Tools and Responsible Gambling Management Information**

The Company displays information both within its premises and on its website that help customers to gamble responsibly and where to seek further help and advice should they experience problem gambling or gambling related harms.

The Company displays responsible gambling information on all marketing information and notices within its premises.

Staying in Control leaflets are available for customers to take away which provide information on help and advice for problem gambling. These leaflets are available at the following locations within the premises.

- Service Desk
- Entrance
- Customer Toilets
- Employee Rest Area

The Manager is responsible for ensuring that leaflets are available in the above locations and that enough stock is available for replenishment.

GamCare Helpline numbers and QR Code are also displayed on gaming machines, tablets, GeWeTe and ATM's. The Manager has a responsibility to ensure that any stickers that are worn or defaced are replaced without delay.

The Company has 'Set Your Limit' Features enabled on all its B3 category slot machines which allows customers to set time and deposit limits.

### **5.4 Customer Interaction**

The Company aims for its employees to have Interaction/Conversations with customers as part of the Customer Journey to ensure employees 'know their customers' and minimises the risk of them experiencing harms associated with gambling and takes into account the Gambling Commissions guidance.

MERKUR Slots Employees attend Interaction and Evaluation Training workshops where, in addition to reviewing the language used in an Interaction/Conversation the evaluation of such conversations is considered. Employees are trained in.

- Observing any changes in customer behaviour which may indicate signs of them suffering from gambling harm.
- Identifying Customers who may be at risk of, or experiencing harms associated with gambling.
- Interacting with Customers who may be at risk of, or experiencing harms associated with gambling.
- Understanding the impact of the interaction on the Customer and Evaluating the interaction/conversation and the impact of the licensee's actions and approach.

The Company has set in place a number of intervention points where a customer may be at risk of or experiencing harms associated with gambling.

Behaviour signs or triggers can be displayed but are not limited to the following.

- Changes to appearance, demeanour and wellbeing brought about through non-gambling related negative events.
- Remaining on the premises for an extended period.
- Patterns of frequent leaving and returning to the premise.
- Repeated evidence of a customer being tired and/or sleep deprived.
- Mentioned self-exclusion or taking a break.
- Seeking to borrow money from associates or unknowns.
- Changes in the nature, patterns, or levels of play.
- A person affected by a health condition which may impair their judgement.
- Frequent use of ATMs on the premises.
- Family/partner/close friend visiting the premise to find Customer or receipt of information with respect to a concern about a customer.
- Mentions frequently about losses or hints that they have been treated unfairly, irrespective of whether they wish to make a complaint.
- Repeated aggressive behaviour, agitation, distress, or changes which would be an indication that gambling is having a negative impact on a customer's wellbeing.
- Admission of a gambling problem or direct request for help in respect of gambling problems.
- Intoxication/substance abuse or other suspected/known addictions.

**Behaviour/Problem Gambling Signs** – in all cases where a customer's behaviour has changed and it is believed they are showing signs of problem gambling or gambling related harm, this must be immediately brought to the attention of the Duty Manager. A Safer Gambling interaction/conversation must be conducted and recorded on the SMART Tablet. Should the Interaction/Conversation give the employee any cause for concern the Customer should be offered advice on where to seek further help, and on self-exclusion (as with all interventions with people who may be in distress, the Duty Manager is required to consider the health and safety of themselves, the customer and other employees/customers within the premises). The Duty Manager must record details of the interaction, what behaviour triggers were observed and the outcome (ranging from customer self-exclusion to an enforced suspension with details of advice offered). The interaction/conversation is to be recorded on the SMART Tablet.

**Long Periods of Play** – While it is recognised that some Customers may only visit the premise with the sole aim of participating in gambling, employees should be vigilant to ensure that unusually prolonged periods of play are monitored and where appropriate measures taken to ensure that the Customer is to take rest breaks.

The Duty Manager or Authorised Person must record details of any Interaction/Conversation, the length of time observed etc. and the outcome (ranging from continuation of gambling to suspension) and why they made this decision. The interaction is to be recorded on the SMART tablet.

**Visitation** – Consideration should be given to the fact that the Customer may just be a regular visitor and the frequency of their visit may not be a concern. In these cases, an interaction/Conversation may not always be required.

The Duty Manager or Authorised Person must record details of the interaction, the number of visits recorded etc. and the outcome (ranging from continuation of gambling to suspension) and why they made this decision. The interaction is to be recorded on the SMART Tablet.

The Manager and the Safer Gambling Compliance Manager are to be informed and the Customer prevented from further gambling and/or entry at that time in cases where the Duty Manager/Authorised Person has concerns that the Customer may be at risk of gambling harm.

**Significant Win** – As with all types of play, it does not necessarily follow that because a customer has won an interaction must take place. However, there is a risk that high staking following a win could hide or lead to harmful behaviours and attention must be paid to this.

- As a guide, normal practice ticket wins of £1,000 will require intervention from an employee to approve pay-out.
- Or where the win is significant in relation to the Customers normal play history and information we hold on the Customer, upon their next visit a safer gambling interaction/welfare check may be undertaken before any gambling takes place.

The interaction is to be recorded on the SMART tablet.

**Consecutive Losses** – As with all types of play, it does not necessarily follow that because a customer has lost an interaction must take place. However, there is a risk that consecutive losses could hide or lead to harmful behaviours and attention must be paid to this.

- As a guide, normal practice where 3 or more consecutive losses are understood to have occurred, the customers play will be reviewed and depending on information known regarding the customer an Interaction/Conversation will be undertaken and recorded on The SMART tablet.
- Or where the loss is significant in relation to the Customers normal play history and information we hold on the Customer, upon their next visit a safer gambling interaction/welfare check may be undertaken before any gambling takes place

The interaction is to be recorded on The SMART tablet.

**Return from a Period of Self-Exclusion** – Customers who self-exclude do so for many reasons ranging from a short-term control mechanism to instances of potential or actual gambling related harms. Customers returning from periods of self-exclusion must be given options to regulate their gambling behaviours and an increased level of protection against gambling harm.

- A customer returning from a period of self-exclusion will be subject to a re-instatement interview and they will not be permitted entry until after a minimum 24 hrs cooling off period.
- The reinstatement is to be recorded on the Smart Tablet and further safer gambling interactions/welfare checks will be scheduled with the Customer, where deemed appropriate following reinstatement.

**Intoxication/Substance Abuse** – Where a customer is suspected of/or observed to be intoxicated/under the influence of an illegal substance either attempting to enter or on the premises the Duty Manager is to be informed immediately.

- Any Customers who are suspected of/or observed to be intoxicated/under the influence of an illegal substance either attempting to enter or on the premises are required to have a safer gambling interaction/conversation with the Duty Manager and entry may not be permitted. (As with all interventions with people who may be intoxicated, the Duty Manager is required to consider the health and safety of themselves, the Customer, and other employees/Customers within the premises).
- For instances that require police assistance such as refusal to leave, operating a motor vehicle etc. the Duty Manager will be required to record on the Smart Tablet Incident App and as an Interaction/conversation on The SMART tablet.

To evaluate an interaction, it is important to understand the impact on the Customer and the effectiveness of the Companies approach. See Appendix A for the safer gambling interaction process. The Company will consider the interactions with those Customers who may be at a higher risk of suffering gambling related harms or displaying signs of problem gambling by looking at the following.

- The Customer behaviour that led to the interaction.
- How the interaction was undertaken and how this was communicated to the Customer.
- Did the Customer understand the reason for the interaction and the purpose of any advice that may have been offered.
- What action was undertaken upon completion of the interaction.
- Is there a need for any follow up action to the interaction.

Safer Gambling Interactions that relate to Customers who may be at an increased risk of gambling harm will be reviewed by the Manager and the Area Manager who will report any situations they feel require escalation to the Safer Gambling Compliance manager.

The Safer Gambling Compliance Manager will report to the Compliance and Risk Committee and will consider the following as part of the evaluation process.

- The outcome and evaluations of the interactions, where Duty Managers have informed the Manager and Area Manager, and which have been escalated to the Safer Gambling Compliance Manager that they have concerns that the customer may be at risk of gambling harm.
- Are Company resources being correctly directed towards those customers that may be at risk of gambling harm.
- Any recommendations to strengthen Company safer gambling policy, identify Customers who may be at risk of gambling harm or to improve staff training.

The Safer Gambling Compliance Manager will conduct regular dip samples of the active Customer base with data available on The SMART tablet to ensure that the Customer interaction process is being followed by Venue Management and that customers who may be at risk of gambling harm are being identified and interacted with/evaluated where required.

## 5.5 Self-exclusion

The Company will help those who have identified themselves as having a problem with gambling or who may be suffering gambling harm by, offering enrolment into voluntary self-exclusion schemes.

The Company is part of the National Self- Exclusion schemes managed under BACTA, which covers all United Kingdom land-based premise operators.

Customers who wish to voluntarily enrol into the self-exclusion scheme can do so at the premise.

The Company are unable to accept any applications to enter self-exclusion from third parties, unless in exceptional circumstances. Any applications must be directed to the Head of Compliance.

Any customer that has entered a period of self-exclusion will have their marketing permissions checked. Any customers that have marketing enabled will have the permissions removed by the Head of Marketing before any further promotions are sent.

Any Customer entering a period of self-exclusion will be offered advice on where to seek additional help in relation to problem gambling/gambling harm and will be advised that the following applies.

- Minimum self-exclusion period is six months and not more than 12 months.
- Any self-exclusion period can be extended by the same time period upon request.
- If a self-excluded person manages to enter a premise and gambles any funds gambled or won may be considered forfeit, and the breach recorded.
- Following a self-exclusion period, the Customer may request for their self-exclusion period to be lifted, (the Company will not notify a customer that a self-exclusion period has, or is about to, expire).
- Following a self-exclusion lift request a 24hr cooling off period will apply.

**Duty Managers are not trained treatment providers and as such can only offer advice to Customers on where to seek professional help and are not required/trained to offer counselling.**

Should a customer who is enrolled on a self-exclusion scheme or who has been excluded on safer gambling grounds attempts entry, the Duty Manager is to be called and no entry is to be permitted.

Where a customer who is enrolled on a self-exclusion scheme or who has been excluded on safer gambling grounds gains entry, they must be told to leave, and the breach is to be recorded on the Smart Tablet Self-Exclusion App and an Interaction/Conversation recorded on The SMART tablet.

Where a customer who is enrolled on a self-exclusion scheme or excluded on safer gambling grounds gains entry and gambles, this must be immediately brought to the attention of the Duty Manager. Any identifiable stakes and or winnings will be considered forfeit, and the Customer may not be permitted to cash out. They must be told to leave, and the breach is to be recorded on the Smart Tablet Self-Exclusion App and an Interaction/Conversation recorded on The SMART tablet.

## **5.6 Employment of Children and Young Persons**

The Company does not employ anyone under the age of 18. All new employees are required to verify their age as part of the application/employment process.

## **5.7 Money Lending Between Customers**

Whilst it is accepted that there are occasions where customers may lend money to each other for the purpose of gambling, the Company is required to monitor and prevent organised or systematic money lending from individuals operating as loan sharks. Where money lending is observed or suspected to be taking place the Duty Manager is to be immediately informed (employees are not to approach customers directly in relation to this matter).

Where the Duty Manager believes that any money lending is non-commercial, a safer gambling interaction/welfare check is to be undertaken. The Duty Manager must record details of the interaction/conversation on The SMART tablet, the reason for non-commercial money lending etc. and the outcome (ranging from continuation of gambling to suspension) and why they made this decision.

Where the Duty Manager believes that any money lending is of a commercial (organised or systematic) nature the Customer must be asked to leave the premises, the Duty Manager is required to consider the health and safety of themselves, the Customer, and other staff/Customers within the premises. The Duty Manager must notify the Nominated Officer to submit a Suspicious Activity Report (SAR).

Where a report is made to the Nominated Officer in relation to systemic or organised money laundering the Nominated Officer will report to the Gambling Commission via a key event and will determine what action to take in relation to any SAR submissions.

Any customers who are believed to be borrowing money from other customers are required to have a safer gambling interaction/welfare check with the Duty Manager. The Duty Manager must record details of the interaction/conversation, reason for Customer borrowing money etc. and the outcome (ranging from continuation of gambling to suspension) and why they made this decision.

The interaction is to be recorded on The SMART tablet.

## **6. FAIR AND OPEN PROVISIONS**

The Company ensures that its terms and conditions are not unfair within the meaning of the Consumer Rights Act 2015.

The Company displays the following information within its premises to assist customers in making an informed choice about which games they may intend to play and/or to provide further assistance if required. Information is available in the following locations.

- Machine information screens

The Company ensures that all gaming areas are correctly supervised. Duty Managers, Supervisors and other employees conduct regular checks of both gaming and non-gaming areas to ensure the safety and security of employees and Customers.

## **7. MARKETING**

### **7.1 Rewards and Bonuses**

Any rewards or bonuses that are offered to any existing or potential customers by the Company are subject to the following rules.

- Terms and Conditions are clear and available to all customers who are offered the reward or bonus.
- The reward or bonus is not subject to the customer gambling for a predetermined length of time.
- The reward or bonus is not subject to the customer spend.

From time to time the Company will send promotional offers in the form of free plays and match plays to its customer base. Any promotional offers will not be based on spend.

The Company does not designate any of its customers as VIP and as such does not offer any increased incentive or reward programs.

### **7.2 Alcoholic Drinks**

The Company does not sell or offer complimentary alcoholic drinks to its customers in MERKUR Slots venues.

### **7.3 Promotion by Agents**

The Company does not use agents for the promotion of any of its gambling activities or to promote its business.

### **7.4 Compliance with Advertising Codes**

The Company undertakes all its marketing in a socially responsible manner and complies with the codes of conduct issued by the Committees of Advertising Practice, non-broadcast (CAP) and the Broadcast (BCAP) which are administered by the Advertising Standards Authority (ASA).

When conforming to the UK Code of Non-broadcast Advertising and Direct and Promotional Marketing (CAP Code, <https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html>) particular attention is paid to the following sections;

- Section 3 – Misleading Advertising.
- Section 8 – Promotional Marketing.
- Section 16 – Gambling.

When conforming to the UK Code of Broadcast Advertising (BCAP) Code

<https://www.asa.org.uk/codes-and-rulings/advertising-codes/broadcast-code.html>

particular attention is paid to the following sections.

- Section 3 – Misleading Advertising.
- Section 17 – Gambling

The Company also complies with the Gamcare Industry Code for the display of Safer Gambling information (Gambling Venues).

<https://www.safergamblingstandard.org.uk/news/new-code-of-conduct-for-land-based-gambling-venues/>

The Company currently has no partnership agreements in place.

## **7.5 Other Marketing Requirements**

The Company ensures that any marketing promotions and new media are within the meaning of the Consumer Protection from Unfair Trading Regulations 2008

<https://www.legislation.gov.uk/ukxi/2008/1277/contents/made>

All marketing material requires approval from the Head of Compliance and where necessary legal advice is sought.

Terms and conditions for all promotions are available to Customers for the duration of said promotion. Terms and conditions can be viewed both on the premises and websites.

The Company ensures that no marketing information or promotions are displayed on materials that are for the purposes of safer gambling.

## **7.6 Direct Electronic Marketing Consent**

Upon initial registration for membership all customers are asked to give their consent to receive marketing and promotions by post, email, text, and social media. The default setting is for no permissions to be set and only customers who give consent (completing a privacy card) will have these permissions enabled on their profile.

All Customers who receive marketing or promotional contact can unsubscribe at any point.

Further information relating to the Privacy and Electronic Communications (PECR) are available on the Information Commissioners Office (ICO) website <https://ico.org.uk>

## **8. COMPLAINTS AND DISPUTES**

### **8.1 Alternative Dispute Resolution**

The Company has a mechanism in place for customers to refer gaming disputes to a recognised Alternative Dispute Resolution (ADR) provider. The Companies approved ADR provider is the Independent Betting Adjudication Service (IBAS [www.ibas-uk.com](http://www.ibas-uk.com)) which is free of charge to customers and approved by the Gambling Commission.

A complaint as determined under the LCCP relates to licensed activities for the outcome of a gambling transaction or a concern over how the Company conducts its gambling business.

Dispute as determined under the LCCP is the non-resolution of a customer complaint which has not been resolved by the Company.

Only disputes of a gambling nature can be referred to IBAS. The Company will address Customer complaints within 8 weeks following receipt.

### **8.2 Non-Gambling Related Customer Complaints**

Customers from time to time may wish to complain on issues relating to service (non-gambling)etc. These complaints will not qualify for ADR and will be dealt with internally by the Company via the Customer Care platform:

- Customer Complaint procedures are available for customers in the premise.
- Customer Care details are displayed on the Customer Information Board and via the company website.

## **9. COMPANY EMPLOYEES**

### **9.1 Responsible Gambling Information for Employees**

Employees are encouraged to report any issues they are experiencing in relation to safer gambling as soon as possible to ensure that the Company can provide both the correct and the right level of advice/support that is required.

The company provides a confidential Employee Assistance Programme (EAP), for free information, support, and counselling – available on the Hapi App or on Inform People.

The Company does not permit any of its employees to gamble within any of its premises.

## **10. SENIOR MANAGEMENT RESPONSIBILITY**

### **10.1 Compliance Risk Committee**

For the purpose of the Company Safer Gambling Policies, Senior Management means individuals within the Company with sufficient knowledge of the Company's Safer Gambling risks and with sufficient authority to take decisions that affect the Company's exposure to

Safer Gambling risk. The Company has determined that members of Senior Management will make up the Compliance Risk Committee and will report to the Board.

The Compliance Risk Committee will be chaired by the Head of Compliance and will include the COO, the CFO, Safer Gambling Compliance Manager, Operations Directors, Head of Product, Head of Marketing, Head of HR, Head of IT. In addition, there is a group Compliance Committee that meet quarterly which is attended by the Chief Executive Manager, Group Compliance Director, and the Company Licensing Advisors, Poppleston Allen. The Compliance Risk Committee makes up the third line of monitoring in the Company's risk-based approach for protecting its customers against the risks of gambling related harms.

The Company has a starting position that most of its customers gamble safely and are not at risk of suffering from gambling related harm and as such present a low risk. All policies, procedures and controls are proportionate to identified Safer Gambling risks.

The Head of Compliance will chair the Compliance Risk Committee meetings and as such they will set agendas and complete minutes.

## **10.2 Company Safer Gambling Obligations**

The Head of Compliance and the Safer Gambling Compliance Manager will provide monthly (calendar), quarterly (calendar) and annual (calendar) reports to the Compliance Risk Committee covering the Company's operation and effectiveness of the systems and controls in place relating to Safer Gambling and will take any action necessary to remedy deficiencies identified by the report in a timely manner. The quarterly and annual reports will set out the following.

- Safer Gambling risks to the Company and/or its customers/employees that are either new/emerging or have changed.
- Remedial action identified through deficiencies or Company Safer Gambling weaknesses.
- Improvements to be made or progress reports on previous measures.
- Internal and independent audit results.
- Interactions with the Gambling Commission or other external bodies.
- Any key notifications (regulatory changes/guidance) from the Gambling Commission or other industry bodies complete with an explanation/interpretation, effects on the company operations/employees/customers and any further recommendations.
- Senior Management and Relevant Employee Safer Gambling training.
- Safer Gambling resource considerations or concerns.
- Any other relevant information at the discretion of the Safer Gambling Compliance Manager.

## **10.3 Policies, Procedures and Controls**

The Company has in place policies, procedures, and controls to mitigate and manage the Safer Gambling risks that have been identified. The Company Safer Gambling policies, procedures and controls are.

- Proportionate to the size and nature of the business using guidance issued by the Gambling Commission (and other relevant bodies such as The Bingo Association)
- Approved by the Head of Compliance and are submitted to both the Compliance Risk Committee, the Board and Group Compliance.

#### 10.4 Safer Gambling Training

The Company provides training to its employees to ensure that they both understand the culture of the company and their personal responsibilities in relation to safer gambling. Safer Gambling training is undertaken upon commencement of employment and then on a six-monthly basis (the Company aims to deliver safer gambling training on a six-monthly basis consisting of a cycle of remote and face to face learning).

All Safer Gambling Training will be devised and supervised by the Safer Gambling Compliance Manager and L&D department and will be reviewed/updated in line with legislation/Gambling Commission guidance. Employees are made aware of.

- The Safer Gambling risks applicable to the Company's customers and how these risks are managed.
- Identifying behavioral changes which may indicate a customer is at risk of Gambling harm.
- Identify Customers at risk of Problem Gambling or Gambling Related Harm.
- Legal requirements of children and young people accessing company premises
- The Customer interaction process.
- Industry Self-Exclusion Scheme.
- Fair and Open provisions.
- The Customer Dispute process.
- The role and responsibilities of the Safer Gambling Manager.

It is the Manager of each venues responsibility to ensure that all employees receive Safer Gambling Training both upon commencement of employment and as a refresher on a minimum six-monthly basis throughout employment with the Company. The Manager will ensure that employee training records are complete and up to date.

Safer gambling Interaction and Evaluation workshops are held on a regular basis to ensure all senior MERKUR Slots Management are aware of the need to conduct Interaction/Conversations and evaluation of these interactions is conducted.

Safer Gambling Interaction and Evaluation workshops review real interactions, give examples of true to life scenarios and encourage open and honest discussions from the attendees.

Internal Compliance Auditors also attend Safer Gambling Interaction and Evaluation workshop to support their Compliance audit assessments.

## **11. THE SAFER GAMBLING MANAGER**

### **11.1 Role of the Safer Gambling Manager**

The Company has appointed a Safer Gambling Compliance Manager who is responsible for:

- Reviewing Safer Gambling documentation that has been collected/completed.
- Reviewing Safer Gambling interactions that have been completed by Duty Managers and approved by the General Manager in line with Company auditing procedures.
- Reviewing transaction data to determine potential Safer Gambling risks or patterns in line with Company audit procedures.
- Being the Company point of contact for all Safer Gambling issues.
- Preparing Safer Gambling training materials for all Company Employees and ensuring face-to-face Safer Gambling training is delivered for Senior Management, Managers and Head Office Employees and ensuring that online Safer Gambling training is relevant.
- Collating, preparing, and presenting Safer Gambling reports on a monthly, quarterly, and annual basis to the Compliance Risk Committee (and where required the Board).
- Providing additional support to the Head of Compliance, the Compliance Assistant or other areas of the business as determined by the Head of Compliance or were identified by the Safer Gambling Compliance Manager.

### **11.2 Standing of the Safer Gambling Manager**

The Company has determined that the Safer Gambling Compliance Manager is responsible for the oversight of all the Company's Safer Gambling activities and is the key person relating to Safer Gambling.

The Safer Gambling Compliance Manager has.

- The authority to act independently in carrying out their Safer Gambling responsibilities (relating to the LCCP).
- Has the necessary seniority within the Company and the resources/information to discharge their duties in an objective manner which may conflict with short term operational concerns.

