### **MERKUR SLOTS UK LIMITED**

### **REFERENCE BUNDLE INDEX**

### **LICENSING SUB-COMMITTEE HEARING**

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# **Compliance and Social Responsibility 4. The Three Licensing Objectives**



### 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.





# **Bingo Express 2**

### **Technical Features Information**

Version 1.2 June 2024

#### INTRODUCTION

Bingo Express 2 is a fully featured scalable Ticket on Demand / Tablet Bingo platform for Bingo licenced premises, packaged up in a standalone small footprint terminal.

The platform allows an operator to deliver, manage and fully report on Ticket on Demand and tablet-based Bingo.

This document describes the technical features and overall architecture of the platform.

#### **BINGO EXPRESS 2 TERMINAL**



24 inch operator touch screen with attract mode.

Option for Top screen

Barcode Scanner for ticket check, tablet crediting, login

3" thermal print for Bingo Tickets, TiTo tickets and reports

Electronic Coin Mech

Tito Compatible Note Acceptor

20 Tablet built in charge capability

Optional external charge racks expand capacity. Available in 10, 16 and 32 slot formats.

- Dimensions:
  - o 700mm Width
  - o 550mm Depth
  - o 1850 Height (w/o optional top screen)
- Rear casters for local manoeuvring
- Power Supply 2 x 230v 13 amp sockets
  - Charge Rack (timed supply)
  - o PC and Server (24 Hour supply)
- Up to 8 x RJ45 network connections
- Public Display Output on HDMI (Required for LCCP)
  - o Operator to provide screens / distribution

Optional Chip and Pin functionality
Currently integrated using Ocius
Sentinel payment solution, with a
Verifone VX820 PED. Merchant
accounts to be supplied and held by
operator. All transactions, processing
accounts and charges are operator's
responsibility

Optional Membership Scan Point functionality. Members can scan a virtual or plastic card to register eir

### **GAMING TABLETS (OPTIONAL)**

The Bingo Express 2 platform uses Lenovo tablets which offer excellent performance, reliability and battery life.

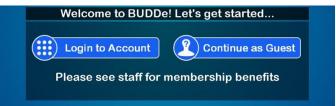


YOGA

- Android Operating System
  - Locked down for security
- 10.1" Full HD Screen
- 7000 mAh battery
- Over 10 hours battery life
- Adaptive charging prolongs the life of devices and provides an average of 20% per hour charge rates
- Magnetic charge cables
- Remote Software management
- Customisable Skins
- Advertising whilst idle
- Built in kick stand
- Vertical or Horizontal orientation

#### **GUEST OR MEMBERSHIP LOGIN**

The system supports full membership integration if required. Users can log on to the tablet with a membership number and secure PIN, or where appropriate securely login as a guest.



Membership login allows storage of customer preferences and a personal account balance to be held on the server. For Bingo variant games it also enables catch-up play, where a player can purchase tickets one day and play them off later.

#### TITO

- GBG standard TiTo functionality
- Supported versions:
  - o 1.3(a)
  - 0 2.1
- Option to disable Ticket In if required.

### **INFRASTRUCTURE - NETWORKS**

The platform uses a server-based architecture that is fully scalable. For the Bingo Express 2 application the terminal is self-contained, housing the server and separate control PC for the user interface and public display output.

The system provides support for up to three networks depending on the configuration of the operator's IT infrastructure.

- 1. Main network
  - Internet connected for secure connection to central Bingo Express server, support and email reports.
  - Subject to provision of suitable V-Lan's can carry TiTo
- 2. Gaming Network (tablet sites only)
  - Independent to other networks
  - Internal WiFi access point
  - POE outputs for multiple external access points (scalable to suit all venue sizes)
- 3. TiTo Network (Optional)
  - Allows an independent network connection for TiTo, if this cannot be accessed on main network via operator V-Lan.

#### **USERS AND SECURITY**

To keep the system secure, each member of staff is supplied with a unique PIN number and their own staff card that must be entered or scanned before full access to the Bingo Express 2 application is permitted.

Two levels of user access are provided, Manager and Staff, giving access only to appropriate functions.

#### **BINGO EXPRESS 2 INTERFACE**

The Bingo Express 2 system is multi-functional, allowing a player the option to play Bingo on paper tickets (printed on demand) or on tablets (where fitted).

The intuitive interface not only allows users to view and buy a full day's worth of paper Bingo tickets, but also allows users to Add or Withdraw credit on their tablet account directly without the need for staff interaction.



#### REPORTING ACCOUNTS AND AUDITS

The server-based backend is fully LCCP compliant for both Bingo and Slots content in suitably licenced premises.

The system supports true account-based play with secure PIN controlled access if required. Optionally it can link to NRM's membership backend or others through an API. This allows automatic syncing of customer details and self-exclusion status.

Where membership login/account-based play is not required operators can use guest accounts; these are tied to a tablet with a secure algorithmically generated PIN. They are audited in just the same way as an individual membership account would be, but must be cashed out at the end of a session otherwise credit is forfeited.

A full timestamped breakdown of all transactions to and from accounts is available from the interface.

The system has a configurable maximum AML credit limit and the latest version of tablet software includes safer gambling controls for the users.

A promo credit system is available, accessed through the Managers level login. Promo credit amounts can be setup as 'packages' and applied to accounts individually by scanning a tablet/membership card. Promo credit can't be cashed out, can be set with an expiry date and is fully audited.

The system audits on daily/sessional basis. For Ticket on Demand Bingo operations there will typically be a single session per day. The system tracks the last seen dates and times of each tablet.

At the end of each day/session printed (and optional Email) reports are generated:

#### Bingo/Terminal Activity:

- Non-resetting meters for:
  - o Cash In (Notes and Coins)
  - o TiTo (voucher) out
  - o Tito (voucher) in
- All Played Bingo Game, sold, won and void
  - Separate entries for Paper and Electronic sales.

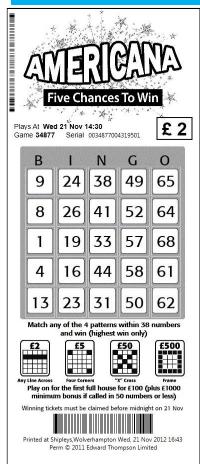
#### Tablet Activity is separately reported, including:

- Full session start/finish times and dates
- Total credits applied to Tablets
- Staked and won figures broken down for each game type
- Total credits withdrawn from the tablets

#### **SAMPLE BINGO CONTENT**

Bingo Games are scheduled typically every 6-10 minutes, they start and play automatically with all required game information shown on public screens. Games are constantly reviewed and the schedule can vary. At the time of writing the following games are scheduled and enabled for both paper ticket and tablet.

### Americana – Classic 75 number style bingo game



Americana is a two part game with a guaranteed Full House winner every time plus a fixed odds element.

It does not have to be played live, but tickets must be marked and be validated within the timeframe identified in the game rules in force at the time.

Game times will be displayed on the Bingo Express screen(s). The game is 'linked', with tickets sold in a number of venues and not just in this site.

The Americana ticket has a 5 by 5 grid of 25 numbers between 1 and 75. Prizes are awarded for the stages as follows:

- 1. After 38 numbers are called, any tickets which match the following patterns win prizes as shown (highest prize only paid):
- Any complete horizontal line across of five numbers eg £2
- Four corners eg £10
- St Andrews Cross (X shape) eg £50
- Picture Frame (all numbers on the outside edges) eg £500
- 2. The game then continues for a full house, and the first ticket to achieve this across all participating sites wins a defined prize. If two or more tickets have a full house on the same lowest number of calls, then the defined prize is split equally between those winning tickets.

The game features an additional progressive prize available on the full house if it is achieved in less than a specified number of calls. The number of calls to win the progressive prize is normally 50, but may be varied during promotional periods.

The value of the progressive prize will be displayed on the Bingo Express screen(s) at the start of each game.

In the event of a win the progressive prize is split as follows:

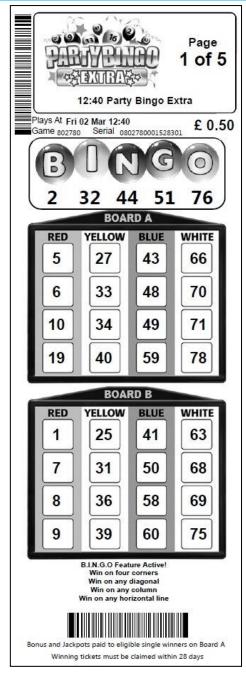
- a. The full house winner takes 50% of the advertised Jackpot value
- b. The remaining 50% to be shared equally between ALL ticket holders for the Jackpot winning game

At game time numbers are called randomly via the Bingo Express system and displayed on a screen(s) while it is being played; players can mark their tickets as the game is being played. If you think you have won, just scan your ticket or ask a member of staff to check it for you.

Alternatively, players can mark their ticket from a printed call sequence, available directly from the terminal.

Players are required to confirm that they have marked their ticket when it is validated. Tickets are easily checked by scanning tickets under the barcode reader at the Bingo Express control point.

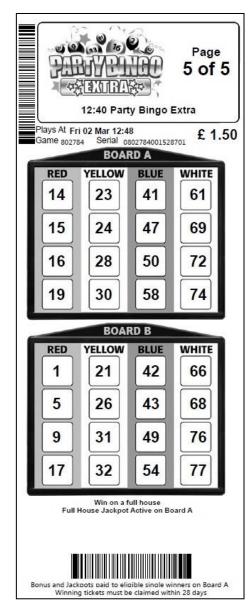
### Party Bingo Extra - 80 Number Cash Bingo style



- 1. Party Bingo Extra operates as a Bingo Variant game whereby tickets do not have to be played live and can be validated up to 28 days from the day in which the game has been started. Game times will be displayed on the Bingo Express screen(s). Game tickets are sold in a number of venues and not just in this site.
- 2. The Party Bingo Extra game includes two types of tickets.
- a. Type 1 includes the B.I.N.G.O feature and allows for win patterns of any horizontal, vertical or diagonal line of four numbers or four outside corner numbers.
- b. Type 2 does <u>not</u> include the B.I.N.G.O feature and plays for either a Full House or Picture frame. Optionally there can also be Jackpots for either prize.

#### Type 1 Ticket: Line and Corners Game

- 3. The Type 1 Party Bingo Extra tickets have two parts:
- a. Two 4 by 4 grids of 16 numbers out of a range from 1 to 80.
- b. One B.I.N.G.O feature with 5 numbers one each from the ranges 1-16, 17-32, 33-48, 49-64, 65-80.
- 4. Random numbers are called from the full range of 1-80 numbers until the first card across all participating sites matches one of the following patterns:
- a. Any horizontal, vertical or diagonal line of four numbers.
- b. All four outside corner numbers.
- c. B.I.N.G.O feature all numbers under the B.I.N.G.O.
- 5. The main prize is set in advance. Once a minimum prize value has been satisfied the prize value will increase proportionally with the number of tickets sold. Prizes may be different for wins on Board A and Board B.
- 6. The optional BONUS feature allows a multiplier on a particular win, so for example a blue line bonus means if a ticket wins on a blue line then they get the main prize multiplied by the bonus multiplier.
- 7. BONUS wins are only possible on the TOP board (Board A).
- 8. B.I.N.G.O feature and BONUS wins are only paid to a single winner, split wins default back to the Main Prize.
- 9. If two or more tickets match a pattern on the same number of calls, then the Main prize is split equally between those winning tickets.
- 10. Should a player mark all 5 numbers of their B.I.N.G.O feature before the main prize is claimed, that player will be awarded the feature prize.
- 11. The game will be closed once a main prize or a B.I.N.G.O feature winner has been found. A main prize claim made on the same number of calls as a feature win will result in the Main prize being shared.
- 12. Numbers are called randomly via the Bingo Express system and displayed on a screen(s) while it is being played. Called numbers for any game on the same day are available to any player with a ticket for that game via the terminal.
- 13. The cost of each type 1 Party Bingo Extra ticket is clearly shown on the ticket, a portion of which is retained from each ticket to fund the feature prize which is paid out in the event of a player marking all five numbers associated with the B.I.N.G.O feature on their ticket before the game is closed. The value of the prize will be displayed on the Bingo Express screen(s) at the start of each Party Bingo Extra game.



#### Type 2 Ticket: Full House Game

- 14. The Type 2 Party Bingo Extra ticket has one part:
- a. Two 4 by 4 grids of 16 numbers out of a range from 1 to 80.
- b. Type 2 tickets do <u>not</u> include the B.I.N.G.O feature and play for either a Full House or Picture Frame pattern only. Optionally there can be Jackpots for either prize. Number of calls to win the jackpot is displayed during the game.
- c. Random numbers are called from the full range of 1- 80 numbers until the first card across all participating sites marks the winning pattern.
- 15. The main prize is set in advance. Once a minimum prize value has been satisfied the prize value will increase proportionally with the number of tickets sold. Prizes may be different for wins on Board A and Board B.
- 16. Jackpots are only paid to a single winner, split win defaults to the Main prize.
- 17. Jackpots can only be won on the Top card (Board A).
- 18. The cost of each type 2 Party Bingo Extra ticket is clearly shown on the ticket, a portion of which is retained from each ticket to fund the Jackpot.
- 19. The total number of tickets sold for any game within the last 7 days is available from staff if required.
- 20. Players are required to confirm that they have marked their ticket when it is validated.
- 21. Winning tickets must be verified within 28 days from the date that the game started, be presented wholly intact and given up to a member of staff. Tickets are easily checked by scanning tickets under the barcode reader at the Bingo Express control point. Tickets presented after 28 days will be void.

### SUPER 6 – Pick Your Own Numbers Fixed Odds Game



- 1. SUPER 6 operates as a Bingo Variant game whereby tickets do not have to be played live and can be validated up to 28 days after the game has been started. Game times will be displayed on the Bingo Express screen(s). Game tickets are sold in a number of venues and not just in this site.
- 2. The Super 6 ticket has six lucky numbers, these can be any six unique numbers from the range 1-49.
- 3. Players have the option to allow the system to allocate six lucky numbers or can choose their own numbers. In either event the system will ensure that the permutation of six numbers on every ticket is unique for each game; players will be requested to re-select if a duplicate ticket exists.
- 4. Numbers are called randomly from the full range of 1- 49 and there are prizes for matching all six lucky numbers before the prize grid is fully populated.
- 5. Prizes are awarded according to the number of calls released at the point when a player's last number is matched. Prizes will be clearly displayed on the game screen and could be varied from time to time. Prizes will be highest for players matching all six numbers in the first 6 calls and will typically reduce for each successive call down to the last prize. There may be multiple different winning tickets on any single game.
- 6. Prizes are displayed based on the win amounts for a £1 ticket. Winners on other value tickets will receive a proportional prize, for example a 50p winning ticket will receive 50% of the displayed prize.
- 7. Numbers are called randomly via the Bingo Express system and displayed on a screen(s) while it is being played. Called numbers for a game within the last 28 days are available to ticket holders from staff on request.
- 8. Super 6 tickets cost 50p or £1 each, a portion of which is retained from each ticket to fund a variable progressive bonus prize which is paid out in full for £1 tickets (or in part for tickets less than £1) as an additional amount for matching 6 numbers on a specific number of a calls. The value of the progressive prize will be displayed on the Bingo Express screen(s) at the start of each Super 6 game.
- 9. The total number of tickets sold for any game within the last 7 days is available from staff if required.
- 10. Players are required to confirm that they have marked their ticket when it is validated.
- 11. Winning tickets must be verified within 28 days of the start of the game and be presented wholly intact and given up to a member of staff. Tickets are easily checked by scanning tickets under the barcode reader at the Bingo Express control point. Tickets presented after 28 days will be void.

### **Super 6 Prize Table:**

Prizes are awarded according to the number of calls released at the point when a player's last number is matched.

Prizes will be clearly displayed on the game screen and could be varied from time to time.

The Prize Table correct as at the 21st June 2024 is as follows:

Call No:	Prize:	Call No:	Prize:	Call No:	Prize:
1	-	13	£250	25	£8
2	-	14	£250	26	£8
3	-	15	£100	27	£7
4	-	16	£100	28	£7
5	-	17	£75	29	£5
6	£10,000	18	£75	30	£5
7	£5,000	19	£50	31	£3
8	£2,000	20	£50	32	£3
9	£1,000	21	£25	33	£2
10	£1,000*	22	£25	34	£2
11	£500	23	£10	35	£2
12	£500	24	£10	36	£1

All prizes shown for a £1 Ticket.

<sup>\*</sup> Plus Super Bonus Jackpot

### Rainbow Bingo – 80 Number Local Game

A key function of the Bingo Express 2 terminal is its ability to run local Bingo games. With Rainbow Bingo all aspects of pricing, win conditions and prizes are controlled locally.

The games appear between other Bingo Express games on the schedule; they typically will be played twice an hour at 25 and 55 minutes past, but can be available at any time.

The settings are accessed directly on the terminal via the purple highlighted buttons below:

#### Admin > Config > Rainbow



#### **Ticket Price**

- The price per ticket.
- The price can be a minimum of £0.00 for a free game and currently has no upper limit.
- Ticket price changes do not affect games which already have sales.

#### Main Prize Min

- This is the minimum amount paid out for each game.
- The Rainbow Bingo prize is given to the first player to mark one number in each coloured column.
- This value will be shared in the event of multiple winners.

#### Per Ticket Prize

- The contribution per ticket towards the main prize.
- The main prize value displayed will remain at the minimum value until total contribution across all tickets sold exceeds that value.
- If the per ticket prize is set to £0.00 then the Main Prize Min remains fixed.

#### **Jackpot Prize**

- This is won if a customer marks at least one number from each coloured column within the jackpot win criteria.
- The jackpot is not shared, it is only paid to a single eligible winner.
- If there is more than one winner even if they are within the jackpot criteria, they share the main prize only.
- If Jackpot Prize is set to £0.00 then there is no Jackpot for the game.

#### Min Calls

• The minimum number of calls required to win the jackpot.

#### Max Calls

• The maximum number of calls to win the jackpot

#### Jackpot win criteria examples:

Min Calls	Max Calls	Win Parameters
1	50	Win between 1 & 50 Calls
0	50	50 Calls or Less
50	50	Win on 50 Calls

#### Playing the Game

Multiple instances of the game will appear on the Bingo Express schedule, with sales opening typically 15 minutes before each game.



Tickets can be purchased as normal by adding them to your basket and pressing 'Buy and Print'.

In self-service sites if the ticket cost is Free (£0), then tickets can only be printed by a logged in member of staff. Tablets will be limited to a single ticket if the cost if Free.

At Game time the game will start and run through automatically until a winner is found.

Alternatively, staff can control the speed of the game using the controls on the 'Caller' tab.

Winners will be declared automatically at the end of the game and can be checked up to 28 days later by scanning the ticket.

#### In Game Screen:





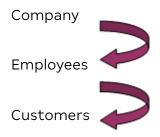
# 1. Social Responsibility Statement

#### 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 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 always comply with these licensing objectives.



# 1. Social Responsibility Statement

#### **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.



### 1. Social Responsibility Statement

#### **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 https://www.gam-anon.org Gam-Anon Gamblers Anonymous https://www.gamblersanonymous.org.uk https://www.gordonmoody.org.uk Gordon Moody Association 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.

Mark Schertle

Chief Operating Officer

Marla SML

Egemen Coskun Chief Financial Officer



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2.2	Licence-conditions-and-codes-of-practice-for- Bingo – November 2024	November 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 2025 V1.2
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8.	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

### 3. Powers of the Gambling Commission



#### 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:
  - o the numbers of people making use of the facilities and the frequency of such use.
  - o the range of gambling activities provided by the licensee and the number of staff employed in connection with them.
  - o 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 beach 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.

### 3. Powers of the Gambling Commission



#### **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 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 <a href="mailto:Compliance\_UK@merkur-casino.com">Compliance\_UK@merkur-casino.com</a>

#### Gambling Commission Sample ID



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



© IIID ICLASS 2K Jenny Williams, Chief Executive

# <u>Front of card</u> Contains the Following:

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

# <u>Back of card</u> contains the following:

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



## 5.2. Keeping Alcohol & Drugs Out

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

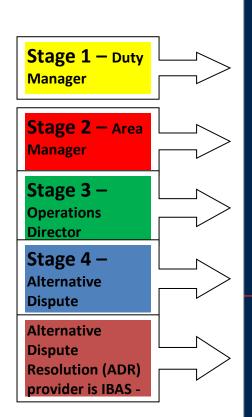
Alcohol is not available for purchase or offered free in any Slots venue and customers must not bring alcohol onsite to be consumed.



### **6.1. Complaints Procedure**

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

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

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



18+ BeGambleAware.org PLAY SENSIBLY ENJOYABLY 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













# 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)

# **Compliance and Social Responsibility**7.1.1. Proof of Age Documents



#### 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.

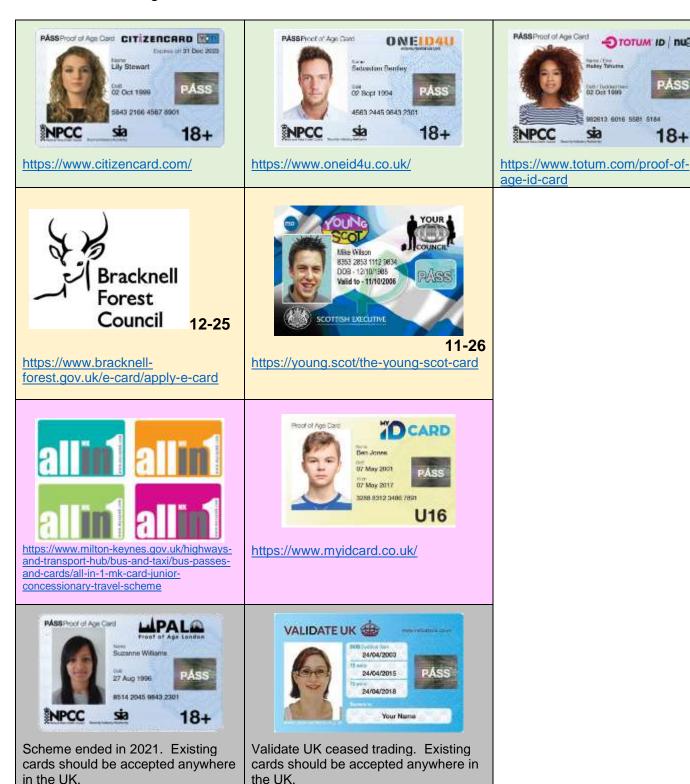
PASS Proof of Age Card

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PASS

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982613 6016 5581 5184



# 7.2. Employment of Children and Young Persons



#### **STATEMENT**

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

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.

# **GAMBLING** COMMISSION

# 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.
- 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 <u>all</u> 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 <u>research (Wardle et al 2018)</u> 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 <a href="PWC remote gambling research">PWC remote gambling research</a> (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 <u>research (PWC 2017)</u>, 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 guickly?
- 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:
  - 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 <u>National Strategy to Reduce Gambling Harms</u> 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 spotchecking 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 <u>combined health surveys in England</u>, <u>Scotland and Wales (NatCen 2018)</u>. 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 <u>regulatory returns</u>. 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

Formal guidance under SR Code 3.4.1: customer interaction in online gambling

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 decisionmaking 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)

<u>Testing normative and self-appraisal feedback in an online slot-machine pop-up in a real-world setting (Auer and Griffiths, 2015)</u>

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

Further information on research to inform action will be made available on www.reducinggamblingharms.org



Making gambling fairer and safer

www.gamblingcommission.gov.uk

## **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 selfexcluder 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.

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. SmartEXCUSION 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**



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). 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.

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. 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 Bir	th:		
Customer Address:			
Customer Mobile Nun	nber:		
Customer Email Addr	ess:		
Start Date:			
request that I be ref	used entry to the following MERKUR	SLOTS venues:	
<b>for a period of 6 or 12</b> from the date of sign	months* (Customer to specify) *ing and acknowledge that I am not a		ninimum six months/maximum 12 months) exclusion during this period.
	ill be contacted within 24 hours to p ne self-exclusion to be activated.	provide a photograph of m	nyself and further ID verification for GDPR
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 <a href="https://customercare.merkurcasinouk.com/index.php">https://customercare.merkurcasinouk.com/index.php</a>

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





### 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.

# **Compliance and Social Responsibility**10. Premises Licence



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

Licenses are issued by the Local Authority Licensing Department.

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

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



## 11. Local Area Risk Assessment LARA

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.



12. Powers of Local Authorities

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.

## 12. Powers of Local Authorities



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@merkurcasino.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 nam	e and address				
Premises pers	on(s) present				
Authorised Off	icer(s)				
Signature of A Officer(s)	uthorised				
Date and time	of the				
assessment					
				Please tick sections completed	
1. Pre-As	sessment			·	
2. Visual	Assessment				
<ol><li>Operate</li></ol>					
Operator Policies – Customer Interaction					
5. Addition	nal Questions				
6. Action	Points				

### 1) <u>Pre-assessment</u> Establishing compliance with these provisions may require prior knowledge/ preparation

1.1) Relevant when assessing policies for preventing Under Age	Primary Authority Name:
Gambling (SRCP 3.2)	-
(England and Wales only) Has the operator formed a Primary	
Authority partnership with another Local Authority? If so, who	
is the Primary Authority?	
•	



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.



