

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.

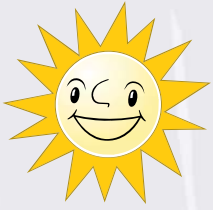
All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

WORKING TOGETHER



Accredited by the Global Gambling Guidance Group

THE MERKUR FAMILY



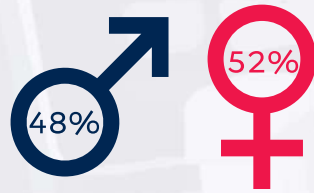
PART OF THE MERKUR GROUP

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.

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.

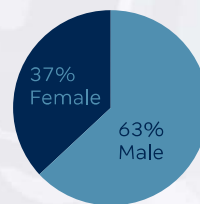


Our AGCs and High Street bingo venues are where people come to spend their spare change, have a game of bingo and enjoy their favourite pastime in convenient locations.

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.





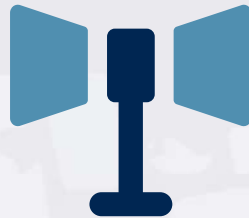
OUR OPERATION

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.



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



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.

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RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging



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

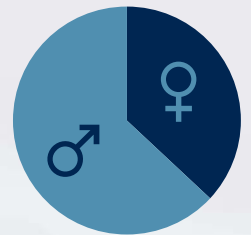


We provide complimentary refreshments, teas and coffees, to customers and do not sell alcohol. Our staff will not allow anyone into the premises who appears to be intoxicated.



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.

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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**

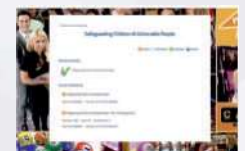
Compliance



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.

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:
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phone +44 (0) 7796 614137

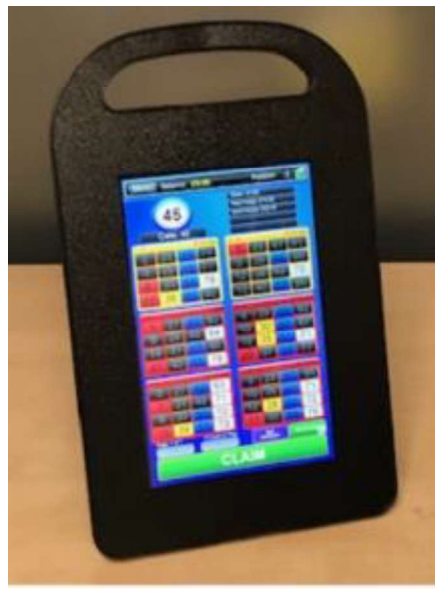
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North Fourth Street
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Mk9 1NJ

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phone 01908 351200
email info@merkur-casino.com



G-TAB Bingo



**Bringing Traditional Bingo
to the High Street**

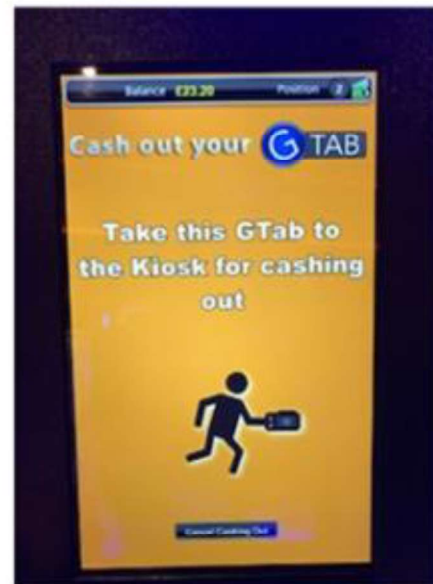
G-Tab is a multi-purpose gaming device offering live link Bingo Games, Bingo Variant Games and participation in the National Bingo Game which is played twice daily. Bingo tablets are bingo machines that provide games of both remote and non-remote bingo with remote bingo being the linked games operated 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