In the temporary absence of the Safer Gambling Compliance Manager Safer Gambling responsibilities will be undertaken by the Head of Compliance.

In the temporary absence of the General Manager (due to holidays/absence etc.) Safer Gambling responsibilities will be undertaken by a Designated Deputy.

## **12. GAMING MACHINES IN GAMBLING PREMISES**

### **12.1 All non-remote operating licences**

The Company makes available Gaming Machines within its licensed premises where there are substantive facilities for non-remote premise games.

All gaming areas are appropriately supervised by staff.

## **13. ASSESSING LOCAL RISK**

### **13.1 Local Risk Assessment**

The Company has in place Local Area Risk Assessments for each of its premises. Each Risk Assessment considers identified risks that are associated with the provision of gambling and the policies/procedures that the Company has in place to mitigate these identified risks.

Each Local Risk Assessment considers matters identified in the relevant licensing authority's statement of licensing policy.

The Safer Gambling Compliance Manager and Internal Compliance Auditors will review the local risk assessments and will update where necessary (at least on a yearly basis or where a notable change has been identified).

The latest version of the Local Area Risk Assessment is available as a reference document in each premise.

## **14. ONGOING MONITORING AND AUDITING**

### **14.1 Monitoring Techniques**

The Company uses various techniques to monitor Customers. The list below is non-exhaustive:

- Monitoring customer play on machines, customer behaviours and ensuring that relevant Safer Gambling interactions are completed and correct. Further to this any Customers of concern are reported to the Duty Manager.
- Monitoring customer behaviours and ensuring that relevant Safer Gambling interactions are completed and correct. Further to this any customers of concern are reported to the Duty Manager.
- Managers to review Safer Gambling Interactions providing rationale for decisions made, ensuring they are recorded correctly. Further to this providing oversight of employees, ensuring training is up to date, reviewing breaches/exceptions to Safer Gambling policy and forwarding information to the Safer Gambling Compliance Manager.
- Area Managers to review Safer Gambling Interactions on a regular basis.
- Safer Gambling Compliance Manager to review Safer Gambling documentation, outcomes and rationale for decisions made and Company documentation.

#### **14.1 Regulatory Compliance Audits**

The Company Internal Auditors conduct unannounced Regulatory Compliance audits to ensure both the Company and its employees are compliant with legislation, LCCP and Company policy.

### **15. ANTI-MONEY LAUNDERING AND SAFER GAMBLING**

It is important to be aware that while some Customers may display signs that they may be engaged in some form of money laundering activity, the signs may also be an indication of problem gambling.

For instance, a customer whose playing habits increase may be chasing losses, rather than engaging in money laundering activity. Similarly, there may be occasions whereby a customer may be a problem gambler, but in fact, may be spending the proceeds of crime.

Whatever the circumstances, Duty Managers must be prepared to engage with the customer and ask pertinent questions to satisfy themselves, as to whether the Company shall commence or continue with the business relationship with the Customer or terminate it. In summary, it is perfectly plausible that an individual attempting to spend criminal proceeds or launder money could also be a problem gambler, but one does not necessarily follow the other.

The effective identification and management of these risks rests upon the ability to have a comprehensive knowledge of customer relationships and upon Duty Managers having a clear understanding of their responsibilities.

Commercial and business information should be considered for AML as well as safer gambling purposes when transacting with an individual.

If Customers expect that a customer interaction is likely, should they play with large amounts of money, or for lengthy periods and such interaction is consistently applied, there would be less reason for players to question or become suspicious of the motives for these interactions.

## APPENDIX A – Safer Gambling Interaction/Conversation Process

Social Responsibility Code Provision 3.4.1 Customer Interaction has been in force since 31<sup>st</sup> October 2019. A Safer Gambling Interaction is broken down into three parts.

- Identify – What is the behaviour, activity or trigger that has led to the interaction.
- Interact – What has been discussed between the customer and the Duty Manager to find out more information relating to the behaviour, activity, or trigger.
- Evaluate – What was the outcome of the interaction (follow up action where required), did the Customer understand the interaction and why did the Duty Manager make their decision.

Identifying Customers who may be at risk of or are experiencing gambling harm at the earliest opportunity is a key factor in reducing any possible or actual harm. Duty Managers will interact with, observe Customers, and record any such safer gambling interaction.

Before any safer gambling interaction/conversation is undertaken the Duty Manager should where review and consider the following.

- Any previous interactions/conversations recorded with the Customer that are relevant and their outcome.
- What information do they know about the Customer.
- Is the reason for the interaction out of character or a cause of concern in relation to the Customer.
- What outcome is expected to be achieved from the interaction.

When conducting the safer gambling interaction/conversation, the Duty Manager is to consider the health and safety of themselves, the Customer, and other employees/customers within the premises as the Customer may be in distress. The Duty Manager is best placed to decide on when, where, and how an interaction will take place.

When interacting with a customer the Duty Manager must remain friendly and supportive. Questions are to be open ended (conversational) to stimulate a response from the Customer and closed questions (yes or no answers) are not recommended.

Examples of open questions are as follows.

- I have noticed that you are not having much fun lately, can you tell me if anything has changed.
- You seem to be spending more time in the premise lately, have things changed at work.

Duty Managers are reminded that the interaction is a conversation relating to customer welfare and is not an interview.

During the interaction/conversation the Duty Manager is to remain vigilant towards signs of gambling harm (agitation, behaviour, language etc). At the same time the Duty Manager is required to assess whether the Customer is showing signs of frustration or is upset for another non-gambling reason. The best outcome for the Customer will only be achieved through an honest and open dialogue.

When evaluating a safer gambling interaction, it is important that the Duty Manager looks at what is in the best interests of the Customer. The evaluation should give an assessment as to whether the Duty Manager feels that the Customer may be at risk of or suffering the effects of gambling harm.

Considerations in the evaluation should include the following.

- Did the Customer understand the reasons for the safer gambling interaction.
- Did the Duty Manager feel that the Customer should be offered further information/advice in relation to problem gambling/Self-exclusion etc.
- Were other gambling management tools discussed such as the Customer reducing their visits, playing at a lower stake, or moderating spend etc.
- Was the Customer considered to be at risk of gambling harm.
- Was it determined that the Customer presents a minimal risk of gambling harm as such no follow up action is required.

The Duty Manager, as part of their evaluation is to give the reasoning for their decision and are to clearly determine what action is to be taken along with any advice that was offered to the Customer.

All Safer Gambling Interactions are to be recorded on The SMART tablet.

The Safer Gambling Compliance Manager will conduct regular reviews of the Safer Gambling Interactions to ensure that the Customer interaction process is being followed by venue staff and that customer who may be at risk of gambling harm, are being identified and interacted with/evaluated where required.

## **APPENDIX B – Industry Self-Exclusion Scheme (The Bingo Association & BACTA)**

Self-exclusion social responsibility code provision 3.5.1 is a condition of our Operating Licence under the Licence Conditions and Codes of Practice – (LCCP). New regulations were implemented by the Gambling Commission (LCCP Self-exclusion 3.5.1) and as from 6th April 2016, all gaming operators must be part of a multi operator self-exclusion scheme.

The Bingo Association and BACTA national schemes covers all UK land-based premise. The system aids operators in preventing access to premises by those Customers who have declared themselves as problem gamblers and have expressed a wish to exclude within the scheme rules.

A customer can self-exclude for a minimum 6 months and a maximum 12 months.

Self-exclusion is sector specific:

- BINGO Licensed Premises 'Traditional Bingo Clubs' – National exclusion zone
- BINGO Licensed Premises 'High Street' – 1km exclusion zone
- AGC Licensed Premise 'AGC' – 1km exclusion zone

The Company has appointed the Head of Compliance as its Primary Administrator for the Self-exclusion system (SmartHub).

Where a customer has expressed a wish to enrol in self-exclusion the Customer is to cease gambling and will be enrolled via the Smart Tablet Self-Exclusion App after establishing the identity of the Customer and explaining how the scheme works.

Where a customer breaches their self-exclusion, the breach must be recorded on the SmartTablet against the persons exclusion.

As self-exclusion is a voluntary scheme a customer can ask to be reinstated once their minimum period of self-exclusion has elapsed. Following a reinstatement interview, a customer enters a 24 hours cooling off period before they can commence gambling.

# MARKETING CODE OF PRACTICE

## A GUIDE TO GETTING OUR ADVERTISING AND PROMOTIONS RIGHT – EVERY TIME !

The Marketing Department provides an annual programme of National activity. All these communications and point-of-sale/display materials are legally compliant and present our customers with a fair and professionally managed image of a responsible gaming provider. HOWEVER, occasionally 'local' activity may be requested from you. All 'local' activity should be cleared through the Marketing Department. This will ensure we are always:

### LEGAL - DECENT - HONEST - TRUTHFUL

1. All our advertising and promotions must be legally compliant and **MUST NOT** be misleading or indecent.
2. All our advertising and promotions must be socially responsible and **NOT** promote gambling for financial gain.
3. All our advertising and promotions must be **TRANSPARENT** and clearly state the offer and any requirements or conditions applied to obtaining it.
4. Any terms or conditions related to the offer, including offer end dates **MUST BE** displayed clearly at the point-of-sale and/or on any related printed literature or publicity materials.
5. Any printed literature, display or point-of-sale material **MUST** contain the company's approved compliance baseline (see example below) which includes the over 18 symbol and Gamble Responsibly statement alongside your business name, brand/logo.
6. Advertising and promotions **MUST NOT** be targeted at, or exploit children, or those vulnerable to gambling. The law states :  
*Advertisements and Promotions should not be specifically and intentionally targeted towards people under the age of 18 through the selection of media, style of presentation, content or context in which they appear. All advertisers and gambling operators should already be aware that it is an offence under Section 46 of the Gambling Act 2005 to invite a child or young person to gamble.*
7. The use of models, photographic images or illustrations in advertising or promotions must look a minimum of 25 years of age.
8. **DO NOT** make purchase a condition of entry into a draw or raffle – buying a 'chance' of winning is a lottery, so always state **NO PURCHASE NECESSARY** (even if for charitable causes).
9. **DO NOT** present offers which reward extended play or incentivise disproportionate stake levels.
10. **ALWAYS** communicate offers clearly in grammatically correct English, avoiding slang, expletives or abusive text. Avoid anything customers could perceive as offensive or discriminatory and remember the 4 key code words:

**GUARANTEED JACKPOT  
WINS FOR EVERYONE!**



**PLAY THIS AND  
DOUBLE YOUR MONEY!**



**YOU WILL WIN  
A FORTUNE!**  
NO TERMS AND CONDITIONS



**BEST BEFORE  
END**



**OVER 18  
ONLY**



**THINK 25**



**FREE TO  
ENTER?**



**PLAY LONGER  
WIN MORE**



### LEGAL - DECENT - HONEST - TRUTHFUL

**IMPORTANT:** All local promotions are required to be run through the Marketing Department.

**18+** BeGambleAware.org



**PLAY  
SENSIBLY**

**PLAY  
ENJOYABLY**

**PLAY  
AFFORDABLY**



**MERKUR  
SLOTS**



## WELCOME TO THE LEARNING PLATFORM FOR MERKUR CASINO TEAMS

Keep the learning adventure exclusively **within working hours!**

### MERKUR Casino e-Learning Portal

Welcome to MERKUR Casino e-Learning Portal. Whether you're looking to educate yourself on the latest compliance competencies or enhance your skillset on new product knowledge, our online courses have been designed to help you achieve this and more. Good luck!



**Anti-Money Laundering & Combatting the Financing of Terrorism**

2/2

**Responsible Gaming**

2/2

**Anti-Bribery**

1/1

**Licence Conditions and Codes of Practice (LCCP)**

1/1

**Advertising Codes and Practices**

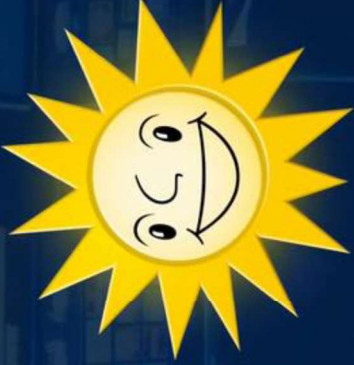
1/1

# Welcome to Litmos!

Browse courses & learning paths



Keep the learning adventure exclusively within working hours!



## Assigned Training Metrics

Total 16



## News

A warm welcome to Litmos - your new E learning platform!

As you navigate around the home page and become familiar with the buttons and widgets, you will become more confident with all the different sections and in particular how to locate your E learning modules. There is so much more that we can introduce to you - but one step at a time! More information on what is to be added soon.

Enjoy the experience!

Happy learning from the L&D team

7 months ago

Completion Status: Completed

Sort By
Reset filters
Default

Assignment Type
☐ My Assigned
☐ Self Enrolled

Content Type
☐ Courses
☐ Learning Paths

Completion Status
☐ In Progress
☒ Completed
☐ Not Started

Overdue
☐ Overdue Courses/Learning Paths

Compliance Status
☐ Compliant
☐ Not Compliant
☐ Compliance retake period



Age Verification

Compliant until 03/15/2025

100%



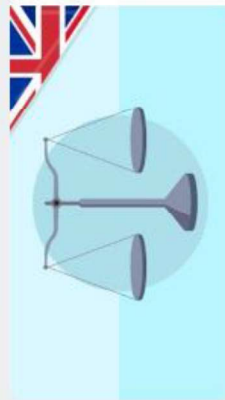
Anti-Money Laundering 4.0 (UK)

100%



Complaint Handling

100%



Compliance Essentials - Equality and Diversity 1.0 (UK)

100%



Essentials of GDPR

Compliant until 01/15/2025

468

100%

# Age Verification



The content of this course is designed to give you all the knowledge, information, and confidence to be able to effectively deal with a customer complaint in venue. It will introduce you to the Customer Care function on the Smarthub and how to effectively use this.

## INTRODUCTION

---

☰ A reminder about the Law

☰ Over 18 - THINK 25

## PROOF OF AGE/ACCEPTABLE ID

---

☰ Proof of Age

☰ What ID is acceptable?

☞ What do I need to look for when checking ID?

 Spotting Fake ID

INTERACTION - WHAT AND HOW FOR OUR EMPLOYEES

---

 What do I say and how do I say it?

REFUSING ENTRY

---

 Refusing Entry End of Module Quiz

## A reminder about the Law

---

---

**When you completed the Essentials of Compliance training  
you learnt about the Gambling Act 2005, the 3 main  
objectives of the Act and about LCCP (License Conditions  
& Codes of Practice)**

**This section is a recap on what you learnt in that training:**



**The Gambling Commission and Age Verification**



## **The Gambling Commission**

AGC, FEC and Bingo and Casino premises are regulated by the Gambling Commission. Gambling Commission Officers, local authority officers and the police can visit your premises at any time.

If we or our employees break the law with regard to the Gambling Act 2005, the company could lose their licence and may not be allowed to operate our premises in the future.

The company could also be heavily fined and individual employees could be prosecuted.

**All gaming businesses are operated according to the Gambling Act 2005. The 3 Main objectives of the Act are:**

1

The protection of children and vulnerable people

**472**

2

To be fair and open

3

To be crime free

## Age Verification sits under Objective 1:

It is illegal for anyone under the age of 18 to enter an AGC or Bingo premises; even babies in pushchairs, toddlers wandering in by accident, or any child, even if they are with an adult who is playing the machines or bingo. In terms of the law; a child is anyone under the age of 18

The first measure the company takes to prevent entry to under 18 is to make sure that signage stating the minimum age requirement (18) is displayed clearly at each entrance to the venue and on each machine, as shown below:



Clear Signage

---

**474**

## Machine Stickers/Signage

Each machine should have clear signage showing the age restrictions to play

### Clear Signage

On entry doors stating the minimum age requirement to enter the premises

### Point of Sale

We have various different posters, stickers and leaflets that clearly state the age requirements to be on the premises and playing the machines

**Let's be clear:**

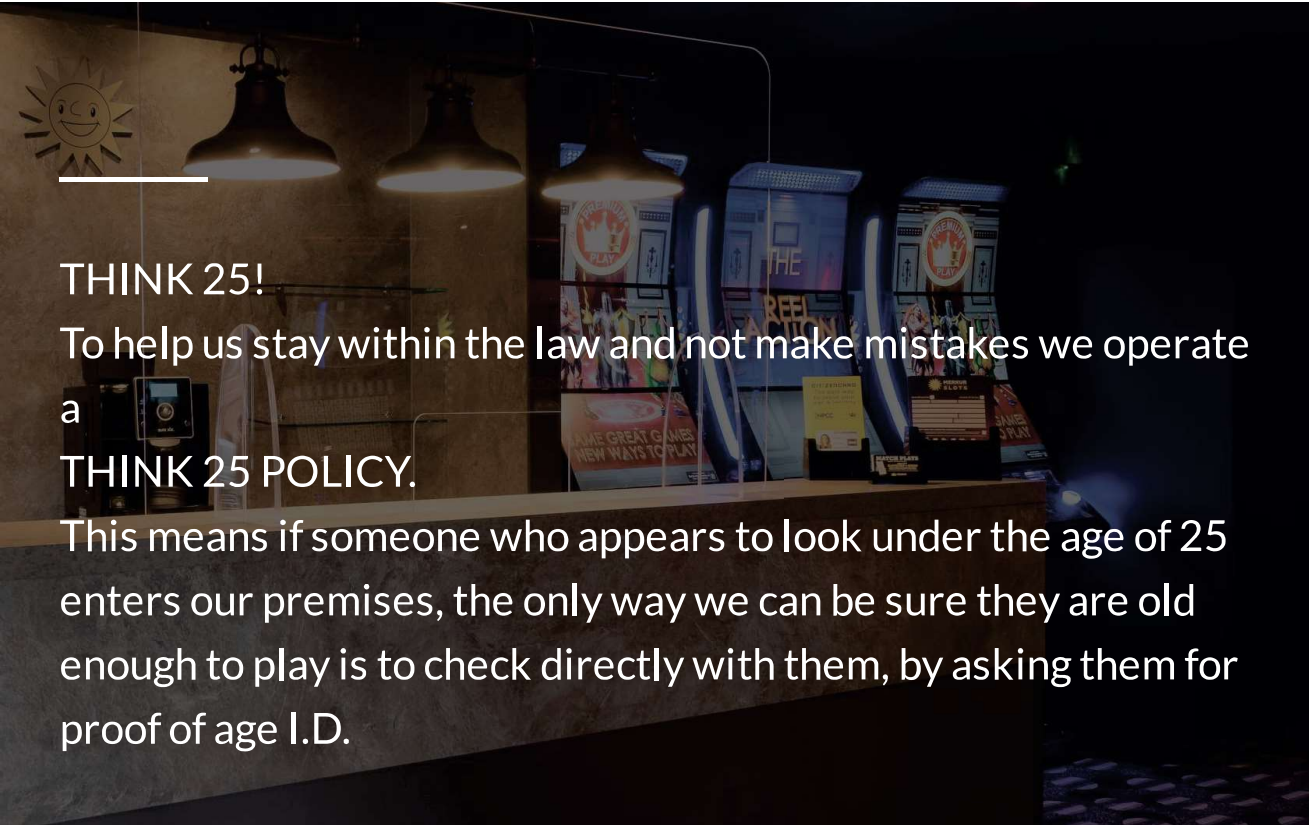
**No one Under 18 can enter the  
premises**

CONTINUE

## Over 18 - THINK 25

---

# MERKUR adopts a THINK 25 POLICY



THINK 25!

To help us stay within the law and not make mistakes we operate a  
**THINK 25 POLICY.**

This means if someone who appears to look under the age of 25 enters our premises, the only way we can be sure they are old enough to play is to check directly with them, by asking them for proof of age I.D.



## **Staff Think 25 Badge**

All employees are required to wear a 'Think 25' badge. This **MUST** be worn as part of your uniform.

You can use this to show the customer that we adopt a Think 25 policy when you need to ask for I.D.

## **Its not just about playing the machines – its about being on the premises**

Certain services we supply are not age restricted, for example using the ATM. We still have to be aware.

The proof of age policy applies to people on the premises. As the ATM is inside our premises you cannot allow under 18's into the venue to use the ATM machine. In this case, regardless of whether or not they intend playing the machines, they **MUST** be 18 years or over to enter our premises.

**REMEMBER:** You **MUST** always apply the Think 25 policy regardless of who they are and what services they may require.



**This is not a choice; it's the  
Law.**

**To abide by the law we**

**MUST CHALLENGE**  
**ANYONE WHO LOOKS**  
**UNDER 25**

CONTINUE

**480**

# Proof of Age

---

## Asking for Proof of Age

Lets start by understanding what Proof of Age is and why we must ask for it.

Click on the '+' symbols below to reveal the information:

What is meant by proof of age? —

Proof of age simply means that you can be asked to PROVE your age.

In environments like ours this is a **LEGAL** requirement

Many businesses **legally** need a proof of age scheme such as pubs, clubs, casinos and our business too – Casino, Bingo and Adult Gaming Centres.

Age restricted areas **must have a system to check the age of its customers**, to prove that they are over 18;

**NO PROOF = NO PLAY**

**481**

### **When must I ask for proof of age?**

This must be actioned as soon as a customer enters the premises. If you think a person entering the Casino, AGC or Bingo premises looks under the age of 25, you must ask them for identification as proof of their age.

If someone has entered the premises and is playing a machine or using the facilities you should ask as soon as possible – it's never 'too late' to ask and it is a legal requirement that you do if you have ANY doubt about their age.

### **What proof of age documents are acceptable?**

Only the following forms of ID are legally acceptable:

1. A passport
2. Driving Licence with photocard
3. Any identification carrying the 'PASS' logo
4. A military ID card can be accepted as proof of age



Sample Military ID Cards; these can differ by Country



## What process should I follow when asking for ID?

You should always be aware of who is entering your premises.

YOU need to apply the Think 25 policy at all times and we MUST STOP anyone that is underage from attempting to play the machines.

## REMEMBER THESE POINTS:

A white, mechanical-looking number 1 with small circular details, set against a solid orange square background.

If a customer (adult or child) who appears to be under 25 enters the gaming premises it is important that you approach them immediately.

A white, mechanical-looking number 2 with small circular details, set against a solid orange square background.

If ID proves the customer is over 18 and it is valid, thank the customer and serve as normal.



If proof of age cannot be provided or the ID appears to be fake or invalid, politely and briefly explain that they cannot play; this is company policy and a legal requirement.

## Would you ID these People?

Go through each question and pick the answer you think is right

Would you age verify this man?

☐

No

☐

Yes

SUBMIT

Does this person look over 25 ?

**486**



- 
- ☐ I'm not sure - would check
- ☐ Yes she does - no need to check

SUBMIT

How old is this man?

**487**



- 
- ☐ I don't know
- ☐ 25
- ☐ 30

SUBMIT

Would you ask for proof of age for this man?