A list of current Primary Authority Partnerships relating to gambling operators is available on the Gambling Commission website

- 1.2) Reviewing the following documents may be useful when preparing for an assessment:
  - 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 No	10	
incensed for bringo:	Ш			
Are there substantive facilities for non-remote bingo available in the		Yes	0	Щ
premises?		No	10	
Is there appropriate supervision of gambling activities at all times?		Yes	0	
is there appropriate supervision or gambing activities at an times:		No	10	
2.2) Plan (MC - SI 2007 / 1409/SSI 2007/266)		Yes	0	
Does the plan match the layout of the premises?		No	10	
Plans must include: the boundary of the premises, external and internal walls 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 update Assessment, will be required if there has been a 'material change' to the layo was last issued.  Any gaming machines authorised by the premises licence must be located wire shown on the plan.	ed L ut s	ocal R	isk e licen	ce
2.3) Premises Summary Display (MC - SI 2007 / 1409/SSI 2007/266)		Yes	0	
Is a summary of the premises licence displayed in a prominent place within the premises?		No	10	
2.4) Under 18 Notices (MC - SI 2007 / 1409/SSI 2007/266)		Yes	0	
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?		No	10	
2.5) Rules of Variants of Bingo and Prize Gaming (SRCP 4 and MC - SI 2007 /		Yes	0	
1409/SSI 2007/266 Are the rules about each variant of bingo and any prize gaming made available?		No	10	
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?		Yes/	0	
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		N/A		
a prominent place at the principal entrance to the premises?		No	10	
2.7) Notice of Other Charges (MC - SI 2007 / 1409/SSI 2007/266)		Yes/ N/A	0	
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?		No	10	
Notices of other charges must include the cost (in money) of each game card payable in respect of the game of bingo and the amount that will be charged by participation fee. There should also be in the notice a statement that all/part of may be waived at the discretion of the person charging it. This notice can be	by v of th	vay of a	ı cipatio	

2.8) Problem Gambling Materials (SRCP 3.3)	Yes		0			
Is information readily available to customers on how to gamble responsibly and seek help in respect of problem gambling?			5			
Things to consider and evidence:	Neede No	<u>d</u>	10			
Is information displayed prominently on posters appropriate to the size and lay						
premises?	out or tri	E		Ш		
Is information contained in leaflets that may be taken away or through the use online or smart technology?	of links	for				
Can information be obtained by customers discreetly?						
2.9) Lottery Tickets (MC - SI 2007 / 1409/SSI 2007/266)		Yes	10			
Is the premises being used to sell tickets for a lottery?		No	0			
The mandatory conditions attached to premises confirm that neither Nati	onal Lot	tery pro	ducte	nor		
tickets in a private lottery may be sold on the premises. In England and	Wales ti	ckets fo	r custo	omer		
lotteries also cannot be sold. Operators can sell society lottery tickets su the relevant permission (an operating licence from the Commission if a la						
local authority registration if a small society lottery.)	arge soc	Hely IOLLE	ery Or	a		
In some instances the energial may also require an External Lettery May	agar lig	ongo fra	m tha			
In some instances the operator may also require an External Lottery Mar Commission (for more detail see para 34.15 of the GLA 5th edition)	nager iid	ence irc	in the			
2.10) Gaming Machines Available for Use		Yes	0			
Bingo premises licences in existence before 13 July 2011:		No	10			
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 machines?	Category B3/B4 Machines make up no more than 20% of the total number of					
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						
Gaming machine content can be made available on hand held bingo terr contribute to the total number of machines. However, for this to apply th 'available for use' i.e. if a player could take steps to use the device witho operator.	e device	es must l	be	е		
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).						
2.11) Gaming Machine Display Requirements SI 2007 / 2319 and SI 2007 / 23	20	Yes	0			
<ul><li>Do all gaming machines display:</li><li>What category it is?</li></ul>		No	10			
The name and telephone number for assistance with problem gambling	ı?					
<ul> <li>That the machine is not to be used by child/ young person unless it is a category D?</li> </ul>	l					
<ul> <li>The percentage return to player?</li> <li>The information above needs to be readily accessible by a person using</li> </ul>	the mas	hino !+	movel	20		
found on the machine cabinet or within the information shown on screen			may t	J <del>e</del>		
2.12) ATM Location (MC - SI 2007/1409/ SSI 2007/266)		Yes/	0			
Is the ATM located in a place that requires any customer who wishes to use the coase gambling at any gaming machine in order to do so?	ise	N/A No	10			
it to cease gambling at any gaming machine in order to do so?						

2.13) Access Between Licensed Premises (MC - SI 2007/1409/SSI 2007/266)		Yes	10				
Is there direct access to the bingo premises from a premises with:		No	0	븜			
A casino premises licence							
An adult gaming centre premises licence							
A betting premises licence other than a track premises licence      A betting premises licence other than a track premises licence      A betting premises licence other than a track premises licence							
2.14) Hours of Operation (DC - SI 2007 / 1409/SSI 2007/266)		Yes	0				
No facilities for gambling shall be provided on the promises between the bours	of	No	10				
No facilities for gambling shall be provided on the premises between the hours midnight and 9am. This condition does not apply to making gaming machines	OI		. •	Ш			
available for use.							
Is the premises compliant?							
If a variation to the hours of operation has been granted, this will be show	vn on th	ne premis	ses lice	ence.			
2.15) Christmas Day (GA05 Section 183).		Yes	0				
The premises shall not be used to provide facilities for gambling on			4.0	<u> </u>			
Christmas day.		No	10				
Is the premises compliant?							
3) Operator Policies - Protection of Children Establishing compliance will require viewing policies and discussi		staff me	mbers				
3.1) Policies for preventing Under Age Gambling (SRCP 3.2)	Yes		0				
In England and Wales please also check Primary Authority status	Imp	rovemen	t 5				
before asking these questions (see section 1.1 above)	nee	needed					
<b>3</b> 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	No		10				
Does the licensee have and put into effect policies and procedures designed to prevent underage gambling?							
Things to consider and evidence when answering the question above:							
Things to consider and evidence when answering the question above.							
Are staff members trained on the prevention of underage gambling on inductio	n to the	compan	y?				
Is training regularly updated – can this be evidenced within staff training logs?							
Are checks of age carried out on apparently underage customers? Can this be							
Is there a procedure in place for challenging any adult who may be complicit in person to gamble?	allowir	ıg a child	or you	ung			
Are only suitable forms of I.D. accepted by the operator? (Driving Licence, Pas PASS Logo I.D?)	ssport,	Military I.	D,				
Is there an awareness of the legal requirements on returning stakes and not pa	ying pr	izes to					
underage customers?				<u> </u>			
Does staff training cover all relevant prohibitions against inviting children or you gamble or to enter gambling premises? (GA05 sections 46 and 47)	ıng per	sons to		Ш			
3.2) Test Purchasing (SRCP 3.2)	Yes	;	0				
Larger Operators	No		10	$\exists$			
Does the licensee conduct test purchasing or take part in	INO		10	Ш			
collective test purchasing programmes?	Sta	ff					
Smaller Operators		ble to		ш			
Does the licensee monitor the effectiveness of their policies     and precedures for preventing underses combling?		wer/					
and procedures for preventing underage gambling?		nown	bosi:				
Smaller operators could monitor effectiveness through participation in collective test purchasing programmes.							
A distinction between larger and smaller operators is made based on the				Э			
category within SRCP 3.2. This information may not be available at the time of assessment.							

3.3) Under 18s Employment		Yes	10		
Is the operator employing anyone under the age of 18 to carry out the		No	0	H	
functions shown below?		INO	U		
It is an offence to employ:					
a person under 18 to provide facilities for gambling (GA05 Section)	51)				
<ul> <li>a person under 18 to perform any function on the premises where</li> </ul>	•	ina machine	e ara	cited	
or in connection with a gaming machine (GA05 Section 54)	gairi	ing macinic	3 aic	Silca	
a person under 18 to perform any function on the premises where a	a pre	emises licen	ce ha	s	
effect and where the gambling activity is being carried on (GA05 Se					
3.4) Over 18s Gaming Machines Area (MC - SI 2007 / 1409/SSI 2007/266)	Ye	es	0		
Where children/ young people are permitted to enter the premises, and	1		<b> </b>		
category B or C gaming machines are made available for use on the		provement eeded	5		
premises, are the gaming machines:	No		10		
	140	,	10		
Separated from the rest of the premises by a physical barrier to prevent access entrance designed to be the entrance?	s ot	her than via	an		
Supervised at all times to ensure children or young persons do not enter the a	rea	>			
Arranged so that the area can be observed by persons responsible for superv television which is monitored?	isior	or closed c	ircuit		
the age of 18 years is permitted to enter the area					
4) Operator Policies – Customer interaction/Protection Establishing compliance will require viewing policies and discuss			ember	S	
4.1) Policies for Customer Interaction (SRCP 3.4.1)		Yes	0		
Has the licensee put into effect policies and procedures for customer		165	0	Ш	
interaction where they have concerns that a customer may be at risk of		Improvemer	nt 5		
or experiencing harms associated with gambling	_ I	needed			
		No	10		
Things to consider and evidence:					
Are staff members trained on the protection of customers on induction to the c		any?			
Is training regularly updated – can this be evidenced within staff training logs?					
Are employees trained in recognising types of behaviour that may be indicative experiencing harms associated with gambling?	e of	being-at risk	of or		
Are staff members trained to deal with customers showing signs of distress?					
Does the licensee use all available sources of information to identify customer of or experiencing harm?			t risk		
Is the licensee able to evidence that customer interaction has been undertake circumstances?		appropriate			
Do records show circumstances where customer interaction has been ruled or	ut?				
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 customer interaction?	the impact of				
4.2) Policies for Self Exclusion (SRCP 3.5)	Yes	0			
Does the licensee have and put into effect procedures for self-exclusion?	Improvement needed	5			
These procedures must include:	No	10			
Employee induction and refresher training to ensure the system is enforced					
A register of those excluded, with appropriate records (i.e. name, address)					
Photo ID (or an effective alternative) and a signature					
Signposting to counselling and support services					
The removal of excluded persons found on the premises					
Consideration of the premises layout - Is the premises appropriately supervised to customers adults are protected?					
Minimum exclusion period of between 6 and 12 months with the option to extend the least 6 months	for periods of a	at			
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.					
Removal of customer from marketing databases during period of exclusion					
Policy to guard against self-excluded individuals using another person to gamble	on their behalf				
Informing staff of individuals who have breached agreements					
4.3) Multi-Operator Self-Exclusion Scheme (SRCP 3.5.6)	Yes	0			
Does the licensee offer the ability for customers to exclude from similar local venues through participation in a multi-operator exclusion scheme?	No	10			
4.4) Free and Discounted Alcohol (SRCP 5)  If customers are offered free or discounted alcohol, is this linked to	Yes	10			
whether or when they begin or continue to gamble or made at times when	No/ N/A	0			
they are participating in gambling activities?	14/71				
4.5) Advising Employees on Socially Responsible Gambling (SRCP 7)  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	No	10			
to control?					

### 5) Additional Questions

5.1) Premises Licence Availability (GA05 s185)			Yes	0			
Is the premises licence (including the premises plan) kept on the premises and available on request?			No	10			
5.2) Reward Schemes – Terms and Conditions (SRCP 5)			Yes	0			
Are the terms and conditions of any sustamer incentive or reward			No	10			
Are the terms and conditions of any customer incentive or reward schemes clearly set out and readily available to customers?							
<ul> <li>Things to consider:</li> <li>Marketing and advertising must not be misleading</li> <li>'Free bet' or 'bonus' offers must comply with the CAP/BCAP 'Guid gambling advertisements</li> <li>Terms and conditions must be made available for their duration of Staff members should be able to explain the terms and conditions schemes offered to customers.</li> </ul>	f the	prom	otion		<sup>r</sup> d		
5.3) Complaints and Disputes (SRCP 6)		Yes		0			
Has the licensee put into effect appropriate policies and procedures for	r		ovemen	t 5			
accepting and handling customer complaints and disputes in a timely,		need No	ed	10			
fair open and transparent manner?		140		10			
Things to consider and evidence:							
Can customers refer any dispute to an Alternative Dispute Resolution (ADR) to their satisfaction within 8 weeks?	enti	ty if no	t resolv	ed			
Is dispute resolution free of charge for customers?							
Terms must not restrict the customer's right to bring court proceedings again may provide for the resolution to be binding on both parties if the customer a with the assistance of an ADR.							
There must be clear and accessible information on how to make a complaint procedure, timescales for responding and the escalation procedure.	, the	comp	laints				
Policies and procedures must be implemented effectively and kept under rev	/iew						
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.							
5.4) Local Risk Assessment (SRCP 10)							
Can the operator evidence policies, procedures and control measures mitigate risks identified within the Local Risk Assessment?	to		Yes No	10			
	+		Yes	0			
Has the operator taken into account relevant matters identified in the					붜		
Licensing Authority's policy statement?			No	10			

5.5) Licensing Author		Yes/ N/A	0		
Is the premises adhering to any additional premises licence conditions?					
of the premise floor staff loca Where a cond Security and loca condition of the	norities may have requested/ received further information rest during the application stage (for example: CCTV, supervisition). The appropriateness of these arrangements can be dition is attached to a premises licence to require door superndustry Act 2001 means that they must be SIA registered the premises licence (GA05 Section 178).  SI.A licence holders can be found at www.sia.homeoffice.	sion of ( hecked visors, en that	gaming I at asse if the Pr	machi essme ivate	nes, nt.
		Ass	essmer	nt Sco	re:
				/ 3	20
	6) Action Points				
Question Number	Issue/ Resolution				

(i)

'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.



# 9. Acronyms & Abbreviations

ACRONYM	MEANING	COMPLIANCE & SOCIAL RESPONSIBILITY DEFINITION
ABBREVIATION 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.

# Operations Manual CCTV S06 – Version 1



### Why:

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

### **Best Result:**

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

### Worst Result:

The CCTV is accessed by those who should have no access, data is lost. Cameras are moved without authorisation 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

# Operations Manual Machine Fraud Prevention M05 – Version 1



### 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, <a href="mailto:Security@Merkur-Casino.Com">Security@Merkur-Casino.Com</a> 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 <u>Security@Merkur-Casino.Com</u>

# Operations Manual Machine Fraud Prevention M05 – Version 1



### 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

### Operations Manual Machine Ratio Check M07 – Version 1



#### 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.

### Operations Manual Machine Ratio Check M07 – Version 1



#### 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 Venue Technician and/or MERKUR Technical Gaming Support Representative.

# Operations Manual Staff Guard and Panic Alarms S04 – Version 1



#### Why:

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

#### **Best Result:**

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

#### Worst Result:

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

#### What:

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

#### When:

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

# Operations Manual Staff Guard and Panic Alarms S04 – Version 1



#### 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:

<u>CALL THE MANAGER</u> - This is our pass phrase that tells them to call for <u>IMMEDIATE POLICE ASSISTANCE</u>

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.





# Operations Manual Staff Guard and Panic Alarms S04 – Version 1



#### 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



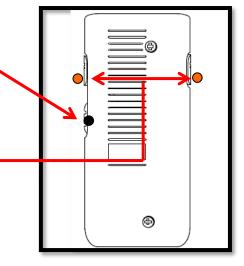
#### Mobile Panic Alarms (MPA)

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.

- 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.

# Operations Manual Customer Smoking/Vaping HS5/01



#### Why:

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

#### **Best Result:**

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

#### Worst Result:

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

#### What:

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

#### When:

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

#### Who:

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

### Related / supporting documents:

- Venue Manager
- Area Manager



### MERKUR Slots Lone Working Policy

#### 1. Introduction

MERKUR Slots, like many companies operating in the gaming and entertainment industry, has several aims when it comes to lone working. These aims typically focus on ensuring the safety, security, and well-being of employees while maintaining operational efficiency.

MERKUR Slots aims to keep lone working periods to a maximum of 6 continuous hours alone for individual employees, whenever possible. However, there may be times when circumstances make this aim unachievable and longer periods of lone working are required to meet business needs. MERKUR Slots will only schedule lone working between the hours of 22:00 and 06:00 as a last resort in order to avoid business closure.

MERKUR Slots is committed to ensuring the health, safety, and welfare of all employees, including those who work alone. This Lone Working Policy and Procedures outline the measures and procedures in place to protect employees who work alone, ensuring they are not exposed to undue risk.

#### 2. Scope

This policy applies to all employees engaged in lone working activities at MERKUR Slots Venues. Lone working is defined as any work activity carried out in isolation from other workers without close or direct supervision.

#### 3. Objectives

- To identify lone working activities and assess associated risks.
- To implement control measures to minimise risks.
- To provide training and resources to support safe lone working.
- To establish communication and monitoring systems for lone workers.
- To review and improve lone working procedures regularly.

#### 4. Responsibilities

#### 4.1 Management

- Ensure a risk assessment is conducted.
- Provide appropriate training and resources.
- Implement and maintain effective communication systems.
- Monitor and review lone working practices.

#### 4.2 Employees

- Follow the lone working procedures and guidelines.
- Complete all Company provided training.
- Report any hazards or incidents to management.
- Use provided communication devices and systems.

#### 5. Risk Assessment

A comprehensive risk assessment must be conducted. This assessment will consider:

- Potential hazards and risks.
- The environment in which the task is performed.
- The health and safety of the lone worker.
- Emergency procedures and communication systems.



#### 6. Control Measures

Based on the risk assessment, appropriate control measures will be implemented, including but not limited to:

- Ensuring the lone worker is medically fit for the task.
- Providing training on safe lone working practices.
- Supplying necessary personal protective equipment (PPE).
- Establishing a robust communication system, such as regular check-ins, emergency contact numbers, and lone worker alarms.
- Ensuring access to first aid supplies and emergency procedures.

#### 7. Communication and Monitoring

Effective communication and monitoring are crucial for the safety of lone workers. Measures include:

- Scheduled check-ins at regular intervals.
- Use of mobile phones or two-way radios.
- Emergency contact procedures and escalation protocols.

#### 8. Training

All lone workers will receive training on:

- The risks associated with lone working.
- Control measures and safety procedures.
- Emergency escalation and response.
- Use of communication and monitoring systems.

#### 9. Emergency Procedures

Clear emergency procedures must be established, including:

- Access to emergency contact numbers.
- First aid and medical assistance procedures.
- Incident reporting and response protocols.

#### 10. Review and Improvement

This Lone Working Policy will be reviewed annually or following any significant incidents or changes in work practices. Employee feedback on lone working issues is encouraged and should be provided to the Area Manager in the first instance. Feedback from employees will also be considered in order to improve the policy and procedures.

#### 11. Policy Compliance

Non-compliance with this policy may result in disciplinary action. All employees are expected to adhere to the lone working procedures and report any concerns to management promptly.

#### 12. Conclusion

MERKUR Slots is dedicated to providing a safe working environment for all employees. This Lone Working Policy is a testament to our commitment to the health and safety of MERKUR Slots employees. By following this policy, MERKUR Slots can ensure that lone workers are protected and supported in their roles



#### Why:

In order to ensure the safety of employees during periods of lone working, security precautions must be taken to ensure that risks to employees and the business are minimised. Employees should familiarise themselves with procedures which must be followed when lone working, before commencing any period of planned/unplanned lone working.

#### **Best Result:**

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

#### Worst Result:

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

### **Lone Working Procedure**

Before commencing a period lone working in any venue, whether planned or emergency lone working, please ensure that the below processes are followed (step by step documents and guidance is included as per page numbers)

Ensure that a telephone (landline or mobile) is available on the shop floor at all times

#### Ensure that a Staff Guard Fob is carried at all times

 Refer to the order of contact list, and contact relevant Manager/Nominated lone working contact venue dependent on the time of day, to inform of lone working situation

Venue specific contacts list: Page 4 Order of contact list: Page 5

1.1 If the period of lone working will be longer than 6 continuous hours; in addition to the above, please also contact the relevant Manager to discuss how a break period will be managed

Venue specific contacts list: Page 4 Order of contact list: Page 5

2. Review and Refresh understanding of emergency procedures and contact numbers to use in the event of an emergency

Venue specific contacts list: Page 4 Emergency contact list: Page 6

- 3. Review and refresh understanding of the lone working risk assessment
- 4. Review and refresh understanding of the lone working "do's and do nots" list Page 7
- 5. Review and refresh understanding of the Checking in and Keeping In Touch procedures

Page 8

6. Review and refresh understanding of Locked Door Operation

Page 9



#### **Contacts List**

Night Manager (Night Phone) Between 22:00 and 06:00 only	07887 416522
Primary Nominated Lone Working Contact Venue:	
Telephone:	
Secondary Nominated Lone Working Contact Venue: (if applicable)	
Telephone:	
Venue Manager:	
Mobile:	
Cluster Manager: (if applicable)	
Mobile:	
Area Manager:	
Mobile:	
Operations Director: (Emergency only)	
Mobile:	



 Employee to refer Non-Emergency Contacts list below, and contact relevant manager/Nominated lone working contact venue, dependent on the time of day, to inform of lone working situation;

#### Non-Emergency Contacts

Order of contact between the hours of 22:00 and 06:00

- Nominated Lone Working Venue
- Night Manager

Order of contact between the hours of 06:00 and 22:00

- Venue Manager
- Cluster Manager
- Area Manager
- 1.1 If the period of lone working will exceed 6 hours, and a break is not able to be taken during the entirety of the shift; in addition to the above, please also contact the relevant Manager below, to discuss how break will be managed.

Between the hours of 22:00 and 06:00

Night Manager

Between the hours of 06:00 and 22:00

- Venue Manager
- Cluster Manager
- Area Manager
- 2. Review and refresh understanding of emergency procedures and contact numbers to use in the event of an emergency

#### **Emergency Procedure**

Should a serious incident happen in your venue, in the worst-case scenario try and stay calm and REMEMBER; we do not expect you to be a hero. Your safety, along with that of other employees and our customers, are of paramount importance.

To help you stay calm and deal with a serious incident remember the following:

- ✓ The priority is always the safety of employees and customers
- ✓ Initial reaction is normally "fight or flight". Do neither. Stay calm and don't take any sudden action
- ✓ Keep calm, don't shout or scream
- ✓ Do as you are told and keep your hands in view at all times
- ✓ Only activate the Staff Guard/PA if it is safe to do so
- ✓ Do not make eye contact with offender(s)
- ✓ Try to memorise things like scars, tattoos, unusual accents as well as clothing. You must write these down as soon as it is possible and safe to do so



Following such an incident the below steps should be followed;

- Close the venue
- Do not touch anything
- Check everyone is OK and if anyone needs assistance
- If the robbers dropped anything do not pick it up
- Try not to stand in the areas that the robbers have stood in
- If Staff Guard or a Panic Alarm was not activated, call 999 and inform the police of the situation
- Inform your Area Manager via a telephone call, if the Area Manager is not available contact the Operations Director.

#### **REMEMBER**

If faced with a serious incident, only activate Staff Guard/ Static Panic Alarm if it is safe to do so and will not put any one at risk

#### **Emergency Contacts List**

Emergency contact telephone numbers can be found on page 4

Order of contact during day time lone working Between the hours of 06:00 and 22:00

- Venue Manager
- Cluster Manager
- Area Manager
- Operations Director

During night time lone working Between the hours of 22:00 and 06:00

- Night Manager
- Venue Manager
- Cluster Manager
- Area Manager
- Operations Director

#### **Incident Reporting Process**

Any unusual incidents must be recorded and reported using the Safety Culture template: "MERKUR Casino Security Report"

In instances where, for whatever reason, an incident cannot be recorded on Safety Culture, the "MS65 -V1 INCIDENT REPORT FORM"

The form can be found on my MERKUR; From the home page > Documents > Venue Documents > MERKUR Paperwork > "MS65 -V1 INCIDENT REPORT FORM"

It is recommended that a small stock of this document is kept alongside the "Lone Working Policy and Procedures" document, for ease of access.



- 3. Review and refresh understanding of the lone working risk assessment
- 4. Review and refresh understanding of the lone working "do's and do nots" list

#### The Do's of Lone Working

- Ensure that a Staff Guard fob is carried at all times
- Ensure that a telephone (mobile or landline) is available at all times
- If you are in need of non-emergency assistance/guidance, make contact with time relevant colleagues in the business via the non-emergency contacts list
- Keep all emergency contact numbers to hand at all times
- Make an assessment to whether Locked Door Operation should be used, if so, the Locked Door Operation guidance must be followed
- Ensure that you carry a Staff Guard Fob and remind yourself of Static Panic Alarm locations
- Keep all office doors locked
- Ensure that all safes are locked
- Ensure that all keys are stored inside time delay safes
- Ensure that all money is inside time delay safes apart from a venue optional personal float (to be agreed by Venue Manager) of £500 which is to be stored in a safe without a time delay requirement for access
- Be mindful/wary of unfamiliar customers
- If there is a threat to the safety of employees or customers, do not hesitate to use Staff Guard, providing it is safe to do so
- In the event of an emergency situation Call 999, providing it is safe to do so
- Record all incidents, as per the incident recording process
- Remind yourself of the GeWeTe S.O.S code;

The GeWeTe S.O.S code for this venue is; .....

#### **The Do Nots of Lone Working**

- Leave the premises unattended at any time, except in the case of an emergency
- Discuss security or operational procedures with anyone whilst working on the venue floor
- Access or remove cash from any time delay safe, GeWeTe, Machine or ATM
- Remove machine, GeWeTe or ATM keys from any time delay safe
- Undertake any maintenance involving electrics or heights within the venue
- Hesitate to contact a member of management using the emergency contact procedures if you are in doubt about anything
- Approach anyone who is threatening the security of the venue. Employee and customer safety must come first and you must co-operate at all times
- Activate the staff guard or static alarm system, if you feel it is unsafe to do so



5. Review and refresh understanding of the Checking in and Keeping in Touch Procedures

#### **The Keeping in Touch Procedure**

#### Employees must follow the keeping in touch procedure when lone working

- 1. When a period of lone working takes place, the lone working employee must contact their nominated keeping in touch venue and advise that they are lone working
- 2. The lone working employee should contact their designated venue every half hour for the full duration of the period of lone working
- 3. Following the period of lone working being completed, the nominated checking in venue should be informed
- 4. If no contact is made at the above times to check in, the nominated venue must try to make contact with employee who is lone working
- 5. If no contact is made following the above step; The nominated venue must contact the Area Manager or Night Manager (between the hours of 22:00 and 06:00) immediately

#### **Checking In**

#### Employees must follow the checking in when opening/closing a venue alone

### When opening/closing a venue or re-opening a venue following a period of locked door operation:

- Be vigilant and aware of anyone suspicious in immediate surrounds of the venue
- Be alert and pay particular attention to parked cars with people sitting inside them and/or anyone waiting in the vicinity of the premises
- If you notice anything suspicious, please contact your Area Manager for advice before opening the venue
- If it is safe to do so, employees should enter the building and immediately lock the door behind them before turning off the venue alarm system
- Collect a Staff Guard fob immediately, and carry at all times.