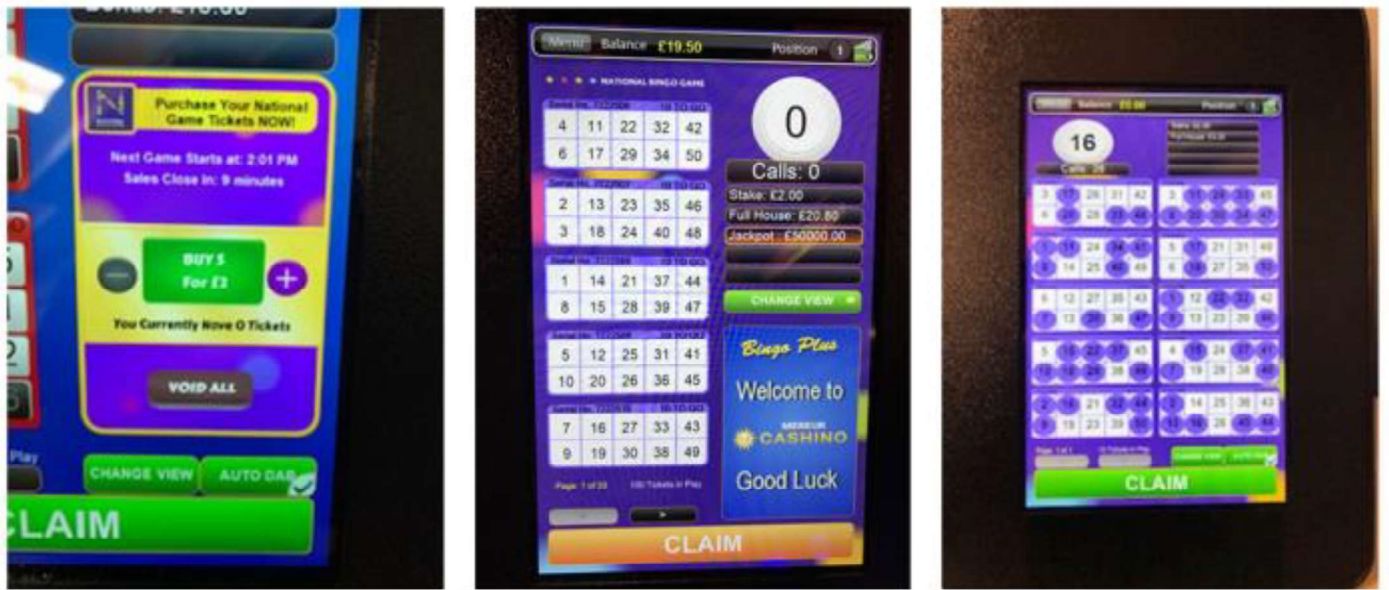
Charges to play clearly displayed



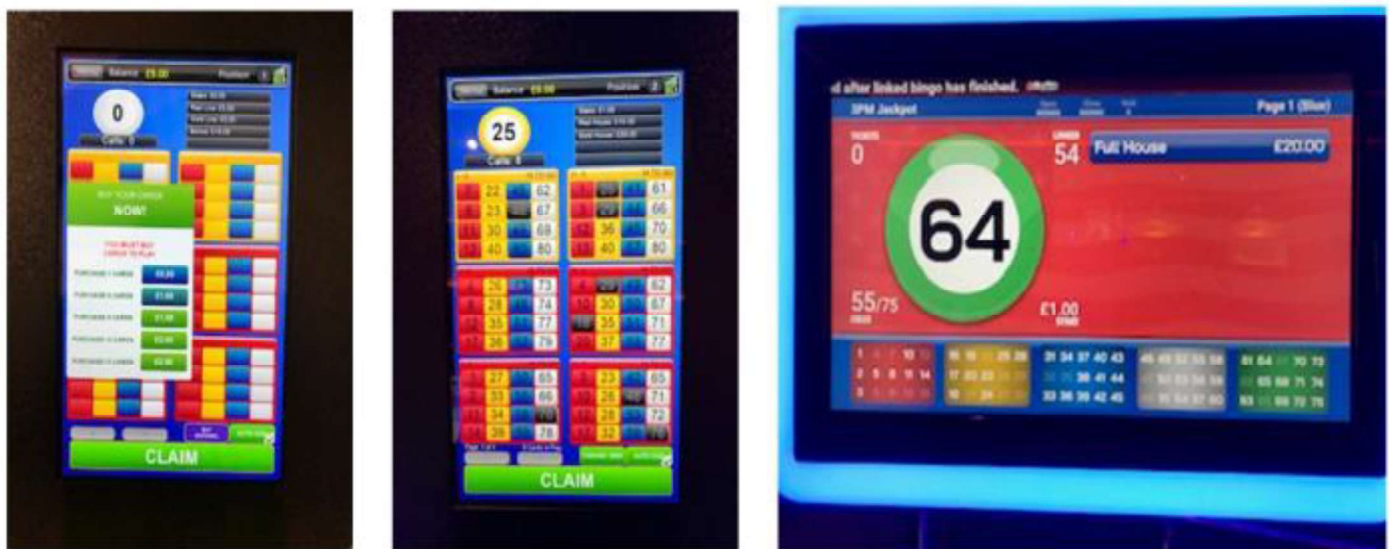
Customers cannot stake-up once game has commenced

“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.