☐

Yes

☐

No

SUBMIT

**489**

# How did you do?

Remember we cannot tell how old someone is

If in doubt, **ask for ID.**

---

Some customers may not like being asked for Proof of Age and could get angry or annoyed – this is not very nice for you but you do still have to ask – remember it's the law. Think about it; most people that are old enough are happy to provide ID. If someone gets annoyed then they have probably been caught out and this means you are doing your job really well.

Know you are in the right, remain calm and professional and stay within the LAW – we know you can do it!

CONTINUE

## What ID is acceptable?

---

# What documents can I accept?

## What proof of age documents are acceptable?

Click on the cards below to reveal the information:



A Passport



A Military ID Card



A Citizen card (A Pass accredited proof of age scheme)



A European Photocard Driving Licence

## What to look for when checking ID:

When looking at these valid forms of ID, what specifically do you need to look out for? Click on the button to find out...

CHECKING ID

## What do I need to look for when checking ID?

---

**There are several things you must check on the persons ID:**

- Check the date of birth
- Check the photo - is it true likeness?
- Check the document is authentic (holograms/watermarks etc.)
- Check the document is valid - could the details have been altered/photo changed
- Feel the edges of the document to check it is smooth and hasn't been tampered with

As an example we have shown these areas on PASS card.

Click on the markers below on the PASS card to reveal what you should be looking out for when checking ID, to verify their proof of age.

**PASS** Proof of Age Card **CITIZENCARD**

Expires on 31 Dec 2023

Name  
**Lily Stewart**

DoB  
**02 Oct 1999**

5843 2166 4567 8901

**18+**

**NPCC**  
National Police Chiefs' Council

**sia**  
Security Industry Authority





Check the edges

Are they smooth and sealed – check the document hasn't been tampered with



## Hologram

Check the document is authentic. For example; make sure that the hologram is present on the proof of age scheme card. All valid ID have holograms – check for them!



### Valid Document

Ensure that the ID document is valid by checking it, feel that it is smooth with no ridges, that it has not been altered or tampered with and that it has not expired.



### Date of Birth

Check that the date of birth shows the person is old enough to be in the AGC or Bingo premises



### Photograph

Make sure that the photograph is true likeness of the person attempting to enter the premises

CONTINUE

# Spotting Fake ID

The government have recently introduced guidance regarding checking ID. Although this new guidance is aimed primarily at the alcohol industry we can use it to learn about how to spot fake ID.

Below is the information from government about how to spot fake ID.

*Click on each tab for full information:*

TYPES OF FAKE ID	PASSPORTS	FAKE DRIVERS LICENCE	FAKE ID CARDS
Click to enlarge:			

## Types of Fake ID

Government guidance explains that there are five types of false document:

- A genuine document which is being used by someone else, e.g. a child using their older sibling's passport.
- A genuine document which has been altered, e.g. a driving licence with the date of birth scratched off.
- A genuine document which has been fraudulently obtained, e.g. a real passport that has been stolen and used by somebody else.
- A fake document which is a form of ID that does not exist, e.g. a provisional motorcycle licence.

The most common fake ID includes those that look like driving licences, such as national identification cards, European or international driving permits and provisional motorcycle licences.

TYPES OF FAKE ID

PASSPORTS

FAKE DRIVERS  
LICENCE

FAKE ID CARDS

Click to enlarge:

## How to Spot a Fake Passport

The British government change UK passports slightly every 5 years to prevent the production of genuine-looking fake passports.

### Authentic UK Passports Must:

- Be the right size (around 125 x 88mm).
- Passports issued after November 2015 have 34-pages.
- Passports issued before November 2015 should have 32pages (48 for a business book).
- Feature a digitally printed photograph with holographic overlay.
- Have a 9-digit number on page 1.
- Have a perforated serial number throughout the pages.
- Feature the holder's signature.

You may identify a fake passport by the following features:

- An invalid expiry date.
- Personal details that have been amended or tampered with.
- An incorrect number of pages for the time it was issued.
- A photograph that isn't digitally printed.
- No holograms or perforations.
- No passport chip.
- Words, signatures or pictures in the wrong places.

There are slight differences between older & newer passports. Differences include:

- The number of pages.
- The page designs.
- The presence of a chip: passports issued after 2010 have a chip in the cover of the passport whereas older passports have the chip located on page 32.

TYPES OF FAKE ID

PASSPORTS

FAKE DRIVERS  
LICENCE

FAKE ID CARDS

Click to enlarge:

## How to Spot a Fake Driving Licence

You may identify a fake driving licence by the following features:

- An incorrect flag image.
  - The wrong words across the top, e.g. 'National Identification' or 'International Driving Permit'.
  - Different languages.
  - A plain or simple-patterned background.
  - A photograph in the wrong place.
  - No signature/an incorrect signature.
  - Fake holograms.
  - Information in the wrong places.
- Driving licences are designed to be difficult to forge and possess many features that are hard to copy.

Authentic UK Driving Licences Must Have:

- A first name, surname, date and place of birth.
- A date of licence issue, photo expiry and issuing authority.
- A driver number.
- A valid photograph (black and white on newer photocards).
- The holder's signature.
- The holder's address.
- Entitlement categories.
- A hologram of a steering wheel over the person's photograph which 'turns' as you move the card.
- Further holographic images on the front.

TYPES OF FAKE ID

PASSPORTS

FAKE DRIVERS  
LICENCE

[FAKE ID CARDS](#)

Click to enlarge:

## How to Spot a Fake ID Card

You may identify a fake PASS Card by the following features:

- A hologram that is stuck on top of the plastic, rather than being smooth.
- An artificial looking hologram in appearance.
- A photograph that is stuck on top of the plastic.
- A photograph that doesn't match the person presenting the ID.
- An incorrect date of birth.
- Details that have been altered or tampered with.
- A non-smooth surface.

Authentic UK PASS Cards Must Have:

- A 3D hologram with the characteristic 'A' in the lettering.
- A photograph that matches the person.
- A valid date of birth – you can calculate the person's age from their DOB or look for the '18+' symbol on the card.
- A flat, smooth surface.

## If you suspect fake ID try these questions:

1

Ask for another form of ID, such as a bank or student card. If someone steals or borrows another person's ID, they are unlikely to take other forms and their purse/wallet will have their own ID in it.

2

Ask the person for their star sign – a person may have memorised the date of birth on the ID which they are using but are unlikely to know the corresponding star sign.

3

Ask the person for their date of birth – this can lead to them mixing their own with the one on the ID or not being able to recite the date on the ID on the spot.

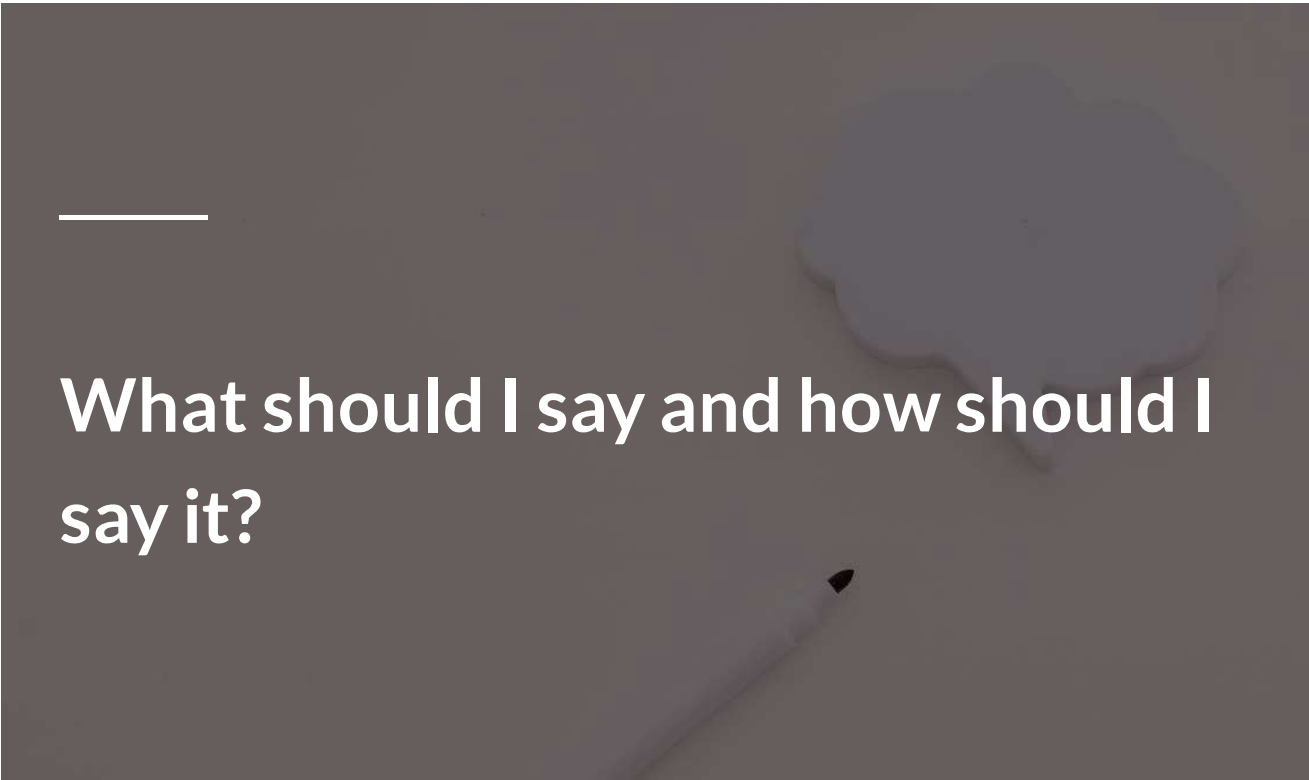
4

Ask for the postcode on the ID; a person using borrowed ID may know the first line of the address but may have difficulty remembering the postcode under pressure

CONTINUE

## What do I say and how do I say it?

---

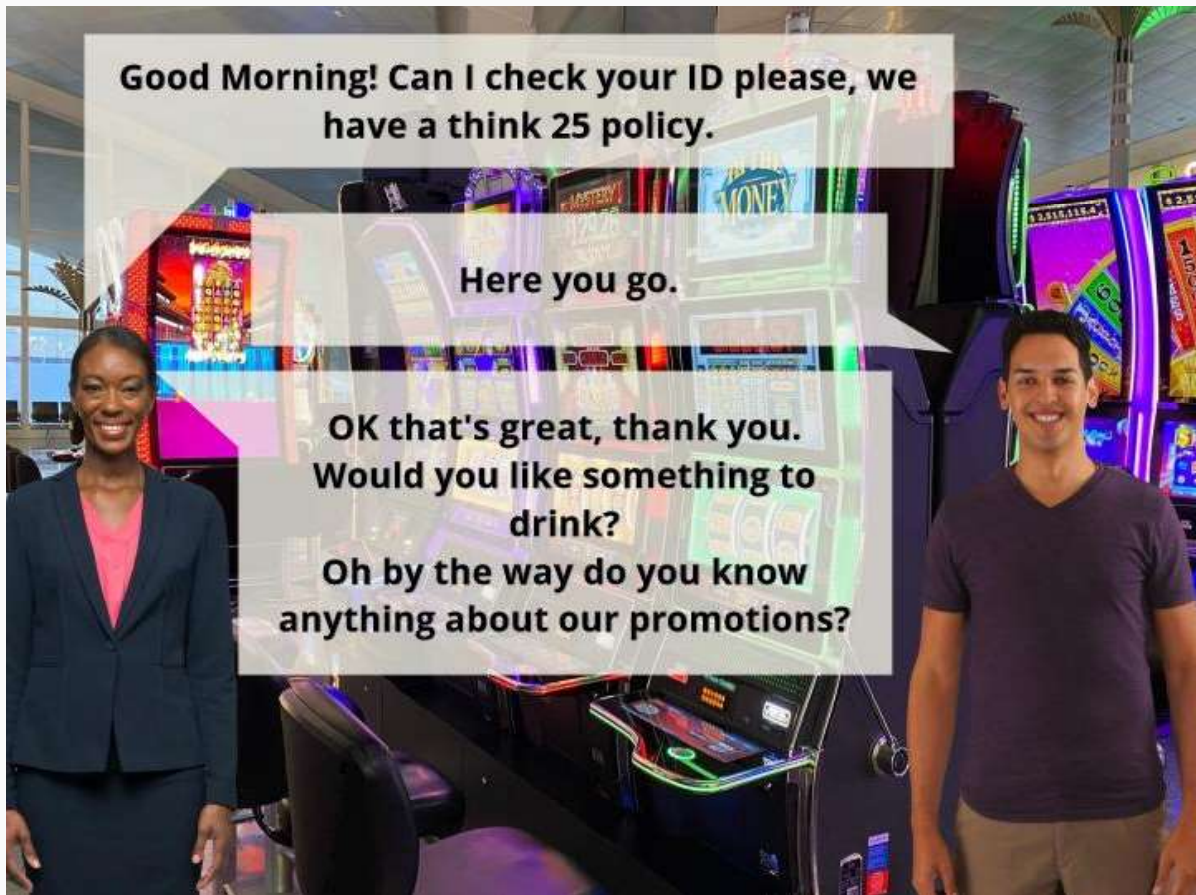


What should I say and how should I say it?

### What do I need to say when asking for ID?

Let's look at some examples of what may happen when you ask for I.D. It is important you know what to say and how to say it so you are confident to act immediately if someone who looks under 25 enters the premises

Let's see 'Sylvia' to show us how it's done!



Sylvia was produced with sufficient I.D. by Javier; therefore she was within the law to allow him into the premises.



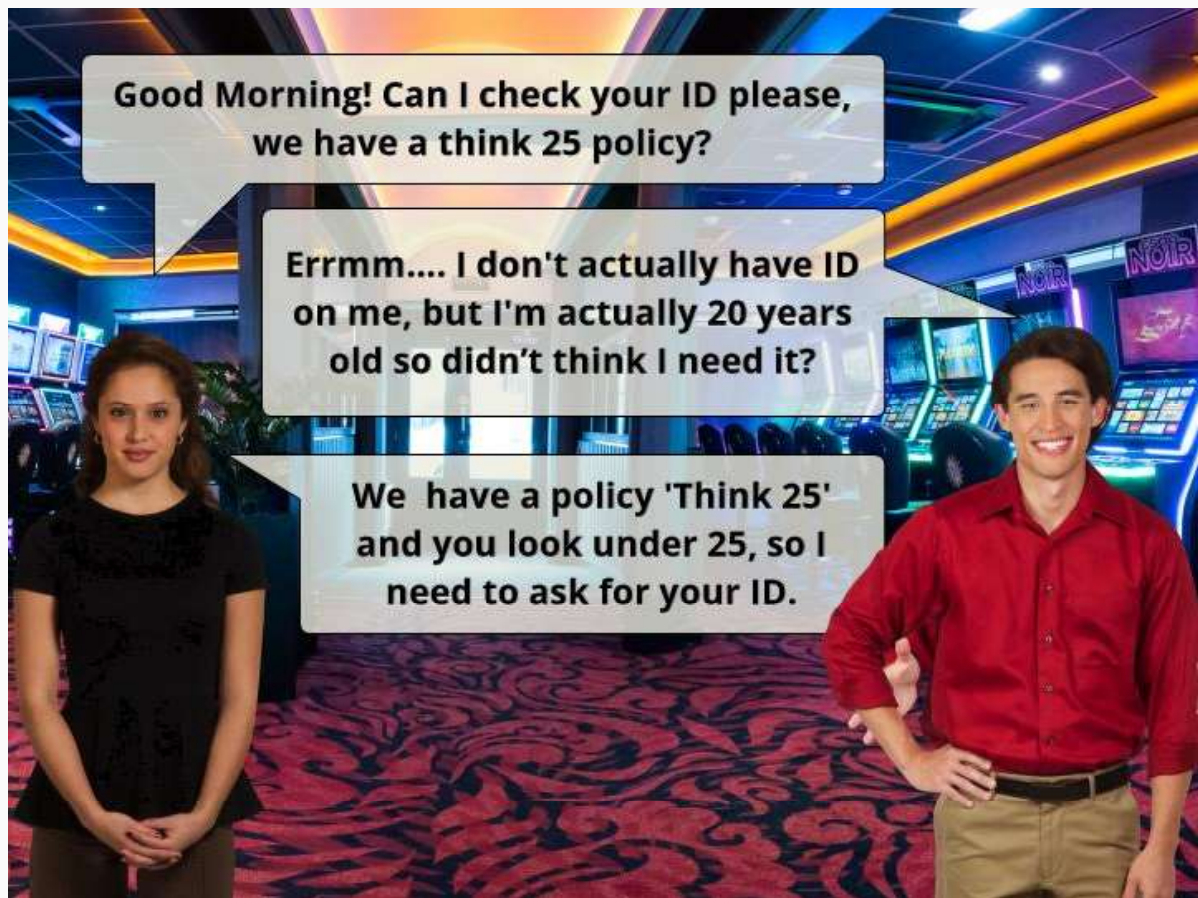
**Remember to remain calm,  
professional and polite but be clear  
that we have to check age and  
need a photo ID.**

**A refusal is the law. A polite refusal  
and explanation is good customer  
service.**

### **So what happens if the customer has no ID?**

If the customer does not present you with any ID to confirm their proof of age.

**Refusal is the law. A polite refusal and explanation is good customer service.**



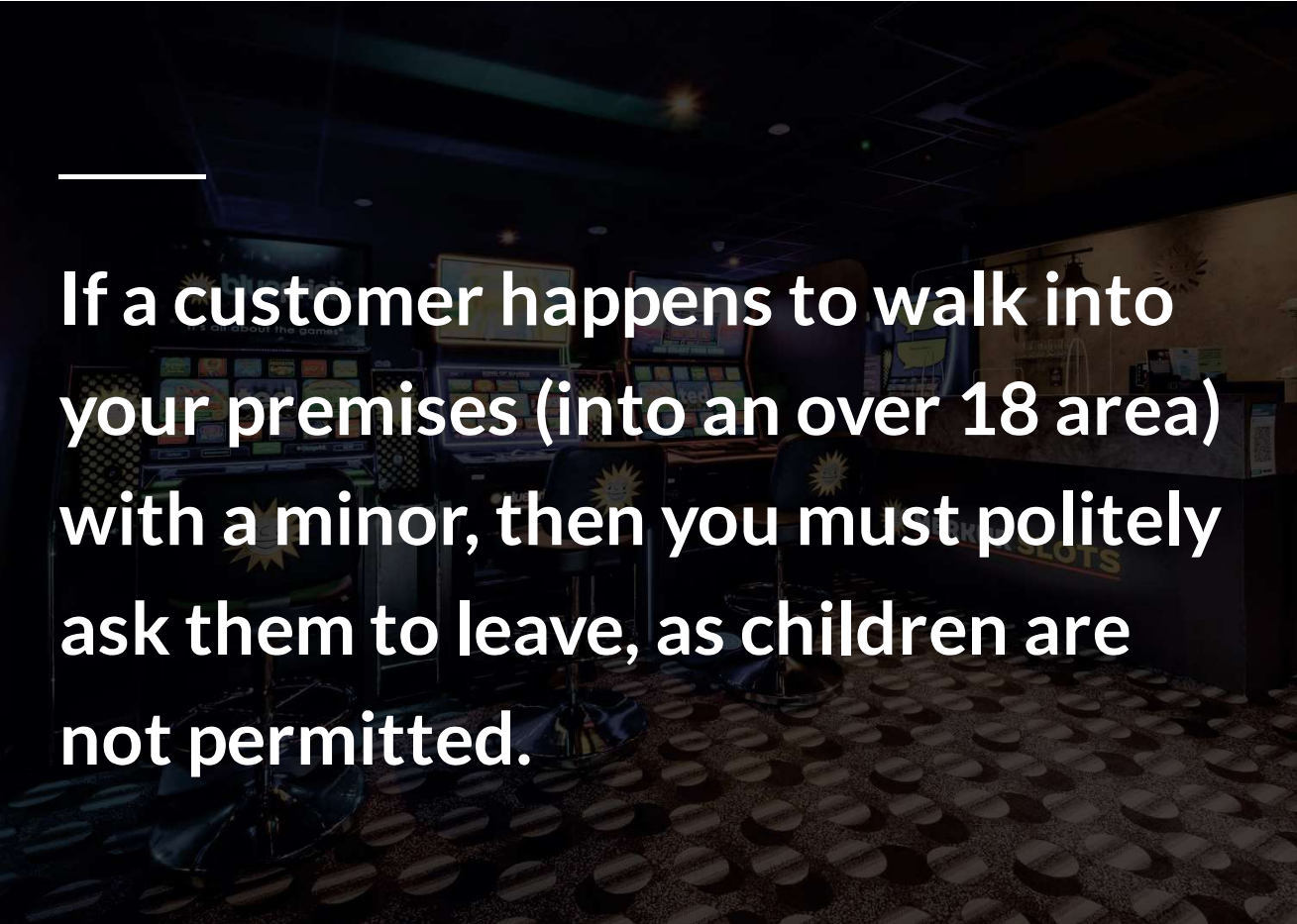
## **The ID is valid but it doesn't look like the person**

Its important that the photo is a true likeness; if we don't check this then the ID might be valid but it probably doesn't belong to the person trying to gain entry.

## What do you do if an adult brings in a child to your venue/club?

If a customer happens to walk into your premises (into an over 18 area) with a minor, then you must politely ask them to leave, as children are not permitted.

Customers can innocently enter the venue/club as they have seen a friend/relative they want to say 'hello' to or wanted to pop in an application form, as they have seen a job advert in the window. In either case, you **do need** to ask the adult to leave, as children are not permitted into over 18 areas.



If a customer happens to walk into your premises (into an over 18 area) with a minor, then you must politely ask them to leave, as children are not permitted.