#### Opening/Closing Venue - The Checking in Procedure

- 1. Prior to opening/closing the venue, a call must be made to the nominated contact venue, Area Manager or Night Manager (if between the hours of 22:00 and 06:00) to inform them that you will be opening/closing a venue alone
- 2. Once the venue is alarmed and closed, a call must be made to the same venue/manager to confirm that all is OK
- 3. If any issues occur which need reporting, these must be immediately reported to the Area Manager or Night Manager (if between the hours of 22:00 06:00)



#### 6. Review and refresh understanding of Locked Door Operation

#### **Locked Door Operation**

If, while lone working, an employee feels that that the safety of themselves, and/or the safety of other customers is at significant risk, a locked door operation can be applied.

All employees are able to make the decision to apply a locked door operation without prior permission, however, as noted below, <u>any occurrences of the door being locked during operational hours must be reported</u>

- Where License Conditions or the Local Area Risk Assessment (LARA) specify that a locked door operation must be in place throughout set hours, venues must comply. The Venue Manager/Area Manger are responsible for ensuring licensing conditions are adhered to, and will provide employees with relevant information on this point.
- In any instances where there is a significant risk to the safety of employees or customers, locked door operation should be applied
- Where locked door operation is applied, and mag locks are in place, the door should be secured by maglock only. In venues which do not have a mag lock, the front door should be locked by key and the lone working employee should pay attention to the front door incase customers wish to enter or exit
- Throughout all hours of trade, a locked door operation should only be applied during hours of lone working, or if there is a safety concern for employees and/or customers
- Operating with a locked door is authorised. however, operating with a locked door must still be reported to either: Cluster Manager, Area Manager or Night Manager, relevant to the time of day as below;

Between the hours of 06:00 and 22:00

- Cluster Manager
- Area Manager

Between the hours of 22:00 and 06:00

- Night Manager 07887 416522
- The length of the time which the locked door operation will be applied for, is to be agreed with the Cluster Manager, Area Manager or Night Manager at the time of reporting the door being locked
- While operating with a locked door, the front door should be manned for as much time as possible
- During operating with a locked door, employees should allow known customers access to the venue (providing they are no threat to safety)
- Employees should consider the access to non-known customers on a customer-bycustomer basis, and should make an informed decision on whether to allow entry or not.
   However, there should be a clear reason as to why an unknown customer is not provided access to the venue



### **Other Relating Procedures**

#### Reporting of Safeguarding Equipment Faults

It is of the highest importance that all equipment which acts as a safeguard for employees during lone working, and non-lone working periods alike, are always in working order.

In instances whereby safeguarding equipment is found to not be working correctly, this must be reported at the earliest opportunity. Ideally to the Venue Manager or as per the email contacts below.

Safe guard equipment which should always be working (or reported):

#### ITSupport@merkur-casino.com

- Staff Guard fobs
- Staff Guard unit
- Telephone
- CCTV

#### Fmhelpdesk@merkur-casino.com

- 60-minute time lock delay main safe
- Mag lock system
- Lock system on door of agreed panic room
- Fire alarm system

#### **Venue Manager**

- Door chimes (if in place/applicable)
- First aid kit Agreed Company stock standards and up to date



#### **Staff Guard Fob**

The Staff Guard system helps to de-escalate and deter aggressive incidents and give employees a way of contacting help when required. We are not charged as a Company for individual usage of the Staff Guard System; therefore, it should be used freely when deemed necessary and is considered safe to do so. Never use the Staff Guard system if you believe it will cause the situation to become more dangerous.

- 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 in order to try and understand what is happening in the venue.



<u>"CALL THE MANAGER"</u> - This is our pass phrase that tells them to call for <u>IMMEDIATE POLICE ASSISTANCE</u>

However, Staff Guard 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.





# Operations Manual Locked Door Operation S07- Version 1



#### Why:

MERKUR Slots venues may, at times, operate a venue with a locked door, in order to ensure the safety of employees and customers. There are certain considerations and reporting processes which must be followed when operating a locked door during operational hours.

#### **Best Result:**

All employees are aware of the importance of following Company processes, when operating with a locked door. Employee and customer safety is heightened as a result.

#### Worst Result:

Employees do not follow the process for operating the venue with a locked door. Resulting in decreased safety for employees and customers and a risk of impact to the businesses profitability.

#### What:

- Where License Conditions or the Local Area Risk Assessment (LARA) specify that a locked door operation must be in place throughout set hours, venues must comply.
- Employees of MERKUR Slots must always make the safety of themselves and customers a priority
- In any instances where there is a significant risk to the safety of employees or customers, locked door operation should be applied
- Throughout all hours of trade, a locked door operation should only be applied during hours of lone working, or if there is a safety concern for employees and/or customers
- Operating with a locked door is authorised. however, operating with a locked door must still be reported, as per below points
- Any locked door operation must be reported to either: Cluster Manager, Area Manager or Night Manager, relevant to the time of day
- The length of the time which the locked door operation will be applied for, is to be agreed with the Cluster Manager, Area Manager or Night Manager at the time of reporting the door being locked
- While operating with a locked door, the front door must be manned for as much time as possible
- During operating with a locked door, employees should allow known customers access to the venue (providing they are no threat to safety)
- Employees should consider the access to non-known customers on a customer-bycustomer basis, and should make an informed decision on whether to allow entry or not. However, there should be a clear reason as to why an unknown customer is not provided access to the venue
- During times of locked door operations, employees should follow Company processes noted in the S1/01 Lone Working document, found in the Operations Manual

#### When:

• Locked door operation can be applied at any point during operational hours, however, as noted, there must be a clear reasoning behind the decision to do so

#### Who:

 All employees are able to make a decision to operate with a locked door, providing the circumstances warrant the decision

### Operations Manual Locked Door Operation S07- Version 1



### Who to contact if in need of help / advice:

- Cluster Manager
- Area Manager
- Night Manager (As per S1/01 Lone Working document)

### Operations Manual Keeping In Touch Procedure S08 – Version 1



#### Why:

The keeping in touch procedure is a safety and security procedure which promotes regular communication between venues during periods of lone working, or opening/closing a venue whilst alone.

#### **Best Result:**

All employees follow the keeping in touch procedure while lone working, increasing the safety and security of those employees undertaking lone working.

#### Worst Result:

Employees do not follow the keeping in touch process, resulting in an increased risk to employees who are lone working.

#### What:

- Employees must follow the keeping in touch procedure when lone working
- Employees must follow the keeping in touch procedure when opening/closing a venue alone

#### When opening a venue:

- Be vigilant and aware of anyone suspicious
- Be alert and pay particular attention to parked cars with people sitting inside them and/or anyone waiting in the vicinity of the premises
- If you notice anything suspicious, please contact your Area Manager for advice before opening the venue
- If you are alone when opening the venue, you must observe the "Checking In: Opening/Closing A Venue Alone" process
- If it is safe to do so, employees should enter the building and immediately lock the door behind them before turning off the venue alarm system

#### How:

#### **Keeping In Touch**

- 1. When a period of lone working takes place between the hours of 22:00 06:00, the lone working employee must contact their nominated keeping in touch venue and advise that they are lone working
- 2. The lone working employee should contact their designated venue on the hour and half hour for the full duration of the period of lone working
- 3. Following the period of lone working being completed, the nominated checking in venue should be informed
- 4. If no contact is made at the above times to check in, the nominated venue must try to make contact with employee who is lone working
- 5. If no contact is made following the above step; The nominated venue must contact the Area Manager or Night Manager (between the hours of 22:00 and 06:00) immediately

### Operations Manual Keeping In Touch Procedure S08 – Version 1



#### **Checking In: Opening/Closing A Venue Alone**

- 1. Prior to opening/closing the venue, a call must be made to the nominated contact venue, Area Manager or Night Manager (if between the hours of 22:00 and 06:00) to inform them that you will be opening/closing a venue alone
- 2. Once the venue is alarmed and closed, a call must be made to the same venue/manager to confirm that all is OK
- 3. If any issues occur which need reporting, these must be immediately reported to the Area Manager or Night Manager (if between the hours of 22:00 06:00)

#### When:

• This document applies to all periods of lone working

#### Who:

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

### Related/supporting documents:

- S1/01 Lone Working
- S7/01 Locked Door Operation

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

- Venue Manager
- Cluster Manager
- Area Manager
- Night Manager (between hours of 22:00 and 06:00 only)
- Operations Director

# Safer Gambling Policy MERKUR SLOTS



#### **Revision History**

Version	Revision Date	Revised by	Section Revised
1.0	January 2024	Gill Clulow – Safer Gambling	New Document
		Compliance Manager	
1.1	01/05/2024	Amanda Kiernan – Head of	1.5 The
		Compliance	Compliance Team
	01/09/2024	Amanda Kiernan – Head of	1.3 Licence
1.2		Compliance	Conditions and
			Codes of Practice
			(LCCP)

Version	Section	Reason	Sign-off
1.0	All	New Document	Amanda Kiernan – Head of Compliance
1.1	1.5 The Compliance Team	New Safer Gambling Compliance Manager appointed	Amanda Kiernan – Head of Compliance
1.2	1.3 Licence Conditions and Codes of Practice (LCCP	Updated LCCP 30 August 2024	Amanda Kiernan – Head of Compliance



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

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- 5.2 Access to Gambling by Children and Young Persons
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**APPENDIX A -** Safer Gambling Interaction Process

**APPENDIX B - Self-Exclusion Process** 



#### 1. INTRODUCTION

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

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

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

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

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

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

#### 1.1 Responsibility for the document

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

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

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

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



#### 1.2 Gambling Commission

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

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

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

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

The LCCP sets out the mandatory conditions (issued under Section 24 of the Gambling Act 2005) which the Company must meet to hold its operating licence. The latest LCCP revision is dated 30 August 2024; <a href="https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp">https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp</a>

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

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

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



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

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

#### 1.4 Trade Association – BACTA

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

#### 1.5 The Compliance Team

The Company has a Compliance Team who can be contacted by any employee by email – <a href="mailto:Compliance\_UK@merkur-casino.com">Compliance\_UK@merkur-casino.com</a>

Head of Compliance/MLRO Nominated Manager

Name: Amanda Kiernan - Email: akiernan@merkur-casino.com

Safer Gambling Compliance Manager

Name: Stacey Irvine - Email: sirvine@merkur-casino.com

Deputy MLRO

Name: Merk Wells - Email: <a href="mailto:mwells@merkur-casino.com">mwells@merkur-casino.com</a>

#### 2. REGULATORY FRAMEWORK

#### 2.1 Legal Background

The Company Safer Gambling Policy is based on the following.

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



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

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

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

#### 2.2 Information Requirements and Access to Premises

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

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

#### 3. FINANCIAL REQUIREMENTS

#### 3.1 Anti-Money Laundering

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

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

#### 4. THE RISK BASED APPROACH

#### 4.1 Risk Based Approach for Safer Gambling

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

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

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

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

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

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

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



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

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

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

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

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

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

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

#### 5.1 Combatting Problem Gambling

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### 5.4 Customer Interaction

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

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

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

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

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

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

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

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



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

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

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

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

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

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

The interaction is to be recorded on the SMART tablet.

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

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

The interaction is to be recorded on The SMART tablet.

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



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

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

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

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

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

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

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

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

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

#### 5.5 Self-exclusion

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

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

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

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

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

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

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

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

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

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

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

### 5.6 Employment of Children and Young Persons

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

### 5.7 Money Lending Between Customers

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

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

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

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

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

The interaction is to be recorded on The SMART tablet.

#### 6. FAIR AND OPEN PROVISIONS

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

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

Machine information screens

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

#### 7. MARKETING

#### 7.1 Rewards and Bonuses

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

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

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

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

#### 7.2 Alcoholic Drinks

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

#### 7.3 Promotion by Agents

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

### 7.4 Compliance with Advertising Codes

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

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

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

When conforming to the UK Code of Broadcast Advertising (BCAP) Code <a href="https://www.asa.org.uk/codes-and-rulings/advertising-codes/broadcast-code.html">https://www.asa.org.uk/codes-and-rulings/advertising-codes/broadcast-code.html</a> particular attention is paid to the following sections.

- Section 3 Misleading Advertising.
- Section 17 Gambling

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

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

The Company currently has no partnership agreements in place.

### 7.5 Other Marketing Requirements

The Company ensures that any marketing promotions and new media are within the meaning of the Consumer Protection from Unfair Trading Regulations 2008 <a href="https://www.legislation.gov.uk/uksi/2008/1277/contents/made">https://www.legislation.gov.uk/uksi/2008/1277/contents/made</a>

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

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

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

## 7.6 Direct Electronic Marketing Consent

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

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

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

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#### 8. COMPLAINTS AND DISPUTES

### 8.1 Alternative Dispute Resolution

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

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

Dispute as determined under the LCCP is the non-resolution of a customer complaint which has ratbeen resolved by the Company.

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

### 8.2 Non-Gambling Related Customer Complaints

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

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

#### 9. COMPANY EMPLOYEES

#### 9.1 Responsible Gambling Information for Employees

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

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

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

#### 10. SENIOR MANAGEMENT RESPONSIBILITY

#### 10.1 Compliance Risk Committee

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

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

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

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

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

### 10.2 Company Safer Gambling Obligations

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

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

#### 10.3 Policies, Procedures and Controls

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

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

## 10.4 Safer Gambling Training

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

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

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

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

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

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

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



#### 11. THE SAFER GAMBLING MANAGER

### 11.1 Role of the Safer Gambling Manager

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

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

## 11.2 Standing of the Safer Gambling Manager

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

The Safer Gambling Compliance Manager has.

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

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

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

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### 12. GAMING MACHINES IN GAMBLING PREMISES

### 12.1 All non-remote operating licences

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

All gaming areas are appropriately supervised by staff.

#### 13. ASSESSING LOCAL RISK

#### 13.1 Local Risk Assessment

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

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

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

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

### 14. ONGOING MONITORING AND AUDITING

#### 14.1 Monitoring Techniques

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

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

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## 14.1 Regulatory Compliance Audits

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

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

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

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

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

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

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

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



### APPENDIX A - Safer Gambling Interaction/Conversation Process

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

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

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

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

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

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

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

Examples of open questions are as follows.

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

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

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

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

Considerations in the evaluation should include the following.

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

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

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

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

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

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

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

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

Self-exclusion is sector specific:

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

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

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

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

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



Safer Gambling – Observation and Interaction

## Safer Gambling – Observation & Interaction Introduction





# Safer Gambling – Observations & Interactions Background

- Gambling Commission Recommendations
- Teams' having an awareness of their customers behaviours
- Teams' knowing their responsibilities and being accountable
- Understanding why interactions is an important part of the customer experience
- · Changing how we approach and perceive a Safer Gambling Interaction



## Safer Gambling – Observations & Interactions Aims

MERKUR Slots teams, gain confidence and knowledge on how to Identify and Interact with customers who may be at risk of suffering from gambling harms.

Retain MERKUR Slots Customers, so they play and visit at a level that is affordable to them and continue to enjoy their gaming experience.

MERKUR Slots teams, being balanced in their approach.





# Safer Gambling – Observation & Interaction Objectives

- Understanding of why being proactive with interactions can benefit the overall Customer Experience and integrity of the MERKUR brand
- Understanding an Interaction is a 'conversation' and should be positive not just negative
- Observe customer behaviours, recognising any changes that will initiate an interaction
- Observe extended periods of play, and recognise when and how to interact appropriately
- Proactive interactions utilising the resources and tools available to the operation, demonstrating due diligence
- Utilising the WOW factor framework to observe and interact with our customers



## Safer Gambling – Observation & Interaction What is an Interaction



## Safer Gambling – Observation & Interaction What is an Interaction

Definition of interaction, (Oxford Dictionary)

The act of communicating with somebody, especially while you work, play or spend time with them.

Definition of customer service interaction, (Oxford Dictionary)

Help and advice that a company gives people who buy or use its products or services.



# Safer Gambling – Observation & Interaction What is Safer Gambling?



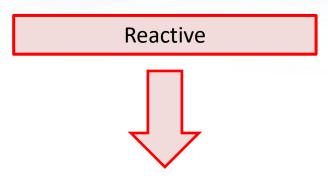
"Safer Gambling is a term used to describe the industry's approach to limiting the risk of problem gambling and gambling related harm. The term is often interchangeable with social responsibility"



# Safer Gambling – Observation & Interaction What is Safer Gambling Interactions?

Pro – Active

- Getting to know our customers
   Observing behaviours for any changes
- Conversing and Listening
- Acting on concerns



- Customer contacting the business
- Business reacting to the contact
- Business unaware of changes within the customer



# Safer Gambling – Observation & Interaction Recording and Interaction



What is the difference between a customer service interaction and a safer gambling interaction?



## **Darius**

Darius is a regular customer, pleasant enough and keeps himself to himself when in MERKUR Slots.

Darius is usually found playing the £500 jackpot machines. You can tell that he is in the venue, as you can hear the buttons being pressed or tapped loudly.

Darius usually plays the machines approx 6 hours at a time and never complains. He usually comes in at 6pm and leaves at midnight. He visits at least twice a week but has been known to come in and play up to four times a week.

This week, he has been in every night. On Thursday night Darius could be hear complaining to himself at the machine he was playing. On Friday night, he stayed until early hours of Saturday morning leaving around 2am.

Saturday night Darius was heard banging the buttons, rather than loudly tapping the buttons. He then approached the staff asking how to self exclude.



## Safer Gambling – Observation & Interaction Observe, Action and Outcome

## **OBSERVE**

A regular customer enters the venue on a day she doesn't normally visits, she states that she has just come in to wait for her bus, and she has a spare £10.

Her bus is in 10 mins and the bus stop is outside the venue front door.

She finishes playing her £10, she starts to walk towards the cash machine (ATM)

## **ACTION**

Member of staff approaches customer and politely says, "Mary is your bus not due soon"

Mary thanks the member of staff for reminding her, and leaves saying, "see you tomorrow if you're working".

## OUTCOME

Member of staff records the

interaction.

Mary returns the next day
on her usual visit to the
venue.



## Safer Gambling – Observation & Interaction Observe, Action and Outcome Cont..

You notice a customer playing one of the games on our gaming machines on £2 stake, and on autoplay.

You also notice they are going to the cash machine a bit more than usual

Whilst offering the customers a drink refill in the venue. You initiate a conversation and let them know that you have seen them go to the cash machine more than usual.

Within conversation, inform them about set your limits, or that they could reduce to a £1 stake Member of staff records the interaction.

Customer initially thought the member of staff was being a bit of a job's worth, however reduce stake and disabled the Auto Play



# Safer Gambling – Observation & Interaction Signs & Triggers

- Repeated aggressive behaviour
- Changes in appearance
- Remaining on the premises for extended periods of time
- Patterns of frequently leaving and returning
- Mentioning self exclusion
- Repeated evidence of a customer being tired and/or sleep deprived
- Seeking to borrow money
- Changes in the nature, pattern, levels of play
- Judgement affected by a health condition
- Frequent use of cash machine on the premises
- Mentions frequently about losses, hints they are treated unfairly
- Multiple Profiles or profiles under different names
- Intoxication/substance abuse
- Family, partner or friends visiting the club to find a customer



## Safer Gambling – Observation & Interaction Interaction Outcomes

Chris asked to selfexcluded, was completely out of the blue did ask if this was what he wanted, and it was so he self-excluded customer said that he was spending far too much and needed to take a break. a few days later he came back to self-exclude.

self-excluded

Peter is a regular but has increased visits recently, spoke to regarding this and he said his wife is in hospital which is why he is in more. discussed that he doesn't need to come in and play if he's feeling lonely, he can pop in for a coffee and chat without the need to spend more money.

Will keep an eye on him

Left after spinning off money

customer was refused to play and left the venue

he wishes to be told what the fault is with either the game or machine. I will report this to the manager as requested by the customer.



## Safer Gambling – Observation & Interaction Exclusion

## Why is an interaction advised at self-exclusion?

- Actively listen to the "why" a customer wishes to self-exclude
- Is this the right option for the customer
- Sign post them on where to receive help

## Why is an interaction advised at re instatement?

- Actively listen to the "why " a customer wishes to return
- Evaluate and follow up with an interaction at a following date
- Record of the customer's journey

Interacting is preserving the customers business and helping them to gamble at a safe level, evaluating their interactions and acting upon any concerns.



## **CUSTOMER SERVICE JOURNEY**



# Safer Gambling – Observation & Interaction Summary and Best Practices

- Retain customers to play affordable
- Customer Experience use it as part of the journey
- Recording the right information
- Handover between shifts
- Prevention before a customer feels that they need to self exclude
- Self exclusion and re –instatement







Welcome to the Essentials of Compliance and Social Responsibility Training course

EVERYONE who works in one of our venues is responsible for making sure that our gaming and bingo operations are monitored and supervised correctly to prevent entry by underage people, to identify vulnerable people and to prevent crime.

This training module will ensure you have covered every element of the Gambling Act and the Gambling Commission's requirements of each and every one of us.

As this is such an important part of our business, this course will be refreshed every 6 months. Remember to go through it carefully when it refreshes as any changes and updates to the law will be updated in this training and quiz.

Click on the first lesson below to get started:

INTRODUCTION		
=	Learning Outcomes	
=	Introduction	
=	The Law	

OBJECTIVE 1		
=	Objective 1: The Protection of Children	
=	Checking Age	
=	Refusing Entry	
<b>M</b>	Knowledge Check 1	
=	Objective 1: The Protection of Vulnerable People	
=	Self Exclusion	
=	MERKUR Self Exclusion	
OBJECTIVE 2		
=	Objective 2: Fair & Open	
=	The Complaints Procedure	
OBJECTIVE 3		
=	Objective 3: Crime Free	
=	Theft and Fraud	
=	Money Laundering	
COMPLIANCE IN MY VENUE		
2	The Compliance Folder	



? Quiz

## **Learning Outcomes**



Work through this online training module and complete the activities and quiz.

You must ask your Line Manager if you are unsure about any aspect of this training or the gaming operation you work in.

This training session will explain everything you need to know to stay compliant and operate within the law whilst at work.

**IMPORTANT**: The playing of any gaming machine by a member of staff within a venue is considered a Gross Misconduct offence under the Company's disciplinary rule.

## **LEARNING OBJECTIVES**

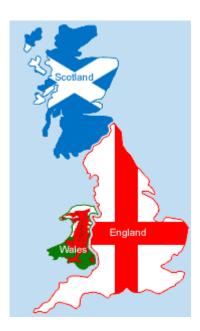
By the end of this session you will be able to . .

- List your responsibilities regarding gaming operations
- 2 Explain the 3 licensing objectives
- Implement the Think 25 policy including identifying proof-ofage documentation and the procedure for confirming age
- Identify the consequences of failing to identify and refuse entry to those who are underage
- Recognise a potentially vulnerable person and take the appropriate action
- 6 Explain self exclusion and the action that should be taken

- Recognise a potentially suspicious situation and take the appropriate action
- 8 Complete the relevant compliance logs at the appropriate time
- Money Laundering procedures and what to report
- Explain the complaints procedure and the 4 stages to follow

# Introduction

This training module will ensure you have covered relevant elements of the Gambling Act and the Gambling Commission's requirements of each and every one of us.



All across the UK

We operate gaming operations all over the country from Aberdeen in Scotland to Lowestoft in the South East and Plymouth in the South West. The majority are licensed as Bingo premises, however a number of them are operating as Adult Gaming Centres and some as a Family Entertainment Centre (FEC).

Your Manager will inform you of the license(s) held by the venue you are working in. All the venues have gaming machines that vary from low stake 10p play machines to high stake, high jackpot machines. Some venues and all those with a Bingo License venues will have one or more Bingo products - this may be a

traditional Cash Bingo rig, Bingo Plus Terminal /G Tab Tablets, Bingo Express Terminal/Flexi Tablets, BETS in Bingo Clubs plus Bingo Video Terminals . All the venues apart from the FEC areas are restricted by law to those who are over the age of 18.

# The Law

All gaming businesses need a **Premises Licence** to operate and are operated according to the **LCCP** (Licence Conditions and Codes of **Practice**).and the **Gambling Act 2005** 

The 3 Main objectives of the Act are:

The protection of children and vulnerable people

To be fair and open

To be crime free

#### WHAT ARE LICENCE CONDITIONS?

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

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

#### WHAT ARE CODES OF PRACTICE?

#### Codes of practice are either:

- social responsibility code provisions which must be adhered to by all licence holders
- > ordinary code provisions these do not have the status of licence conditions but failure to take account of them can be used as evidence in criminal or civil proceedings

#### Click on picture to enlarge

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

The Licence conditions and Codes of Practice set out the requirements you must meet in order to hold your operating licence and your personal licence.

It is a very important part of running your business

AGCs, FECs, Bingo and Casino premises are regulated by the Gambling Commission. Gambling Commission Officers, Local Authority Officers and the Police can visit your venue at any time.

If we, or our employees break the law with regard to the Gambling Act 2005, the Company could lose their licence and would not be allowed to operate gambling areas in the future.

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



Any employee found breaking the law relating to the Gambling Act, playing any machine or not complying with the company's policies and procedures relating to gaming operations may face disciplinary action (including dismissal). If you work through this training you will have all the knowledge you need to get Compliance right.

#### CONTINUE

The reason Compliance training is so important is so that you; our team in the venues and clubs can deliver Socially Responsible Gambling - but what does that mean....

Social responsibility is all about protecting

# people from gambling-related harm The Gambling Commission

PLEASE USE THE ARROWS TO CLICK THROUGH THE 4 CARDS

Social responsibility is all about protecting people from gamblingrelated harm. Three licensing objectives support the whole basis of gambling regulation: that crime should be kept out of gambling, it should be conducted in a fair and open way; and children and other vulnerable persons should be protected from harm or exploitation from gambling.

Most people who gamble do so safely most of the time. But gambling can be harmful for some. Excessive play due to inexperience or binge gambling, periods of loss of control and more serious gambling addiction. The harm suffered is not restricted to the gambler, but also felt by families, friends, communities and employers.