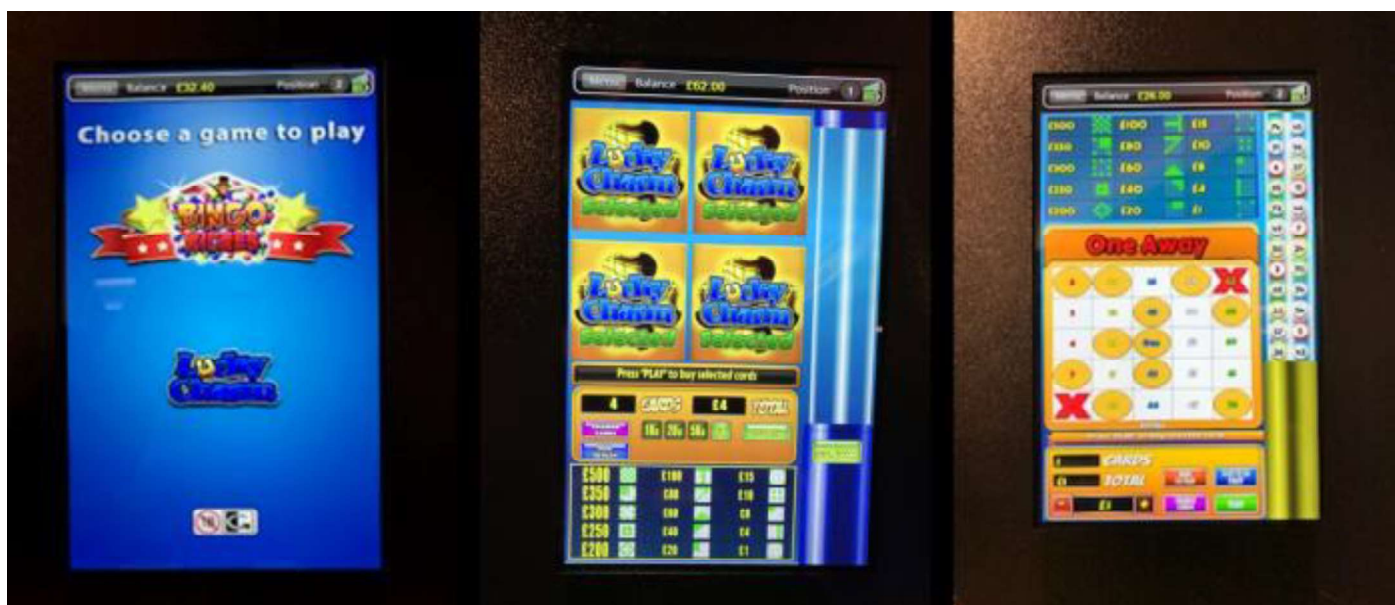


Bingo Variant (BV) Games are available 9:00 till midnight. The game of bingo stands alone on the tablet and does not connect via remote communication to a server or link to games across premises.

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 licencing 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:

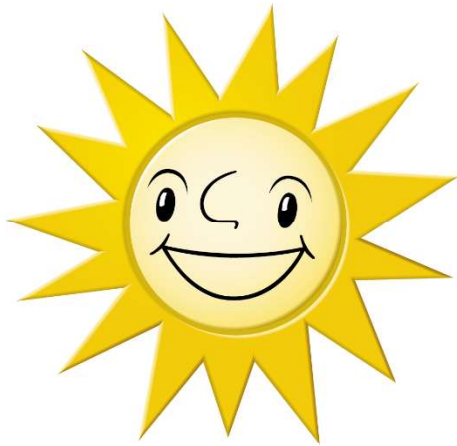
- All employees of MERKUR Slots (and MERKUR Casino) retain the responsibility of ensuring that the business operates in line with compliance rules and regulations, at all times.