Here are some words/phrases you can use in your  
conversations:



**"Please see the notice, we operate a Think 25 policy".**



**"I'm sorry, if I let you play on the machines I will be breaking the law"**



**"The law requires me to ask for proof of age".**



**"If you don't have ID I will have to ask you to leave; it is the law".**



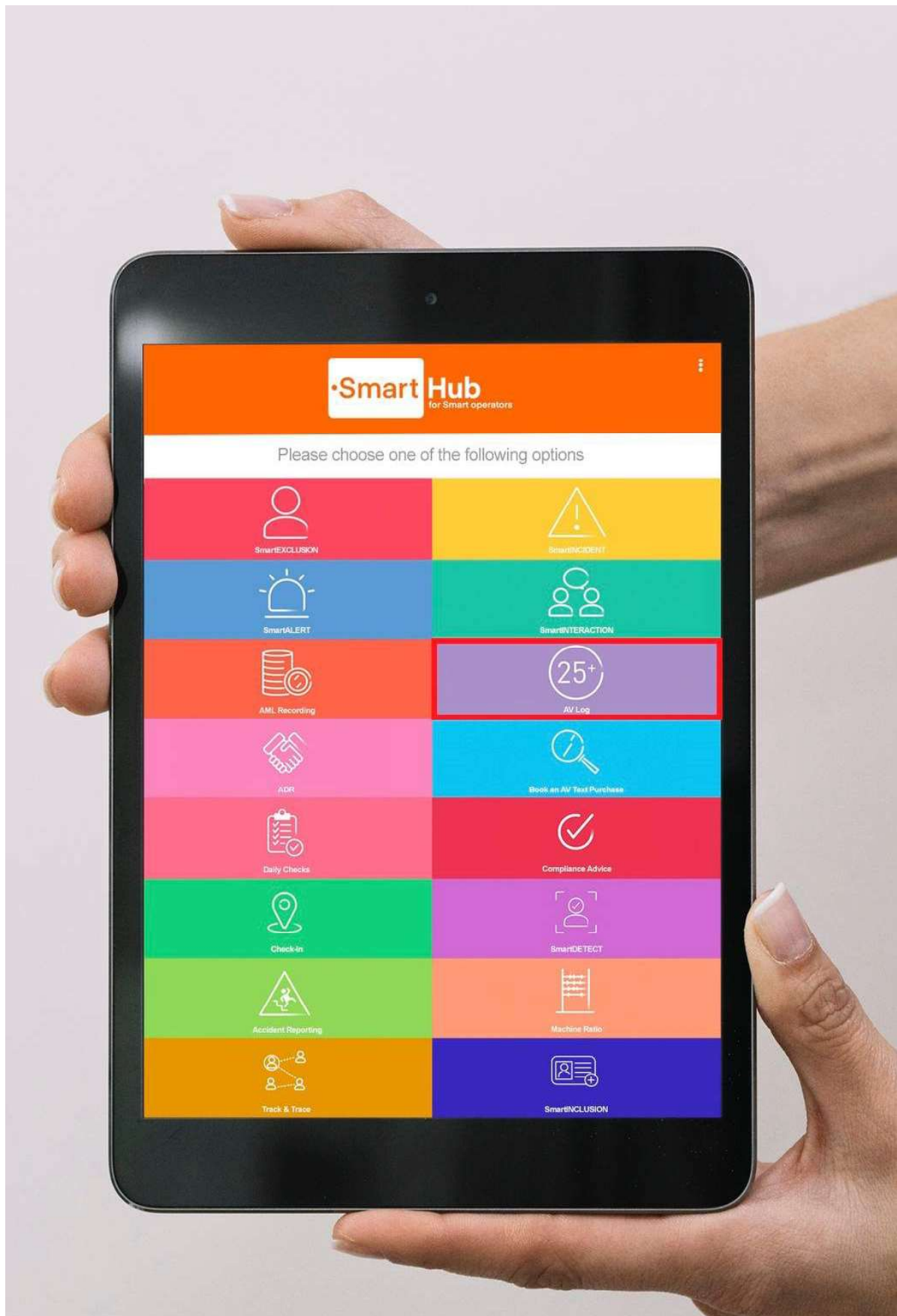
**"If you want to go and get suitable ID then I can let you play but I can't let you play without it".**



**"The company has a policy of no proof of age, no play"**

**It is your responsibility to apply the Think 25 policy to all customers that look under 25 years old, but it is also your**

**responsibility to ask for it in a polite, friendly and professional manner.**



## Record Age Verification Interaction

All Age verification checks must be recorded on the Smart Tablet AV Log

To evidence compliance with the LCCP requirements to prevent underage gambling, Gambling Operators must implement age verification test purchasing.

These test purchases must be conducted by an independent Age Verification Test provider. This test purchases must be unannounced and conducted at different times of the day (morning, afternoon, and evening) and at different times of the year.

For reporting purposes the Gambling Commission expects, test purchase results should be recorded as 'challenge before gambling activity', 'challenge during gambling activity', 'challenge after gambling activity', or 'unchallenged'

- the definition of a 'challenge before gambling activity' includes any challenges conducted at the entrance to a premises; noting that it is illegal for a child or young person to enter most types of gambling premises. In an FEC, this could be a challenge before or at the point that the tester attempts to enter the Category C gaming machine area

- where a premises fails a test purchase visit, we expect the premises staff to be informed of the result and for retesting to be carried out. We expect the retest to be conducted as soon as practicable after remedial action has been taken and no longer than three months after the failed test

If a venue fails an Age Verification test purchase the Area Manager will be informed and asked to investigate the reason for the fail.

CONTINUE

## Refusing Entry

---



When would you need to  
refuse entry?

## The key reasons to refuse entry are:

- ☐ The customer looks younger than 25
- ☐ Cannot produce valid photo ID
- ☐ The ID presented is not an acceptable format (e.g. a birth certificate)
- ☐ The ID document appears fraudulent or has been tampered with
- ☐ ID's photo doesn't match with the person trying to gain entry

Whatever the circumstances you must remain polite, friendly and professional.

If your refusal is said in the wrong tone, sounds rude, confrontational or aggressive, then the customer may not respond how you expect.

**What should you do if the customer is uncooperative?**



### **Angry Customer**

If the customer continues to be uncooperative or you are in any doubt call your Duty Manager. If you are working alone and feel in danger then you should use the Staffguard system for support.

**What happens if an underage person actually plays on the machines?**

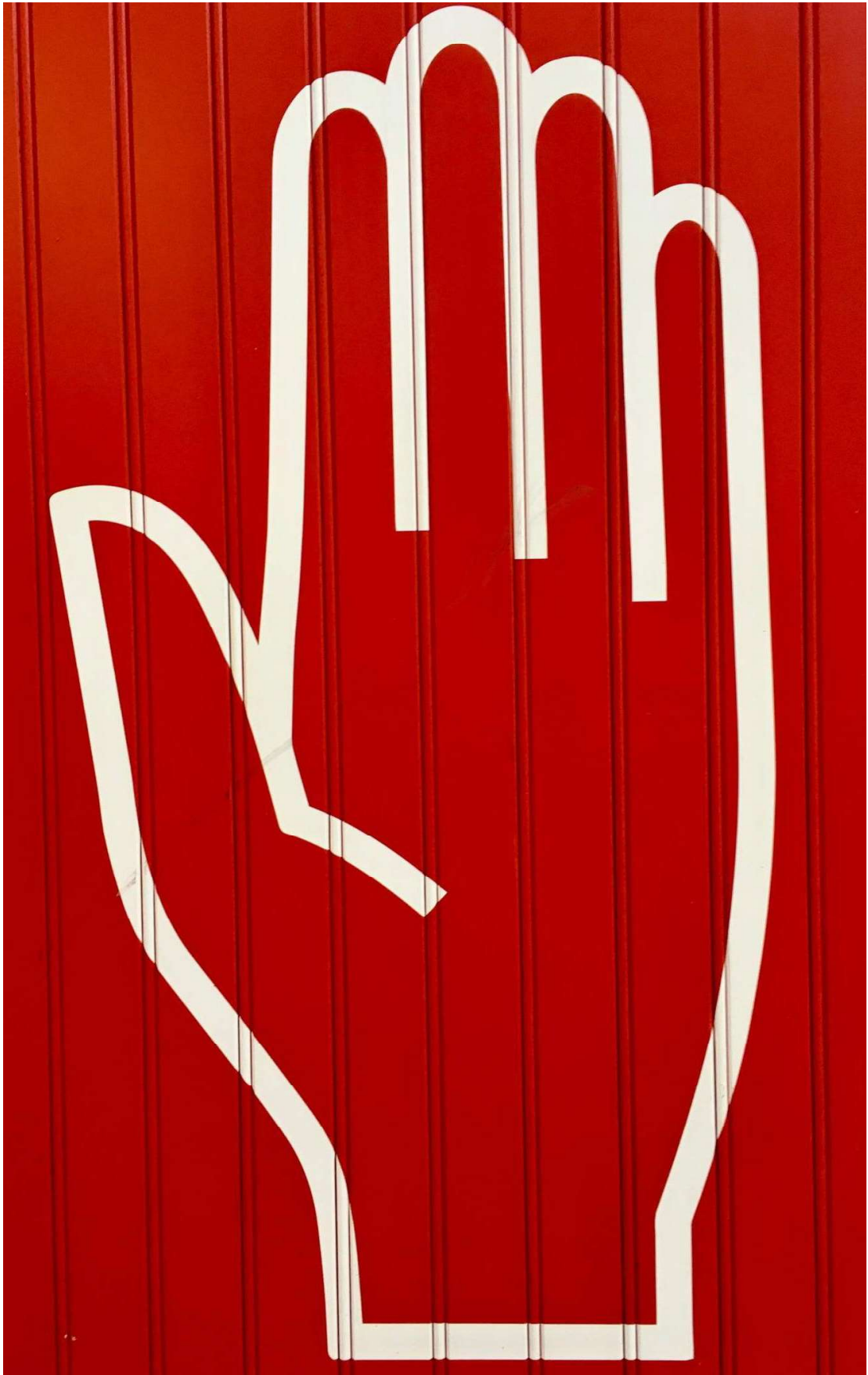
It is illegal for anyone under 18 to play machines or to gain from illegal gambling. This means that if an under age customer has not been asked for ID and has started to play the

**521**

machines, they must be **stopped immediately** and given their stake (the money they have put into the machine) back, excluding any winnings.

#### **What to do?**

If you discover either of these incidents have happened, you must call for a member of management immediately or if you are working alone, then you must deal with it. The under age customer must have their money refunded. This type of incident must be recorded on the IHL Tablet using the Age Verification App 'child or underage person playing the machines'.



**523**



**If you do not stop an  
underage person from  
playing YOU will be  
breaking the law!**

**All potential underage entries should be  
challenged.**

**Every challenge/request interaction for ID,  
MUST be recorded on the IHL Tablet using  
the Age Verification App.**

**CONTINUE**

## End of Module Quiz

---

To conclude this module and to understand what you have learnt, you will need to complete the following quiz.

You must have a 100% pass mark to finish the course and all results will be recorded.

If you fail the quiz, you can either retake the quiz by clicking 'Take Again', or you can exit the course, by clicking 'Exit Course' in the top right hand corner of the results screen, to retake the quiz at another time.

Please note: Do not close the course via your browser, as your score may not be recorded.

Good Luck!

*Question*

01/09

What do you do if a person who looks under 25 wants to come in and use the ATM machine?

---

- ☐ You politely ask them for ID and refuse entry if they are under 18.
- ☐ You let them in regardless, as they only need to use the ATM.

Question

02/09

What must you do if an underage person is actually playing on the machines?

---

- ☐ Stop them immediately and ask to leave. Then log on the IHL Tablet using the Age Verification App.
- ☐ Pretend I haven't noticed
- ☐ Stop them immediately, and give them back their stake money, excluding any winnings. Then log it in on the IHL Tablet using the Age Verification App

Question

03/09

At what age are people allowed into the adult gaming area?

---

- ☐ 25 years or over
- ☐ 21 years or over
- ☐ 18 years or over

Question

04/09

What do you do if the customer is unable to provide you with ID?

---

- ☐ Let them in anyway, as you know they have the potential to spend a lot of money.
- ☐ Ask them to leave and not to return ever again.
- ☐ Politely ask them to leave, explaining that we operate a Think 25 policy and without proof of age, they are unable to enter our premises.

Question

05/09

Are babies and small children allowed into our venues/clubs if their parents are playing on the machines?

---

☐ No

☐ Yes

What ID / Proof of age are acceptable?

---

- ☐
  - A Pass accredited proof of age scheme
  - A birth certificate
  - A driving licence
  - A passport
  
- ☐
  - A passport
  - A European Photocard licence
  - A Pass accredited proof of age scheme
  - A military ID card
  
- ☐
  - A passport
  - A student card
  - A military ID card
  - A Pass accredited proof of age scheme

Question

07/09

When checking ID, what are the 4 areas you are looking for?

---

- ☐ Date of birth/ Photograph/ ID is authentic/ Hologram
- ☐ Date of birth/ Place of birth/ Photograph/ ID is authentic
- ☐ Date of birth/ Hologram/ Not fake

Question

08/09

What **must** you do when you have asked someone for their ID?

---

- ☐ Log details on the IHL Tablet using the Age Verification App
- ☐ Nothing, if they have proved they are over 25
- ☐ Add the details in the Premises Log: Log C

Question

09/09

What age policy do we operate?

---

- ☐ Think 21
- ☐ Think 25
- ☐ Think 18



# Safeguarding Children & Vulnerable People

Our suite of Compliance training seeks to ensure you understand the Gambling Act and its 3 main objectives and that you follow the businesses defined processes to ensure we operate within the law.

Within the Gambling Act we have a duty to protect children and vulnerable people. Safeguarding is the responsibility of everyone in our business and this session explains why its so important and how you can play your part.

To get started click on the first lesson below:

## SAFEGUARDING AND RESPONSIBLE GAMING

---

☰ What is Safeguarding?

☰ Children

☰ Vulnerable People

☰ The Stages of Change

## TAKING ACTION

---

☰ Taking Action



Observing & Listening



Dealing with Anger & Aggression

OUTSIDE THE VENUE/CLUB

---



Advertising Responsibly



GamCare/Support



Behaviours



Quiz

# What is Safeguarding?

Safeguarding is a term usually associated with children; it makes us think about the protection of children, social services, abuse and the mistreatment of children. As a socially responsible operator, MERKUR and its operating businesses take a different view on Safeguarding and what it means:

The screenshot shows a web browser with the URL [www.dictionary.com/browse/safeguard?s=t](http://www.dictionary.com/browse/safeguard?s=t). The browser's address bar and tabs are visible. The Dictionary.com website interface includes a search bar with the word 'safeguard' entered. Below the search bar, the word 'safeguard' is displayed in a large font with a speaker icon for audio pronunciation. The phonetic transcription [seyf-gahrd] is shown, along with 'Spell' and 'Syllables' buttons. A sidebar on the left contains a star icon, a 'CITE' button, and social media sharing icons for Facebook, Twitter, and Google+. The main content area lists synonyms, examples, and the word origin. The word is defined as a noun with four meanings: 1. something that serves as a protection or defense or that ensures safety, 2. a permit for safe passage, 3. a guard or convoy, and 4. a mechanical device for ensuring safety. It is also defined as a verb (used with object) with one meaning: 5. to guard; protect; secure.

← → ↻ 🏠 [www.dictionary.com/browse/safeguard?s=t](http://www.dictionary.com/browse/safeguard?s=t)

Apps Social Responsibility Walled Garden | City itm ILMA Assessment Poi Rise

Dictionary.com Thesaurus.com

Dictionary.com definitions safeguard 🔍

**safeguard** 🔊

[seyf-gahrd]

Spell Syllables

Synonyms Examples Word Origin

See more synonyms on Thesaurus.com

**noun**

1. something that serves as a protection or defense or that ensures safety.
2. a permit for safe passage.
3. a guard or convoy.
4. a mechanical device for ensuring safety.

**verb (used with object)**

5. to guard; protect; secure.

CITE

A>あ

f

Twitter


g+

*CLICK TO ENLARGE IMAGE/READ THE DEFINITION OF  
SAFEGUARDING*

---

**The term actually means:**

***something that serves as a protection or defence  
or that ensures safety***

  
For most of our customers, gambling is an enjoyable hobby and a social event, however; we must be aware of players that may become addicted to gambling.

When a Customer's gaming changes from enjoyment/social to a problem or addiction we **MUST** safeguard. Safeguarding is very much an action required within our business.

## KEY POINTS:

The Commission's investigation found:

1

Due to a technical failure in 888's systems, over 7,000 customers who had chosen to self-exclude(1) from their casino/poker/sport platform were still able to access their accounts on their bingo platform. The issue went undetected for a prolonged period of time, meaning customers were able to deposit £3.5million into their accounts, and then continue to gamble, for over 13 months.

While 888 did have self-exclusion procedures in place, they were not robust enough and failed to protect potentially vulnerable customers.

2

888 also failed to recognise visible signs of problem gambling behaviour displayed by an individual customer, which was so significant that it resulted in criminal activity. The customer staked over £1.3million, including £55k stolen from their employer. During a 13 month period the customer placed a large number of bets, gambling on average 3-4 hours a day. The lack of interaction with the customer, given the frequency, duration and sums of money involved in the gambling, raised serious concerns about 888's safeguarding of customers at-risk of gambling harm

**It is every employees  
responsibility to recognise  
the visible signs**

# Licensing objectives



- To keep crime out of gambling
- To keep gambling fair and open
- To protect children and other vulnerable people.

**Safeguarding in our business is about the 3rd licensing objective  
PROTECT = SAFEGUARD**

**The Gambling Commission puts a high priority on the social responsibilities operators have to protect children and vulnerable adults from the harm associated with gambling and policies must be in place to support the protection of these people.**

**This means as a business have to manage the risks and be socially responsible.**

## **We should:**

- Train staff on how to recognise and respond to indicators of concern
- Train staff to know how to protect their own safety if customers behave aggressively
- Make information and advice about gambling responsibly generally and discretely available, and provide contact details about where to get help

- Interact with customers to spot warning signs of a problem
- Explain Setting Your Limits to set time limit or deposit limit
- If the customer opts to self exclude make sure you provide the right information and follow the process for self exclusion (detailed in Compliance training)
- Encourage customers to register or become members so we have a point of contact



**This online session is designed to help you understand our responsibilities in terms of safeguarding our Customers. It looks at the potential signs of problem gambling and how we can interact with customers to intervene and support their choices.**

**Please complete this training module yourself and ask if you do not understand any of the information.**

## Children

---

---

**The protection of children is vitally important to us as a business. We have a separate and detailed training module dedicated to this area (Age Verification) as well as the Essentials of Compliance training.**

**Research undertaken on behalf of the Gambling Commission in 2022 has shown the following figures for children aged 11-16 accessing gambling:**

<b>78%</b>	Percentage of young people who spent their own money gambling in the last 12 months, did so because they regard it as a fun thing to do.
<b>50%</b>	Percentage of young people have had any gambling experience in 12 months with <u>over a third (35%)</u> playing on arcade gaming machines.
<b>31%</b>	Percentage of 11- to 16-year-olds spent their own money on any gambling activity in the twelve months prior to taking part in the survey. During that period, the most common types of gambling activity that young people spent their own money on were legal or did not feature age restricted products, namely: <ul style="list-style-type: none"> <li>▪ 22 % playing arcade gaming machines such as penny pusher or claw grab machines</li> <li>▪ 15% placing a bet for money between friends or family</li> <li>▪ 5% playing cards with friends or family for money</li> </ul>
<b>28%</b>	Three in ten young people had seen family members they live with gamble, of which 7 percent indicated it had resulted in arguments or tension at home.
<b>10%</b>	One in ten young people said that their own experience of gambling had led them to talk to their parents about how they felt, either sometimes, often, or all of the time
<b>0.9%</b>	This figure has increased from 0.4% since 2016 of 11–16-year-olds that are defined as problem gamblers

Source: research project undertake for the Gambling Commission

NB: The study included 11 - 16-year-olds and from a representation of 2559 pupils using the Ipsos Young People Omnibus.

## What are the risks to children of being exposed to Gambling?

The risks vary, depending on the type of gambling activities taking place at the premises.

For example: in MERKUR, safeguarding systems (such as Think 25) should be in place to prevent young people gaining access to the premises.



The Challenge 25 scheme **MUST** be operated by ALL staff and only recognised proof of age accepted (for example photo driving licence or passport; PASS cards)



Signage **MUST BE** prominently displayed at all points of entry regarding the prohibition of under 18's



Signage **MUST BE** displayed on machines highlighting age restrictions

If children are permitted access to adult gaming activities, they may be at risk of being:



Exposed to information  
or advertisements  
encouraging them to  
gamble



Allowed or invited to  
gamble or bet in a  
commercial setting



Allowed to purchase  
and consume alcohol  
(Bingo & Casino)



Be financially exploited

We must ALL operate systems to ensure that under 18's are prevented from access to areas where adult activities (such as betting or high stakes gambling) take place; or where adult gaming machines are located.



**REMEMBER: if in doubt, ask for  
I.D.**

**Make sure you complete our Age verification course for more on our age policies and how to check I.D.**

---

**If you work in one of our FEC's it is even more important that you are vigilant:**

FECs are commonly located at seaside resorts, in airports and at motorway service stations, and cater for families, including unaccompanied children and young persons.

Children and young persons are permitted to enter an FEC and may use category D machines. They are not permitted to use category C machines and it is a requirement that there must be clear segregation between the two types of machine, so that under-18s do not have access to them.

Social Responsibility (SR) code 3.2.5(3) in the Licence conditions and codes of practice (LCCP) it states that 'licensees must ensure that their policies and procedures take account of the structure and layout

The Gambling Regulations requires operators to ensure that employees prevent access and challenge children or young persons who attempt to use category C machines.

Over-18 areas within FECs that admit under-18s, must be separated by a barrier with prominently displayed notices at the entrance stating that under-18s are not allowed in that area and with adequate supervision in place to ensure that children and young persons are not able to access these areas or the category C machines. Supervision may be done either by placing the terminals within the line of sight of an official of the operator or via monitored CCTV.

of their gambling premises' in order  
to prevent underage gambling.

Safeguarding is not just about children; as we have already seen we  
need to safeguard vulnerable adults too.  
Let's look at this next!

CONTINUE

## Vulnerable People

---

---

The **Gambling Commission** puts a high priority on the social responsibilities operators have to **protect** vulnerable adults from the harm associated with gambling and policies must be in place to support the protection of vulnerable adults.



**Which one is a vulnerable adult?**



Which person is at Risk?

---



A



B



C

☐

D

☐

I don't know

SUBMIT

CONTINUE

**It's not possible to tell who is at risk by looking at them. Most customers are **in control** and enjoy the **social** element of gambling**

**Safeguarding means we have to look a little deeper and think about **those at risk of developing a problem.****

**It's about the signs and signals we see and hear whilst our customers are in our premises.**

**Social responsibility/Safeguarding is about using your eyes and ears to understand who is vulnerable.**

**Click on the + signs to understand more about those people at risk:**

#### **Risks Factors: Developing a problem**

These are the situations that increase players risks of developing a problem (click to enlarge)

##### **Risk Factors for Developing a Gambling Problem**

These risk factors can contribute to the development of gambling problems or make it more difficult to stop. People are more at risk if they:

- Have an early big win (leading to false expectation of future wins)
- Have easy access to their preferred form of gambling
- Hold mistaken beliefs about the odds of winning
- Do not take steps to monitor gambling wins and losses
- Often feel bored or lonely, or have a history of risk-taking or impulsive behaviour
- Have financial problems
- Have few interests or hobbies, or feel their lives lack direction
- Have a history of mental health problems, particularly depression and anxiety
- Have a parent who also has (or has had) problems with gambling
- Have (or have had) problems with alcohol or other drugs, gambling or overspending
- Tie their self-esteem to gambling wins or losses.