It's not always easy to know who may have a problem so Customer Service and Interaction are vitally important

Proactively interacting early enough and in the right way can help someone keep control of their gambling and you will retain them as a customer, instead of them choosing to opt for self-exclusion or ending their membership. In the long term this approach is more sustainable for our business

Proactive interaction is about how we interact with our customers when they are in our venues & clubs



It's important we fully understand the 3 Objectives so we can deliver Socially Responsible Gambling. **YOU**; the staff who interact with Customers every day, are at the fore of how we deliver socially responsible gambling at MERKUR.

So lets get started with the 3 main objectives.

## Licensing

In order for us to operate gaming premises the business is required to hold an operating licence. Several directors and key senior personnel must also hold a personal licence, just as you would to be able to own a pub or drive a car.

All these licences, at different levels, confirm that your venue is legal. These are checked for when officers from the Gambling Commission and local authorities visit venues.

Each individual venue/club must have a premises licence.

# **Objective 1: The Protection of Children**

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

The first measure the company takes to prevent entry to under 18's is to make sure that signage stating the minimum age requirement (18) is displayed clearly at each entrance to the venue and on each machine.

If someone who appears to be under the age of 25 enters any AGC, Bingo or Casino premises, the only way we can be sure they are old enough to play is to check directly with them.



WE PROTECT CHILDREN UNDER THE LAW BY ASKING FOR PROOF OF AGE WHEN PEOPLE ENTER OUR PREMISES. IF YOU THINK SOMONE IS UNDER 18 YOU SHOULD CHECK BEFORE YOU LET THEM IN/PLAY. IN OUR BUSINESS WE OPERATE A 'THINK 25' POLICY; THIS MEANS WE ASK FOR PROOF OF AGE OF ANYONE WHO LOOKS UNDER 25 YEARS OLD.

#### Click to flip each card and reveal the answers:

WHAT DOES PROOF OF AGE MEAN IN OUR BUSINESS?

A business that has age restricted areas like ours must have a system to check the age of its customers, to prove that they are **over 18**; no proof - no play.

WHEN SHOULD I ASK FOR PROOF OF AGE?

The company operates a **Think 25 Policy**. If you think a person entering the AGC or Bingo premises looks under the age of 25, you must ask them for identification as proof of their age.

WHAT PROVES THEIR AGE?

A passport, a European photograph driving licence, a PASS accredited proof of age scheme. A military ID card can also be accepted as proof of age.

#### CONTINUE







EUROPEAN PHOTOCARD LICENCE



PASS ACCREDITED SCHEME MILITARY ID



mple Military ID Cards; these can diffe by Country

# When checking the above documents you MUST CHECK for the following:

- Date of birth shows the person is old enough to be in the AGC or Bingo premises
- The **photograph** is a true likeness of the person attempting to play the machines
- That the **ID** document is valid by checking it, feel that it is smooth with no ridges, that it has not been altered or tampered with and that it has not expired
- The **hologram** is present on the proof of age scheme card

#### CONTINUE

# How do I approach the Customer?

Please click on the boxes to show you have read and understood each point.

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

	Explain politely that they have entered a restricted area where the	
	company operates a Think 25 Policy. If it is	
	A) a child or baby accompanied by an adult wishing to play the machines, you must inform the adult that the child is not permitted to stay in the gaming area under any circumstances as it is against the law.	
	B) an adult who wishes to play the machines, request politely that they provide ID to prove they are over 18.	
	If ID proves the customer is over 18 and it is valid, thank the customer and serve as normal.	
	If proof of age cannot be provided or the ID appears to be fake or invalid, politely and briefly explain that they cannot play; this is Company policy and a legal requirement.	
Liston for how to any	porach the customer	00:14
Listeri for flow to app	porach the customer	
<b>&gt;</b> •		00:14
Listen for How to ref	fuse Play	
<b>•</b> •		00:16



NO ID = NO PLAY!

IF THIS HAPPENS WE MUST REFUSE ENTRY.

Let's take a quick quiz to see if we can tell how old people are. Click on the next lesson.

# **Checking Age**

## Is she Under 25?



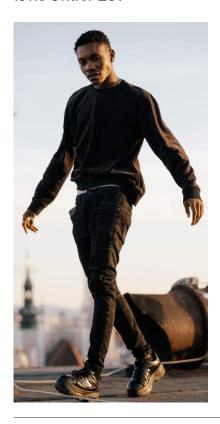
Yes

No

I Don't Know - would need ID.

**SUBMIT** 

Is he Under 25?



Yes I think he is

- No I don't think he is
- I'm not sure I would ask for ID

SUBMIT

# How old do you think this lady is?



	18
$\bigcirc$	24
	28
	I don't know - I'd ask for ID
	SUBMIT

#### CONTINUE

We cannot know these peoples ages for sure - if there is ANY DOUBT; ASK!

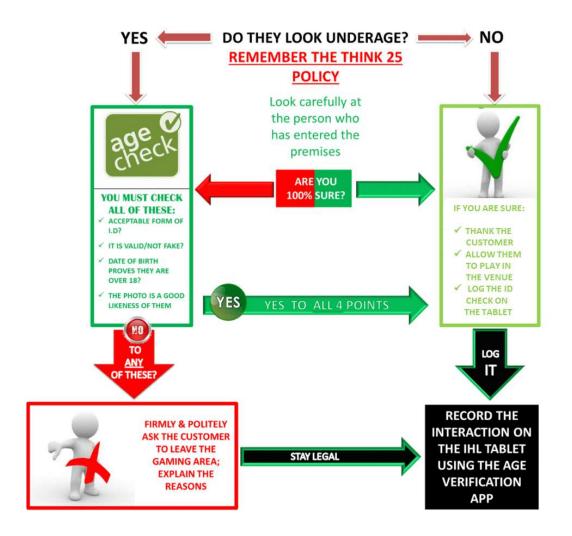
## No ID = No PLAY

If someone has been challenged and cannot provide ID we must refuse them entry and not allow them to play the machines. In the next section we look at refusing entry so click to find out more.

# **Refusing Entry**

Sometimes we have to refuse entry either because the person does not have ID or because their ID proves they are underage.

This section is about what to do



It is a legal requirement that licencees must have (and put into effect) policies and procedures designed to prevent underage gambling and monitor the effectiveness of these. This is a very important part of your role and to support you we have a separate training module dedicated to age verification - please make sure you have completed this.



# Access-to-gambling-by-children-and-young-persons-may-2021-v-1-2.pdf



178 KB

Click continue for advice on how to refuse entry

#### CONTINUE

OK! So we know that you have to refuse anyone without ID that appears under 25. But what is the best way?

Click on each picture for some top tips for dealing with refusing entry



Always remain calm and be tactful and polite in your refusal to play



Use a firm tone of voice but do not humiliate the person.
Be positive about what you are saying



Be Confident and maintain eye contact. Positive body language reinforces your message



Keep it light and avoid any conflict. Do not enter into a negotiation or argument



Maintain personal space and do not get too close to the customer



Make sure you have an easy and clear exit route away from the customer

(i)

If the customer continues to be uncooperative or you are in any doubt call your Duty Manager. If you are working alone and feel in danger then you should call the police.

# WHAT HAPPENS IF AN UNDERAGE PERSON ACTUALLY PLAYS THE MACHINES BEFORE I CAN CHECK THEIR ID?

It is illegal for anyone under 18 to play machines or to gain from illegal gambling. This means that if an under age customer has not been asked for ID and has started to play the machines, they must be stopped immediately and given their stake (the money they have put into the machine) back.

If you discover either of these incidents has happened, you must call for a member of Management immediately or if you are working alone, you must deal with it. The under age customer must have their money refunded. This type of incident must be recorded on the tablet specifically as a 'child or underage person playing the machines'.

If you do not stop an underage person from playing YOU will be breaking the law.

# **Knowledge Check 1**

Read each of the statements on the cards. Put them on the TRUE or FALSE piles.

TRUE

We operate a THINK 25 POLICY

Age restrictions are the law in our premises

For the purpose of the law a 17 year old is considered a child.

Anyone entering the premises must be 18 or over and be able to prove it

I can be personally prosecuted

The Gambling Commission is the Regulatory Body

I can accept a passport as proof of age

**FALSE** 

I can accept a birth certificate as proof of age

I don't have to age check regular customers even if I think they are Under 25

If I refuse entry &they go quietly I don't have to record it on the Smart Tablet Children of staff are allowed in if they are with the member of staff

Children in buggies are allowed in if they are with someone over 18

# **Objective 1: The Protection of Vulnerable People**

Legislation states that the company must promote 'socially responsible' gambling and protect vulnerable people

#### **Vulnerable People**

A vulnerable person is someone who may become addicted to gambling. You may be concerned about someone who ......

- Plays the machine for a long time
- Goes to the cash machines frequently for more money
- Looks agitated
- Behaves aggressively
- Is visibly upset



CONTINUE



Although the signs listed can signpost a problem with gambling, it's not clear cut so we should check.

#### But we should check!

If you are concerned about a player, you have an obligation to try and break or interrupt their play; do this by chatting to them; being in the areas close to them; cleaning the machines around them or simply making

your presence felt.

Try and make conversation; try some of the ideas below

(click play to listen)



Are you OK?

If they are OK and choose to carry on playing - that's OK. Keep an eye on them and if you are concerned, let your Line Manager know. If you are working alone, try talking to them again. Under no circumstances should you tamper with the machine they are playing.

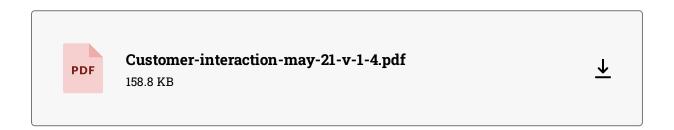
If a customer is concerned about the level of their gambling, they may request help or information from you. REMEMBER; as a responsible Operator we may need to approach a customer who we think may have a problem with gambling - it is a 2 way process, so if you are concerned you should approach the customer.

Whether you approach them or they approach you for help; you <u>must</u> record it as this is an interaction and should be recorded.

Use the **Staying in Control** leaflets which are available in the machine area and the toilets. The helpline number is also on every machine.



Leaflets and Contact information are readily available in your venue



What is a Vulnerable Person?

Someone who IS or MAY become addicted to gambling
Someone who comes in every day
Someone who doesn't interact with staff
SUBMIT

What behaviour from a customer might cause you some concern about		
their gamb		
$\bigcirc$	Playing the machines for long time periods	
$\bigcirc$	Frequently visiting the cash machine	
$\bigcirc$	Agitated or upset	
$\bigcirc$	Displays aggressive behaviour	

	Any/all of these could indicate a gambling problem
	SUBMIT
Whatshould	you do if you are concerned about a MERKUR Customer?
	Try and break their play by chatting or offering a tea/coffee

SURMIT

Ask 'Do you have a problem?'

Wait until they ask for help its not right to interrupt

### **Self Exclusion**

The majority of our customers are able to **enjoy gambling responsibly**, but the Company recognises that we have a **duty of care** to the very small number of people who may have problems and where gambling ceases to be fun.

This duty of care includes a **Self Exclusion** facility. Self exclusion is when a customer requests to be 'excluded' from your venue for a specific length of time. That way, they will not be allowed to gamble in your venue.



What does the Gambling Act 2005 tell us about self exclusion?

If you interact with customers you must provide the option of self exclusion for those who would like to take steps to stop gambling. Click on each of the tiles below to find out more about how to do this

OFFER CUSTOMERS HELP

Entering into a self-exclusion is a significant step, and you should do what you can to ensure that the individual understands what it means

TIME RESTRICTED

For example, that it is a commitment not to attempt to gamble for a minimum period of six months.

Generally speaking, it is considered that this length of self-exclusion is necessary to enable an individual to deal with their problem gambling behaviour.

#### **IMMEDIATE**

A customer who has decided to take the step of self-excluding should be able to do so immediately and should not be required to wait.

#### TAKE ACTION

The customer should be offered
the opportunity to speak to
someone appropriate about selfexclusion, in some
circumstances this may not be
possible immediately. However,
arrangements should be made as
soon as possible, and if a
customer is certain that they wish
to self-exclude and does not wish

#### SELF EXCLUSION TABLET

All our staff need to know how to self exclude. You have to be able to explain the process to the customer and complete the self exclusion on the tablet

OUR POLICIES & PROCESS

We have set processes to follow; continue with this section to find out WHAT you need to DO and HOW to do it.



What we need to do.

Please check/click each box to confirm you have read and understand:

If a customer requests to be self excluded, you must call the Duty
Manager to carry out the self exclusion process.
If you are working alone, you <b>must</b> deal with the self exclusion process yourself.
A customer can initially exclude themselves for a minimum of 6 months and a maximum of 12 months, the customer will have the option to extend their exclusion upon expiry.
The exclusion is active in the immediate area and will include other operating premises of the same licence type in that area. Please note: this is defined by either AGC or Bingo, therefore you need to know which type of Premises Licence your venue holds, the Smart Tablet will default to your licence type and the customer has the option to select other licence types. Further details are available in the Self Exclusion Policy & Procedure.
Once excluded the customer is NOT allowed to enter the premises during the exclusion period.
Once a customer has excluded themselves they cannot change their minds - they must wait until the end of the exclusion period.
If an excluded customer enters the venue and/or plays the machines whilst they are excluded, this is classed as a "BREACH" and they must be asked to leave. If they refuse to leave you must call for the duty manager. If you are working alone YOU must ask them to leave.
A breach must be recorded on the tablet by selecting the customer photo and pressing the "BREACH" button.
An excluded customer can only start using the venue once their exclusion period has expired and following the completion of a Self Exclusion Reinstatement. This is completed using the Smart Tablet EXCLUSION

App and must be followed by a 24 hour cooling-off period before the customer can play.

Please move on to the next lesson to look at the process of self exclusion in Merkur venues

YOU <u>MUST</u> UNDERSTAND THE PROCESS FOR YOUR VENUE/CLUB.

## **MERKUR Self Exclusion**

It is very important to follow procedure.

It's the LAW - Regulations have changed in recent years:

In April 2015 the length of time a Customer could self exclude for changed.
Up to 5th April 2015 Customers could exclude for a minimum of 6 months and a maximum of 5 years.
From 6th April 2015; Customers could exclude for a minimum of 6 months and a <u>maximum of 12 months.</u>
In April 2016 - the paperwork used for self exclusions and reviews changed due to the introduction of the Multi Operator Self-Exclusion Scheme (MOSES)
Once a reinstatement has been actioned the customer will need to wait for a 24-hour cooling off period before they can enter the venue.

0

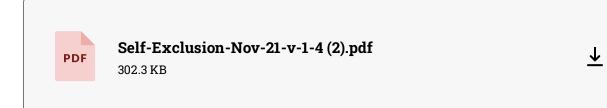
Please tick the boxes to confirm you have read both statements above. You cannot continue until you have done this.

New regulations were implemented by the Gambling Commission and as from 6th April 2016, all gaming operators have to be part of a Multi Operator Self-Exclusion Scheme, referred to as MOSES.

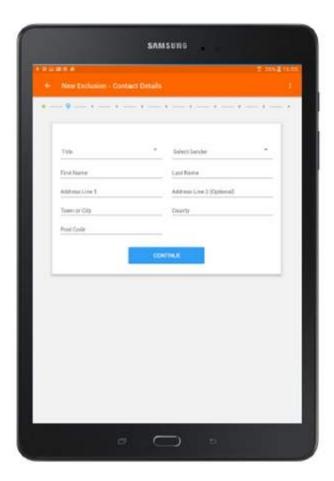
Please take your time and work through this lesson and the updated policy attached so you understand the changes.

Here's what you need to know:

The procedures for MERKUR are set out below - <u>please open and read</u> the attached policy and make sure you understand it. Ask your Manager if you have any questions.



#### What this means in practise:



SMART EXCLUSION TABLET

#### **Customers Wishing to Self Exclude now**

Customers who wish to self exclude should be excluded on the SMART EXCLUSION Tablet.

NB: A user guide on how to use the tablet can be found in knowledge base

#### **REMEMBER:**

If a customer requests to be self excluded, you must call the duty manager to carry out the self exclusion process.

Ask your manager to show you next time they complete one on the tablet. A user guide on how the tablet can be found in your venue/club. It is also available to view and download

in Knowledge Base.

# When a customer's self-exclusion period has expired they are required to go through a reinstatement before they can commence gambling.

## A customer reinstatement is actioned on the Smart Exclusion Tablet.

From the carousel you can click on an image and view in a larger format.

From here you can reinstate a customer.

## NB. YOU CAN ONLY REINSTATE IN THE VENUE THE CUSTOMER COMPLETED THE EXCLUSION.

The option will not appear if the customer excluded from another venue.



Click on image to enlarge

i	As this is a legal requirement; let's check you got all that information right:	

$\bigcirc$	4 months	
	6 months	
$\bigcirc$	12 months	
	SUBMIT	

What is the maximum length of time a customer can self exclude for since April 2016?

6 months

	12 months
	18 months
	SUBMIT
What do	oes MOSES stand for?
	Mandatory Operations Self-Exclusion Scheme
	Multi Operator Self-Exclusion Scheme
	SUBMIT

Understanding how to deal with self exclusion is very important. If you are unsure on what to do

## please ask your Manager to show you.

## **Self-Exclusion Procedure**



## Objective 2: Fair & Open

The company is required to operate a fair gaming operation. To achieve this there are complaints procedures which are well publicised, fair and effective.

The complaints procedure has an internal and an external element. We are also required to keep records of complaints and disputes in Casino, AGCS, FECS or Bingo premises and provide these records to the Gambling Commission annually and on request.

THE LAW STATES THAT ...

We must give full and unrestricted access to gambling premises and provide any information the Gambling Commission and/or local authorities requires about gambling facilities and activities.

IN OTHER WORDS ...

....Running an 'open' and transparent gambling operation.

To achieve this, each venue must give full and unrestricted access to:

**OUR GAMBLING PREMISES** 

ALL OUR GAMBLING DOCUMENTS

The three main objectives of the Gambling Act and how you can help to achieve them.

How to ask for proof of age documents and what to do if you need to refuse entry to under 18's.

What you can do if someone asks for help with their gambling.
What to do if you observe suspicious activity (covered in Objective ${\bf 3}$ - Crime Free)
What the rules of the gaming area are and where they are displayed.
Where the premises licence is displayed.

## **The Complaints Procedure**

The <u>law</u> requires us to have a clear Complaints Procedure.

# CUSTOMERS CAN ONLY REINSTATE IN THE VENUE WHERE THEY COMPLETED THEIR EXCLUSION



## **Complaints Procedure Process**

The Gambling Commission requires the Company to record all complaints through MERKUR Customer care that are specifically about Casino, AGC, FEC or Bingo operations.

If it is the case that the complaint cannot be resolved in the first instance; we operate a four stage complaints procedure.

Should a customer wish to complain about any aspect of the gaming operation, you should deal with it in the first instance

## COMPLAINTS & DISPUTES POLICY

At MERKUR, we aim to provide our customers with the very best in 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 and in the first instance will escalate to the Duty Manager to discuss with you.

If the Duty Manager is unable to resolve, 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.

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.







ENJOYABLY ENJOYABLY

AFFORDABLY



#### If you wish to contact us directly you can do so via:

The guickest way to do this is to visit our online Customer Care:



https://customercare.merkurcasinouk.com/

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

Alternatively, you can reach us:

In Writing:

**Customer Care**, **MERKUR Casino,** Seebeck House, 1A Seebeck Place, Knowlhill, Milton Keynes, MK5 8FR

 By Phone: 01908 351200 (please note our phones are not manned 24/7)

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). P.O.Box 62639, London EC3P 3AS.



PLAY SENSIBLY









#### 1st Stage; Deal with it Immediately

Make sure you follow the 8 stage process in the complaint handling training. It is important to listen attentively and acknowledge the impact to the customer. Any complaint resolved in venue must be documented on customer care and marked as resolved in venue.

#### 2nd Stage; Escalate

If you are unable to resolve the complaint you must explain the next stages to the customer and record the complaint on Customer care marking as unable to resolve for this to then be passed to the Area Manager. It is essential at this point that you obtain contact information for the customer to enter on to the system.

#### 3rd Stage; Operations Manager - Head Office

Should the customer be dissatisfied with the response from the Area Manager they are to inform the Operations Director and the customer that this has been escalated. The ticket on customer care will then be assigned to the Operations Director.

#### 4th Stage; Alternative Dispute Resolution

The decision of the Operations Director is final. Should the customer not be satisfied and their complaint is solely in relation to gambling then the Operations Director is to provide the customer with the details of our alternate dispute resolution services (ADR). At this stage the customer is to be provided with a deadlock letter signed by the Operations Director.

Our ADR provider is: 'Independent Betting Adjudication Services (IBAS)'

http://www.ibas-uk.com/

vviiatuoes	ADR mean?
	Alternative Dispute Resolution
$\bigcap$	Additional Dispute Resolution
	/ tautieria. Dispute resolution
	Another Dispute Received
	SUBMIT
At what Sta	age of the Complaints Process would we use ADR?
$\bigcirc$	1st stage

	3rd Stage
	4th/Final Stage
	SUBMIT
Who is our	chosen ADR Provider?
	BASS (Betting Adjudication Service System)
	IBAS (Independent Betting Adjudication Service)
	BASI (Betting Adjudication Services Independent)
	SUBMIT

## **Objective 3: Crime Free**

#### **Objective 3: Crime Free**

The Law states that: We must operate a crime free gambling business. This means that the business must also be free from disorder.

Crime and disorder can occur in a gaming operation in the form of cheating, fraud, theft, money laundering, abusive or aggressive customers as well as non gambling related crime such as drug taking, stolen goods, customer intimidation etc.

Crime and disorder is minimal in our venues. However, it is important that you are aware of the controls and procedures in place to help you, your colleagues, our customers and to keep the business safe.

# Crime can take place in many forms but in our business there are 2 ways which we should all be aware of:





**Theft and Fraud** 

**Money Laundering** 

## **Theft and Fraud**



All gaming operations are subject to fraud or theft at some point and your venue is no exception.

## WHAT TO DO IF SOMEONE IS ACTING SUSPICOUSLY:

Tick each box to show you have read and understood the point

For your own safety, NEVER approach a customer who is acting suspiciously unless you feel confident to do so.

Clean machines, check paperwork, or offer them refreshments - experience tells us that just by being in the
area, 90% of frauds are prevented from happening.
If you are confident that a fraud is taking place call your Duty
Manager, or ask them to leave. If a fraudster becomes
aggressive, or you are working alone and feel endangered,
then call the Police.
NB - such incidents should be recorded on on the Smart
NB - such incidents should be recorded on on the Smart  Tablet Incident App and an email circulated on the group

## **Money Laundering**

As a Company we have to comply with the Money Laundering Regulations 2007, to ensure we have processes to be adopted to avoid the possibility of money laundering in our premises.

The document explains new obligations which were imposed by the <a href="Proceeds of Crime Act 2002">Proceeds of Crime Act 2002</a> (the "POCA") and the Money Laundering Regulations 2007.

The document explains 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").

MERKUR is committed to ensuring all necessary safeguards are in place with regards to the receipt of money in our venues, in order to avoid it being used to launder money that may originate from the proceeds of crime.



## Money Laundering Policy Dec 21 V1.3.pdf



What does this mean to us in the venue?

With the ever increasing use of digital payment methods and the reduction of cash on the high street Gambling premises are often a target for Money Laundering.

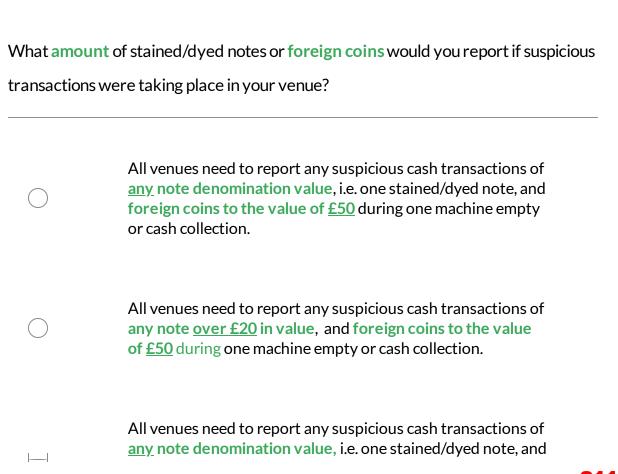
If suspected Money Laundering has taken place in a MERKUR venue, staff should record the incident on the Smart Tablet AML App.

When submitted a copy is automatically emailed to the Money Laundering Officer (MLO) for information purposes.

To answer the following questions correctly you will need to have read the Money Laundering Policy:

What does **POCA** stand for?

Proceeds of Cash Act  Proof of Crime Act  SUBMIT		Proceeds of Crime Act
		Proceeds of Cash Act
SUBMIT	$\bigcirc$	Proof of Crime Act
		SUBMIT



<b>foreign coins to the value of £100</b> during one machine empty or cash collection.
SUBMIT

	My Area Manager
$\bigcirc$	Mrs Amanda Kiernan
	Mr Mark Schertle

## The Compliance Folder

Every venue/club has a Compliance Folder which contains all the policies and procedures mentioned in this training. It is important you know where the folder is and are familiar with its contents.

Get the compliance folder and sort the following cards into the correct piles.