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

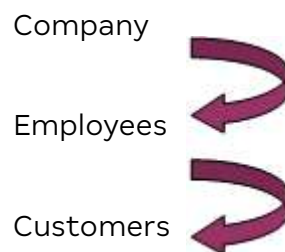
No.	Title	Version
1.	Social Responsibility Statement	December 2023 V1
2.	LCCP – Licence Conditions and Code of Practice - April 2024	April 2024
2.1	Licence-conditions-and-codes-of-practice-for- Arcades - April 2024	April 2024
2.2	Licence-conditions-and-codes-of-practice-for- Bingo - April 2024	April 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

	Open all
1. Operating licence conditions	+
2. Code of practice provisions	+
3. Personal licence conditions	+

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 identify and authority.
- A constable, enforcement officer or authorised person may use reasonable force to enter a premise.
- It is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

Please refer to the training section where you will find the Compliance Training document to be used for training purposes. Our online 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.

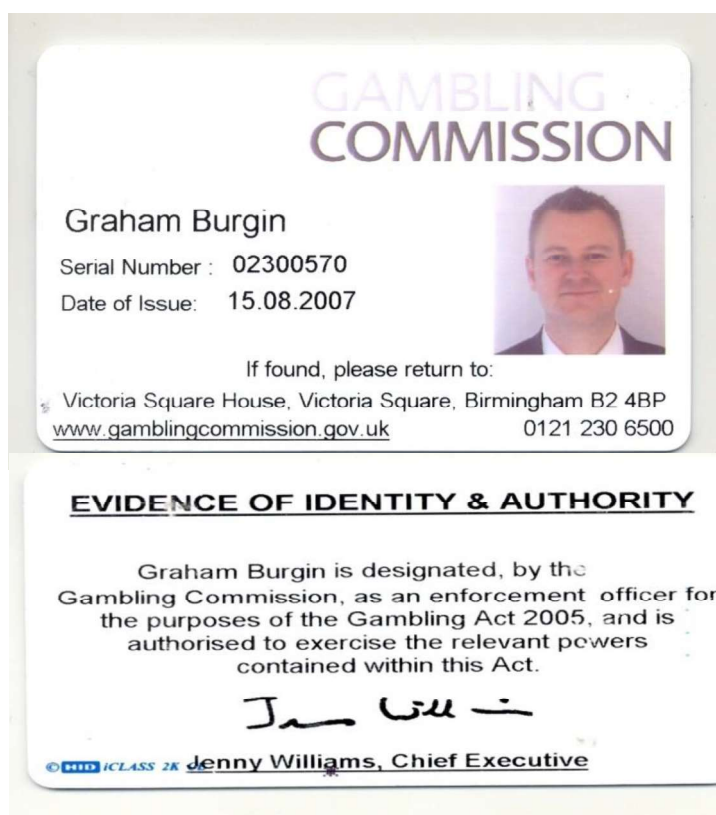
The visitor must also be requested to sign into the visitor's logbook.

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

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

The deputy MLRO is - Mark Wells. Email: 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.

Platonic Human beings tend to judge things they are familiar with as good and things not familiar as suspect.

Instinctive The best defence is attack!

Learned Behaviour Aggression is sometimes part of the behaviour we have learned from society.

Energy Source Natural release of pent-up instinctual energy - a pressure relief valve. Many of the activities socially acceptable are high forms of controlled aggression. The career drive in some people may be explained as an attempt to express instinctual aggression drive, but in a way, society accepts and rewards.

Frustration Response When frustration in an individual 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:

Physical Such as Brain Damage, Drug Abuse, Alcoholism, Sexual Abnormalities, Pain, Hunger, Sleep Deprivation, Environmental Changes (weather), Appearance, Illness, Defence of Territory of Possessions, Age.

Psychological Such as Fear, Frustration, Humiliation, Inappropriate Assertiveness, Pain, Vulnerability, Threats (Defence of self), Age, Illness (affective disorders, schizophrenia), Oppression.