The more factors that apply, the more likely a person is to develop a gambling problem.

## Risk Factors: Impact

If we don't take our social responsibilities seriously; vulnerable adults are at risk in many ways including (click to enlarge):

## Managing The Risks

As a business we undertake to minimise the risks in the following ways (click to enlarge):

### We need to:

- ✓ Have trained staff able to recognise and respond to indicators of concern
  - This course along with the other compliance courses
- ✓ Staff know how to protect their own safety if customers behave aggressively
  - This course.
- ✓ Make information and advice about gambling responsibly generally and discreetly available, and provide contact details about where to get help
  - Use the Gam Care contact information and staying in Control leaflets
- ✓ Explain the Setting your Limits to help set a time limit/ deposit limit
  - Explain Setting your Limits to help control time spent playing
- ✓ If the customer opts to self exclude make sure you provide the right information and follow the process for self exclusion
  - Follow the process and steps for MERKUR this is fully detailed in your compliance training module
- ✓ Encourage customers to register or become members so we have a point of contact
  - Although membership is not compulsory it should be encouraged and discussed with all customers

**Some of the signs may be more obvious to loved ones at home but we should be aware**

## **of these signs when interacting with our customers; observe and listen for these indicators**

***(tick each box to show you have read each of the common signs of a problem with gambling):***

- ☐ Spending more money and time on gambling than they can afford.
- ☐ Losing interest in usual activities or hobbies like going out with friends or spending time with family.
- ☐ Always thinking or talking about gambling.
- ☐ Chasing losses or gambling to get out of financial trouble.
- ☐ Gambling until all of their money is gone.
- ☐ Needing to gamble with larger amounts of money or for a longer time to get the same feeling of excitement or buzz.
- ☐ Feeling anxious, worried, guilty, depressed or irritable.
- ☐ Neglecting other responsibilities (work, family, chores) in order to gamble
- ☐ Having arguments with family or friends about money and gambling.

CONTINUE

There are warning indicators that show when someone is moving from having fun and responsible gambling to becoming more of an issue or problem.

Click play below for more info:

## What is problem gambling?

When playing for fun moves across to playing for need, it could be a problem.

**WARNING SIGNS**

- IT'S NOT FUN ANYMORE
- LOSING TRACK OF TIME
- WORRYING/FEELING GUILTY
- COMPULSIVE URGE TO PLAY
- WANT TO STOP – BUT CAN'T



**ANYONE WHO HAS....**

CONTINUE

## ANYONE WHO HAS....

EASY ACCESS TO  
PREFERRED  
GAMBLING ACTIVITY

FALSE BELIEFS  
ABOUT THE ODDS OR  
CHANCES OF  
WINNING

HAD CHILDHOOD  
EXPOSURE TO  
GAMBLING

HAD A BIG WIN AND NOW  
HAS FALSE  
EXPECTATIONS OF  
FUTURE CHANCES

A BELIEF THEY HAVE A  
SYSTEM TO BE ABLE  
TO 'BEAT THE ODDS'

EXPERIENCE OF  
MENTAL HEALTH  
PROBLEMS

**OR ANYONE WHO IS LOSING CONTROL**

## The Stages of Change

---

**Gambling becomes a problem when people are not in control. Staying in control is vitally important and is the ethos we at MERKUR Slots, MERKUR Bingo, MERKUR Casino all work to.**

**When someone starts to change their gambling behaviour, there are often different stages of awareness that they move through. These include:**

**Stage 1 – No problem**

**If customers are in this stage the positives of gambling outweigh the negatives. They enjoy gambling and don't see it as a problem.**



## Stage 2 – Awareness

**People at this stage feel ambivalent ( having mixed feelings) about their gambling.**

**Often they enjoy it, even though they know that it costs time and money. If they are in this stage they might be thinking about or considering making a change, like cutting down, limiting spend or restricting time spent gambling.**



### Stage 3 – Wanting to Make a Change

**People in this stage feel ready to control their gambling and have made the decision to do something about it. Additionally, they have scheduled a time in the very near future in which to start making changes.**



#### Stage 4 – Take Action —

People in this stage say things like - "I am doing something to change my behaviour".

They might try various things such as setting limits on their time and/or deposits

Our support is important at this time as they may be experiencing different emotions as they reflect on the consequences of their gambling.

#### Stage 5 – Sticking to it —

**Maintaining change - This stage can be hard. It is when people have identified all the things they need to do to change their behaviour and they have started to put these things into practice.**

**You know the customers best so your personal support is invaluable too.**

**Setting Limits is one of the ways MERKUR supports our customers**

Customers can choose to set their own limits on any Blueprint B3 machine by choosing the set limits option at the bottom left-hand side of the menu.



#### Stage 6 - Final Stage - Self Exclusion

The final stage of stopping gambling is if the customer decides they need an external intervention to stop them gambling. When a customer reaches this decision we should fully support them.

This is where MERKUR offer a self exclusion option for Customers.

For full details of self exclusion in Merkur Slots, Merkur Casino and Merkur Bingo, please ensure you have completed the Compliance Training and understand our policies and processes and can facilitate the customers choice. Make sure they are aware of the minimum/maximum time they can self-exclude for.

Often the person who's gambling doesn't think that he or she has a problem; they don't see the subtle changes. Sometimes **YOU** will spot the problem first, because the customer might be convincing him/herself that everything is fine when really it isn't. It's important to use positive communication rather than

being confrontational or critical. It's also important to be genuine and talk to the customer in a natural way.

For example:



**"I can see you're not  
happy at the moment  
- I want to help."**



**"I sense you're getting  
frustrated – shall we  
take time out and  
have a cuppa and a  
chat"**



**What to  
“say”**

**“You’ve been in more  
often this week – is  
everything OK?”**

Once you’ve started the conversation, listen carefully to what they have to say in response and be patient. Don’t jump in or cut them off mid sentence, as this might drive them back into their shell or make them turn defensive. Being calm and caring is really important as is knowing what advice and support we can offer

**Ultimately we as a business have a  
responsibility to take action to  
safeguard vulnerable people so let’s  
move to the next section and look at  
this next.**

Next Section

Click the button to move to the next section of this training module

TAKE ACTION

## Taking Action

---

As a business we have several processes and tools in place to ensure we are promoting responsible gambling. These include:

- 1 Think 25 Policy
- 2 Setting your Limits
- 3 Gamcare Information and Leaflets
- 4 Complaints Procedure and ADR (Alternative Dispute Resolution)
- 5 Responsible advertising
- 6 Self Exclusion Policy and Process
- 7 and most importantly - **YOU; OUR EMPLOYEES**

These processes and interventions only work if our employees know and understand them and to ensure you do we have the following training modules which refresh every 6 months to keep you up to date and trained to the latest standards





## Your role

As we have seen your best tools are your eyes and ears, but observing people and listening for clues to gain insight takes practice; so lets take a look at this next:

### Observing & Listening Tips

CLICK ON THE BUTTON FOR MORE INFORMATION ON WHAT YOU CAN DO TO BE SOCIALLY RESPONSIBLE AND SAFEGUARD OUR CUSTOMERS

OBSERVE/LISTEN

# Observing & Listening

---

In this section we will take you through a series of tips and ideas to improve your listening and observation skills

---

## Interact

---

**In order to gain insight into our customers we must interact.**

**This means approaching and talking to our customers as well as observing their behaviours.**

## Interact

---

**In order to gain insight into our customers we must interact.**

**This means approaching and talking to our customers as well as observing their behaviours.**

## Understand habits

---

**Start by getting a baseline understanding. A common way to get this is by simply observing a person's habits over time. For example how often, and when, do they come in?**

**Knowing this pattern will help you identify when it changes and you can ask about the behaviour change**

**This will help identify when gambling maybe developing from a social event to more of a problem**

## Ask Questions

---

**A seemingly innocent question such as "How are you doing today?" is a way to gauge peoples emotional state and sets you up to probe their answers if you are concerned.**

If people are 'fed up' or 'tired' or 'bored' - or if they label any feeling or emotion - **ask them WHY?**

## Listen with your eyes and ears

---

**Look for inconsistencies between the person's gestures and words. If they are saying all is fine and well but they are slouched, look tired or seem angry - there may be something bothering them.**

- If someone closes their eyes for a moment (longer than a simple blink), takes the time to clear their throat, or asks you to repeat a question, they're probably stalling - reflect on why.
- A lack of eye contact, or excessive blinking or fidgeting are signs that a person may be lying and are also signs of anxiety

**Keep an eye on their gaming and remember to offer refreshments and break play**

## Spot Stress and Break Play

---

**It's important to identify when people in our premises are getting stressed. Look for the following indicators and always attempt to break play:**

- When a person leans with their torso away from you, this can mean that the person is going through a moment of stress
- Gestures such as the touch to the forehead or the rubbing of palms against thighs are indicators of stress too
- Facial clues of distress and discomfort include the furrowing of the brow, clenching of jaws, lip compression, or the tightening of face and neck muscles
- Touching the notch in the front-middle of the neck can mean that the person is trying to protect themselves - suggesting discomfort, especially in women. Similarly, men usually stroke their necks, which is an attempt to lower heart rate
- A long, audible exhale - known as a cathartic exhale - means that the person is under severe emotional distress

## Getting Angry?

---

**Customers getting agitated and angry is easy to spot and is a sure sign they need to break play. But before the real shouting begins; what signs can you spot early to stop it escalating? Look out for:**

- Pupil constriction and squinting at the machines - this can mean that a person is bothered by what they're seeing
- Clenching the jaws or grinding teeth
- Balled up hands or fists
- Shaking or trembling whilst playing at the machines
- Speech becoming more rapid or high-pitched.
- Head thrust forward
- 'Eye-balling' (staring in anger) at other customers, employees or the machines

## Handling Stress and Emotion in Customers

---

Sometimes we can see the signs but are not sure how to handle them. The next section will look at dealing with angry or agitated customers.

## PRACTISE AND DO IT!

---

Learning how to read people must occur over time - a quick training course won't be an instant solution! It is a behaviour that comes from YOU.

It takes practice and intent. You have to know what to look for and understand what certain gestures mean in order to stay socially responsible.

Keep in mind, there's no single surefire way to tell what someone is thinking but the best start is to take time to simply be present, observe, ask questions and listen - to the words and the body language.

## Dealing with Anger & Aggression

---

**It is true that when Customers start to lose control of their gambling they may become agitated or upset and get angry and perhaps become confrontational; remember - this is a sign of a problem and rather than ignore it we have to deal with the situation and help the customers.**

**Here are some top tips to help you in these situations.** Click on each card to flip it for an explanation of what to do and then use the arrows to move to the next or previous cards:

**STAY  
CALM**

**Stay calm and self-assured; make sure you are not displaying the same signs of agitation that can be seen in the other person**

# FACIAL EXPRESSIONS

**Maintain a neutral facial expression, even our eyebrows can indicate we are surprised or angry, and similarly our mouths can betray our emotions unwittingly**

# ALLOW THEM SPACE

**When a customer is agitated getting too close to them can indicate aggression on your part and escalate the situation. Staying some distance away will also help keep you safe should the customer become physically aggressive.**

4 of 7

# THINK ABOUT YOUR VOICE

**Control your breathing; when we are stressed, angry or tense, our**

**Lower your voice and keep your tone even; it is hard to have an argument with someone who is not responding aggressively back to you.**

5 of 7

# BREAK PLAY

**Distraction and diversion are extremely useful; when a person is aggressive, they are responding with their own fight-or-flight instincts and not thinking about their actions. Distraction can diffuse the fight response.**

6 of 7

**When the situation has**

**580**

# REFLECT

calmed down think about what happened and why. Talk to a colleague or your manager. If you know the customer well; ask them what caused it and provide them with support and information (such as the staying in control

threatening to remove the person.

- Do not be defensive or take it personally. What is being said may seem insulting and directed at you, but this is not really about you.
- Do not use humour unless you are sure it will help and you have a very good relationship with the customer
- Do not use sarcasm or humiliate the customer
- Do not put yourself at risk; use staffguard if you are alone and feel vulnerable

## Advertising Responsibly

---

Whilst we do all we can to safeguard children and vulnerable people in our premises; we need to be aware of the messages that are reaching them outside of venues and clubs



When we run promotions locally we must adhere to the marketing code of conduct to ensure that we are safeguarding children and vulnerable people when we promote and advertise our business. Please read the code of conduct attached below. This is available as a printable poster in Knowledge base.



## Marketing Code of Practice

---



**Marketing Code of Practice.pdf**

6.6 MB



## GamCare/Support

---

---

Our role is to be **aware** and provide **support** to any customer at risk. The industry has strong links to **organisations** that can help anyone who **thinks** they have a **problem with gambling**. It is our duty to provide this information readily and freely:



**Every Venue and Club has Staying in Control Leaflets**

Make sure you know where they are, the information in them and do not hesitate to share this information with customers who feel they need to make a change.

It's our responsibility to provide this information and support customers in their decision making.

### 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 it 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 is 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.



### Who can help

If you are in difficulty with your gambling or know someone who is, and would like help, call the GamCare helpline:

**GamCare: 0808 8020 133**

GamCare is the national centre for information, advice and practical help regarding the social impact of gambling.

The national helpline is answered by trained staff. They can offer counselling information and advice to problem gamblers, family members and to friends of a gambler. Information regarding counselling for problem gamblers is available on request.



## What the Staying in Control Leaflet covers

### Download a pdf of the leaflet below:



**Staying in control leaflet.pdf**  
328 KB





**responsible**  
gamblingtrust

**BeGambleAware**

**These organisations are free and accessible to all our customers who think they need help. They are active in promoting responsible gambling and a great source of information for both our employees and our customers.**



If you have any questions or concerns about your responsibility to safeguard children, vulnerable people and our customers please talk to your Line Manager and ask for help.

The next stage is to look at what you have learned in this session.  
Click the button below to start on the knowledge checks.

**Let's Go!**

Click to get started on the behaviours card sorting activity

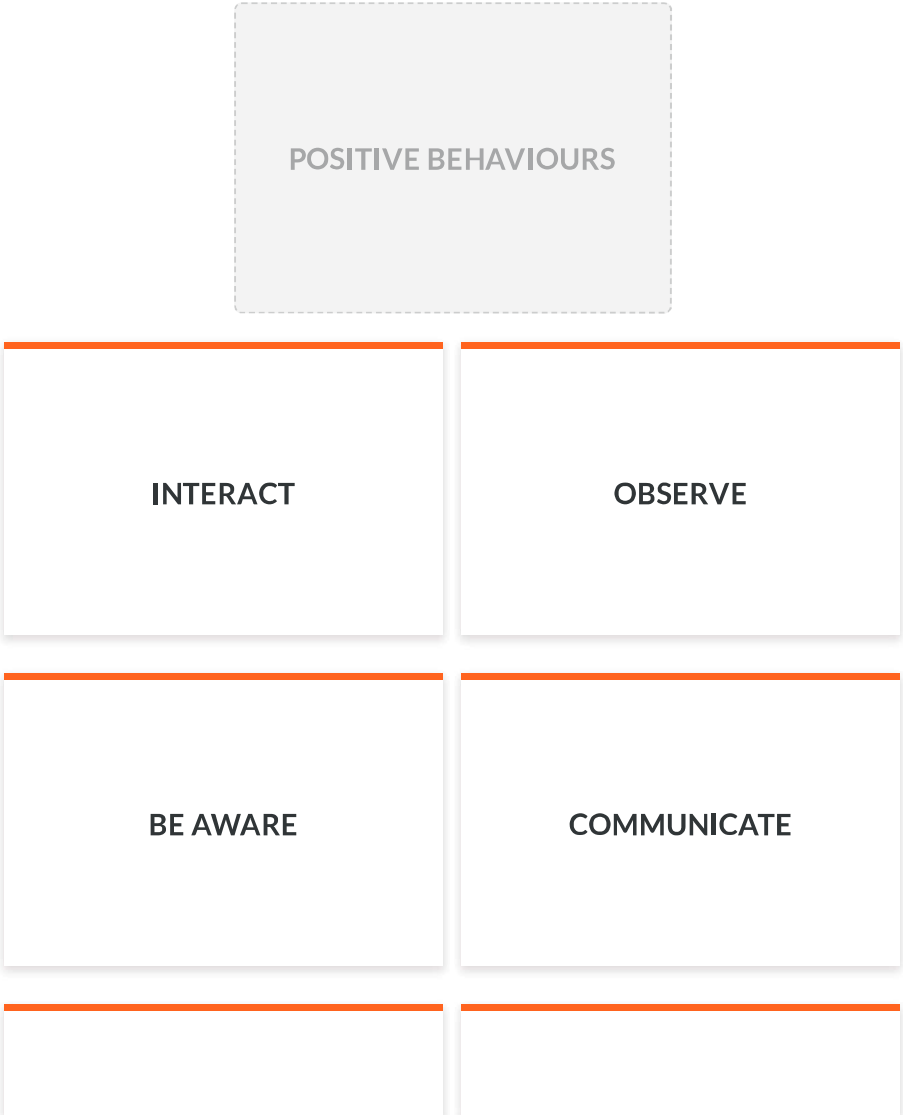
BEHAVIOURS KNOWLE...

# Behaviours

---

What behaviours should YOU our employees adopt in order to safeguard?

Look at the words on each card. Each word describes either a positive behaviour and is what we should be doing or a negative behaviour and what we should NOT be doing



AGE CHECK

THINK 25

LISTEN

ASK QUESTIONS

BREAK PLAY

NEGATIVE BEHAVIOURS

IGNORE

DISREGARD

GIVE UP

JUDGE

ACCUSE	CONFRONT
BLAME	

# Quiz

---

Read each question and the answer options carefully.

When you complete the quiz your score will be shown. You can then get feedback on the questions and see which you got right and wrong (if any!).

Read any feedback carefully and follow the instructions of what to do.

Good luck!

*Question*

01/09

What does the term 'safeguarding' mean?

---

- ☐ It is something that serves as a protection or defence or that ensures safety
- ☐ It is the protection or defence of children/minors
- ☐ It applies to FEC's (family entertainment centres) as they have children in the premises

*Question*

02/09

What is the reason that 888 had to pay a penalty package of over £7.8million

---

- ☐ as a result of allowing children into its premises
- ☐ as a result of not upholding the 3 licensing objectives
- ☐ As a result of serious failings in its handling of vulnerable customers

*Question*

03/09

How do we protect children in our business?

---

- ☐ By following the Think 25 policy and age-verifying anyone who looks under 25
- ☐ By age checking everyone
- ☐ By remembering to safeguard

*Question*

04/09

How can we tell who is at risk/vulnerable?

---

- ☐ By observing them
- ☐ By interacting with them
- ☐ By looking for signs of stress
- ☐ By looking for changes in behaviour
- ☐ All of the other answers

*Question*

05/09

Which policies and/or processes do we have in place to protect and safeguard our customers (tick all that apply)?

---

- ☐ Think 25 Policy
- ☐ GamCare Information
- ☐ Employee interaction with customers
- ☐ Self exclusion policy
- ☐ Responsible advertising
- ☐ ADR (Alternative Dispute Resolution)

*Question*

06/09

What should you do if customers are getting agitated/annoyed?

---

- ☐ Match their behaviour and firmly tell them to stop it
- ☐ Diffuse the situation by breaking their play
- ☐ Ignore them - everyone gets cross when they lose

*Question*

07/09

Who is at Risk of Problem Gambling?

---

- ☐ Mainly men
- ☐ Mainly women
- ☐ Anyone who shows signs of losing control of their gambling.
- ☐ Mostly people with mental health problem

*Question*

08/09

Which organisation/phone number is detailed on the 'Staying in Control' leaflet?

---

- ☐ Head Office
- ☐ GamCare
- ☐ The Gambling Commission

**Question**

**09/09**

What is your role in safeguarding

---

- ☐ To report my concerns to one of the support organisations (e.g. gamcare)
- ☐ To listen, observe, interact and break play if concerned
- ☐ To wait for the customer to ask for help then give them the Staying in Control leaflet

**600**



## *Safer Gambling – Observation and Interaction*

601

# Safer Gambling – Observation & Interaction

## Introduction



# Safer Gambling – Observations & Interactions

## Background

---

- Teams' having awareness of their customers behaviours
- Teams' knowing their responsibilities
- Understanding why interactions is an important part of the customer experience
- Changing how we approach and perceive a Safer Gambling interaction

Page 270

# Safer Gambling – Observations & Interactions

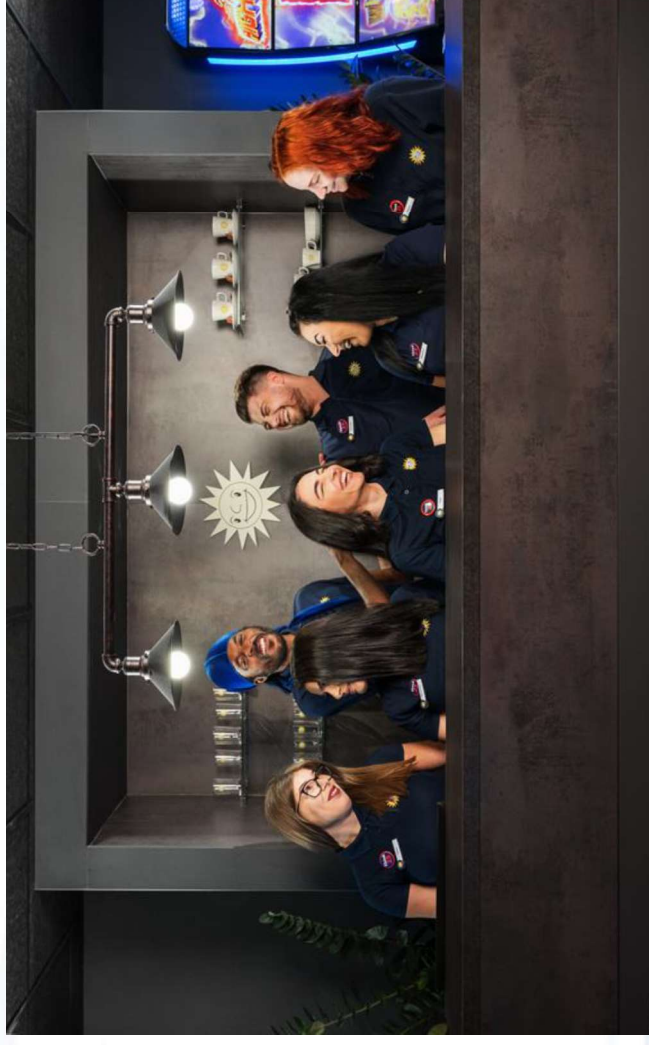
## Aims

---

MERKUR Teams, gain a confidence and knowledge on how to identify and interact with customers who may be at risk of suffering from gambling harms.

Retain MERKUR customers, so they play and visit at a level that is affordable to them and continue to enjoy their gaming experience.

MERKUR Slots teams, being balanced in their approach.