IN THE COMPLIANCE FOLDER OR ON THE IHL TABLET

**AML POLICY** 

LICENSING CONDITIONS
AND CODES OF PRACTICE
(LCCP)

DEALING WITH AGGRESSIVE CUSTOMERS

COMPLAINTS PROCEDURE & COMPLAINTS LEAFLET

## MARKETING AND PROMOTIONAL GUIDELINES

#### **SELF-EXCLUSION T&C's**

LOCAL AREA RISK ASSESSMENT (LARA)

NOT IN THE COMPLIANCE FOLDER

CONTRACTS

**HOLIDAY FORMS** 

MEMBERSHIP LEAFLETS

PROMOTIONS POSTCARDS

**EMPLOYEE HANDBOOK** 

HO CONTACT LIST

## **Around the Venue**

The Law and Regulations have an impact on how we present ourselves in the venue. It covers the following areas:

- Machine Standards/Point of Sale Stickers
- 2 Marketing & Promotions
- The Information Board

marketing-code-of-practice-2021.pdf
2.1 MB







MACHINE STANDARDS - AWP'S

#### MARKETING & PROMOTIONS

INFORMATION BOARD

We <u>MUST</u> follow the below standards to ensure our machines are fully compliant and presented in a consistent manner throughout all venues. <u>Please refer to the Machine Standards Document available in your venue or in knowledge base.</u>

#### The following notices/stickers are required by law on every AWP (amusement with prize) machine:

- No Under 18's to Play
- Gamble Responsibly (Gamcare UK Helpline)
- Minimum percentage payout
- Machine Category either B3, Category C/D, Legacy or Non Legacy

N.B.'Notices' refers to those that are already built into the machine 'Stickers' refers to those manually applied by us or machine supplier.



MACHINE STANDARDS - AWP'S

**MARKETING & PROMOTIONS** 

INFORMATION BOARD

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

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

We adopt the general principles that our advertising is:

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

More specifically (click to enlarge):



MACHINE STANDARDS - AWP'S

MARKETING & PROMOTIONS

INFORMATION BOARD

Every venue has an information board displaying our license to operate and age restriction information.

This is usually by the entrance.

Take a look at what is on the board in your venue.

If you are unsure about anything you see ask your Manager.



Which notices/stickers do we need on every machine?

## 4 which are:

- No Under 18's to Play
- Gamble Responsibly (Gamcare UK Helpline)
- Minimum percentage payout
- Machine Category either Legacy or Non Legacy (see below)

1 which is:  • No Under 18's to Play
<ul> <li>2 which are:</li> <li>No Under 18's to Play</li> <li>Gamble Responsibly (Gamcare UK Helpline)</li> </ul>
SUBMIT

What is BC	AP?
$\bigcirc$	Basic Cashino Advertising Practice
	Broadcast Committee of Advertising Practice
	SUBMIT

What is CA	p?
	Committee of Advertising Practice
	Cashinos Advertising Policy
	SUBMIT

# Quiz

Read each question and the answer options carefully.

When you complete the quiz your score will be shown. You can then get feedback on the questions and see which you got right and wrong (if any!).

Read any feedback carefully and follow the instructions of what to do.

Good luck!

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Which of the following form part of the Licensing Objectives?		
There are 2	2 correct answers	
	Maximise cost savings	
	Operate a crime free venue	
	Protection of Children and Vulnerable People	
	Ensuring promotions are carried out efficiently	

## 02/26

Having excluded for 12 months, a customer requests permission to re-enter the premises after 7 months. What do you do?		
	Welcome them without question	
	Say "I am sorry self exclusion periods cannot be altered" and politely ask them to leave and record on the "SmartHub"	
$\bigcirc$	Give them some free plays and see how they get on	

Say "I'll have to ask the Manager first"

## 03/26

If the company were unable to resolve a customer complaint or dispute, which external organisation would we refer the complaint or dispute to?		
	Gambling Commission	
	Independent Betting Adjudication Services (IBAS)	
	International Betting Association Services (IBAS)	

Compliance Director

You recognise that a regular customer's behaviour changes whilst playing a machine. This is a		
sign that th	ney may be having problem with gambling. What approach would you take?	
There are	3 correct answers	
	Ignore them and let them carry on playing	
	Try chatting to them and ask if they are OK and offer them a drink	
	Make your presence felt by cleaning the machines near them so you can keep an eye on their behaviour	
	If you are concerned about the customer's behaviour inform your Line Manager	

Which areas, by law, are restricted to over 18's?		
There are	2 correct answers	
	Bingo	
	Family Entertainment Centre (FEC)	
	Adult Gaming Centre (AGC)	
	All of these are restricted to over 18's	

During a machine empty you suspect money laundering has taken place in your venue. Which of			
	the following would you report?		
There are	e 3 correct answers		
	Dyed/Stained notes		
	Foreign Coins		
	Forged/Fake notes		
	I would not report anything		

## 07/26

Stage 4

As a company we operate a 4 stage complaints & disputes procedure. At what stage would the customer refer the complaint to the Alternative Dispute Resolution (ADR) provider?		
	Stage 1	
	Stage 2	
$\bigcirc$	Stage 3	

## 08/26

During a machine empty you find some dyed notes and foreign coins. What is the amount you would report on the Anti Money Laundering Form using the AML app at MERKUR Slots and MERKUR Bingo?

- \_\_\_\_\_£5
- \_\_\_\_\_£50
- £500
- £1000

What would you do if you suspected a known machine fraudster was in your venue?				
There are	There are 2 correct answers			
	Let them play the machines			
	Offer them a coffee			
	Call the Duty Manager			
	Ask them to leave if you feel confident to do so and if necessary, call the police			

What type of Licence is required to operate gaming premises?			
	An Operating Licence		
$\bigcirc$	A Drivers Licence		
$\bigcirc$	A Premises Licence		
	A Liquor Licence		

А	A		10	N /
-1	- 1	1 /	, ,	,,

Which proof of age documents are acceptable? (there's more than one answer) There are 4 correct answers		
	A European photographic driving licence	
	A UK paper driving licence	
	A passport	
	A PASS accredited proof of age scheme document	
	A Military ID card	

What is the maximum period of time a customer may self exclude from our venues?			
$\bigcirc$	12 months		
$\bigcirc$	18 months		
$\bigcirc$	36 months		
$\bigcirc$	5 years		

## 13/26

As a company we need to ensure all our advertising & marketing material is compliant and legal. This includes what we advertise on our TV screens, radio and marketing material for gambling facilities in our venues. Which 2 UK regulatory organisations are responsible for overseeing this function?

There are 2 correct answers

Broadcast Committee of Advertising Practice
British Compliance of Advertising Practice
Committee of Advertising Practice
Committee of Advisory Practice

Where would you see signage displayed in your venue/club stating the minimum age requirement (18)?		
	By the door	
	At the entrance to a venue/club and on each machine	
	Displayed on each machine and in the toilet	
	By the door, on the machines, in the toilet and on all promotional posters	

When might you refuse entry to a customer? There are 2 correct answers		
	When they are not clean shaven	
	When they are obviously under 18	
	When they look under 25 and have no proof of age documents with them	
	When they are over 65	

How would you identify a vulnerable person who you consider may have a problem with gambling? There are 3 correct answers		
	Someone who asks for help because they realise they may have a problem with gambling and are unable to control their habit	
	Someone who goes to the cash machine frequently for money and you have concerns on their level of spend	
	Someone who keeps on asking for coffee	
	Someone who looks agitated and show signs of mood swings, keeps swearing at their machine and banging the buttons aggressively with possible threats of violence to staff and other customers	

Which authorised persons are allowed to visit your premises unannounced at any time? There are 3 correct answers	
	A police constable/officer
	Gambling Commission Enforcement Officer
	Local Authority
	Building Inspector

What is the minimum period of time a customer may self exclude from our venues?		
$\bigcirc$	1 month	
	3 months	
	6 months	
	12 months	

What should you do if you suspect someone of being underage? There are 2 correct answers		
	Let them play and once they have played off their credits ask them to leave	
	If they have managed to actually play a machine, stop them from playing, ask for suitable ID and if no suitable ID is available return only the stake monies but no winnings and politely ask them to leave the site and log it on the tablet using the Age Verification App.	
	Offer them a drink and new membership	
	Challenge them on entry for suitable ID if they look under 25; if no suitable ID is available politely ask them to leave the site and log it on the tablet using the Age Verification App, telling them they are welcome to return when they have the correct ID	

When would you complete a Self Exclusion Reinstatement/Review Form? (either using the Smart Exclusion tablet or in paper format for any existing exclusions you have on file) There are 2 correct answers	
	At the beginning of the Self Exclusion period
	When the Self Exclusion period has expired
	Before the 24 hours cooling off period
	After the 24 hours cooling off period

You suspect a customer is underage and ask for proof of ID.  Where would you record the details?	
$\bigcirc$	Smart Hub - Customer Interaction App
$\bigcirc$	Smart Hub - Self-Exclusion App
$\bigcirc$	Smart Hub - in the Age Verification App
	Smart Hub - Incident Disputes and Complaints

What does the acronym POCA stand for when associated with money laundering activities?	
	Prevention Of Criminal Activity
$\bigcirc$	Proceeds Of Criminal Activity
	Proceeds Of Crime Act
$\bigcirc$	Police Official Crime Administrator

Name 3 of the stickers which are required to be displayed on AWP machines by law There are 3 correct answers	
	Machine category
	Percentage
	Gamble Responsibly
	Price of Play

Which regulatory body oversees gambling in the UK?	
	The Police
$\bigcirc$	The Gambling Commission
$\bigcirc$	The Local Council
	The National Lottery

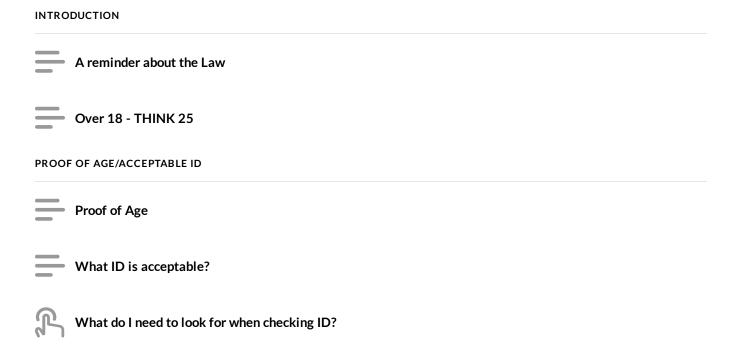
If a customer has a complaint regarding payouts or another unresolved issue, who should you report it to in the first instance?	
$\bigcirc$	A team member
$\bigcirc$	A key holder
	A Duty Manager
	Nobody

How often are staff required to refresh the Essentials of Compliance course and knowledge quiz?		
	Every 6 months	
	Every 3 months	
	Every 12 months	
	As often as they want to	





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



=	Spotting Fake ID	
INTER	ACTION - WHAT AND HOW FOR OUR EMPLOYEES	
=	What do I say and how do I say it?	
REFUSING ENTRY		
=	Refusing Entry	
7	End of Module Quiz	

## A reminder about the Law

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

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





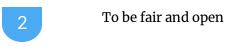
## **The Gambling Commission**

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

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

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

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



To be crime free

# Age Verification sits under Objective 1:

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

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



**Clear Signage** 

# **Machine Stickers/Signage**

Each machine should have clear signage showing the <u>age restrictions to play</u>

# **Clear Signage**

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

# **Point of Sale**

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

# Let's be clear:

No one Under 18 can enter the premises

# CONTINUE

# **Over 18 - THINK 25**

# MERKUR adopts a THINK 25 POLICY



# Staff Think 25 Badge

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

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

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

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

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

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



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

To abide by the law we

# MUST CHALLENGE ANYONE WHO LOOKS UNDER 25

CONTINUE

# **Proof of Age**

# Asking for Proof of Age

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

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

What is meant by proof of age?

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

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

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

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

**NO PROOF = NO PLAY** 

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

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

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

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

Only the following forms of ID are legally acceptable:

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

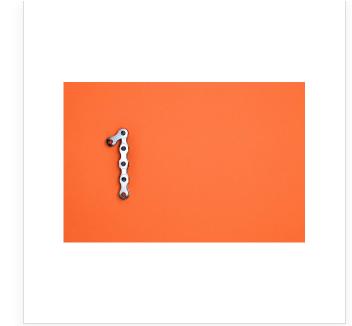


# What process should I follow when asking for ID?

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

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

# REMEMBER THESE POINTS:



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



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



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

# Would you ID these People?

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

Would you age verify this man?



O No

Yes

SUBMIT

Does this person look over 25?



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

SUBMIT

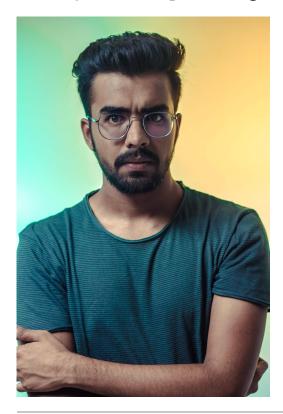
How old is this man?



- O I don't know
- 25
- 30

SUBMIT

# Would you ask for proof of age for this man?



- Yes
- O No

SUBMIT

# How did you do?

#### Remember we cannot tell how old someone is

If in doubt, ask for ID.

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

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

#### CONTINUE

# What ID is acceptable?

# What documents can I accept?

# What proof of age documents are acceptable?

Click on the cards below to reveal the information:



A Passport



A Military ID Card



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



A European Photocard Driving Licence

# What to look for when checking ID:

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

**CHECKING ID** 

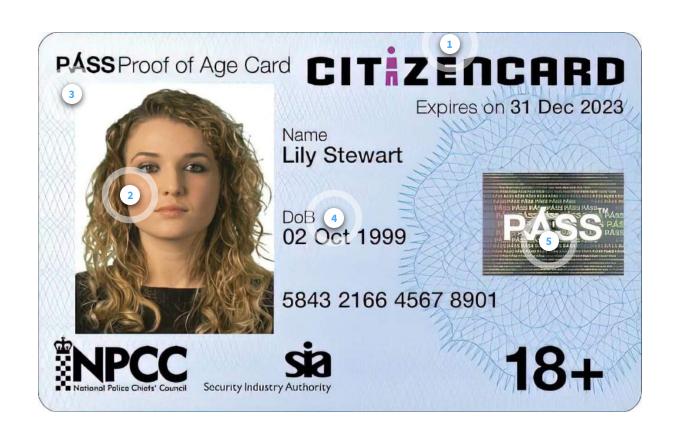
# What do I need to look for when checking ID?

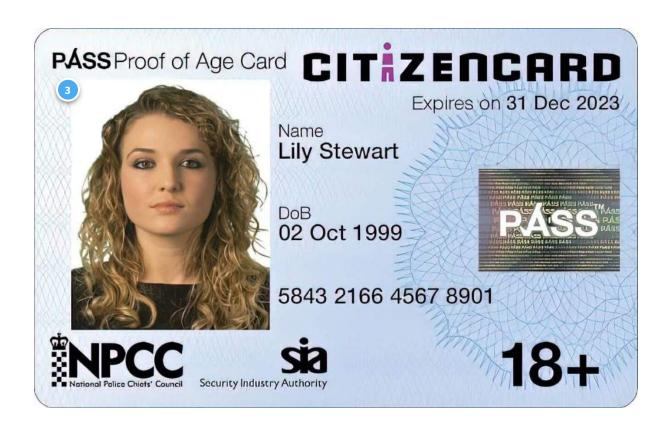
# There are several things you must check on the persons ID:

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

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

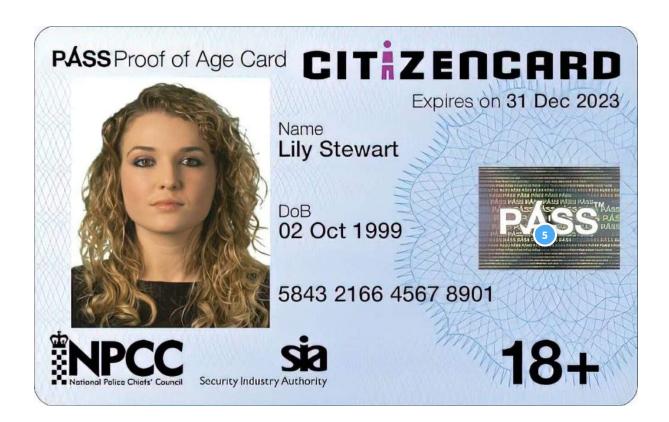
Click on the markers below on the PASS card to reveal what you should be looking out for when checking ID, to verify their proof of age.





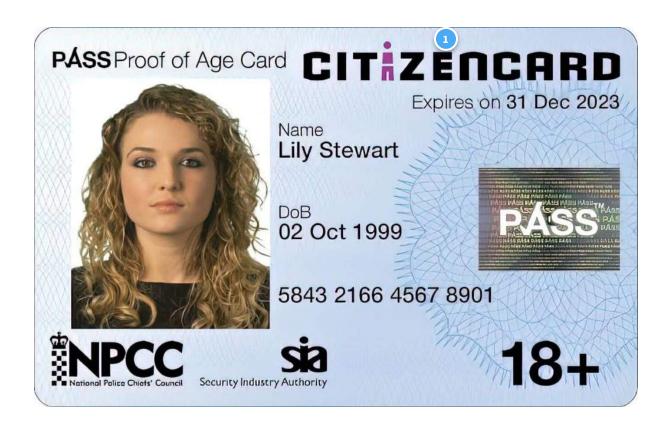
# Check the edges

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



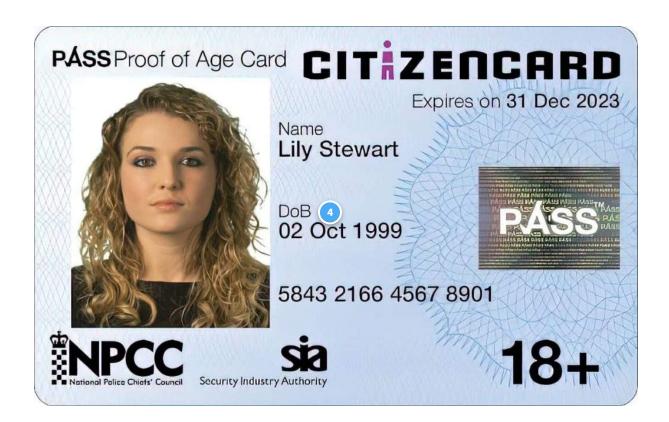
#### Hologram

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



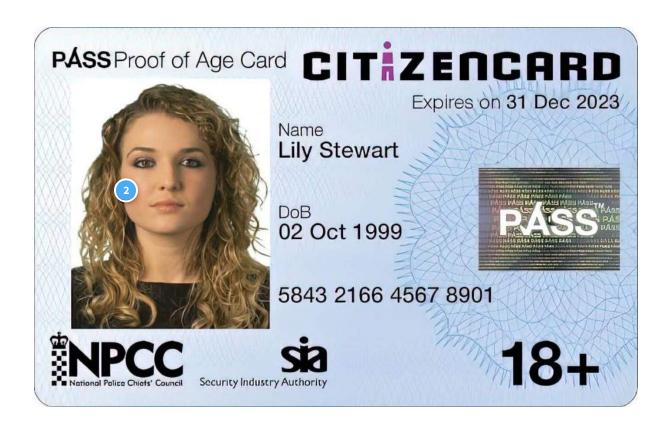
#### **Valid Document**

Ensure that the ID document is valid by checking it, feel that it is smooth with no ridges, that it has not been altered or tampered with and that it has not expired.



#### Date of Birth

Check that the date of birth shows the person is old enough to be in the AGC or Bingo premises



### **Photograph**

Make sure that the photograph is true likeness of the person attempting to enter the premises

#### CONTINUE

# **Spotting Fake ID**

The government have recently introduced guidance regarding checking ID. Although this new guidance is aimed primarily at the alcohol industry we can use it to learn about how to spot fake ID.

Below is the information from government about how to spot fake ID.

Click on each tab for full information:

TYPES OF FAKE ID	PASSPORTS	FAKE DRIVERS LICENCE	FAKE ID CARDS

## Types of Fake ID

Government guidance explains that there are five types of false document:

- A genuine document which is being used by someone else, e.g. a child using their older sibling's passport.
- A genuine document which has been altered, e.g. a driving licence with the date of birth scratched off.
- A genuine document which has been fraudulently obtained, e.g. a real passport that has been stolen and used by somebody else.
- A fake document which is a form of ID that does not exist, e.g. a provisional motorcycle licence.

The most common fake ID includes those that look like driving licences, such as national identification cards, European or international driving permits and provisional motorcycle licences.

TYPES OF FAKE ID

PASSPORTS

FAKE DRIVERS

LICENCE

FAKE ID CARDS

#### How to Spot a Fake Passport

The British government change UK passports slightly every 5 years to prevent the production of genuine-looking fake passports.

#### Authentic UK Passports Must:

- Be the right size (around 125 x 88mm).
- Passports issued after November 2015 have 34-pages.
- Passports issued before November 2015 should have 32pages (48 for a business book).
- Feature a digitally printed photograph with holographic overlay.
- Have a 9-digit number on page 1.
- Have a perforated serial number throughout the pages.
- Feature the holder's signature.

You may identify a fake passport by the following features:

- An invalid expiry date.
- Personal details that have been amended or tampered with.
- An incorrect number of pages for the time it was issued.
- A photograph that isn't digitally printed.
- No holograms or perforations.
- No passport chip.
- Words, signatures or pictures in the wrong places.

There are slight differences between older & newer passports. Differences include:

- The number of pages.
- The page designs.
- The presence of a chip: passports issued after 2010 have a chip in the cover of the passport whereas older passports have the chip located on page 32.

TYPES OF FAKE ID PASSPORTS

FAKE DRIVERS
LICENCE

FAKE ID CARDS

#### How to Spot a Fake Driving Licence

You may identify a fake driving licence by the following features:

- An incorrect flag image.
- The wrong words across the top, e.g. 'National Identification' or 'International Driving Permit'.
- Different languages.
- A plain or simple-patterned background.
- A photograph in the wrong place.
- No signature/an incorrect signature.
- Fake holograms.
- Information in the wrong places.
  Driving licences are designed to be difficult to
  forge and possess many features that are hard
  to copy.

#### Authentic UK Driving Licences Must Have:

- A first name, surname, date and place of birth.
- A date of licence issue, photo expiry and issuing authority.
- A driver number.
- A valid photograph (black and white on newer photocards).
- The holder's signature.
- The holder's address.
- Entitlement categories.
- A hologram of a steering wheel over the person's photograph which 'turns' as you move the card.
- Further holographic images on the front.

TYPES OF FAKE ID	PASSPORTS	FAKE DRIVERS LICENCE	FAKE ID CARDS
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#### How to Spot a Fake ID Card

You may identify a fake PASS Card by the following features:

- A hologram that is stuck on top of the plastic, rather than being smooth.
- An artificial looking hologram in appearance.
- A photograph that is stuck on top of the plastic.
- A photograph that doesn't match the person presenting the ID.
- An incorrect date of birth.
- Details that have been altered or tampered with.
- A non-smooth surface.

#### Authentic UK PASS Cards Must Have:

- A 3D hologram with the characteristic 'A' in the lettering.
- A photograph that matches the person.
- A valid date of birth you can calculate the person's age from their DOB or look for the '18+' symbol on the card.
- A flat, smooth surface.

# If you suspect fake ID try these questions:

- Ask for another form of ID, such as a bank or student card. If someone steals or borrows another person's ID, they are unlikely to take other forms and their purse/wallet will have their own ID in it.
- Ask the person for their star sign a person may have memorised the date of birth on the ID which they are using but are unlikely to know the corresponding star sign.
- Ask the person for their date of birth this can lead to them mixing their own with the one on the ID or not being able to recite the date on the ID on the spot.

4

Ask for the postcode on the ID; a person using borrowed ID may know the first line of the address but may have difficulty remembering the postcode under pressure

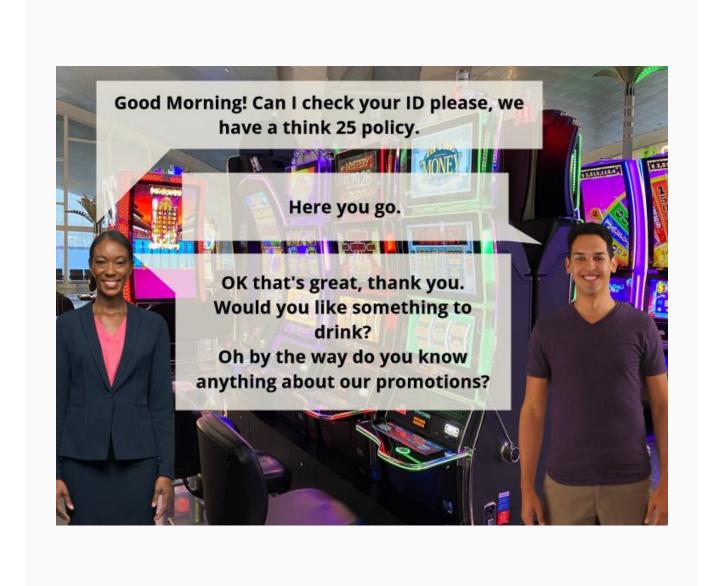
# CONTINUE

# What do I say and how do I say it?

What should I say and how should I say it?

# What do I need to say when asking for ID?

Let's look at some examples of what may happen when you ask for I.D. It is important you know what to say and how to say it so you are confident to act immediately if someone who looks under 25 enters the premises



Sylvia was produced with sufficient I.D. by Javier; therefore she was within the law to allow him into the premises.

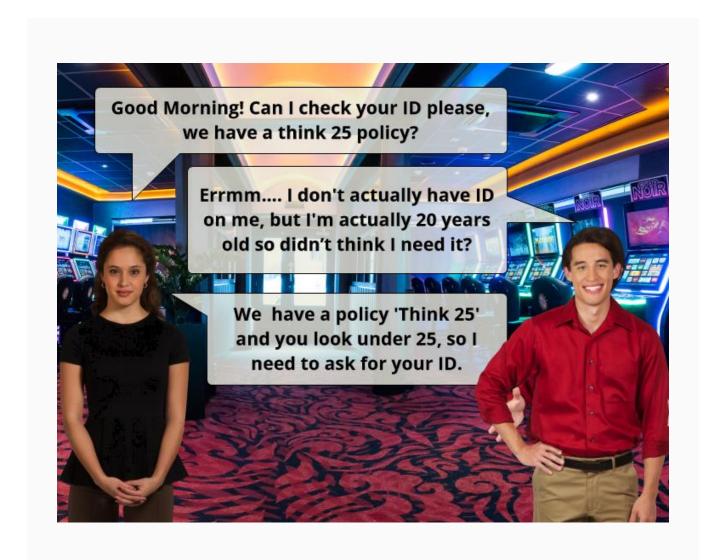
Remember to remain calm, professional and polite but be clear that we have to check age and need a photo ID.