IDENTIFYING AN AGGRESSIVE OR VIOLENT 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

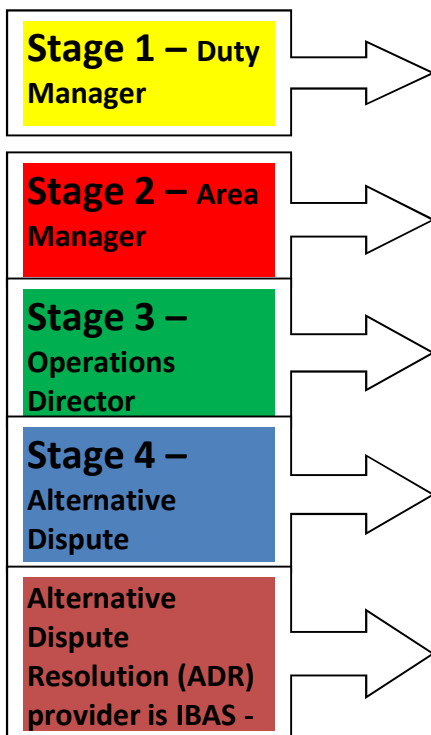
MERKUR Slots have to ensure the terms we offer with regards to our business practices are fair and transparent to our customers and as Licensees we must comply with the Consumer Rights Act 2015. This means ensuring our machines and marketing are promoted in a fair and open way.

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


Unresolved complaints or disputes regarding repayments or any other issue should be brought to the attention of the Duty Manager in the first instance.

If the complaint or dispute cannot be resolved by the Duty Manager, the matter will be referred to the General Manager for action, within 7 working days. The Duty Manager will complete the relevant form for referral to the General Manager. The form will also be logged at the head office of Merkur Slots.

If the matter cannot be resolved by the General Manager, the complainant should write to: The Operations Director, Merkur Slots Ltd., Seebeck House, 1A Seebeck Place, Knowlhill, Milton Keynes MKS 8FR.

If the Operations Director is unable to resolve the complaint or dispute to the customer's satisfaction, then the customer may refer the matter to the body with which the Company has an arrangement for alternative third party dispute resolution.

Alternative dispute resolution is provided by:
(IBAS) Independent Betting Adjudication Service Limited
P.O. Box 62639, London EC3P 3AS



MERKUR SLOTS

18+ BeGambleAware.org

PLAY SENSIBLY

PLAY ENJOYABLY

PLAY AFFORDABLY

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>https://www.citizencard.com/</p>	 <p>https://www.oneid4u.co.uk/</p>	 <p>https://www.totum.com/proof-of-age-id-card</p>
 <p>https://www.bracknell-forest.gov.uk/e-card/apply-e-card</p>	 <p>https://young.scot/the-young-scot-card</p>	
 <p>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</p>	 <p>https://www.myidcard.co.uk/</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

July 2019

Making gambling fairer and safer

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, uppercase letters.

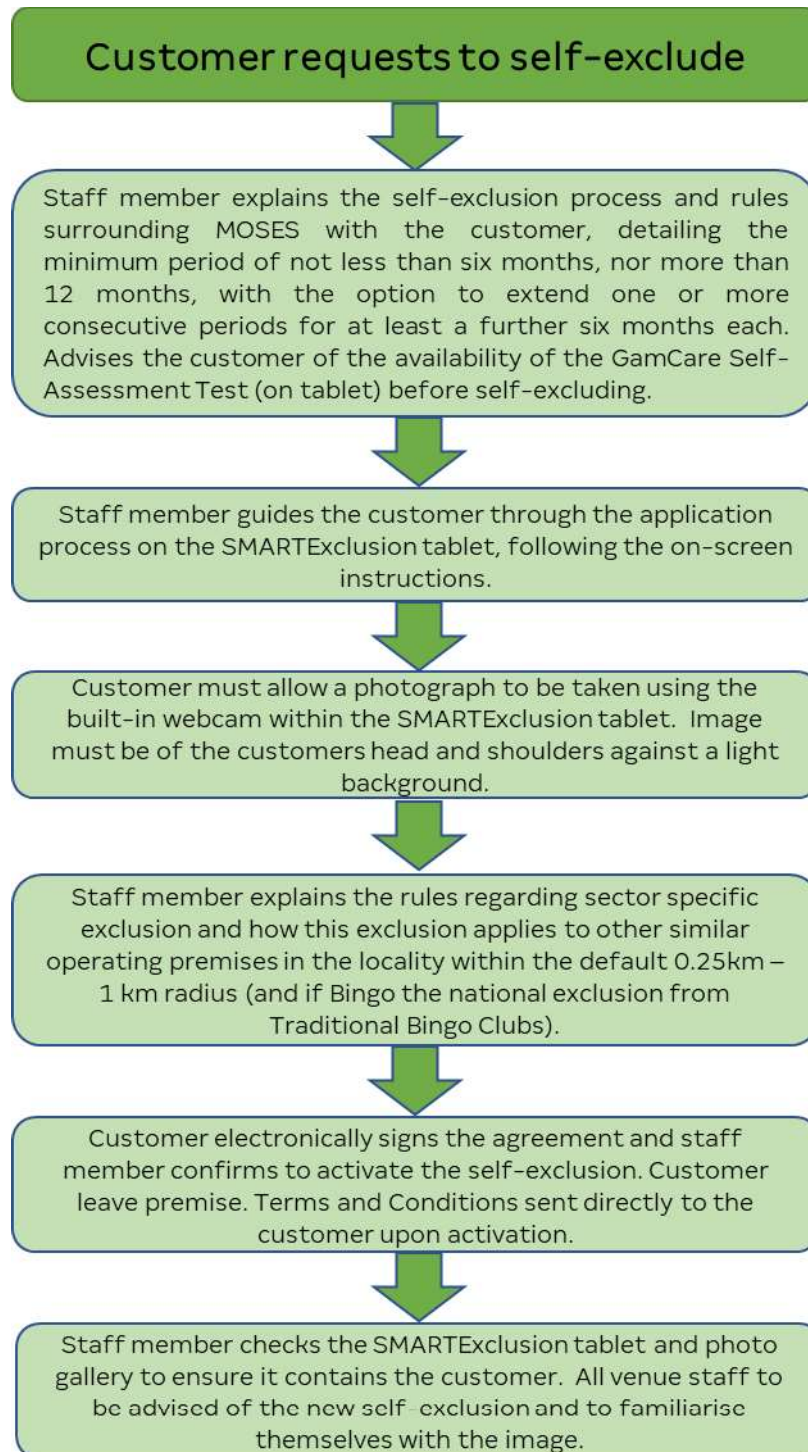
When the self-exclusion period ends, a customer has the option to return to gambling. **The customer should return to the venue where they originally self-excluded from, to complete the re-instatement process on the tablet.** This button will be visible on the tablet only after the end date of the self-exclusion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