# Safer Gambling – Observation & Interaction Objectives

---

- Understanding of why being proactive with interactions can benefit the overall Customer Experience and integrity of the MERKUR brand
- Understanding an Interaction is a ‘conversation’ and should be positive not just negative
- Observe customer behaviours, recognising any changes that will initiate an interaction
- Observe extended periods of play, and recognise when and how to interact appropriately
- Proactive interactions utilising the resources and tools available to the operation, demonstrating due diligence
- Utilising the WOW factor framework to observe and interact with our customers

# Safer Gambling – Observation & Interaction

## What is an Interaction

---



# Safer Gambling – Observation & Interaction

## What is an Interaction

---

Definition of interaction, (Oxford Dictionary)

*The act of communicating with somebody, especially while you work, play or spend time with them.*

Page 274

Definition of customer service interaction, (Oxford Dictionary)

*Help and advice that a company gives people who buy or use its products or services.*

# Customer Story

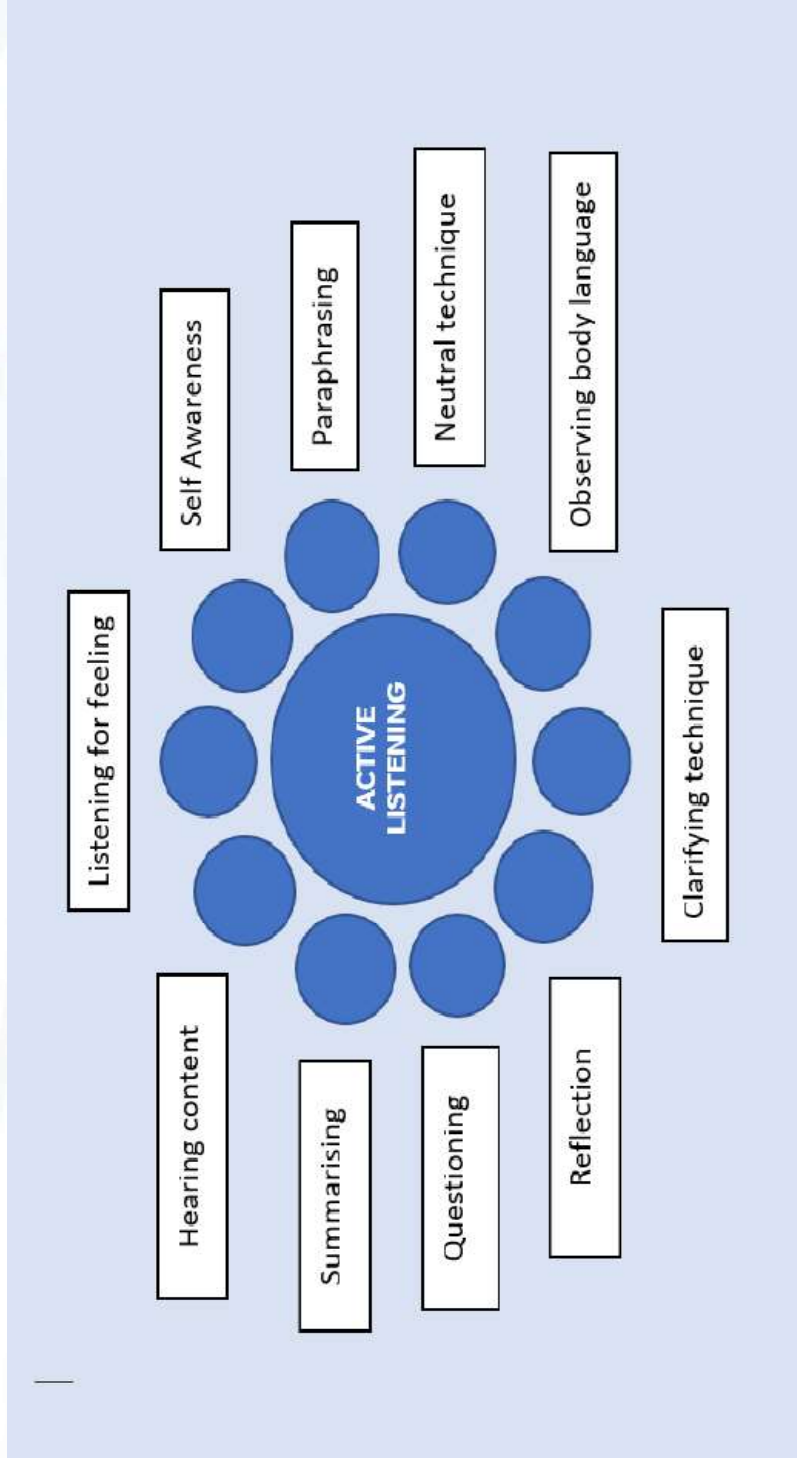


608



608

*“We don’t learn from talking, but we do learn from listening”*



# Safer Gambling – Observation & Interaction

## What is Safer Gambling?

---



*“Safer Gambling is a term used to describe the industry's approach to limiting the risk of problem gambling and gambling related harm. The term is often interchangeable with social responsibility”*

# Safer Gambling – Observation & Interaction

## Recording and Interaction

---



Page 278

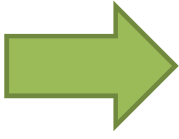
What is the difference between a customer service interaction and a safer gambling interaction?

# Safer Gambling – Observation & Interaction

## What is Safer Gambling Interactions?

---

Pro – Active

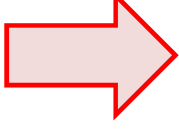


Getting to know our customers  
Observing behaviours for any changes

- Conversing and Listening
- Acting on concerns

Page 279

Reactive



- Customer contacting the business
- Business reacting to the contact
- Business unaware of changes within the customer

# Safer Gambling – Observation & Interaction

## Observe, Action and Outcome

Observe	Action	Outcome
<p>A regular customer enters the venue on a day she doesn't normally visits, she states that she has just come in to wait for her bus, and she has a spare £10.</p> <p>Her bus is in 10 mins and the bus stop is outside the venue front door.</p> <p>She finishes playing her £10, she starts to walk towards the cash machine (ATM).</p>	<p>Member of staff approaches customer and politely says, "Mary is your bus not due soon"</p> <p>Mary thanks the member of staff for reminding her and leaves saying, "see you tomorrow if you're working".</p>	<p>Member of staff records the interaction.</p> <p>Mary returns the next day on her usual visit to the venue.</p>

# Safer Gambling – Observation & Interaction

## Observe, Action and Outcome

Observe	Action	Outcome
<p>A regular customer enters the venue on a day she doesn't normally visits, she states that she has just come in to wait for her bus, and she has a spare £10.</p> <p>Her bus is in 10 mins and the bus stop is outside the venue front door.</p> <p>She finishes playing her £10, she starts to walk towards the cash machine (ATM). She then repeats going to the cash machine a further 9 times, she then gets upset and starts complaining that her machine is not paying out.</p>	<p>Member of staff is approached by the customer, who is clearly distressed.</p> <p>The customer is complaining that there is a fault with the machine as it has not paid her out any money and she has lost nearly £1000 and had to dip into her savings.</p> <p>The member of staff says they will investigate it for her, however suggested she should self – exclude.</p>	<p>The customer self excludes and due to how upset she is, she lodges a complaint via e mail. This then gets escalated to the Gambling Commission.</p>

# When do we complete a safer gambling interaction?



# Safer Gambling – Observation & Interaction

## Signs & Triggers

---

- Repeated aggressive behaviour
- Changes in appearance
- Remaining on the premises for extended periods of time
- Patterns of frequently leaving and returning
- Mentioning self – exclusion
- Repeated evidence of a customer being tired and/or sleep deprived
- Seeking to borrow money
- Changes in the nature, pattern, levels of play
- Judgement affected by a health condition
- Frequent use of cash machine on the premises
- Mentions frequently about losses, hints they are treated unfairly
- Multiple Profiles or profiles under different names
- Intoxication/substance abuse
- Family, partner or friends visiting the club to find a customer

Page 283

# Safer Gambling – Scenarios

## Observe, Action and Outcome

---

- When was the change in behaviour, (if any changes)?
- What was the change in behaviour, (if any changes)?
- When should you interact with the customer?
- What information would you record about the customer?

Remember think Observe, Actions and Outcome and what you think should to ensure that there is a follow up with these scenarios.

# Darius

---

Darius is a regular customer, pleasant enough and keeps himself to himself when in MERKUR Slots .

Darius is usually found playing the £500 jackpot machines. You can tell that he is in the venue, as you can hear the buttons being pressed or tapped loudly.

Darius usually plays the machines approx 6 hours at a time and never complains . He usually comes in at 6pm and leaves at midnight. He visits at least twice a week but has been known to come in and play up to four times a week.

This week, he has been in every night. On Thursday night Darius could be heard complaining to himself at the machine he was playing. On Friday night, he stayed until early hours of Saturday morning leaving around 2am.

Saturday night Darius was heard banging the buttons, rather than loudly tapping the buttons. He then approached the staff asking how to self exclude.

# Stella

---

Stella is a fairly regular customer and has been visiting the venue for nearly 15 years. She is pleasant, she will ask how the staff are that are on duty, but very rarely discloses personal information about herself.

She is quite a private person.

Stella can be in the venue for up to 12 hours in the venue when she visits.

She never complains and always has a friendly nature.

Page 6

Unknown to the staff in the venue, Stella has recently been diagnosed with a serious health problem. She has also been playing at a higher stake than she usually plays.

# Joe

---

Joe comes into the venue during his lunch break from work Monday to Friday. He usually is in the venue from 12:30pm until 13:20pm. This Week Joe has been coming in at his usual time but staying longer.

He looks unkempt and untidy which is unusual for Joe.

Joe is less chatty with the staff, and has also been a bit sharp with the staff when they have offered him a drink during the service rounds.

The staff are not aware that Joe is actually on holiday, and is using his visits to get out the house as his relationship with his partner is not great.

287

# Safer Gambling – Observation & Interaction

## Interaction Outcomes

Chris asked to self-excluded, was completely out of the blue did ask if this was what he wanted, and it was so he self-excluded

self-excluded

Peter is a regular but has increased visits recently, spoke to regarding this and he said his wife is in hospital which is why he is in more. discussed that he doesn't need to come in and play if he's feeling lonely, he can pop in for a coffee and chat without the need to spend more money. Will keep an eye on him

customer said that he was spending far too much and needed to take a break. a few days later he came back to self-exclude.

Left after spinning off money

he wishes to be told what the fault is with either the game or machine.  
I will report this to the manager as requested by the customer.

customer was refused to play and left the venue

# Safer Gambling – Observation & Interaction

## Exclusion

---

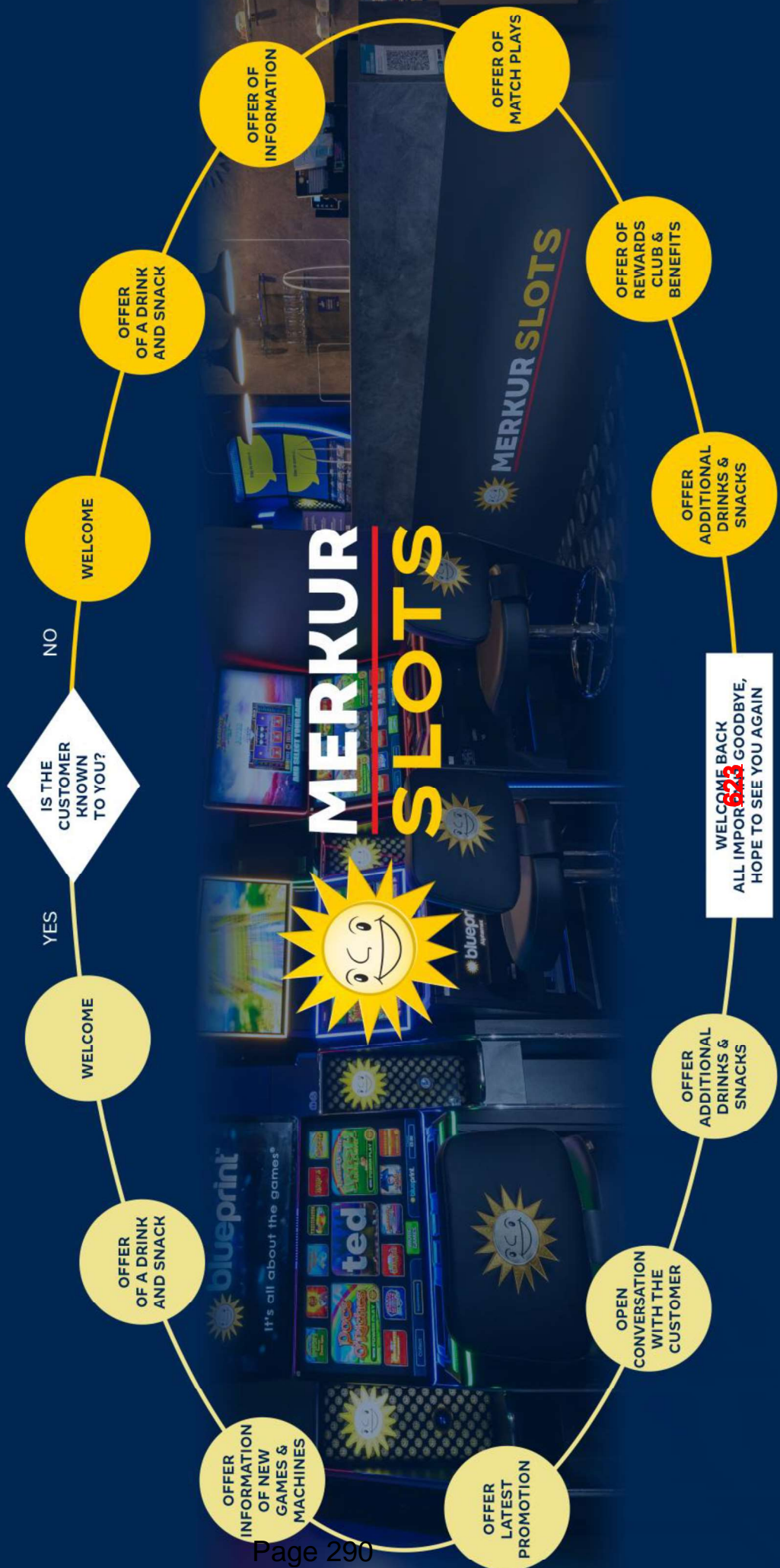
### Why is an interaction advised at self-exclusion?

- Actively listen to the “why” a customer wishes to self-exclude
- Is this the right option for the customer
- Sign post them on where to receive help

### Why is an interaction advised at re instatement?

- Actively listen to the “why” a customer wishes to return
  - Evaluate and follow up with an interaction at a following date
  - Record of the customer's journey
- Interacting is preserving the customers business and helping them to gamble at a safe level, evaluating their interactions and acting upon any concerns.

# CUSTOMER SERVICE JOURNEY



# Safer Gambling – Observation & Interaction

## Summary and Best Practices

---

- Retain customers to play affordable
- Customer Experience use it as part of the journey
- Recording the right information
- Handover between shifts
- Prevention before a customer feels that they need to self – exclude
- Self – exclusion and re –instatement

Page 291

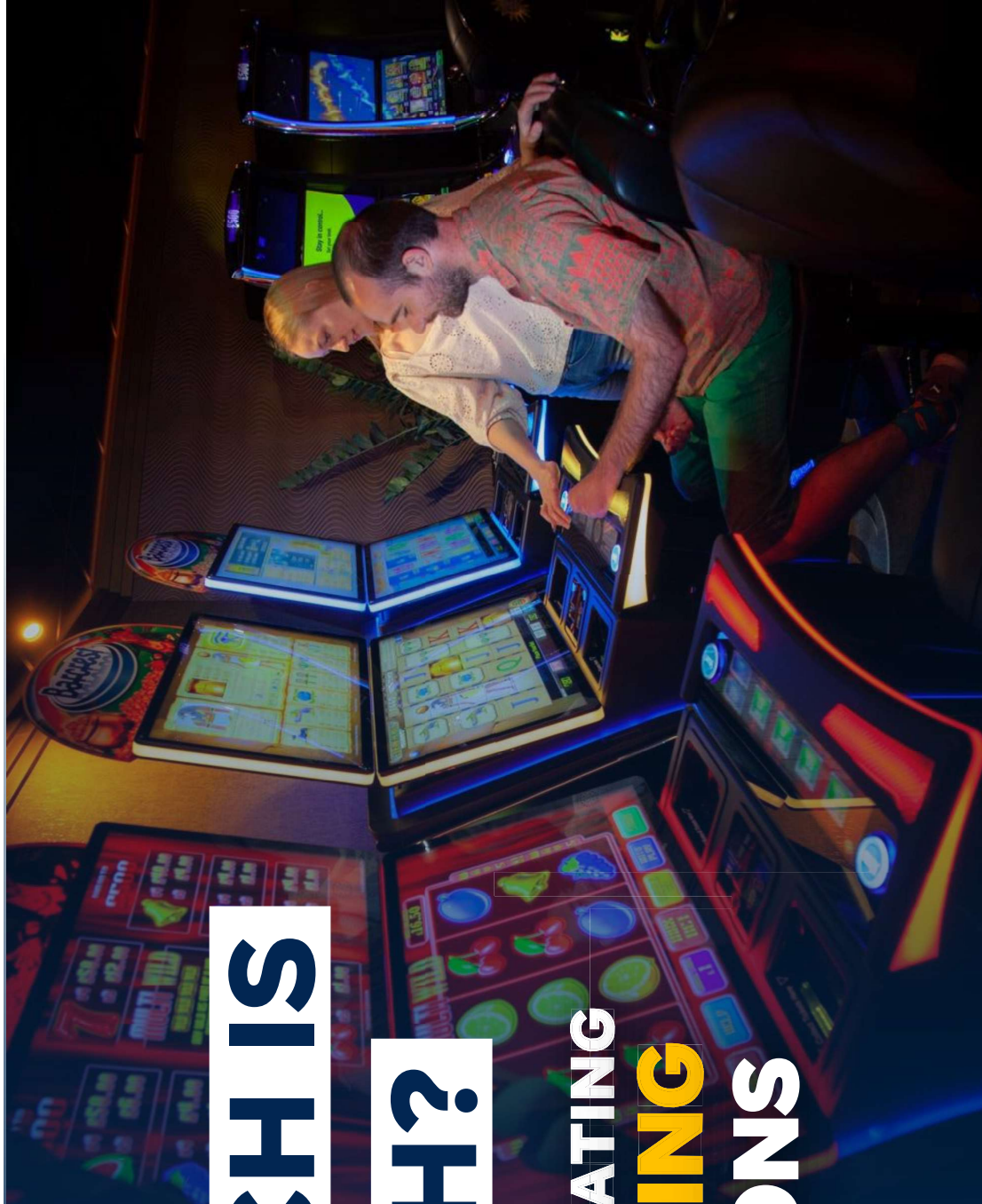
# HOW MUCH IS

# TOO MUCH?

## TRIGGERS FOR INITIATING

## SAFER GAMBLING

## CONVERSATIONS

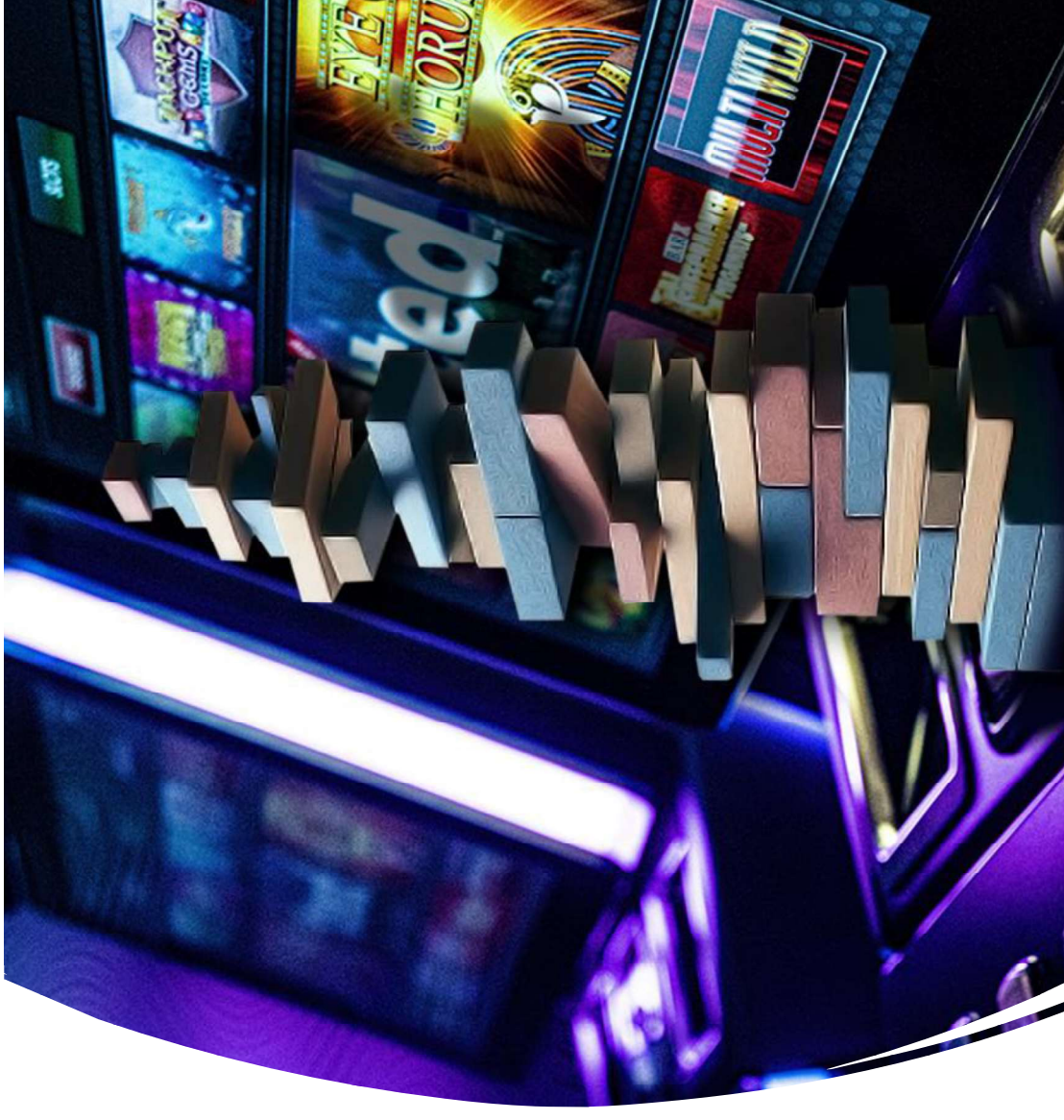


# HOW MUCH IS

## TOO MUCH?


- Determining how much gambling-related harm is too much can vary depending on individual circumstances and factors.
- We are all individuals, and we all have individual behaviours
  - How much do we know about our customers?
  - Do we recognise their regularities, and when do we check in on them?
  - Do we actively listen to what they are telling us?
  - Are we checking in enough and recording our observations and conversations?
- The following slides serve as prompts and reminders of when to interact


Page 293



# VENUE TRIGGERS


## How much is too much?


 Too much time in Venue


 Too many trips to the ATM

 Too many trips to the GeWeTe

Page 294

 Too many uses of a hold card

 Too many machines being played

 Too many visits and too much play compared to normal

An instance of these should initiate a safer gambling observation & conversation by a member of the team and be recorded on the Smart Hub



# VENUE TRIGGERS

## Time



Too many hours spent in the premises



Spending multiple hours gambling could be a sign that someone is displaying harms caused by gambling

Page 295

This may be their normal level of play, however, by checking in on a customer and having a conversation with them we may find out information that may cause concern



**REMEMBER TO RECORD YOUR  
OBSERVATION & INTERACTION.**



# VENUE TRIGGERS

## ATM



Too many trips to the ATM



Making multiple trips to the ATM could be a sign of chasing losses.