A refusal is the law. A polite refusal and explanation is good customer service.

### So what happens if the customer has no ID?

If the customer does not present you with any ID to confirm their proof of age.

Refusal is the law. A polite refusal and explanation is good customer service.



## The ID is valid but it doesn't look like the person

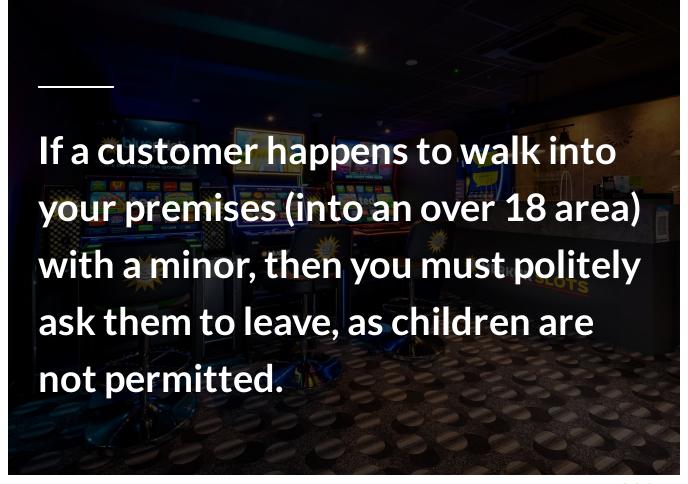
Its important that the photo is a true likeness; if we don't check this then the ID might be valid but it probably doesn't belong to the person trying to gain entry.

#### CONTINUE

# What do you do if an adult brings in a child to your venue/club?

If a customer happens to walk into your premises (into an over 18 area) with a minor, then you must politely ask them to leave, as children are not permitted.

Customers can innocently enter the venue/club as they have seen a friend/relative they want to say 'hello' to or wanted to pop in an application form, as they have seen a job advert in the window. In either case, you <u>do need</u> to ask the adult to leave, as children are not permitted into over 18 areas.





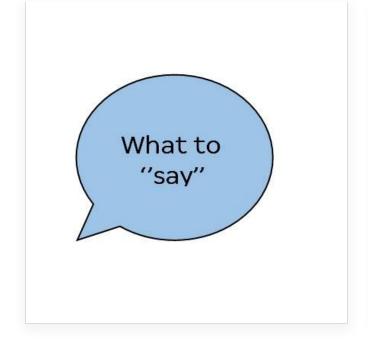
Asking for ID, checking it and staying calm, polite and professional is part of your job role.

If we do have to ask a customer to leave, we want them to come back with ID so focus on Customer Service at all times

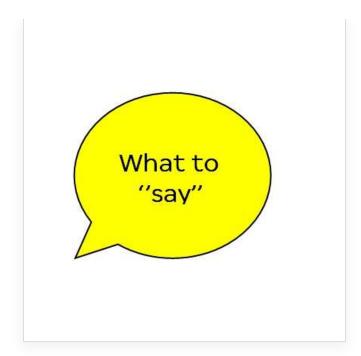
Here are some words/phrases you can use in your conversations:



"Please see the notice, we operate a Think 25 policy".



"I'm sorry, if I let you play on the machines I will be breaking the law"



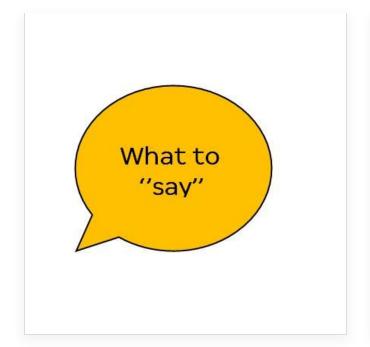
"The law requires me to ask for proof of age".



"If you don't have ID I will have to ask you to leave; it is the law".



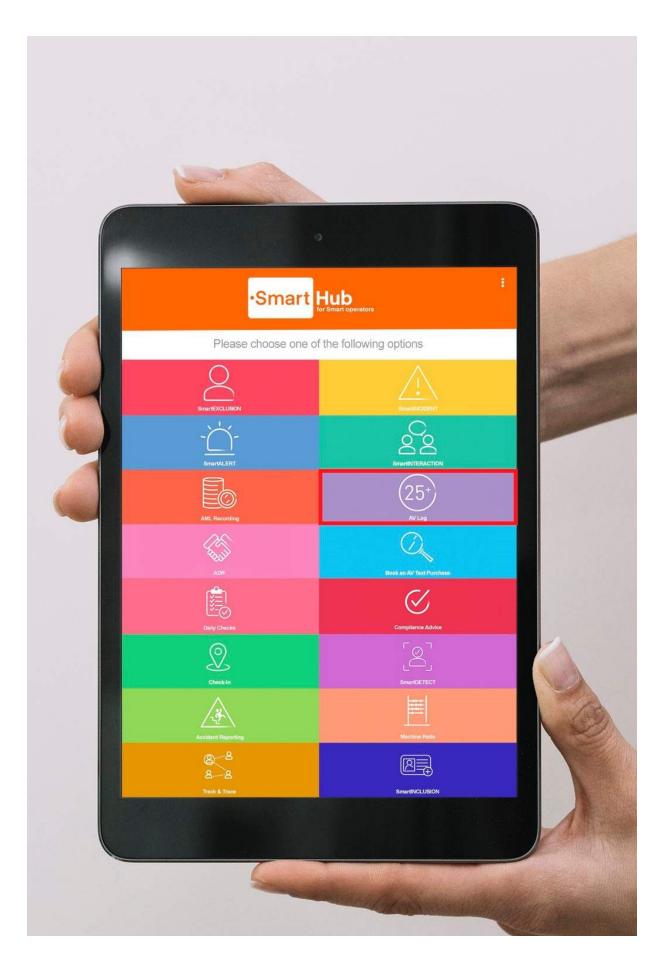
"If you want to go and get suitable ID then I can let you play but I can't let you play without it".



"The company has a policy of no proof of age, no play"

It is your responsibility to apply the Think 25 policy to all customers that look under 25 years old, but it is also your

# responsibility to ask for it in a polite, friendly and professional manner.



#### **Record Age Verification Interaction**

All Age verification checks must be recorded on the Smart Tablet AV Log

To evidence compliance with the LCCP requirements to prevent underage gambling, Gambling Operators must implement age verification test purchasing.

These test purchases must be conducted by an independent Age Verification Test provider. This test purchases must be unannounced and conducted at different times of the day (morning, afternoon, and evening) and at different times of the year.

For reporting purposes the Gambling Commission expects, test purchase results should be recorded as 'challenge before gambling activity', 'challenge during gambling activity', 'challenge after gambling activity', or 'unchallenged'

- the definition of a 'challenge before gambling activity' includes any challenges conducted at the entrance to a premises; noting that it is illegal for a child or young person to enter most types of gambling premises. In an FEC, this could be a challenge before or at the point that the tester attempts to enter the Category C gaming machine area
- where a premises fails a test purchase visit, we expect the premises staff to be informed of the result and for retesting to be carried out. We expect the retest to be conducted as soon as practicable after remedial action has been taken and no longer than three months after the failed test

If a venue fails an Age Verification test purchase the Area Manager will be informed and asked to investigate the reason for the fail.

#### CONTINUE

# **Refusing Entry**



### The key reasons to refuse entry are:

The customer looks younger than 25
Cannot produce valid photo ID
The ID presented is not an acceptable format (e.g. a birth certificate)
The ID document appears fraudulent or has been tampered with
ID's photo doesn't match with the person trying to gain entry

Whatever the circumstances you must remain polite, friendly and professional.

If your refusal is said in the wrong tone, sounds rude, confrontational or aggressive, then the customer may not respond how you expect.

What should you do if the customer is uncooperative?



#### **Angry Customer**

If the customer continues to be uncooperative or you are in any doubt call your Duty Manager. If you are working alone and feel in danger then you should use the Staffguard system for support.

What happens if an underage person actually plays on the machines?

It is illegal for anyone under 18 to play machines or to gain from illegal gambling. This means that if an under age customer has not been asked for ID and has started to play the machines, they must be **stopped immediately** and given their stake (the money they have put into the machine) back, excluding any winnings.

#### What to do?

If you discover either of these incidents have happened, you must call for a member of management immediately or if you are working alone, then you must deal with it. The under age customer must have their money refunded. This type of incident must be recorded on the IHL Tablet using the Age Verification App 'child or underage person playing the machines'.



i

If you do not stop an underage person from playing YOU will be breaking the law!

All potential underage entries should be challenged.

Every challenge/request interaction for ID, MUST be recorded on the IHL Tablet using the Age Verification App.

CONTINUE

# **End of Module Quiz**

To conclude this module and to understand what you have learnt, you will need to complete the following quiz.

You must have a 100% pass mark to finish the course and all results will be recorded.

If you fail the quiz, you can either retake the quiz by clicking 'Take Again', or you can exit the course, by clicking 'Exit Course' in the top right hand corner of the results screen, to retake the quiz at another time.

Please note: Do not close the course via your browser, as your score may not be recorded.

Good Luck!

#### Question

#### 01/09

What do you do if a person who looks under 25 wants to come in and use the ATM machine?

- You politely ask them for ID and refuse entry if they are under 18.
- You let them in regardless, as they only need to use the ATM.

#### 02/09

What must you do if an underage person is actually playing on the machines?

- Stop them immediately and ask to leave. Then log on the IHL Tablet using the Age Verification App.
- Pretend I haven't noticed
- Stop them immediately, and give them back their stake money, excluding any winnings. Then log it in on the IHL Tablet using the Age Verification App

#### Question

#### 03/09

At what age are people allowed into the adult gaming area?		
	25 years or over	
	21 years or over	
	18 years or over	

#### 04/09

What do you do if the customer is unable to provide you with ID?

- Let them in anyway, as you know they have the potential to spend a lot of money.
- Ask them to leave and not to return ever again.
- Politely ask them to leave, explaining that we operate a Think 25 policy and without proof of age, they are unable to enter our premises.

#### Question

#### 05/09

Are babies and small children allowed into our venues/clubs if their parents are playing on the machines?

O No

Yes

#### 06/09

## What ID / Proof of age are acceptable?

- A Pass accredited proof of age scheme
  A birth certificate
  A driving licence
  A passport
- A passport
  A European Photocard licence
  A Pass accredited proof of age scheme
  A military ID card
- A passport
  A student card
  A military ID card
  A Pass accredited proof of age scheme

#### Question

#### 07/09

When checking ID, what are the 4 areas you are looking for?

- O Date of birth/ Photograph/ ID is authentic/ Hologram
- O Date of birth/ Place of birth/ Photograph/ ID is authentic
- O Date of birth/ Hologram/ Not fake

#### 08/09

What **must** you do when you have asked someone for their ID?

- Log details on the IHL Tablet using the Age Verification App
- On Nothing, if they have proved they are over 25
- Add the details in the Premises Log: Log C

#### Question

#### 09/09

What age policy do we operate?

- Think 21
- Think 25
- O Think 18

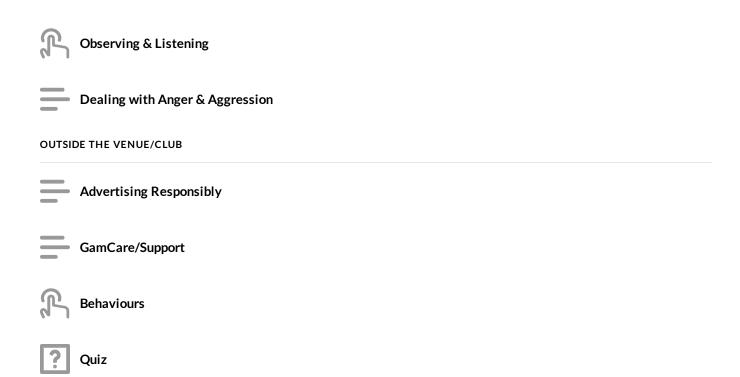


Our suite of Compliance training seeks to ensure you understand the Gambling Act and its 3 main objectives and that you follow the businesses defined processes to ensure we operate within the law.

Within the Gambling Act we have a duty to protect children and vulnerable people. Safeguarding is the responsibility of everyone in our business and this session explains why its so important and how you can play your part.

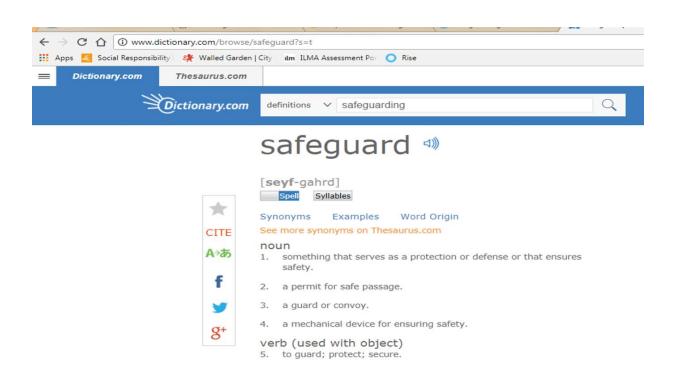
To get started click on the first lesson below:

SAFEGUARDING AND RESPONSIBLE GAMING		
=	What is Safeguarding?	
=	Children	
=	Vulnerable People	
=	The Stages of Change	
TAKING ACTION		
=	Taking Action	



# What is Safeguarding?

Safeguarding is a term usually associated with children; it makes us think about the protection of children, social services, abuse and the mistreatment of children. As a socially responsible operator, MERKUR and its operating businesses take a different view on Safeguarding and what it means:



# CLICK TO ENLARGE IMAGE/READ THE DEFINITION OF SAFEGUARDING

# The term actually means:

# something that serves as a protection or defence or that ensures safety

For most of our customers, gambling is an enjoyable hobby and a social event, however; we must be aware of players that may become addicted to gambling.

When a Customer's gaming changes from enjoyment/social to a problem or addiction we MUST safeguard. Safeguarding is very much an action required within our business.

#### **KEY POINTS:**

The Commission's investigation found:

1

Due to a technical failure in 888's systems, over 7,000 customers who had chosen to self-exclude(1) from their casino/poker/sport platform were still able to access their accounts on their bingo platform. The issue went undetected for a prolonged period of time, meaning customers were able to deposit £3.5million into their accounts, and then continue to gamble, for over 13 months.

While 888 did have self-exclusion procedures in place, they were not robust enough and failed to protect potentially vulnerable customers.

2

888 also failed to recognise visible signs problem gambling behaviour displayed by an individual customer, which was so significant that it resulted in criminal activity. The customer staked over £1.3million, including £55k stolen from their employer. During a 13 month period the customer placed a large number of bets, gambling on average 3-4 hours a day. The lack of interaction with the customer, given the frequency, duration and sums of money involved in the gambling, raised serious concerns about 888's safeguarding of customers at-risk of gambling harm

> It is <u>every</u> <u>employees</u> <u>responsibility</u> to recognise the visible signs

# Licensing objectives









 To protect children and other vulnerable people.



Safeguarding in our business is about the 3rd licensing objective PROTECT = SAFEGUARD

The Gambling Commission puts a high priority on the social responsibilities operators have to protect children and vulnerable adults from the harm associated with gambling and policies must be in place to support the protection of these people.

This means as a business have to manage the risks and be socially responsible.

#### We should:

- Train staff on how to recognise and respond to indicators of concern
- Train staff to know how to protect their own safety if customers behave aggressively
- Make information and advice about gambling responsibly generally and discretely available, and provide contact details about where to get help

- Interact with customers to spot warning signs of a problem
- Explain Setting Your Limits to set time limit or deposit limit
- If the customer opts to self exclude make sure you provide the right information and follow the process for self exclusion (detailed in Compliance training)
- Encourage customers to register or become members so we have a point of contact
  - This online session is designed to help you understand our responsibilities in terms of safeguarding our Customers. It looks at the potential signs of problem gambling and how we can interact with customers to intervene and support their choices.

Please complete this training module yourself and ask if you do not understand any of the information.

## Children

The protection of children is vitally important to us as a business. We have a separate and detailed training module dedicated to this area (Age Verification) as well as the Essentials of Compliance training.

Research undertaken on behalf of the Gambling Commission in 2022 has shown the following figures for children aged 11-16 accessing gambling:

78%	Percentage of young people who spent their own money gambling in the last 12 months, did so because they regard it as a fun thing to do.
50%	Percentage of young people have had any gambling experience in 12 months with <u>over a third</u> (35%) playing on arcade gaming machines.
31%	Percentage of 11- to 16-year-olds spent their own money on any gambling activity in the twelve months prior to taking part in the survey.  During that period, the most common types of gambling activity that young people spent their own money on were legal or did not feature age restricted products, namely:  22 % playing arcade gaming machines such as penny pusher or claw grab machines  15% placing a bet for money between friends or family  5% playing cards with friends or family for money
28%	Three in ten young people had seen family members they live with gamble, of which 7 percent indicated it had resulted in arguments or tension at home.
10%	One in ten young people said that their own experience of gambling had led them to talk to their parents about how they felt, either sometimes, often, or all of the time
0.9%	This figure has increased from 0.4% since 2016 of 11–16-year-olds that are defined as problem gamblers

Source: research project undertake for the Gambling Commission

NB: The study included 11 - 16-year-olds and from a representation of 2559 pupils using the Ipsos Young People Omnibus.

# What are the risks to children of being exposed to Gambling?

The risks vary, depending on the type of gambling activities taking place at the premises.

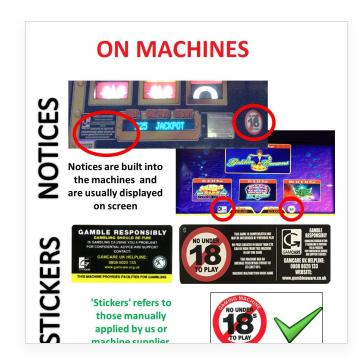
For example: in MERKUR, safeguarding systems (such as Think 25) should be in place to prevent young people gaining access to the premises.



The Challenge 25 scheme MUST
be operated by ALL staff and only
recognised proof of age accepted
(for example photo driving licence
or passport; PASS cards)



Signage MUST BE prominently displayed at all points of entry regarding the prohibition of under 18's



Signage MUST BE displayed on machines highlighting age restrictions

If children are permitted access to adult gaming activities, they may be at risk of being:



Exposed to information or advertisements encouraging them to gamble



Allowed or invited to gamble or bet in a commercial setting



Allowed to purchase and consume alcohol (Bingo & Casino)



Be financially exploited

We must ALL operate systems to ensure that under 18's are prevented from access to areas where adult activities (such as betting or high stakes gambling) take place; or where adult gaming machines are located.

REMEMBER: if in doubt, <u>ask for</u>
I.D.

# Make sure you complete our Age verification course for more on our age policies and how to check I.D.

# If you work in one of our FEC's it is even more important that you are vigilant:

FECs are commonly located at seaside resorts, in airports and at motorway service stations, and cater for families, including unaccompanied children and young persons.

Children and young persons are permitted to enter an FEC and may use category D machines. They are not permitted to use category C machines and it is a requirement that there must be clear segregation between the two types of machine, so that under-18s do not have access to them.

Social Responsibility (SR) code 3.2.5(3) in the Licence conditions and codes of practice (LCCP) it states that 'licensees must ensure that their policies and procedures take account of the structure and layout

The Gambling Regulations requires operators to ensure that employees prevent access and challenge children or young persons who attempt to use category C machines.

Over-18 areas within FECs that admit under-18s, must be separated by a barrier with prominently displayed notices at the entrance stating that under-18s are not allowed in that area and with adequate supervision in place to ensure that children and young persons are not able to access these areas or the category C machines. Supervision may be done either by placing the terminals within the line of sight of an official of the operator or via monitored CCTV.

of their gambling premises' in order to prevent underage gambling.

Safeguarding is not just about children; as we have already seen we need to safeguard vulnerable adults too.

Let's look at this next!

#### CONTINUE

# **Vulnerable People**

The **Gambling Commission** puts a high priority on the social responsibilities operators have to **protect** vulnerable adults from the harm associated with gambling and policies must be in place to support the protection of vulnerable adults.



Which one is a vulnerable adult?





# Which person is at Risk?

- \_\_\_\_\_A
- В
- O C

D
I don't know
SUBMIT

#### CONTINUE

It's not possible to tell who is at risk by looking at them. Most customers are in control and enjoy the social element of gambling

Safeguarding means we have to look a little deeper and think about those at risk of developing a problem.

It's about the signs and signals we see and hear whilst our customers are in our premises.

Social responsibility/Safeguarding is about using your eyes and ears to understand who is vulnerable.

Click on the + signs to understand more about those people at risk:

Risks Factors: Developing a problem \_\_

These are the situations that increase players risks of developing a problem (click to enlarge)

#### Risk Factors for Developing a Gambling Problem

These risk factors can contribute to the development of gambling problems or make it more difficult to stop. People are more at risk if they:

- ➤ Have an early big win (leading to false expectation of future wins)
- Have easy access to their preferred form of gambling
- Hold mistaken beliefs about the odds of winning
- Do not take steps to monitor gambling wins and losses
- > Often feel bored or lonely, or have a history of risk-taking or impulsive behaviour
- Have financial problems
- ➤ Have few interests or hobbies, or feel their lives lack direction
- > Have a history of mental health problems, particularly depression and anxiety
- > Have a parent who also has (or has had) problems with gambling
- Have (or have had) problems with alcohol or other drugs, gambling or overspending
- > Tie their self-esteem to gambling wins or losses.

The more factors that apply, the more likely a person is to develop a gambling problem.

<b>Risk Factor</b>	s Imnact	
KISK FACIOI	5. IIIIpaci	

If we don't take our social responsibilities seriously; vulnerable adults are at risk in many ways including (click to enlarge):

#### Managing The Risks \_\_

As a business we undertake to minimise the risks in the following ways (click to enlarge):

#### We need to:

- ✓ Have trained staff able to recognise and respond to indicators of concern
  - This course along with the other compliance courses
- ✓ Staff know how to protect their own safety if customers behave aggressively
  - This course
- ✓ Make information and advice about gambling responsibly generally and discreetely available, and provide contact details about where to get help
  - > Use the Gam Care contact information and staying in Control leaflets
- ✓ Explain the Setting your Limits to help set a time limit/ deposit limit
  - > Explain Setting your Limits to help control time spent playing
- ✓ If the customer opts to self exclude make sure you provide the right information and follow the process for self exclusion
  - > Follow the process and steps for MERKUR this is fully detailed in your compliance training module
- ✓ Encourage customers to register or become members so we have a point of contact
  - > Although membership is not compulsory it should be encouraged and discussed with all customers

Some of the signs may be more obvious to loved ones at home <u>but</u> we should be aware

# of these signs when interacting with our customers; observe and listen for these indicators

(tick each box to show you have read each of the common signs of a problem with gambling):

Spending more money and time on gambling than they can afford.
Losing interest in usual activities or hobbies like going out with friends or spending time with family.
Always thinking or talking about gambling.
Chasing losses or gambling to get out of financial trouble.
Gambling until all of their money is gone.
Needing to gamble with larger amounts of money or for a longer time to get the same feeling of excitement or buzz.
Feeling anxious, worried, guilty, depressed or irritable.
Neglecting other responsibilities (work, family, chores) in order to gamble
Having arguments with family or friends about money and gambling.

#### CONTINUE

There are warning indicators that show when someone is moving from having fun and responsible gambling to becoming more of an issue or problem.

Click play below for more info:

## What is problem gambling?

When playing for fun moves across to playing for need, it could be a problem.





# **ANYONE WHO HAS....**

#### CONTINUE

# **ANYONE WHO HAS....**

EASY ACCESS TO PREFERRED GAMBLING ACTIVITY FALSE BELIEFS
ABOUT THE ODDS OR
CHANCES OF
WINNING

HAD CHILDHOOD EXPOSURE TO GAMBLING

HAD A BIG WIN AND NOW HAS FALSE EXPECTATIONS OF FUTURE CHANCES A BELIEF THEY HAVE A SYSTEM TO BE ABLE TO 'BEAT THE ODDS' EXPERIENCE OF MENTAL HEALTH PROBLEMS

OR ANYONE WHO IS LOSING CONTROL

# The Stages of Change

Gambling becomes a problem when people are not in control. Staying in control is vitally important and is the ethos we at MERKUR Slots, MERKUR Bingo, MERKUR Casino all work to.

When someone starts to change their gambling behaviour, there are often different stages of awareness that they move through. These include:

Stage 1 – No problem

If customers are in this stage the positives of gambling outweigh the negatives. They enjoy gambling and don't see it as a problem.



Stage 2 - Awareness

People at this stage feel ambivalent ( having mixed feelings) about their gambling.

Often they enjoy it, even though they know that it costs time and money. If they are in this stage they might be thinking about or considering making a change, like cutting down, limiting spend or restricting time spent gambling.



Stage 3 - Wanting to Make a Change

People in this stage feel ready to control their gambling and have made the decision to do something about it. Additionally, they have scheduled a time in the very near future in which to start making changes.



Stage 4 - Take Action

People in this stage say things like - "I am doing something to change my behaviour".

They might try various things such as setting limits on their time and/or deposits

Our support is important at this time as they may be experiencing different emotions as they reflect on the consequences of their gambling.

Stage 5 - Sticking to it \_

Maintaining change - This stage can be hard. It is when people have identified all the things they need to do to change their behaviour and they have started to put these things into practice.

You know the customers best so your personal support is invaluable too.

Setting Limits is one of the ways MERKUR supports our customers

Customers can choose to set their own limits on any Blueprint B3 machine by choosing the set limits option at the bottom left-hand side of the menu.



Stage 6 - Final Stage - Self Exclusion

The final stage of stopping gambling is if the customer decides they need an external intervention to stop them gambling. When a customer reaches this decision we should fully support them.

This is where MERKUR offer a self exclusion option for Customers.

For full details of self exclusion in Merkur Slots, Merkur Casino and Merkur Bingo, please ensure you have completed the Compliance Training and understand our policies and processes and can facilitate the customers choice. Make sure they are aware of the minimum/maximum time they can self-exclude for.