A green rectangular button with the text "REINSTATE CUSTOMER" in white, uppercase 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" in black, uppercase letters.

SELF EXCLUSION PROCEDURE FLOWCHART



Self-exclusion breach

Any incidents of self-excluded customers identified as entering the premise during their self-exclusion period must be recorded on the Smart Exclusion as a breach and the customer must be asked to leave the premise.

Self-exclusion extension

Customers wishing to extend their self-exclusion upon expiry can do so by requesting an extension for a further 6 months.

Customer wishing to re-instate after self-exclusion has expired

Customers wishing to resume gambling after a period of self-exclusion must be offered support and advice should they choose to re-instate. They must return to the venue in which they originally self-excluded to complete the re-instatement process with a member of staff who will conduct an interaction and guide them through the re-instatement process.

Once the re-instatement has been processed the customer enters a 24 hour cooling off period. Information will also be provided on how to extend the self-exclusion period should they wish to do so.

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

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 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. 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.

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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>)

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



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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 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>)

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.



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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

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



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

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



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



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

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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 " Alternative Dispute Resolution " (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 venues 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.

Licences are issued by the Local Authority Licensing Department.

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

It is the Manager's responsibility to adhere to the conditions applied to the premises 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

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.
- 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.

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



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><u>1.1) Relevant when assessing policies for preventing Under Age Gambling (SRCP 3.2)</u> (England and Wales only) Has the operator formed a Primary Authority partnership with another Local Authority? If so, who is the Primary Authority?</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>1.2) Reviewing the following documents may be useful when preparing for an assessment:</p> <ul style="list-style-type: none"> • The premises licence and any attached conditions • The premises plan attached to the licence • The operator’s Local Risk Assessment (if a copy has been submitted to you) 	

2) Visual Assessment




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

2.1) Gaming Machines in Gambling Premises (SRCP 9.1.1)			
Could a customer be reasonably expected to recognise that the premises is licensed for bingo?	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
Are there substantive facilities for non-remote bingo available in the premises?	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
Is there appropriate supervision of gambling activities at all times?	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
2.2) Plan (MC - SI 2007 / 1409/SSI 2007/266)			
Does the plan match the layout of the premises?	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<p>i 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> <p>i Any gaming machines authorised by the premises licence must be located within the licensed area shown on the plan.</p>			
2.3) Premises Summary Display (MC – SI 2007 / 1409/SSI 2007/266)			
Is a summary of the premises licence displayed in a prominent place within the premises?	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
2.4) Under 18 Notices (MC - SI 2007 / 1409/SSI 2007/266)			
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?	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
2.5) Rules of Variants of Bingo and Prize Gaming (SRCP 4 and MC - SI 2007 / 1409/SSI 2007/266)			
Are the rules about each variant of bingo and any prize gaming made available?	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
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?			
2.6) Admission Charge (MC - SI 2007 / 1409/SSI 2007/266)			
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?	Yes/ N/A	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
2.7) Notice of Other Charges (MC - SI 2007 / 1409/SSI 2007/266)			
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?	Yes/ N/A	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<p>i 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>			