Have transactions been declined?



Spotting a customer making multiple trips to the ATM should initiate a safer gambling conversation



**REMEMBER TO RECORD YOUR  
OBSERVATION & INTERACTION.**



# VENUE TRIGGERS

## GeWeTe



Too many trips to the GeWeTe

Making multiple trips to the GeWeTe could be a sign of chasing losses and should initiate a safer gambling conversation



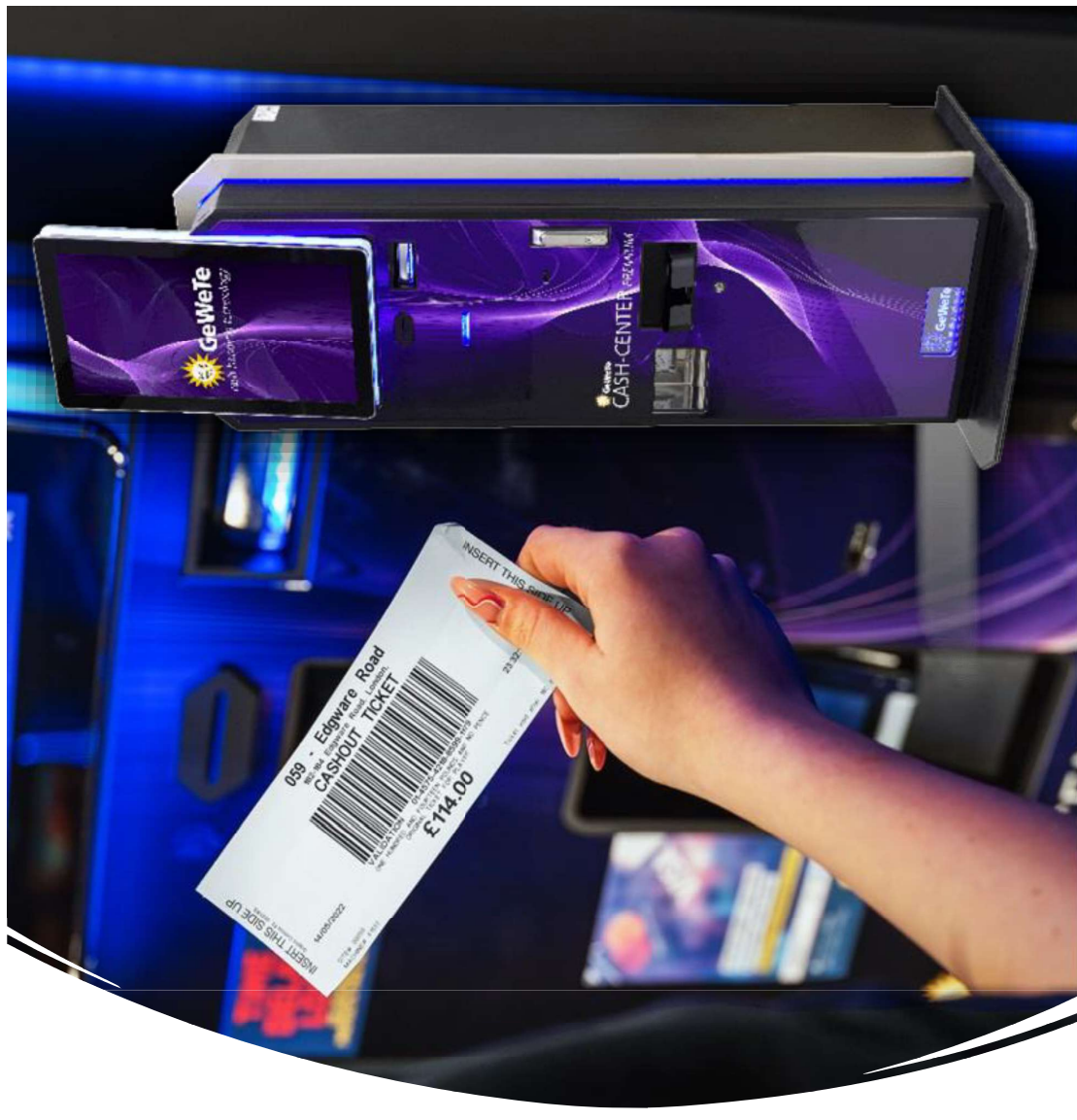
Are customers using the cash withdrawal facilities or are they cashing in their TITO tickets?



Customers inserting small coins and change may be a sign they are gambling beyond their means



Page 297



630

# VENUE TRIGGERS

## Machine Hold Request

👉 Too many instances of holding a machine

🏧 Holding a machine may be a sign of a customer searching for additional funds

🕒 Be extra vigilant before and after midnight.

💬 Having a conversation and probing further why their machine needs holding may highlight any concerns




**REMEMBER TO RECORD YOUR OBSERVATION & INTERACTION.**



# VENUE TRIGGERS

## Machines

-  Too many machines being played by the same customer
- Flitting from machine to machine or playing multiple machines at the same time may indicate a lack of control or chasing losses
- If they are playing B3s, are they aware of time and limit settings?

↔ Page 299 ⌚




**REMEMBER TO RECORD YOUR  
OBSERVATION & INTERACTION.**





**632**

# VENUE TRIGGERS

## Increases

 Change in play and visit frequency could be a display of gambling harm

 It could be they are on holiday and have more free time

 They may have already told you in a conversation, have you actively listened?

Page 300





**REMEMBER TO RECORD YOUR  
OBSERVATION & INTERACTION.**



# SAFER GAMBLING TOOLBOX

## How much is too much?

 The Safer Gambling Toolbox refers to a set of resources and tools provided through all the compliance & safer gambling training

 These slides are only one tool and serve to compliment your other additional training

Make sure you use all the available tools to keep our customers safe and gambling responsibly



**REMEMBER TO RECORD YOUR  
OBSERVATION & INTERACTION.**



634



# INTERNATIONAL CERTIFICATE OF ACCREDITATION



GLOBAL GAMBLING GUIDANCE GROUP

In accordance with the responsible  
gaming policies, procedures and  
standards set by the Global  
Gambling Guidance Group (G4),  
Amsterdam, the Netherlands,  
accreditation is hereby granted to:


**Merkur Casino UK**

Audit date(s):  
30 October - 3 November

Certificate Number: EG - 00042024  
Original Approval: 10 August 2020  
Current Certificate: 3 November 2023  
Certificate Expiry: 3 November 2026

On behalf of the G4 Foundation:

  
Jeffrey Derevensky

  
Pieter Remmers

Vincit qui se vincit

# CUSTOMER CARE

Your feedback is important to us; there are a few ways to reach us:

1. Visit <https://customercare.mercurcasinouk.com/>



or simply scan this QR code:

2. Telephone **01908 351265**

(please note that this is an automated phone service)

3. Write to us at:

MERKUR Casino UK,  
Second Floor,  
Matrix House,  
North Fourth Street,  
Milton Keynes  
MK9 1NJ



**BeGambleAware.org**

<sup>637</sup> CERTIFIED BY THE



GLOBAL GAMBLING GUIDANCE GROUP

# THINK

---

# 25

If you are lucky enough to look under 25 years of age, we need to check your ID.

**Please do not be offended.**

Acceptable forms of ID are:  
Driving Licence, Passport, Citizen Card.

18+ BeGambleAware.org   

PLAY  
SENSIBLY

PLAY  
ENJOYABLY

PLAY  
AFFORDABLY



**MERKUR**  
**SLOTS**





# MERKUR SLOTS



No Smoking



Over 18s Only



No Alcohol



CCTV

If you feel you are in  
difficulty with your  
gambling or know  
someone who is  
and would like help,

Call the National  
Gambling Helpline:

**0808 8020 133**

# PLAYING THE MACHINES

## Staying in Control

	<b>JOCUL LA APARATE:</b> CUM SĂ DEȚINEȚI CONTROLUL		<b>LOJA ME MAKINERITË:</b> TË JESH NË KONTROLL
	玩角子老虎机时： 保持克制		<b>GRAJÁC NA AUTOMATACH:</b> NIE TRAC KONTROLI
	ИГРАТЬ НА ИГРОВЫХ АВТОМАТАХ ДЕРЖАТЬ СЕБЯ В РУКАХ		<b>A JÁTEKGÉPEKEN VALÓ JÁTSZÁS:</b> MEGTARTANI A KONTROLLT
	ИГРА НА РОТАТИВКИ: НЕ ГУБЕТЕ КОНТРОЛ		मेरा निहटू खेल्तु नयिन्त्रणमा रहनुहोस्
	<b>MAKİNELERDE OYNARKEN:</b> KONTROLÜ ELİNİZDE TUTUN		<b>JOUER AUX MACHINES À SOUS :</b> GARDER LE CONTRÔLE
	<b>JUGAR CON LAS MÁQUINAS:</b> MANTENER EL CONTROL		<b>NUTZUNG VON SPIELAUTOMATEN:</b> DIE KONTROLLE BEHALTEN
	<b>HRANÍ NA AUTOMATECH:</b> MĚJTE TO POD KONTROLOU		

18+ BeGambleAware.org



PLAY  
SENSIBLY

PLAY  
ENJOYABLY

PLAY  
AFFORDABLY



641

# **Extract of Licence Conditions and Codes of Practice (LCCP) for Bingo**

**Version effective from 12 September 2022**

### 1.1.1 - Qualified persons – qualifying position

**Applies to:**

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

1. In this condition the terms 'small-scale operator', 'qualifying position' and 'qualified person' have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
2. Schedule X<sup>1</sup> 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<sup>1</sup>.
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.

---

<sup>1</sup> The schedules mentioned here will be attached to individual licences.

## 1.2.1 - Specified management offices – personal management licences

### Applies to:

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

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

### 2.1.1 - Access to (and provision of data from) key equipment

**Applies to:**

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences

1. Licensees must, on request, permit an enforcement officer to inspect any of their remote gambling equipment and/or provide to the Commission copies of data held on such equipment in such format and manner as the Commission may request.

### 2.2.1 - Gambling software

**Applies to:**

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences

1 All gambling software<sup>1</sup> used by the licensee must have been manufactured by the holder of a gambling software operating licence. All such gambling software must also be supplied to the licensee by a holder of a gambling software operating licence. Such software must only be installed or adapted by the holder of such a licence.

---

<sup>1</sup> As defined in section 41(2)&(3) of the Act

### 2.3.1 - Technical standards

**Applies to:**

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

1. Licensees must comply with the Commission's technical standards and with requirements set by the Commission relating to the timing and procedures for testing.

### 2.3.2 - Bingo equipment specifications

**Applies to:**

Non-remote bingo operating licences and bingo ancillary remote licences

1. Licensees must comply with the Commission's specification for bingo equipment.

### 3.1.2 - Other networks

**Applies to:**

All remote casino, bingo, and betting licences (except ancillary remote and host licences)

1. Subject to 2 below, all licensees who provide facilities for gambling, other than peer to peer gaming, in circumstances in which they do not contract directly with all of the participants using those facilities ('network operators') must have, put into effect and monitor the effectiveness of policies and procedures designed to ensure that:
  - a. every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the network operator, or that player and another holder of a Gambling Commission remote operating licence of the same kind as that held by the network operator ('a relevant licence');
  - b. the arrangements between the network operator and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
  - c. the network operator's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
    - i. prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act,
    - ii. investigation of suspected cheating,
    - iii. combating of problem gambling, and
    - iv. investigation of customer complaints.
2. Paragraph 1 above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (eg the National Bingo Game).

### 3.1.3 - Hosting

**Applies to:**

All casino (game host), bingo (game host), general betting (host) (real events) and general betting (host) (virtual events) licences

1. Subject to 2 below, all licensees who provide facilities for gambling in circumstances in which they do not contract directly with any of the participants using those facilities ('hosts') must ensure that:
  - a. every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the holder of a Gambling Commission remote casino, bingo, general betting (real events) or general betting (virtual events) operating licence ('a relevant licence');
  - b. the arrangements between the host and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
  - c. the host's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
    - i. prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act,
    - ii. investigation of suspected cheating,
    - iii. combating of problem gambling, and
    - iv. investigation of customer complaints.
2. Paragraph 1 above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (eg the National Bingo Game).

## 4.1.1 - Segregation of funds

### Applies to:

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

1. Licensees who hold customer funds must ensure that these are held in a separate client bank account or accounts.
2. 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.

## 4.2.1 - Disclosure to customers

### Applies to:

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

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

### 5.1.1 - Cash and cash equivalents

**Applies to:**

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

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

### 6.1.2 - Use of credit cards

**Applies to:**

All non-remote general betting, pool betting and betting intermediary licences, and all remote licences (including ancillary remote betting and ancillary remote lottery licences) except gaming machine technical, gambling software and host licences

1. Licensees must not accept payment for gambling by credit card. This includes payments to the licensee made by credit card through a money service business.

## 7.1.1 - Fair and transparent terms and practices

### Applies to:

All operating licences except gaming machine technical and gambling software licences

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

### 8.1.1 - Display of licensed status

**Applies to:**

All remote casino, bingo and betting licences other than ancillary, host, remote betting intermediary (trading room only), remote general betting (limited) and remote general betting (standard) (remote platform) licences

Read additional guidance on the technical requirements contained within this section.

1. Licensees providing facilities for remote gambling must display on every screen from which customers are able to access gambling facilities provided in reliance on this licence:
  - a. a statement that they are licensed and regulated by the Gambling Commission;
  - b. their account number; and
  - c. a link (which will be supplied by the Commission) to their current licensed status as recorded on the Commission's website.
2. Such statement, account number and link must be in the format, provided by the means, and contain the information from time to time specified by the Commission in its technical standards applicable to the kind of facilities for gambling provided in accordance with this licence or otherwise notified to licensees for the purposes of this condition.
3. Licensees may also display on screens accessible from Great Britain information about licences or other permissions they hold from regulators in, or by virtue of the laws of, jurisdictions outside Great Britain provided it is made plain on those screens that the licensee provides facilities for gambling to persons in Great Britain in reliance on their Gambling Commission licence(s).

### 9.1.2 - Prohibited bingo prize games

**Applies to:**

All non-remote bingo operating licences

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

### 12.1.1 - Anti-money laundering - Prevention of money laundering and terrorist financing

**Applies to:**

All operating licences except gaming machine technical and gambling software licences

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

### 14.1.1 - Access to premises

**Applies to:**

All operating licences

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

### 15.1.1 - Reporting suspicion of offences etc – non-betting licences

**Applies to:**

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

1. Licensees must as soon as reasonably practicable, in such a form or manner as the Commission may from time to time specify, provide the Commission 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.<sup>1</sup>

Read additional guidance on the information requirements contained within this section.

---

<sup>1</sup> These matters are to be reported to us online via our 'eServices' digital service on our website

### 15.1.3 - Reporting of systematic or organised money lending

**Applies to:**

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

1. Licensees must as soon as reasonably practicable, in such form or manner as the Commission may from time to time specify, provide the Commission with any information relating to cases where they encounter systematic, organised or substantial money lending between customers on their premises, in accordance with the ordinary code provisions on money lending between customers.<sup>1</sup>

Read additional guidance on the information requirements contained within this section.

---

<sup>1</sup> These matters are to be reported to us online via our 'eServices' digital service on our website

## 15.2.1 - Reporting key events

### Applies to:

All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, 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<sup>1</sup>.

### Operator status

1. Any of the following applying to a licensee, any person holding a key position for a licensee, a group company or a shareholder or member (holding 3% or more of the issued share capital of the licensee or its holding company): • presenting of a petition for winding up • making of a winding up order • entering into administration or receivership • bankruptcy (applying to individuals only) • sequestration (applicable in Scotland), or • an individual voluntary arrangement.

### Relevant persons and positions

2. 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.
3. 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.
4. The appointment of a person to, or a person ceasing to occupy, a 'key position' (including leaving one position to take up another). 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 where the holder of which has overall responsibility for the licensee's anti-money laundering and/or terrorist financing compliance, and/or for the reporting of known or suspected money laundering or terrorist financing activity.
  - 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.)

### Financial events

5. 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.
6. Any breach of a covenant given to a bank or other lender.
7. 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.
8. 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

9. 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.)
10. Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities of a person in a 'key position', where such an investigation could result in the imposition of a sanction or penalty which could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
11. Any criminal investigation by a law enforcement agency in any jurisdiction in which the licensee, or a person in a 'key position' related to the licensee, is involved and where the Commission might have cause to question whether the licensee's measures to keep crime out of gambling had failed.
12. 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, or a professional, statutory or other regulatory or government body (in whatever jurisdiction)) about the provision of facilities for gambling: a summary of the nature of the concerns must be provided.
13. 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.
14. 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.
15. The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number

issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

#### Gambling facilities

16. Any security breach to the licensee's environment that adversely affects the confidentiality of customer data; or prevents the licensee's customers, staff, or legitimate users from accessing their accounts for longer than 12 hours.
17. Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
18. 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 (including domains covered by 'white label' arrangements). In this condition: 'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof
  - a. in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
  - b. a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

Read additional guidance on the information requirements contained within this section.

---

<sup>1</sup>Key events are to be reported to us online via the 'eServices' digital service on our website.

## 15.2.2 - Other reportable events

### Applies to:

All operating licences

1. Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable of the occurrence of any of the following events<sup>1</sup>:
  - a. any material change in the licensee's arrangements for the protection of customer funds in accordance with licence condition 4 (protection of customer funds) (where applicable)
  - b. 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.
  - c. their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised, or their becoming aware of a sustained or meaningful generation of 3% or 10% of group Gross Gambling Yield being exceeded by the group in that jurisdiction.
  - d. any actual or potential breaches by the licensee of the requirements imposed by or under Parts 7 or 8 of the Proceeds of Crime Act 2002, or Part III of the Terrorism Act 2000, or any UK law by which those statutes are amended or superseded.

In this condition:

- a. 'group company' has the same meaning as in condition 15.2.1; and
- b. without prejudice to section 327 of the Gambling Act 2005, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

Read additional guidance on the information requirements contained within this section.

---

<sup>1</sup> Other reportable events are to be reported to us online via the 'eServices' digital service on our website.

## 15.3.1 - General and regulatory returns

### Applies to:

All operating licences

1. On request, licensees must provide the Commission with such information as the Commission may require, in such a form or manner as the Commission may from time-to-time specify, 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.
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 an accurate Regulatory Return to the Commission containing such information as the Commission may from time to time specify.<sup>1</sup>

Read additional guidance on the information requirements contained within this section.

---

<sup>1</sup> Regulatory returns are to be submitted to us online via the 'eServices' digital service on our website.

## 16.1.1 - Responsible placement of digital adverts

### Applies to:

All licences

#### 1 Licences must:

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

## 17.1.1 - Customer identity verification

### Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except any lottery licence the holder of which only provides facilities for participation in low frequency <sup>1</sup>[1](#1711-1) or subscription lotteries, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo.

1. Licensees must obtain and verify information in order to establish the identity of a customer before that customer is permitted to gamble. Information must include, but is not restricted to, the customer's name, address and date of birth.
2. A request made by a customer to withdraw funds from their account must not result in a requirement for additional information to be supplied as a condition of withdrawal if the licensee could have reasonably requested that information earlier. This requirement does not prevent a licensee from seeking information on the customer which they must obtain at that time due to any other legal obligation.
3. Before permitting a customer to deposit funds, licensees should inform customers what types of identity documents or other information the licensee may need the customer to provide, the circumstances in which such information might be required, and the form and manner in which such information should be provided.
4. Licensees must take reasonable steps to ensure that the information they hold on a customer's identity remains accurate.

---

<sup>1</sup> A 'low frequency lottery' is one of a series of separate lotteries promoted on behalf of the same non-commercial society or local authority, or as part of the same multiple society lottery scheme, in respect of which there is a period of at least two days between each lottery draw.

### Ordinary code

These do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner.

Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty.

## Social responsibility code

Compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution.

### 1.1.1 - Cooperation with the Commission

#### Ordinary code

##### Applies to:

All licences

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

## 1.1.2 - Responsibility for third parties – all licences

### Social responsibility code

#### Applies to:

All licences

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

### 1.1.3 - Responsibility for third parties – remote

#### Social responsibility code

##### Applies to:

All remote licences

1. Remote licensees must ensure in particular:
  - a. that third parties who provide user interfaces enabling customers to access their remote gambling facilities:
    - i. include a term that any such user interface complies with the Commission's technical standards for remote gambling systems; and
    - ii. enable them, 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 that term.

### 2.1.2 - Anti-money laundering – other than casino

#### Ordinary code

##### Applies to:

All licences except casino licences

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

### 3.1.1 - Combating problem gambling

#### Social responsibility code

##### Applies to:

All licences

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

### 3.2.5 - Bingo and FEC SR code

#### Social responsibility code

##### Applies to:

All non-remote bingo and family entertainment centre licences

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

purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Read additional guidance on the information requirements contained within this section.

### 3.2.6 - Bingo and FEC ordinary code

#### Ordinary code

##### Applies to:

All non-remote bingo and family entertainment centre licences

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

Read additional guidance on the information requirements contained within this section.

---

<sup>1</sup> These matters are to be reported to us online via our 'eServices' digital service on our website.

### 3.2.11 - Remote SR code

#### Social responsibility code

##### Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except lottery licences, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo licences

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these.
2. Such procedures must include:
  - a. Verifying the age of a customer before the customer is able to:
    - i. deposit any funds into their account;
    - ii. access any free-to-play versions of gambling games that the licensee may make available; or
    - iii. gamble with the licensee using either their own money or any free bet or bonus.
  - b. warning potential customers that underage gambling is an offence;
  - c. regularly reviewing their age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves;
  - d. ensuring that relevant staff are properly trained in the use of their age verification procedures; in particular customer services staff must be appropriately trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of legal age; and
  - e. enabling their gambling websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites.