Often the person who's gambling doesn't think that he or she has a problem; they don't see the subtle changes. Sometimes YOU will spot the problem first, because the customer might be convincing him/herself that everything is fine when really it isn't. It's important to use positive communication rather than

being confrontational or critical. It's also important to be genuine and talk to the customer in a natural way.

#### For example:



"I can see you're not happy at the moment - I want to help."



"I sense you're getting frustrated – shall we take time out and have a cuppa and a chat"



"You've been in more often this week - is everything OK?"

Once you've started the conversation, listen carefully to what they have to say in response and be patient. Don't jump in or cut them off mid sentence, as this might drive them back into their shell or make them turn defensive. Being calm and caring is really important as is knowing what advice and support we can offer

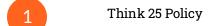
Ultimately we as a business have a responsibility to take action to safeguard vulnerable people so let's move to the next section and look at this next.

Click the button to move to the next section of this training module

TAKE ACTION

# **Taking Action**

As a business we have several processes and tools in place to ensure we are promoting responsible gambling. These include:



- 2 Setting your Limits
- Gamcare Information and Leaflets
- Complaints Procedure and ADR (Alternative Dispute Resolution)
- Responsible advertising
- 6 Self Exclusion Policy and Process
- and most importantly YOU; OUR EMPLOYEES

These processes and interventions only work if our employees know and understand them and to ensure you do we have the following training modules which refresh every 6 months to keep you up to date and trained to the latest standards









#### Your role

As we have seen your best tools are your eyes and ears, but observing people and listening for clues to gain insight takes practice; so lets take a look at this next:

#### Observing & Listening Tips

CLICK ON THE BUTTON FOR MORE INFORMATION ON WHAT YOU CAN DO TO BE SOCIALLY RESPONSIBLE AND SAFEGUARD OUR CUSTOMERS

OBSERVE/LISTEN

# **Observing & Listening**

In this section we will take you through a series of tips and ideas to improve your listening and observation skills



## Interact

In order to gain insight into our customers we must interact.

This means approaching and talking to our customers as well as observing their behaviours.



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In order to gain insight into our customers we must interact.

This means approaching and talking to our customers as well as observing their behaviours.



#### **Understand habits**

Start by getting a baseline understanding. A common way to get this is by simply observing a person's habits over time. For example how often, and when, do they come in?

Knowing this pattern will help you identify when it changes and you can ask about the behaviour change

This will help identify when gambling maybe developing from a social event to more of a problem



## **Ask Questions**

A seemingly innocent question such as "How are you doing today?" is a way to gauge peoples emotional state and sets you up to probe their answers if you are concerned.

If people are 'fed up' or 'tired' or 'bored' - or if they label any feeling or emotion - ask them WHY?



## Listen with your eyes and ears

Look for inconsistencies between the person's gestures and words. If they are saying all is fine and well but they are slouched, look tired or seem angry - there may be something bothering them.

- If someone closes their eyes for a moment (longer than a simple blink), takes the time to clear their throat, or asks you to repeat a question, they're probably stalling reflect on why.
- A lack of eye contact, or excessive blinking or fidgeting are signs that a person may be lying and are also signs of anxiety

Keep an eye on their gaming and remember to offer refreshments and break play



# **Spot Stress and Break Play**

It's important to identify when people in our premises are getting stressed. Look for the following indicators and always attempt to break play:

- When a person leans with their torso away from you, this can mean that the person is going through a
  moment of stress
- Gestures such as the touch to the forehead or the rubbing of palms against thighs are indicators of stress too
- Facial clues of distress and discomfort include the furrowing of the brow, clenching of jaws, lip compression, or the tightening of face and neck muscles
- Touching the notch in the front-middle of the neck can mean that the person is trying to protect
  themselves suggesting discomfort, especially in women. Similarly, men usually stroke their necks,
  which is an attempt to lower heart rate
- A long, audible exhale known as a cathartic exhale means that the person is under severe emotional distress



## **Getting Angry?**

Customers getting agitated and angry is easy to spot and is a sure sign they need to break play. But before the real shouting begins; what signs can you spot early to stop it escalating? Look out for:

- Pupil constriction and squinting at the machines this can mean that a person is bothered by what they're seeing
- Clenching the jaws or grinding teeth
- Balled up hands or fists
- Shaking or trembling whilst playing at the machines
- Speech becoming more rapid or high-pitched.
- Head thrust forward
- 'Eye-balling' (staring in anger) at other customers, employees or the machines



# **Handling Stress and Emotion in Customers**

Sometimes we can see the signs but are not surehow to handle them. The next section will look at dealing with angry or agitated customers.



#### PRACTISE AND DO IT!

Learning how to read people must occur over time - a quick training course won't be an instant solution! It is a behaviour that comes from YOU.

It takes practice and intent. You have to know what to look for and understand what certain gestures mean in order to stay socially responsible.

Keep in mind, there's no single surefire way to tell what someone is thinking but the best start is to take time to simply be present, observe, ask questions and listen - to the words and the body language.

# Dealing with Anger & Aggression

It is true that when Customers start to lose control of their gambling they may become agitated or upset and get angry and perhaps become confrontational; remember - this is a sign of a problem and rather than ignore it we have to deal with the situation and help the customers.

Here are some top tips to help you in these situations. Click on each card to flip it for an explanation of what to do and then use the arrows to move to the next or previous cards:

# STAY CALM

Stay calm and self-assured; make sure you are not displaying the same signs of agitation that can be seen in the other person

# FACIAL EXPRESSI ONS

Maintain a neutral facial expression, even our eyebrows can indicate we are surprised or angry, and similarly our mouths can betray our emotions unwittingly

2 of 7

# ALLOW THEM SPACE

When a customer is agitated getting too close to them can indicate aggression on your part and escalate the situation. Staying some distance away will also help keep you safe should the customer become physically aggressive.

3 of 7

THINK
ABOUT
YOUR

4 of 7

Control your breathing; when we are stressed, angry or tense, our

Lower your voice and keep your tone even; it is hard to have an argument with someone who is not responding aggressively back to you.

5 of 7

## BREAK PLAY

Distraction and diversion are extremely useful; when a person is aggressive, they are responding with their own fight-or-flight instincts and not thinking about their actions. Distraction can diffuse the fight response.

6 of 7

When the situation has

### REFLECT

calmed down think about
what happened and why. Talk
to a colleague or your
manager. If you know the
customer well; ask them what
caused it and provide them
with support and information
(such as the staying in control

threatening to remove the person.

• Do not be defensive or take it personally. What is being said may seem insulting and directed at you, but this is not really about you.

7 of 7

to

ıca

- Do not use humour unless you are sure it will help and you have a very good relationship with the customer
- Do not use sarcasm or humiliate the customer
- Do not put yourself at risk; use <u>staffguard</u> if you are alone and feel vulnerable

#### **Advertising Responsibly**

Whilst we do all we can to safeguard children and vulnerable people in our premises; we need to be aware of the messages that are reaching them outside of venues and clubs



When we run promotions locally we must adhere to the marketing code of conduct to ensure that we are safeguarding children and vulnerable people when we promote and advertise our business.

Please read the code of conduct attached below. This is available as a printable poster in Knowledge base.

# MARKETING CODE OF PRACTICE A GUIDE TO GETTING OUR ADVERTISING AND PROMOTIONS RIGHT – EVERY TIME! The Marketing Department provides an annual programme of National activity. All these communications and point-of-sale/display materials are legally compliant and present our customers with a fair and professionally managed image of a responsible gaming provider. HOWEVER, occasionally 'local' activity may be requested from you. All 'local' activity should be cleared through the Marketing Department. This will ensure we are always: LEGAL - DECENT - HONEST - TRUTHFUL

#### Marketing Code of Practice



### GamCare/Support

Our role is to be **aware** and provide **support** to any customer at risk. The industry has strong links to **organisations** that can help anyone who **thinks** they have a **problem with gambling.** It is our duty to provide this information readily and freely:



#### **Every Venue and Club has Staying in Control Leaflets**

Make sure you know where they are, the information in them and do not hesitate to share this information with customers who feel they need to make a change.

It's our responsibility to provide this information and support customers in their decision making.

#### Calculating the risk

Gambling is a fun and exciting form of entertainment, which provides an enjoyable experience.

Playing slot machines is an attractive way of taking a risk as long as the risk taking is kept under control.

The great majority of people who play slot machines or gamble in other ways enjoy the experience without any problems, but a very small number lose control of what they are doing.

For these players it ceases to be fun.

Their life can be dominated by gambling.







#### **Problem Gambling**

Problem gamblers will continue playing whether winning or losing. They will use their own and other people's money in order to keep playing. As gambling takes over their life, many other things can suffer: family life, their job, and other interests.

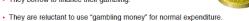
Gambling becomes a problem when you:

- · Gamble until all your money has gone.
- · Borrow or steal money to continue gambling.
- · Gamble to chase your losses.
- Neglect other interests, family and friends to gamble.

#### Checking it out

Someone who thinks they might have a gambling problem should ask themselves if:

- They lose time from education or work because of gambling.
- · They gamble to get money to pay debts or solve financial difficulties.
- After losing they feel they must return as soon as possible to win back losses
- · They gamble until their last pound is gone.
- · They borrow to finance their gambling.



- They have ever committed, or considered committing, an illegal act in order to finance their gambling.
- They have ever considered self destructive behaviour as a result of their gambling.



#### Who can help

If you are in difficulty with your gambling or know someone who is, and would like help, call the GamCare helpline:

GamCare: 0808 8020 133

GamCare is the national centre for information, advice and practical help regarding the social impact of gambling.

The national helpline is answered by trained staff. They can offer counselling information and advice to problem gamblers, family members and to friends of a gambler. Information regarding counselling for problem gamblers is available on request.



#### What the Staying in Control Leaflet covers Download a pdf of the leaflet below:



Staying in control leaflet.pdf 328 KB







#### **Be**Gamble**Aware**

These organisations are free and accessible to all our customers who think they need help. They are active in promoting responsible gambling and a great source of information for both our employees and our customers.



If you have any questions or concerns about your responsibility to safeguard children, vulnerable people and our customers please talk to your Line Manager and ask for help.

The next stage is to look at what you have learned in this session. Click the button below to start on the knowledge checks.

#### Let's Go!

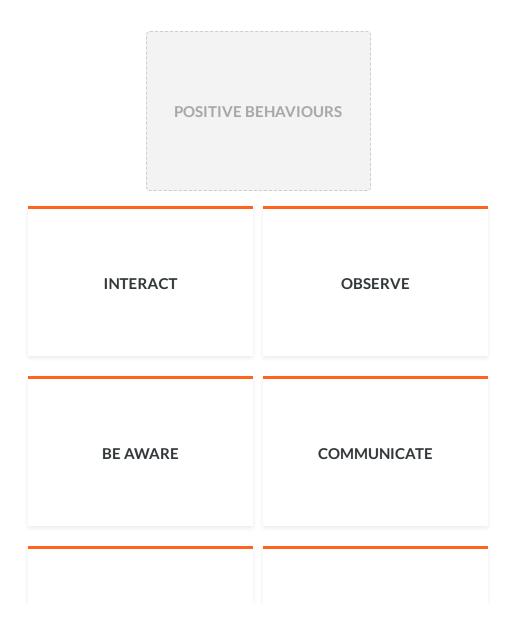
Click to get started on the behaviours card sorting activity

**BEHAVIOURS KNOWLE...** 

#### **Behaviours**

What behaviours should YOU our employees adopt in order to safeguard?

Look at the words on each card. Each word describes either a positive behaviour and is what we should be doing or a negative behaviour and what we should NOT be doing



AGE CHECK	THINK 25			
LISTEN	ASK QUESTIONS			
BREAK PLAY				
NEGATIVE BEHAVIOURS				
IGNORE	DISREGARD			
GIVE UP	JUDGE			

ACCUSE	CONFRONT
BLAME	

### Quiz

Read each question and the answer options carefully.

When you complete the quiz your score will be shown. You can then get feedback on the questions and see which you got right and wrong (if any!).

Read any feedback carefully and follow the instructions of what to do.

Good luck!

- It is something that serves as a protection or defence or that ensures safety
- It is the protection or defence of children/minors
- It applies to FEC's (family entertainment centres) as they have children in the premises

#### 02/09

What is the reason that 888 had to pay a penalty package of over £7.8million

- as a result of allowing children into its premises
- as a result of not upholding the 3 licensing objectives
- As a result of serious failings in its handling of vulnerable customers

#### 03/09

How do we protect children in our business?

- By following the Think 25 policy and age-verifying anyone who looks under 25
- By age checking everyone
- By remembering to safeguard

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How can we tell who is at risk/vulnerable?				
	By observing them			
	By interacting with them			
	By looking for signs of stress			
	By looking for changes in behaviour			
	All of the other answers			

Which policies and/or processes do we have in place to protect and safeguard our customers (tick all that apply)?				
	Think 25 Policy			
	GamCare Information			
	Employee interaction with customers			
	Self exclusion policy			
	Responsible advertising			
	ADR (Alternative Dispute Resolution)			

#### 06/09

What should you do if customers are getting agitated/annoyed?				
	Match their behaviour and firmly tell them to stop it			
	Diffuse the situation by breaking their play			

Ignore them - everyone gets cross when they lose

Who is at Risk of Problem Gambling?				
$\bigcirc$	Mainly men			
$\bigcirc$	Mainly women			
$\bigcirc$	Anyone who shows signs of losing control of their gambling.			
$\bigcirc$	Mostly people with mental health problem			

Which organisation/phone number is detailed on the 'Staying in Control' leaflet?					
	Head Office				
	GamCare				
	The Gambling Commission				

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- To report my concerns to one of the support organisations (e.g. gamcare)
- To listen, observe, interact and break play if concerned
- To wait for the customer to ask for help then give them the Staying in Control leaflet

If you are lucky enough to look under 25 years of age, we need to check your ID.

Please do not be offended.

Acceptable forms of ID are: Driving Licence, Passport, Citizen Card.













If you feel you are in difficulty with your gambling or know someone who is and would like help,

Call the National Gambling Helpline:

0808 8020 133

## PLAYING THE MACHINES

#### **Staying in Control**



JOCUL LA APARATE:

CUM SĂ DEȚINEȚI CONTROLUL



LOJA ME MAKINERITË:

TË JESH NË KONTROLL



玩角子老虎机时: (保持克制



GRAJĄC NA AUTOMATACH:

NIE TRAĆ KONTROLI



ИГРАТЬ НА ИГРОВЫХ АВТОМАТАХ ДЕРЖАТЬ СЕБЯ В РУКАХ



A JÁTÉKGÉPEKEN VALÓ JÁTSZÁS:

MEGTARTANI A KONTROLLT



ИГРА НА РОТАТИВКИ: НЕ ГУБЕТЕ КОНТРОЛ



मेशनिहरू खेल्नु नयिन्त्रणमा रहनुहोस्



MAKINELERDE OYNARKEN:

KONTROLÜ ELİNİZDE TUTUN



JOUER AUX MACHINES À SOUS : GARDER LE CONTÔLE

UL MAN

JUGAR CON LAS MÁQUINAS:
MANTENER EL CONTROL



NUTZUNG VON SPIELAUTOMATEN:

DIE KONTROLLE BEHALTEN



HRANÍ NA AUTOMATECH:

MĚJTE TO POD KONTOLOU











#### **CALCULATING THE RISK**

Gambling is a fun and exciting form of entertainment, which provides an enjoyable experience.

Playing slot machines is an attractive way of taking a risk as long as the risk taking is kept under control.

The great majority of people who play slot machines or gamble in other ways enjoy the experience without any problems, but a very small number lose control of what they are doing.

For these players it ceases to be fun.

Their life can be dominated by gambling.

#### PROBLEM GAMBLING

Problem gamblers will continue playing whether winning or losing.

They will use their own and other people's money in order to keep playing. As gambling takes over their life, many other things can suffer: family life, their job and other interests.

Gambling becomes a problem when you:

- · Gamble until all your money has gone.
- · Borrow or steal money to continue gambling.
- · Gamble to chase your losses.
- · Neglect other interests, family and friends to gamble.

## STAYING IN CONTROL

Whenever you play machines it is wise to remember that:

#### **CHECKING IT OUT**

Someone who thinks they have a gambling problem should ask themselves if:

- · They lose time from education or work because of gambling.
- They gamble to get money to pay debts or solve financial difficulties.
- · After losing they feel they must return as soon as possible to win back losses.
- · They gamble until their last pound in gone.
- · They borrow to finance their gambling.
- They are reluctant to use "gambling money" for normal expenditure.
- They have ever committed, or considered committing, an illegal act in order to finance their gambling.
- · They have ever considered self destructive behaviour as a result of their gambling.

#### **WHO CAN HELP?**

If you are in difficulty with your gambling or know someone who is, and would like help, call the GamCare helpline:

#### GamCare: 0808 8020 133

GamCare is the national centre for information, advice and practical help regarding the social impact of gambling.

The national helpline is answered by trained staff. They can offer counselling, information and advice to problem gamblers, family members and to friends of a gambler. Information regarding counselling for problem gamblers is available on request.

- · You are buying entertainment, not investing your money
- You should only spend money you can afford to lose.
- In advance of playing you should set strict limits on how much you will spend
- · Problems will arise if playing machines becomes the most important part of your life
- Playing should take up only a relatively small amount of your time and interest
- · Playing within your means is likely to be fun and exciting
- Spending outside your means is likely to create problems for you and others.
- · You shouldn't play to escape from worries or pressure



#### **CALCULAREA RISCULUI**

Jocurile de noroc reprezintă o formă de divertisment plăcută și palpitantă, care oferă o experientă savuroasă.

Jocul la aparatele de tip slot-machine reprezintă o metodă atractivă de a risca, atât timp cât riscul este tinut sub control.

Marea majoritate a persoanelor care joacă la aparate de tip slot-machine sau la alte jocuri de noroc se bucură de experiență fără nicio problemă, însă un număr foarte mic de persoane pierd controlul asupra lucrurilor pe care le fac.

Pentru acești jucători, începe să nu mai fie distractiv.

Viața lor poate fi dominată de jocurile de noroc.

#### PROBLEMELE JOCURILOR DE NOROC

Jucătorii cu probleme vor continua să joace, fie că pierd sau câștigă.

Aceștia vor folosi banii proprii și banii altor persoane pentru a continua să joace. Pe măsură ce jocurile de noroc le acaparează viața, multe alte lucruri vor avea de suferit: viața de familie, serviciul și alte interese.

Jocurile de noroc devin o problemă atunci când:

- · Jucați până când vă pierdeți toți banii.
- · Împrumutati sau furati bani pentru a continua să jucati.
- · Jucați pentru a încerca să vă recuperați pierderile.
- · Neglijați alte interese, familia sau prietenii pentru a juca.

## CUM SĂ DEȚINEȚI CONTROLUL

Oricând jucați la aparate de tip slot-machine, este înțelept să vă amintiți că:

#### **VERIFICAREA**

O persoană care consideră că ar putea avea o problemă legată de jocurile de noroc trebuie să se întrebe dacă:

- · Iroseste timpul alocat educatiei sau serviciului din cauza jocurilor de noroc.
- Joacă pentru a obține bani în vederea achitării datoriilor sau a rezolvării dificultăților financiare.
- După ce pierde, simte că trebuie să revină cât mai repede posibil pentru a recupera pierderile.
- · Joacă până când pierde ultimul ban.
- · Împrumută bani pentru a-si finanta jocurile de noroc.
- Nu doreste să folosească "banii pentru jocuri de noroc" pentru o cheltuială normală.
- · A comis sau s-a gândit să comită un act ilegal pentru a-și finanța jocurile de noroc.
- A luat vreodată în considerare un comportament autodistructiv ca rezultat al jocurilor de noroc.

#### **CINE POATE OFERI AJUTOR?**

În cazul în care vă aflați în dificultate privind jocurile de noroc sau cunoașteți pe cineva în această situație și care dorește ajutor, apelați linia de asistență telefonică a GamCare:

#### GamCare: 0808 8020 133

GamCare este centrul național de informații, sfaturi și asistență practică privind impactul social al jocurilor de noroc.

La linia de asistență telefonică națională se primește răspuns din partea unui personal instruit. Acesta poate oferi consiliere, informații și sfaturi pentru jucătorii cu probleme, membrii familiei și prietenii unui jucător. Informații privind consilierea pentru jucătorii cu probleme sunt disponibile la cerere.

- · Cumpărați divertisment, nu vă investiți banii.
- · Trebuie să cheltuiți doar banii pe care vă permiteți să îi pierdeți.
- Înainte de a juca, trebuie să vă stabiliți limite stricte privind ce sumă veți cheltui.
- Vor apărea probleme dacă jocul la aparatele de tip slot-machine devine cea mai importantă parte a vieții dumneavoastră.
- Jocul trebuie să ocupe doar o parte relativ mică a timpului și interesului dumneavoastră.
- · Jocul în limitele posibilităților este cel mai probabil distractiv și palpitant.
- · Cheltuirea dincolo de posibilități poate genera probleme pentru dumneavoastră și pentru alții.
- · Nu trebuie să jucați pentru a scăpa de griji sau presiuni.

#### **LLOGARITJA E RREZIKUT**

Loja e fatit është një formë argëtimi dhe emocionuese, e cila siguron përvojë të kënaqshme.

Të luash me makineritë e lojërave të fatit është mënyrë tërheqëse e marrjes së një rreziku për sa kohë që rreziku mbahet nën kontroll.

Shumica dërrmuese e njerëzve që luajnë lojëra fati ose bixhoz në mënyra të tjera e shijojnë përvojën pa ndonjë problem, por një numër shumë i vogël humbasin kontrollin e asaj që po bëjnë.

Për këta lojtarë pushon së qeni kënaqësi.

Jeta e tyre mund të sundohet nga lojërat e fatit.

#### **BIXHOZI PROBLEMATIK**

Bixhozxhinjtë problematikë do të vazhdojnë të luajnë qofshin fitues, qofshin humbës.

Ata do të përdorin paratë e tyre dhe të të tjerëve në mënyrë që të vazhdojnë të luajnë. Ndërsa bixhozi mbizotëron në jetën atyre, shumë gjëra të tjera mund të kenë probleme: jeta familjare, puna e tyre dhe interesa të tjera.

Kumari bëhet problem kur ju:

- · Luani bixhoz deri sa të mbarojnë të gjitha paratë.
- Merrni borxh ose vidhni para për të vazhduar bixhozin.
- · Luani bixhoz për të ndjekur humbjet tuaja.
- · Neglizhoni interesat e tjera, familjen dhe migtë për të luajtur bixhoz.

## TË JESH NË KONTROLL

Kurdoherë që luani me makineri kujtoni me mençuri se:

#### **TA KONSTATOSH**

Dikush që mendon se mund të ketë një problem bixhozi duhet të pyesë veten nëse:

- · Humb kohë nga edukimi ose puna për shkak të lojërave të fatit.
- Luan me lojëra fati për të marrë para për të paguar borxhet ose për të zgjidhur vështirësitë financiare.
- Pas humbjes ata mendojnë se duhet të kthehen sa më shpejt për të fituar përsëri çfarë kanë humbur.
- · Ata luainë bixhoz derisa të humbasin lekët e fundit.
- · Ata marrin borxh për të financuar lojën e tyre.
- · Ata hezitojnë të përdorin "paratë e bixhozit" për shpenzime normale.
- Ata kanë kryer ose konsideruar kryerjen e një veprimi të paligjshëm që të financojnë lojën e tyre.
- Ata kanë konsideruar ndonjëherë sjelljen vetëshkatërruese si rezultat i lojërave të tyre të fatit.

#### KUSH MUND TË NDIHMOJË?

Nëse jeni në vështirësi me lojëra të fatit ose njihni dikë që është dhe dëshiron ndihmë, telefononi linjën telefonike të ndihmës GamCare:

#### GamCare: 0808 8020 133

GamCare është qendra kombëtare për informacion, këshilla dhe ndihmë praktike në lidhje me ndikimin shoqëror të lojërave të fatit.

Linja kombëtare telefonike e ndihmës përgjigjet nga stafi i trajnuar. Ata ofrojnë këshillim, informacion dhe këshilla për lojtarët problematikë, anëtarët e familjes dhe miqtë një lojtari të fatit. Informacioni në lidhje me këshillimin për lojtarët problematikë disponohet sipas kërkesës.

- · Ju po blini argëtim, nuk po investoni paratë tuaja.
- · Duhet të luani vetëm me para që mund t'ia lejoni vetes të humbisni.
- Para se të luani, duhet të vendosni kufij të rreptë se sa të harxhoni.
- Problemet lindin nëse loja me makineri bëhet pjesa më e rëndësishme e jetës tuaj.
- · Loja duhet të marrë vetëm një sasi relativisht të vogël të kohës dhe interesit tuaj.
- Të luani brenda mundësive tuaja ka mundësi të jetë argëtuese dhe emocionuese.
- · Harxhimi jashtë mundësive tuaja ka mundësi të krijojë probleme për veten tuaj dhe të tjerët.
- · Nuk duhet të luani për të shpëtuar nga shqetësimet ose presionet.