<p><u>2.8) Problem Gambling Materials (SRCP 3.3)</u> Is information readily available to customers on how to gamble responsibly and seek help in respect of problem gambling? 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?</p>	<input type="checkbox"/>									
<p>Is information contained in leaflets that may be taken away or through the use of links for online or smart technology?</p>	<input type="checkbox"/>									
<p>Can information be obtained by customers discreetly?</p>	<input type="checkbox"/>									
<p><u>2.9) Lottery Tickets (MC - SI 2007 / 1409/SSI 2007/266)</u> Is the premises being used to sell tickets for a lottery?</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> Bingo premises licences in existence before 13 July 2011: 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? Bingo premises licences granted on or after 13 July 2011: Do Category B3/B4 Machines make up no more than 20% of the total number of machines? 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> Do all gaming machines display:</p> <ul style="list-style-type: none"> • What category it is? • The name and telephone number for assistance with problem gambling? • That the machine is not to be used by child/ young person unless it is a category D? • The percentage return to player? 	<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> 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?</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"/>								

<p><u>2.13) Access Between Licensed Premises (MC - SI 2007/1409/SSI 2007/266)</u> Is there direct access to the bingo premises from a premises with:</p> <ul style="list-style-type: none"> • A casino premises licence • An adult gaming centre premises licence • A betting premises licence other than a track premises licence 	<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><u>2.14) Hours of Operation (DC - SI 2007 / 1409/SSI 2007/266)</u></p> <p>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.</p> <p>Is the premises compliant?</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> If a variation to the hours of operation has been granted, this will be shown on the premises licence.</p>							
<p><u>2.15) Christmas Day (GA05 Section 183).</u> The premises shall not be used to provide facilities for gambling on Christmas day.</p> <p>Is the premises compliant?</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"/>					

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

<p><u>3.1) Policies for preventing Under Age Gambling (SRCP 3.2)</u></p> <p> In England and Wales please also check Primary Authority status before asking these questions (see section 1.1 above)</p> <p>Does the licensee have and put into effect policies and procedures designed to prevent underage gambling?</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>Things to consider and evidence when answering the question above:</p>										
<p>Are staff members trained on the prevention of underage gambling on induction to the company? <input type="checkbox"/></p>										
<p>Is training regularly updated – can this be evidenced within staff training logs? <input type="checkbox"/></p>										
<p>Are checks of age carried out on apparently underage customers? Can this be evidenced? <input type="checkbox"/></p>										
<p>Is there a procedure in place for challenging any adult who may be complicit in allowing a child or young person to gamble?</p>										
<p>Are only suitable forms of I.D. accepted by the operator? (Driving Licence, Passport, Military I.D, PASS Logo I.D?) <input type="checkbox"/></p>										
<p>Is there an awareness of the legal requirements on returning stakes and not paying prizes to underage customers? <input type="checkbox"/></p>										
<p>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"/></p>										
<p><u>3.2) Test Purchasing (SRCP 3.2)</u> Larger Operators</p> <ul style="list-style-type: none"> • Does the licensee conduct test purchasing or take part in collective test purchasing programmes? <p>Smaller Operators</p> <ul style="list-style-type: none"> • Does the licensee monitor the effectiveness of their policies and procedures for preventing underage gambling? 	<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"/>								
<p> Smaller operators could monitor effectiveness through participation in collective test purchasing programmes.</p> <p> 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.</p>										

3.3) Under 18s Employment Is the operator employing anyone under the age of 18 to carry out the functions shown below?	Yes	10	<input type="checkbox"/>
	No	0	<input type="checkbox"/>

i It is an offence to employ:

- a person under 18 to provide facilities for gambling (GA05 Section 51)
- 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)
- 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)

3.4) Over 18s Gaming Machines Area (MC - SI 2007 / 1409/SSI 2007/266) 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:	Yes	0	<input type="checkbox"/>
	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?