### 3.2.12 - Remote ordinary code

#### Ordinary code

##### Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees should, and should request their contracted partners to, draw attention to parental responsibility as part of the purchasing process of facilities such as mobile phones and interactive television.

### 3.3.1 - Responsible gambling information

#### Social responsibility code

##### Applies to:

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

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

### 3.3.2 - Foreign languages

#### Ordinary code

##### Applies to:

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

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

### 3.3.4 - Remote time-out facility

#### Social responsibility code

##### Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting licences, remote betting (remote platform), gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading room only) licences

- 1 Licensees must offer a 'time out' facility for customers for the following durations:
  - a. 24 hours
  - b. one week
  - c. one month or
  - d. such other period as the customer may reasonably request, up to a maximum of 6 weeks.

### 3.4.1 - Premises-based customer interaction

#### Social responsibility code

##### Applies to:

All non-remote licences (except non-remote lottery, gaming machine technical, gambling software and host licences); only the following remote licences – ancillary remote bingo, ancillary remote casino, ancillary remote betting, remote general betting limited, and remote betting intermediary (trading rooms only).

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

### 3.5.1 - Self exclusion – Non-remote and trading rooms SR code

#### Social responsibility code

##### Applies to:

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

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

8. Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

### 3.5.2 - Self-exclusion – non-remote ordinary code

#### Ordinary code

##### Applies to:

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

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
2. Individuals should be able to self-exclude without having to enter gambling premises.
3. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
4. Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
5. Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
6. Customers should be given the opportunity to discuss self-exclusion in private, where possible.
7. Licensees should take steps to ensure that:
  - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
  - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
  - c. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
  - d. at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
  - e. where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
  - f. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.

8. The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
9. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
10. Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.
11. Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
12. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

### 3.5.3 - Self-exclusion – remote SR code

#### Social responsibility code

##### Applies to:

All remote licences except: gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, betting intermediary (trading room only) and remote betting (standard) (remote platform) licences. Paragraph 8 does not apply to ancillary remote betting licences, remote general betting (limited), or any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries

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

8. Customers must be given the opportunity to self-exclude by contacting customer services and in addition by entering an automated process using remote communication. In order to avoid inadvertent self-exclusion it is acceptable for an automated process to include an additional step that requires the customer to confirm that they wish to self-exclude. The licensee must ensure that all staff who are involved in direct customer service are aware of the self-exclusion system in place, and are able to direct that individual to an immediate point of contact with whom/which to complete that process.

### 3.5.4 - Self-exclusion – Remote ordinary code

#### Ordinary code

##### Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, remote betting intermediary (trading rooms only) and remote betting (standard) (remote platform) licences

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude:
  - a. over the internet; this can be a box that must be ticked in order to indicate that they understand the system
  - b. by telephone; this can be a direct question asking whether they understand the system.
2. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
3. Licensees should encourage the customer to consider extending their self-exclusion to other remote gambling operators currently used by the customer.
4. Within the licensee's information about self-exclusion policies, the licensee should provide a statement to explain that software is available to prevent an individual computer from accessing gambling internet sites. The licensee should provide a link to a site where further information is available.
5. Licensees should take all reasonable steps to ensure that:
  - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months;
  - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months;
  - c. the self-exclusion arrangements give customers the option of selecting a self-exclusion period of up to at least five years;
  - d. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
  - e. at the end of the period chosen by the customer, self-exclusion remains in place, for a minimum of 7 years, unless the customer takes positive action to gamble again;
  - f. where a customer chooses not to renew, and makes a positive request to begin gambling again, during the 7 year period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed to access gambling facilities. Contact must be made via phone or in person; re-registering online is not sufficient; and
  - g. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed

to accept such material.

6. The licensee should retain the records relating to a self-exclusion agreement for as long as is needed to enable the self-exclusion procedures set out in paragraph 5 above to be implemented.
7. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
8. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

### 3.5.5 - Remote multi-operator SR code

#### Social responsibility code

##### Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting, remote general betting (remote platform), remote betting intermediary (trading room only), remote general betting (limited), gaming machine technical, gambling software, host, ancillary remote bingo, and ancillary remote casino licences

1. Licensees must participate in the national multi-operator self-exclusion scheme.

### 3.5.6 - Multi-operator non-remote SR code

#### Social responsibility code

##### Applies to:

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

1. Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

### 3.5.7 - Multi-operator non-remote ordinary code

#### Ordinary code

##### Applies to:

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

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

## 3.6.2 - Bingo

### Ordinary code

#### Applies to:

All non-remote bingo licences

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

### 3.6.7 - Remote

#### Ordinary code

##### Applies to:

All remote licences, except remote lottery, remote pool betting, remote gaming machine technical, remote gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence to employ them to provide facilities for gambling.

### 3.8.2 - Money-lending – other than casinos

#### Ordinary code

##### Applies to:

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

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

### 3.9.1 - Identification of individual customers - remote

#### Social responsibility code

##### Applies to:

All remote licences (including ancillary remote betting licences) except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees must have and put into effect policies and procedures designed to identify separate accounts which are held by the same individual.
2. Where licensees allow customers to hold more than one account with them, the licensee must have and put into effect procedures which enable them to relate each of a customer's such accounts to each of the others and ensure that:
  - a. if a customer opts to self-exclude they are effectively excluded from all gambling with the licensee unless they make it clear that their request relates only to some forms of gambling or gambling using only some of the accounts they hold with the licensee;
  - b. all of a customer's accounts are monitored and decisions that trigger customer interaction are based on the observed behaviour and transactions across all the accounts;
  - c. where credit is offered or allowed the maximum credit limit is applied on an aggregate basis across all accounts; and
  - d. individual financial limits can be implemented across all of a customer's accounts.
3. Licensees which are companies or other bodies corporate must take all reasonable steps to comply with the above provision as if reference to a customer holding more than one account with them included a reference to a customer holding one or more accounts with them and one or more accounts with a group company.
4. A company is a 'group company' in relation to a licensee if it is the holding company of, subsidiary of, or shares a common holding company with, the licensee. For these purposes 'holding company' and 'subsidiary' have the meanings ascribed to them by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof.

### 4.1.1 - Fair terms

#### Social responsibility code

##### Applies to:

All licences, except gaming machine technical and gambling software licences

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

### 4.2.2 - Display of rules - bingo

#### Social responsibility code

##### Applies to:

All non-remote bingo licences

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

### 4.2.3 - Display of rules – remote SR code

#### Social responsibility code

##### Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees must make the following available to customers:
  - a. a player's guide to each gambling opportunity (bet, game or lottery) made available by the operator; and
  - b. such additional information relating to the available gambling as the Commission shall from time to time publish to licensees: the current requirements are set out in the Commission's Remote gambling and software technical standards.

### 4.2.4 - Remote ordinary code

#### Ordinary code

##### Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Where practicable, the player's guide and additional information referred to in the social responsibility code 4.2.3 should be made available through the medium in which the remote gambling is to be conducted. Where that is not practicable, licensees should either:
  - a. send a copy of the guide and required additional information by post, fax or email; or
  - b. make these available to the customer in another medium to which he has access.

## 5.1.1 - Rewards and bonuses – SR code

### Social responsibility code

#### Applies to:

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

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

Licensees must take into account the Commission's guidance on high value customer incentives.

### 5.1.2 - Proportionate rewards

#### Ordinary code

##### Applies to:

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

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

### 5.1.3 - Alcoholic drinks

#### Social responsibility code

##### Applies to:

All non-remote bingo and casino licences

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

## 5.1.6 - Compliance with advertising codes

### Social responsibility code

#### Applies to:

All licences, except lottery licences

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

## 5.1.8 - Compliance with industry advertising codes

### Ordinary code

#### Applies to:

All licences

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

## 5.1.9 - Other marketing requirements

### Social responsibility code

#### Applies to:

All licences

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

## 5.1.10 - Online marketing in proximity to information on responsible gambling

### Ordinary code

#### Applies to:

All licences

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

## 5.1.11 - Direct electronic marketing consent

### Social responsibility code

#### Applies to:

All licences

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

## 6.1.1 - Complaints and disputes

### Social responsibility code

#### Applies to:

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

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

In this Code, 'ADR entity' means

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

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

Read additional guidance on the information requirements contained within this section.

### 7.1.2 - Responsible gambling information for staff

**Social responsibility code**

**Applies to:**

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

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

## 8.1.1 - Ordinary code

### Ordinary code

#### Applies to:

All licences

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

Read additional guidance on the information requirements contained within this section.

---

<sup>1</sup> These matters are to be reported to us online via our 'eServices' digital service on our website.

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

## 9.1.2 - Bingo

### Social responsibility code

#### Applies to:

All non-remote bingo operating licences

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

## 10.1.1 - Assessing local risk

### Social responsibility code

#### Applies to:

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy<sup>1</sup>.
2. Licensees must review (and update as necessary) their local risk assessments:
  - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
  - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
  - c. when applying for a variation of a premises licence; and
  - d. in any case, undertake a local risk assessment when applying for a new premises licence.

---

<sup>1</sup>This is the statement of licensing policy under the Gambling Act 2005.

## 10.1.2 - Sharing local risk assessments

### Ordinary code

#### Applies to:

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

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

## Other provisions and legislation

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

## Licensing authority decisions

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

## Delegations

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

## Part 5: Principles to be applied by licensing authorities

### Licensing objectives

- 5.1** In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:
- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
  - ensuring that gambling is conducted in a fair and open way
  - protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 5.2** It is expected that the licensing authority will have set out their approach to regulation in their statement of policy, having taken into account local circumstances. This is dealt with in more detail at Part 6.
- Objective 1 : Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime**
- 5.3** Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6.
- 5.4** A licensing authority will need to consider questions raised by the location of gambling premises when:
- formulating its statement of licensing policy
  - receiving relevant representations to an application
  - dealing with applications as a responsible authority in its own right
  - considering applications before it.
- 5.5** In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.
- 5.6** Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.
- 5.7** Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003 / Licensing (Scotland) Act 2005, in which context they have wider powers to also take into account measures to prevent nuisance.

- 5.8** In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in Part 9 of this Guidance.
- 5.9** There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. Further information can often be found on the website of industry trade associations<sup>5</sup>.
- 5.10** Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

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

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

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

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

---

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

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

### S.153 principles

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

- 5.22 In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should **not** have regard to:
- s.153 makes it clear that in deciding whether or not to grant a licence, a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application
  - s.210 (1) of the Act states that 'in making a decision in respect of an application...a licensing authority should not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with law relating to planning or building'.
- 5.23 A licensing authority is therefore afforded significant scope to exercise its powers under s.153 on the grounds that it does not encroach on the two principles set out above.
- 5.24 The requirements in s.153 are subject to the licensing authority's power under s.166 to resolve not to issue casino premises licences. This means that a resolution not to issue a casino premises licence applies regardless of the matters set out in s.153.

## Codes of Practice

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

## Good practice in regulation

- 5.27 Under the Legislative and Regulatory Reform Act 2006, any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation<sup>6</sup> in the exercise of the function. These provide that regulatory activities should be carried out in a way which is transparent, accountable, proportionate, and consistent and should be targeted only at cases in which action is needed. The Commission has regard to these principles in relation to its responsibilities and also has regard to the requirements of the Regulators' Code<sup>7</sup>. The purpose of the Code is to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on business.
- 5.28 The statutory principles of good regulation and the Regulators' Code also apply to local authorities, who are under a statutory duty to have regard to them when fulfilling their regulatory functions under the Act<sup>8</sup>.

<sup>6</sup> Legislative and Regulatory Reform Act 2006, section 21

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

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

- 5.29 Guidance produced by the Better Regulation Delivery Office seeks to assist local authorities in interpreting the requirements of the Regulators' Code, for example in developing their Compliance and Enforcement Policy<sup>9</sup>, and in delivering risk-based regulation in relation to age restrictions<sup>10</sup>.

## Human Rights Act 1998

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

## Other considerations

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

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

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

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

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

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

### **Representations**

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

### **Making a decision**

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

- 7.57** Further information and guidance as to the meaning and effect of s.153 is set out at paragraph 5.19 above.

- 9.28** Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this Guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 9.29** Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.
- 9.30** Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.
- 9.31** Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:
- relevant to the need to make the proposed building suitable as a gambling facility
  - directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
  - fairly and reasonably related to the scale and type of premises
  - reasonable in all other respects.

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

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

## Hansard Extract

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

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

**Column Number: 012**

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

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

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

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

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

**Column Number: 037**

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

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

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

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

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

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

**Column Number: 038**

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

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

<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/pm/41109s02.htm>  
<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/am/41109s03.htm>

<sup>6</sup> Standing Committee B, Thursday, 2nd December 2004 (Afternoon) Col 359.

## Determination of application

### [5.158]

In determining an application the licensing authority must hold a hearing<sup>1</sup> if:

- representations have been made by an interested party or responsible authority and have not been withdrawn;
- the authority intend to use their discretion under s 169(1) to attach a condition to a licence; or
- the authority intend to use their discretion under s 169 to exclude a default condition (ie a condition automatically attached to the licence under s 168 unless excluded by the authority in its discretion)<sup>2</sup>.

A hearing may, however, be dispensed with if the applicant and any interested party or responsible authority who have made representations consents to this course<sup>3</sup>, or the authority think that the representations are vexatious or frivolous or will certainly not influence their determination of the application<sup>4</sup>. If the authority do propose to dispense with a hearing on these latter grounds they must as soon as is reasonably practicable notify the person who made the representations<sup>5</sup>, presumably to enable him to seek a remedy by way of judicial review if so advised.

Where the applicant for the premises licence is an applicant for an operating licence<sup>6</sup> the authority cannot determine the application until the relevant operating licence has been issued<sup>7</sup>.

On considering an application for a premises licence (whether at a hearing or not) the licensing authority must either grant it or reject it<sup>8</sup>. In making that determination the licensing authority will be subject to the provisions of s 153 which sets out the principles to be applied by the authority in exercising all their functions under Part 8 GA 2005 (ie including, but not limited to, the grant or refusal of an application for a premises licence). Section 153(1) provides as follows:

"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 it—

- (a) in accordance with any relevant code of practice under s 24,
- (b) in accordance with any relevant guidance issued by the Commission under s 25,
- (c) reasonably consistent with the licensing objectives (subject to paras (a) and (b)), and
- (d) in accordance with the statement published by the authority under s 349 (subject to paras (a) to (c))."

The subsection starts by imposing a general duty on the authority to 'aim to permit the use of premises for gambling' and then sets out a series of four factors which may, in any individual case, qualify or override the general duty. The first point to note is that the provision imposes a duty on the licensing authority: it must, subject to the qualifying factors, aim to permit the use of premises for gambling. What is the scope of this duty? It is suggested that there are two 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*<sup>9</sup> as meaning: '5. To calculate one's course with a view to arriving (at a point); to direct one's course, to make it one's object to attain. Hence fig To have it as an object, to endeavour earnestly'. The *Shorter OED*<sup>10</sup> defines it as: '3. Direct one's course, make it one's object to attain, intend, try'. A person who 'aims' to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling. The most obvious way in which the authority will be able to exercise their powers in this way will be by an imaginative use of their power to frame and impose conditions (see para 5.159 below) so as to overcome objections to the application which might, in the absence of suitable conditions, lead to the application being rejected. No doubt the authority could also, in a case where a licence application gave rise to issues which could not be addressed by suitably drafted conditions, seek to consider with the applicant whether amendments to the application might overcome the objections and enable it to be granted. However, it is also necessary to recognise that the language of s 153(1) stops short of being mandatory; 'aim to permit' provides a strong steer to look favourably on an application, but no more.

As to the list of qualifying factors, these are set out in s 153(1)(a)–(d). Section 153(1)(a) qualifies the duty to aim to permit use of premises for gambling to the extent that such use must be in accordance with any relevant code of practice issued by the Gambling Commission under s 24. That section requires the Gambling Commission to issue codes of practice about the manner in which facilities for gambling are to be provided (whether by the holder of a licence or by another person). In issuing a code of practice the Gambling Commission will be subject to a duty under s 22 to promote the licensing objectives. Accordingly any code of practice should be consistent with those objectives. Section 153(1)(b) qualifies the licensing authority's duty to aim to permit the use of premises for gambling to the extent that such use must be in accordance with any relevant guidance issued by the Gambling

Commission under s 25. This section requires the Gambling Commission to issue guidance to local authorities<sup>11</sup> as to the manner in which they are to exercise their functions under the Act and the principles that they should apply in exercising those functions. Again the effect of s 22 is that in issuing such guidance the Commission will be under a duty to promote the licensing objectives, so again such guidance should be consistent with those objectives. The effect of all this is that any code of practice and any guidance to local authorities ought to promote the licensing objectives and no inconsistencies between the two should arise. On that basis codes of practice and guidance are placed (by s 153(1)(a) and (b)) as enjoying equal importance at the top of the hierarchy of factors set out in s 153(1)(a)-(d).

Next comes s 153(1)(c): this provides that the duty of the licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be reasonably consistent with the licensing objectives, but it goes on to provide that this condition is 'subject to paras (a) and (b)'. In principle there should, of course, be no conflict between (a) and (b) (which will both reflect the Gambling Commission's duty to promote the licensing objectives) and (c) (which will reflect the licensing authority's view of what the licensing objectives require). However the effect of the legislation appears to be that should there be any conflict between the two then the guidance set out in codes of practice or guidance emanating from the Gambling Commission will 'trump' any factors which the licensing authority themselves would otherwise have taken into account as relevant to the licensing objectives under s 153(1)(c).

Finally, s 153(1)(d) provides that the duty of a licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be in accordance with the authority's own statement issued under s 349. In preparing that statement the authority are not themselves expressly required to have regard to the licensing objectives, but they are obliged to have regard to guidance issued by the Gambling Commission under s 25 and such guidance deals, amongst other things, with the formulation by the authority of their licensing policy (see para AM5.6655). Since the s 25 guidance must itself promote the licensing objectives the effect should be that the authority's licensing policy will itself be consistent with those objectives so that it should not conflict with any code of practice or guidance issued by the Commission nor with the licensing objectives themselves. However, s 153(1)(d) provides that consideration of the licensing authority's own policy is 'subject to paras (a) to (c)' which appears to mean that in the case of an inconsistency a relevant Commission code of practice, relevant guidance or the licensing objectives themselves would 'trump' the authority's licensing policy.

In determining the application the authority may not have regard to the expected demand for the facilities which it is proposed to provide<sup>12</sup>, nor may they have regard to the question whether or not the proposal is likely to be granted planning permission or building regulation approval<sup>13</sup>. Where the authority have resolved under s 166 not to issue casino premises licences an application for such a licence will, of course, necessarily fail and be rejected<sup>14</sup>.

Where the application is granted the authority must as soon as reasonably practicable give notice of the grant in the form prescribed to the applicant, the Commission, any person who made representations, the chief officer of police for any area in which the premises are wholly or partly situated and HMRC<sup>15</sup> and must issue the licence to the applicant and must give him a summary of the terms and conditions in the prescribed form. If they have attached a condition to the licence under s 169(1)(a) or have excluded a default condition<sup>16</sup> they must give their reasons<sup>17</sup>. If representations were made by an interested party or a responsible authority they must give their response to the representations<sup>18</sup>.

Where the application is rejected the authority must as soon as reasonably practicable give notice of the rejection in the form prescribed to the applicant and to the same parties as are entitled to be notified of a grant<sup>18</sup>. The notice must give the authority's reasons for rejecting the application<sup>19</sup>.

<sup>1</sup> As to procedure at hearings in relation to applications see SI 2007/173.

<sup>2</sup> GA 2005, s 162. See further para 5.159 below.

<sup>3</sup> GA 2005, s 162.

<sup>4</sup> GA 2005, s 162(3).

<sup>5</sup> GA 2005, s 162(4).

<sup>6</sup> Ie under GA 2005, s 159(3)(b).

<sup>7</sup> GA 2005, s 163(2).

<sup>8</sup> GA 2005, s 163(1).

<sup>9</sup> *The Oxford English Dictionary* (2nd edn, 1989).

<sup>10</sup> (5th Edn, OUP).

## SCHEDULE 2

Regulations 10 and 11

### Conditions attaching to bingo premises licences

## PART 1

### Mandatory conditions attaching to bingo premises licences

1. A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.

2. No customer shall be able to enter the premises directly from any other premises in respect of which one of the following permissions has effect—

- (a) a casino premises licence;
- (b) an adult gaming centre premises licence;
- (c) a betting premises licence other than a track premises licence; and

3.—(1) This paragraph shall apply where children or young persons or both are permitted by the licence holder to enter the premises, and Category B or C gaming machines are made available for use on the premises.

(2) Any area of the premises to which category B and C gaming machines are located—

- (a) shall be separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for the purpose;
- (b) shall be supervised at all times to ensure children or young persons or both do not enter the area; and
- (c) shall be arranged in such a way that ensures all parts of the area can be observed by the persons mentioned in sub-paragraph (3).

(3) The reference to supervision in this paragraph means supervision by—

- (a) one or more persons whose responsibilities include ensuring children or young persons or both do not enter the area; or
- (b) closed circuit television which is monitored by one or more persons whose responsibilities include ensuring that children or young persons or both do not enter the area.

(4) A notice stating that no person under the age of 18 years is permitted to enter the area shall be displayed in a prominent place at the entrance to any area of the premises in which Category B or C gaming machines are made available for use.

4.—(1) In the case of a charge for admission to the premises, a notice of that charge shall be displayed in a prominent place at the principal entrance to the premises.

(2) In the case of any other charges in respect of gaming, a notice setting out the information in sub-paragraph (3) shall be displayed at the main point where payment for the charge is to be made.

(3) The notice in sub-paragraph (2) shall include the following information—

- (a) the cost (in money) of each game card (or set of game cards) payable by an individual in respect of a game of bingo;
- (b) in respect of each game card (or set of game cards) referred to in paragraph (a) the amount that will be charged by way of a participation fee for entitlement to participate in that game; and

- (c) a statement to the effect that all or part of the participation fee may be waived at the discretion of the person charging it.
  - (4) The notice may be displayed in electronic form.
  - (5) A reference in this paragraph to a charge in respect of gaming does not include an amount paid for an opportunity to win one or more prizes in gaming to which section 288 of the 2005 Act (meaning of “prize gaming”) applies.
- 5.—**(1) The rules of each type of game that is available to be played the premises other than games played on gaming machines shall be made available to customers within the premises.
- (2) The condition in sub-paragraph (1) may be satisfied by—
- (a) displaying a sign setting out the rules,
  - (b) making available leaflets or other written material containing the rules, or
  - (c) running an audio-visual guide to the rules prior to any bingo game being commenced.
- 6.** Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.

## PART 2

### Default conditions attaching to bingo premises licences

- 1.** Subject to paragraph 2, no facilities for gambling shall be provided on the premises between the hours of midnight and 9am.
- 2.** The condition in paragraph 1 shall not apply to making gaming machines available for use.