Supervised at all times to ensure children or young persons do not enter the area?

Arranged so that the area can be observed by persons responsible for supervision or closed circuit television which is monitored?

i 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

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

4.1) Policies for Customer Interaction (SRCP 3.4.1) 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 Things to consider and evidence:	Yes	0	<input type="checkbox"/>
	Improvement needed	5	<input type="checkbox"/>
	No	10	<input type="checkbox"/>

Are staff members trained on the protection of customers on induction to the company?

Is training regularly updated – can this be evidenced within staff training logs?

Are employees trained in recognising types of behaviour that may be indicative of being-at risk of or experiencing harms associated with gambling?

Are staff members trained to deal with customers showing signs of distress?

Does the licensee use all available sources of information to identify customers who may be at risk of or experiencing harm?



Is the licensee able to evidence that customer interaction has been undertaken in appropriate circumstances?




Do records show circumstances where customer interaction has been ruled out?

Are staff members able to talk about how a customer interaction has had a positive impact?

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> Does the licensee have and put into effect procedures for self-exclusion? 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> Does the licensee offer the ability for customers to exclude from similar local venues through participation in a multi-operator exclusion scheme?	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<u>4.4) Free and Discounted Alcohol (SRCP 5)</u> 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?	Yes	10	<input type="checkbox"/>
	No/ N/A	0	<input type="checkbox"/>
<u>4.5) Advising Employees on Socially Responsible Gambling (SRCP 7)</u> 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?	Yes	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>


5) Additional Questions

<p><u>5.1) Premises Licence Availability (GA05 s185)</u></p> <p>Is the premises licence (including the premises plan) kept on the premises and available on request?</p>	<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%;"><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><u>5.2) Reward Schemes – Terms and Conditions (SRCP 5)</u></p> <p>Are the terms and conditions of any customer incentive or reward schemes clearly set out and readily available to customers?</p>	<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%;"><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> Things to consider:</p> <ul style="list-style-type: none"> Marketing and advertising must not be misleading 'Free bet' or 'bonus' offers must comply with the CAP/BCAP 'Guidance on the rules for gambling advertisements Terms and conditions must be made available for their duration of the promotion Staff members should be able to explain the terms and conditions of incentives and reward schemes offered to customers. 										
<p><u>5.3) Complaints and Disputes (SRCP 6)</u></p> <p>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?</p> <p>Things to consider and evidence:</p>	<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%;"><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>Can customers refer any dispute to an Alternative Dispute Resolution (ADR) entity if not resolved to their satisfaction within 8 weeks?</p>										
<p>Is dispute resolution free of charge for customers?</p>										
<p>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.</p>										
<p>There must be clear and accessible information on how to make a complaint, the complaints procedure, timescales for responding and the escalation procedure.</p>										
<p>Policies and procedures must be implemented effectively and kept under review</p>										
<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>										
<p><u>5.4) Local Risk Assessment (SRCP 10)</u></p> <p>Can the operator evidence policies, procedures and control measures to mitigate risks identified within the Local Risk Assessment?</p>	<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%;"><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>Has the operator taken into account relevant matters identified in the Licensing Authority's policy statement?</p>	<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%;"><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"/>								

5.5) Licensing Authority Conditions Is the premises adhering to any additional premises licence conditions?	Yes/ N/A	0	<input type="checkbox"/>
	No	10	<input type="checkbox"/>
<p> 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.</p> <p> 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).</p> <p> Registration of S.I.A licence holders can be found at www.sia.homeoffice.gov.uk</p>			
			Assessment Score: / 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. Camera 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 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

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 utmost 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

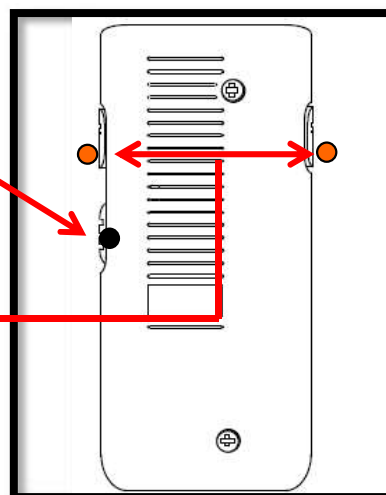


Mobile Panic Alarms (MPA)

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.