#### 估算风险

赌博是一项十分有趣、令人兴奋的娱乐活动,可以为参与者提供愉快的体验。

玩老虎机是一种极富吸引力的冒险方式,前提是风险控制得当。

虽然绝大多数玩老虎机或以其他方式赌博的人均可以愉快地享受这种体验且不会出现任何问题,但也有极少数人无法控制自己的行为。

对于此类赌博参与者而言,赌博不再有趣。

他们的生活可以由赌博主宰。

#### 问题赌博

问题赌徒无论输赢,均会不断进行赌博。

他们会用自己以及他人的钱不断进行赌博。随着赌博逐渐占据他们的生活,许多其他事情可能会 受到影响:家庭生活、工作以及其他兴趣爱好。

当您出现以下情况,即成为一名问题赌徒:

- 不断赌博,直到将所有钱输光。
- 借钱或者偷钱以继续赌博。
- 不断赌博,试图弥补之前的损失。
- 因赌博而忽视其他兴趣爱好、家庭和朋友。

## 保持克制

## 赌博时切记以下几点:

#### 进行自查

对于认为自己可能存在赌博问题的人而言,应该自查一下是否属于以下情况:

- 因赌博而浪费接受教育或工作的时间。
- 利用赌博赚钱来偿还债务或解决财务困难。
- 在输钱后认为自己必须尽快用更多的赌博来赢回输掉的本钱。
- 不输得精光绝不离场。
- 靠借钱获得赌资。
- 不愿意将赌资用于正常支出。
- 曾经采取过违法行为或考虑过采取违法行为来获得赌资。
- 曾经考虑过因赌博而采取自毁行为。

#### 向谁求助?

如果您在赌博时很难保持克制,或者认识存在这种情况的人并且他们希望寻求帮助,请拨打 GamCare求助热线:

#### GamCare: 0808 8020 133

GamCare是就赌博的社会影响提供相关信息、建议和实际帮助的国家中心。

该全国性求助热线由经过专门训练的工作人员受理。他们可以为问题赌徒、其家庭成员以及赌徒 的朋友提供咨询、信息和建议。有关问题赌徒的咨询信息,可应要求提供。

- 您正在进行的赌博活动纯属娱乐,而非投资。
- 您应该仅在经济能力承受范围内参与赌博。
- 您应该在赌博前设定严格的赌资上限。
- 如果您的生活被赌博所主导,就会出现各种问题。
- •赌博应该仅占用您相应较少的时间,您应该仅仅将它作为一项不起眼的兴趣爱好。
- 在经济能力承受范围内赌博才有可能获得最大乐趣,让人兴奋不已。
- 超出经济能力承受范围的赌博可能会给自己和他人带来极大麻烦。
- 您不应将赌博作为一种逃避烦恼或减轻压力的方式。

**3:3:7** 

#### **OCEŃ RYZYKO**

Hazard jest zabawną i ekscytującą formą rozrywki, która zapewnia przyjemne wrażenia.

Gra na automatach jest atrakcyjnym sposobem podejmowania ryzyka, o ile podejmowanie ryzyka jest pod kontrolą.

Większość ludzi grających na automatach lub uprawiających hazard w inny sposób korzysta z tego doświadczenia bez żadnych problemów, ale bardzo mała liczba traci kontrolę nad tym, co robi.

Dla tych graczy przestaje być zabawą.

Ich życie może być zdominowane przez hazard.

#### PROBLEM Z HAZARDEM

Problemowi hazardzistom będzie nadal grali, czy wygrywają czy przegrywają.

Będą korzystać z własnych i innych pieniędzy, aby dalej grać. Ponieważ hazard dominuje ich życie, wiele innych rzeczy może ucierpieć: życie rodzinne, praca i inne zainteresowania.

Hazard staje sie problemem, gdy:

- · Uprawiasz hazard, aż stracisz wszystkie swoje pieniądze.
- · Pożyczasz lub kradniesz pieniądze, aby dalej grać.
- Uprawiasz hazard, aby pokryć swoje straty.
- · Zaniedbujesz inne zainteresowania, rodzinę i przyjaciół, aby grać.

## NIE TRAĆ KONTROLI

Zawsze, gdy grasz na maszynach, dobrze abyś pamiętał, że:

#### SPRAWDŹ

Ktoś, kto uważa, że może mieć problem z hazardem, powinien zadać sobie pytanie, czy:

- · Czas przeznaczony na edukację lub pracę poświęca hazardowi.
- Uprawia hazard, aby zdobyć pieniądze na spłatę długów lub rozwiązać problemy finansowe.
- Po przegranej czuje, że musi jak najszybciej wrócić do gry, aby odzyskać przegraną kwotę.
- · Gra, dopóki nie straci ostatniego grosza.
- · Pożycza pieniądze, aby mieć na grę.
- · Niechętnie przeznacza "pieniądze na hazard" na normalne wydatki.
- · Popełnił lub rozważał popełnienie nielegalnego czynu, aby mieć pieniądze na grę.
- · Zawsze uważał zachowania autodestrukcyjne za skutek hazardu.

#### KTO MOŻE POMÓC?

Jeśli uważasz, że masz problemy z hazardem lub znasz kogoś, kto ma i chciałby uzyskać pomoc. zadzwoń na infolinie GamCare:

#### GamCare: 0808 8020 133

GamCare jest krajowym centrum informacji, porad i praktycznej pomocy w zakresie społecznych skutków hazardu.

Na krajowej infolinii pracuje wykwalifikowany personel. Mogą zaoferować informacje i porady osobom, które mają problem z hazardem, ich rodzinom i przyjaciołom. Informacje dotyczące doradztwa osobom uzależnionym od hazardu są udostępniane na życzenie.

- · Kupujesz rozrywkę, a nie inwestujesz pieniądze.
- · Powinieneś wydawać tylko pieniądze, które możesz stracić.
- · Przed rozpoczęciem gry powinieneś wyznaczyć ścisłe limity wydatków.
- Pojawią się problemy, jeśli gra na automatach stanie się najważniejszą częścią Twojego życia.
- Hazard powinien stanowić tylko stosunkowo niewielki procent Twojego czasu i zainteresowań.
- · Granie w ramach swoich możliwości finansowych może być przyjemne i ekscytujące.
- Wydawanie ponad swoje możliwości finansowe może stworzyć problemy dla Ciebie i innych.
- · Nie graj, aby uciec od zmartwień czy presji.

#### РАСЧЕТ РИСКА

Азартные игры – это забавная и увлекательная форма развлечения, доставляющая удовольствие.

Игра на игровых автоматах - это привлекательный способ рисковать, до тех пор, пока риск находится под контролем.

Подавляющее большинство людей, которые играют на игровых автоматах или играют в азартные игры другими способами, без проблем получают от этого удовольствие, но очень малое число людей теряют контроль над тем, что они делают.

Для таких игроков это перестает быть развлечением.

Азартные игры могут начать доминировать в их жизни.

#### ИГРОВАЯ ЗАВИСИМОСТЬ

Игроки с зависимостью будут продолжать играть, выигрывая или проигрывая.

Они будут использовать свои и чужие деньги, чтобы продолжать играть. Поскольку азартные игры захватывают их жизнь, могут пострадать многие другие стороны: их семейная жизнь, работа и прочие интересы.

Азартные игры становятся проблемой, когда вы:

- Играете, пока все ваши деньги не кончатся.
- Занимаете или крадете деньги, чтобы продолжить играть.
- Играете, чтобы отыграть свои потери.
- Игнорируйте другие интересы, семью и друзей.

## ДЕРЖАТЬ СЕБЯ В РУКАХ

Каждый раз, когда вы играете на автоматах, следует помнить следующее:

#### ПРОВЕРЬТЕ ЭТО

Te, кто думает, что у них могут быть проблемы с азартными играми, должны спросить себя:

- Теряют ли они время на учебу или работу из-за азартных игр?
- Играют ли они, чтобы получить деньги, чтобы заплатить долги или решить финансовые проблемы?
- Чувствуют ли они после проигрыша, что должны вернуться как можно скорее, чтобы отыграть потери?
- Играют ли они до тех пор, пока не кончится их последний фунт?
- Занимают ли они деньги, чтобы финансировать свои азартные игры?
- Используют ли они неохотно «деньги на азартные игры» на обычные расходы?
- Совершали или рассматривали ли они когда-либо возможность совершения незаконных действий с целью финансирования своих азартных игр?
- Задумывались ли они когда-либо о саморазрушительном поведении в результате своих азартных игр?

#### КТО МОЖЕТ ПОМОЧЬ?

Если вы чувствуете, что у вас есть зависимость от азартных игр, или вы знаете такого человека и хотите ему помочь, позвоните на горячую линию GamCare:

#### GamCare: 0808 8020 133

GAMCARE – это национальный центр информации, советов и практической помощи в отношении социальных последствий азартных игр.

Их горячую линию обслуживает обученный персонал Они могут предложить информацию о терапии и советы игрокам с зависимостью, членам семьи и друзьям таких игроков. Информация о консультациях для игроков с зависимостью предоставляется по запросу.

- Вы покупаете развлечения, а не вкладываете деньги.
- Вы должны тратить только те деньги, которые можете позволить себе потерять.
- Перед игрой вы должны установить строгие ограничения суммы, которую вы потратите.
- Если игровые автоматы станут самой важной частью вашей жизни, у вас возникнут проблемы.
- Игра должна отнимать у вас относительно небольшое количество времени и интересов.
- Играть по средствам скорее всего будет весело и увлекательно.
- Игра не по средствам может создать проблемы как для вас, так и для других.
- Вы не должны играть, чтобы убежать от забот или давления.

#### A KOCKÁZAT KISZÁMÍTÁSA

A szerencsejáték a szórakoztatás vidám és izgalmas formája, amely élvezetes élményt nyújt.

A játékgépeken való játék a kockázatvállalás vonzó módja mindaddig, amíg a kockázatvállalást kézben tartja.

A játékgépekkel játszó vagy más módon szerencsejátékot játszó emberek nagy többsége minden gond nélkül élvezi az élményt, de nagyon kevés ember elveszíti az irányítást a tetteik felett.

Ezeknek a játékosoknak már nem szórakozás a játék.

Életüket a szerencsejáték uralhatja.

#### SZERENCSEJÁTÉK-FÜGGŐSÉG

A szerencsejáték-függők tovább játszanak, akár nyernek, akár vesztenek.

Saját és mások pénzét fogják felhasználni a játék folytatásához. Amint a szerencsejáték átveszi az életüket, sok minden más szenvedhet: a családi élet, a munkájuk és más érdekek

A szerencsejáték akkor válik problémává, ha:

- · Addig játszik, amíg minden pénze el nem fogy.
- A szerencsejáték folytatásához pénzt kölcsönöz vagy lop.
- · Játszik, hogy behozza a veszteségeit.
- Elhanyagolja el a többi érdekét, a családot és a barátokat a játékért.

## MEGTARTANI A KONTROLLT

Bármikor játékgépeken játszik, bölcs dolog megjegyezni, hogy:

#### **ELLENŐRZÉS:**

Valaki, aki úgy gondolja, hogy szerencsejáték-függősége van, tegye fel magának a következő kérdéseket:

- A szerencsejáték miatt időt veszít-e az oktatásból vagy a munkából?
- Szerencsejátékot űz, hogy pénzt szerezzen adósságai kifizetéséhez vagy pénzügyi nehézségei megoldásához?
- Veszteségük után úgy érzi, a lehető leghamarabb vissza kell térnie, hogy visszanyerje a veszteségeit?
- · Addig játszik, amíg az utolsó fontja el nem fogy?
- · Kölcsönözn szerencsejátéka finanszírozására?
- · Nem szívesen használja a "szerencsejáték-pénzt" normál kiadásokra?
- Szerencsejátéka finanszírozása érdekében valaha törvénysértő cselekményt követett el, vagy fontolóra vette annak elkövetését?
- · Szerencsejátéka eredményeként valaha is fontolgatott önpusztító magatartást?

#### **KI TUD SEGÍTENI?**

Ha úgy érzi, hogy nehézségei vannak a szerencsejátékkal kapcsolatban, vagy ismer egy olyan személyt, akinek segíteni szeretne, hívja a GamCare segélyvonalat:

#### GamCare: 0808 8020 133

A GamCare a szerencsejáték szociális hatásaival kapcsolatos nemzeti információs, tanácsadó és gyakorlati segítségnyújtási központ.

Segélyvonalukat képzett személyzet működteti. Ők tanácsadásra vonatkozó tájékoztatást és tanácsokat kínálnak a függőséggel küzdő szerencsejátékosoknak, családtagjaiknak és barátaiknak. Kérésre rendelkezésre állnak információk a szerencsejáték-függőknek való tanácsadással kapcsolatban.

- · Szórakozást vásárol, és nem pénzt fektet be.
- · Csak olyan összeget, amelynek elvesztését megengedheti magának.
- A játék előtt szigorú korlátokat kell meghatároznia arra vonatkozóan, hogy mennyit költ.
- Problémák merülnek fel, ha a gépeken való játék válik az életének legfontosabb részévé
- A játéknak csak viszonylag kis részét kell lefoglalnia az idejéből és érdeklődéséből.
- · A lehetőségein belül való játék valószínűleg szórakoztató és izgalmas lesz.
- · A lehetőségein felüli költekezés valószínűleg problémákat okoz Önnek és másoknak.
- Nem szabad azért játszani, hogy meneküljön gondok vagy nyomás elegent

#### ВЗЕМАЙТЕ ПРЕМЕРЕНИ РИСКОВЕ

Хазартът е забавно и вълнуващо развлечение, което предлага приятно изживяване.

Игрите на ротативки предлагат възможност да поемете риск, стига той да е премерен.

Повечето хора, които играят на ротативки или други хазартни игри, се забавляват без да имат проблеми, но малък брой хора губят контрол върху това, което правят.

За тези играчи, забавлението изчезва.

Хазартът контролира техния живот.

#### ПРОБЛЕМИ С ХАЗАРТА

Играчите с проблеми продължават да играят независми дали печелят или губят.

Те ползват собствените си пари, както и тези на други хора, за да продължат да играят. Докато хазартът завзема живота им, други негови аспекти страдат, като семейството, работата и другите интереси.

Хазарът се превръща в проблем, когато:

- Играете докато не изхарчите всичките си пари.
- Вземате пари назаем или крадете, за да продължите да залагате.
- Залагате, за да наваксате за загубите си.
- Пренебрегвате другите си интереси, семейството и приятелите си, за да залагате.

## **НЕ ГУБЕТЕ КОНТРОЛ**

Когато играете на ротативки, е добре да помните, че:

#### ЗАМИСЛЕТЕ СЕ

Играчите, които смятат, че имате хазартен проблем, трябва да се запитат дали:

- Бягат от работа или образование заради хазарта.
- Играят хазарт, за да изплатят дългове или да разрешат финансови проблеми.
- След като загубят, те чувстват, че трябва да се върнат възможно най-скоро, за да си върнат загубите.
- Залагат докато пропилеят и последната стотинка.
- Вземат пари назаем, за да финансират хазартните си навици.
- Отказват да използват парите спечелени от хазарт за ежедневни разходи.
- Извършват или мислят да извършат незаконни дела, за да финансират хазартните си навици.
- Имат поведение, което е заплаха за самите тях, заради хазартните им навици.

#### КОЙ МОЖЕ ДА ПОМОГНЕ?

Ако имате проблеми с хазарта, или познавате някой с такъв проблем, и искате да помогнете, позвънете на линията за помощ на GamCare:

#### GamCare: 0808 8020 133

GamCare е национален център за информация, съвет и практична помощ относно социалните последици от хазарта.

Националната линия за помощ се поддържа от обучени служители, които могат да предложат консултации, информация или съвети на играчи с проблеми, членове на семействата им или техни приятели. При поискване можете да получите консултации относно играчи с хазартни зависимости.

- Вие си купувате забавление, а НЕ инвестирате пари.
- Трябва да харчите единствено толкова, колкото можете да си позволите да загубите.
- Преди да започнете да играете, трябва да поставите лимит на сумата, която ще изхарчите.
- Ако играта на ротативки стане най-важното нещо в живота ви, ще изпитате проблеми.
- Играта трябва да заема малка част от вашето време и интереси.
- По-забавно и вълнуващо е да играете в допустими граници.
- Харченето на повече, отколкото можете да си позволите на-вероятно ще създаде проблеми и на вас и на другите.
- Играта не бива да бъде начин да избегнете тревогите или проблемите си.

#### जोखिम आकलन गर्नु

जुवा मनोरन्जनको मजा र उत्तेजना पूर्ण रूप हो, जसले एउटा रमाइलो अनुभव प्रदान गर्दछ ।

जोखिम लिनलाई नियन्त्रणमा राख्दासम्म स्लट मेसनिहरू खेल्नु जोखिम लिन आकर्षक तरीका हो

स्लट मेसनिहरू खेल्ने वा अन्य तरिकाले जुवा खेल्ने धेरै जसो मानसिहरूले कुनै समस्या नभइकन रमाइलोको अनुभव गर्ने गर्छन्, तर एक सानो संख्याका मानसिहरूले उनीहरूले के गरिरेहेछन् भन्ने कुराको नियन्त्रण गुमाउँछन् ।

यी खेलाडीहरूको लागि यो रमाइलो हुँदैन ।

तिनीहरूको जीवनमा जूवाले प्रभुत्व जमाएको हुन्छ

#### समस्या युक्त जुवा खेलाइ

समस्या युक्त जुवा खेलाडीहरूले हारे पनि जिते पनि जुवा खेलरिहने गर्छन् ।

खेललाई जारी राख्नको लागि तिनीहरूले आफ्नै र अरू व्यक्तिको पैसा प्रयोग गर्ने गर्छन् । जुवा खेलले आफ्नो जीवन लिन भएकोले, अरू धेरै कुराले पीडति हुन सक्छन्: पारविारिक जीवन, तिनीहरूको जागरि, र अन्य रुचिहरू

जुवा खेल्ने समस्या बन्छ यदि तपाईँ:

- तपाईँको सबै पैसा नसकिएसम्म जुवा खेल्नुहुन्छ ।
- जुवा खेल्नलाई जारी राख्नको लागि पैसा सापटी लिने वा चोरी गर्ने गर्नुहुन्छ ।
- तपाईँको घाटालाई लखेट्नको लागा जुवा खेल्नुहुन्छ ।
- जुवा खेल्नको लागि परिवार र साथीहरू जस्ता अन्य रुचिहरूलाई बेवास्ता गर्नुहुन्छ ।

## नयिन्त्रणमा रहनु

तपाईँले मेशनिहरू खेल्नुहुँदा निम्नलखिति कुरा सम्झनु बुद्धिमानी हुन्छ:

### यसलाई नियन्त्रण गर्नु

आफूमा जूवाको समस्या भएको हुन सक्ने सोच्ने कसैले आफैलाई सोध्नु पर्छ कि:

- जुवा खेलको कारणले तिनीहरूले शिक्षा वा कामबाट समय गुमाउँछन् ।
- ऋण तरि्न वा वित्तीय कठनािइहरू समाधान गर्नको लागि तिनीिहरूले पैसा लिन जुवा खेल्छन् ।
- पैसा हारेपछि तिनीहरले गमेको पैसा फरिता जितन सकेसमम चाँडो फरकन परछ भनने महसस गरने गरछन
- अन्तिम पाउन्ड नगइसकेसम्म तिनीहरू जुवा खेल्छन् ।
- तिनीहरू आफ्नो जुवाको लागि पैसा जुटाउन सापटी लिन्छन् ।
- सामान्य खर्चको लागि तिनीहरू "जुवा पैसा" प्रयोग गर्न अनिच्छुक हुन्छन् ।
- जुवा खेलको लागि पैसा जुटाउन उनीहरूले कहिल्यै गैहर कानुनी काम गर्छन्, वा गर्ने बारे सोच्छन् ।
- आफ्नो जूवाको परिणामको रूपमा उनीहरूले कहिल्यै आत्म विनाशकारी व्यवहारको बारेमा सोचेका छन् ।

### कसले सहयोग गर्न सक्छ ?

यदि तपाई आफ्नो जुवा खेल्नमा समस्या भएको महसुस गर्नुहुन्छ वा कसैलाई समस्या भएको थाहा छ र जसले सहयोग चाहन्छ भने, GamCare हेल्पलाइन लाई फोन गर्नुहोस्

#### GamCare: 0808 8020 133

GamCare जुवाको सामाजिक प्रभावको सम्बन्धमा सूचना, सल्लाह र व्यावहारिक सहयोगको लागि राष्ट्रिय केन्द्र हो ।

राष्ट्रिय हेल्पलाइनमा प्रशक्षिपति कर्मचारीहरूले जवाफ दिन्छन् । तिनीहरूले जूवा खेल्नेहरू, परिवारका सदस्यहरू र जूवा खेल्ने साथीहरूलाई परामर्श, सूचना र सल्लाह प्रदान गर्न सक्दछ । समस्या युक्त जुवा खेलाडीहरूको लागि परामर्श सम्बन्धी जानकारी अनुरोध गरेमा उपलब्ध हुन्छ ।

- तपाईँ मनोरञ्जन किन्दै हुनुहुन्छ, तपाईँको पैसामा लगानी गर्दै हुनुहुन्न ।
- तपाईँले केवल आफूले हार व्यहोर्न सक्ने पैसा मात्र खर्च गर्नु पर्छ ।केवल पैसाले खेल्नुहोस् तपाईँले हार व्यहोर्न सक्नुहुन्छ
- खेल्नु भन्दा पहिला तपाईँले कर्ता खर्च गर्नुहुन्छ त्यसको सख्त सीमा तोक्नु पर्छ ।
- यदि खेल्ने मेसनिहरू तपाईँको जीवनको सबै भन्दा महत्त्वपूर्ण हिस्सा भयो भने समस्याहरू खडा हुनेछन् ।
- खेलले तपाईँको समय र रुचिको सापेक्ष रूपमा सानो मात्रा मात्र लिनु पर्छ ।
- तपाईँको आय स्रोत भित्र खेल्नुको अर्थ रमाइलो र उत्तेजना हुन सक्छ
- तपाईँको आय स्रोत भन्दा बाहरि खर्च गर्नाले तपाईँ र अरुको लागि समस्या सरि्जना हुन सक्छ
- चिन्ता वा दबाबबाट उम्कनको लागि तपाईँले खेल्नु हुँदैन ।

#### **RISK HESAPLAMASI YAPIN**

Kumar, keyifli bir deneyim sağlayan zevkli ve heyecan verici bir eğlence şeklidir.

Slot makinelerinde oynamak, kontrollü bir şekilde yapıldığı sürece cazip bir risk alma yoludur

Slot makinelerinde veya başka şekillerde kumar oynayan insanların büyük çoğunluğu herhangi bir sorun yaşamadan bu deneyimin tadını çıkarırken, bu kişilerin az da olsa bir kısmı kontrolünü kaybeder.

Bu durum oyuncular için eğlenceli olmaktan çıkar.

Kumar hayatlarını tamamen ele geçirebilir

#### **KUMAR BAĞIMLILIĞI**

Kumar bağımlıları, kazansalar da kaybetseler de oynamaya devam ederler.

Oynamaya devam edebilmek için kendi paralarını ve başkalarının parasını kullanırlar. Kumar hayatlarını ele geçirdikçe aile hayatı, iş hayatı ve diğer ilgi alanları gibi birçok unsur da zarar görür

Kumar, şu durumlarda sorun haline gelir:

- · Tüm paranız bitene kadar kumar oynamak.
- · Kumar oynamaya devam etmek için borç almak veya para çalmak.
- · Kayıpları geri kazanmak için kumar oynamak.
- Kumar oynamak için diğer ilgi alanlarını, aile ve arkadaşları ihmal etmek.

## KONTROLÜ ELINIZDE TUTUN

Makinelerde oyun oynadığınızda şunları unutmamak önemlidir:

#### **DEĞERLENDIRME YAPIN**

Kumar sorunu yaşıyor olabileceğini düşünen biri, kendine şunları yapıp yapmadığını sormalıdır:

- · Kumar yüzünden okula veya işe daha az zaman ayırmak.
- Borç ödemek veya maddi zorlukların üstesinden gelmek üzere para kazanmak için kumar oynamak.
- Kaybettikten sonra, kayıpları geri kazanmak için mümkün olan en kısa sürede yeniden oynamak zorunda hissetmek.
- · Son parası bitene kadar kumar oynamak.
- · Kumar giderlerini finanse etmek için borç almak.
- "Kumar parasını" normal harcamalar için kullanmaktan çekinmek.
- Kumar alışkanlığını finanse etmek için yasa dışı bir eylemde bulunmak veya bulunmayı düşünmek
- Kumar oynamanın bir sonucu olarak aklından kendine zarar verecek davranışlarda bulunmayı geçirmek.

#### KIM YARDIM EDEBILIR?

Kumar alışkanlığınızla ilgili zorluk yaşıyorsanız veya bu durumda olup yardım isteyen başka birini tanıyorsanız, GamCare yardım hattını arayın:

#### GamCare: 0808 8020 133

GamCare, kumarın sosyal etkileriyle ilgili bilgi, tavsiye ve pratik yardım sunan ulusal bir merkezdir.

Ulusal yardım hattı, eğitimli personel tarafından yanıtlanır. Kumar bağımlılarına, kumar oynayanların aile ve arkadaşlarına danışmanlık, bilgi ve tavsiye sunabilir. Kumar bağımlılarına yönelik danışmanlıkla ilgili bilgiler talep üzerine sunulur.

- Paranızla yatırım yapmış değil, eğlence satın almış olursunuz.
- Sadece kaybetmeyi göze alabileceğiniz parayı harcamalısınız.
- Oynamadan önce, ne kadar harcama yapacağınızla ilgili net sınırlar belirlemelisiniz.
- Makinelerde oyun oynamanın hayatınızın en önemli parçası haline gelmesi, sorunların ortaya cıkmasına neden olur.
- Zamanınızın ve ilginizin yalnızca küçük bir kısmını oyun oynamaya ayırmalısınız.
- · İmkânlarınız dahilinde oynamak eğlenceli ve heyecan verici olabilir.
- İmkânlarınızın ötesinde harcama yapmak hem siz hem de başkaları için sorunlar yaratabilir.
- Endişelerden veya baskılardan uzaklaşmak için oynamamalısınız.

#### **MESURER LES RISQUES**

Les jeux d'argent sont une forme de divertissement amusante et passionnante pour profiter d'une expérience agréable.

Jouer aux machines à sous est une manière attrayante de prendre des risques tant que cette prise de risque est maîtrisée.

La plupart des gens qui jouent à des jeux d'argent ou aux machines à sous profitent de cette expérience sans aucun problème, mais une minorité de personnes perdent le contrôle de ce qu'ils font.

Pour ces joueurs, l'expérience n'est plus agréable.

Leur vie entière peut tourner autour des jeux d'argent.

#### **DÉPENDANCE AU JEU**

Les personnes dépendantes au jeu continueront de jouer qu'elles gagnent ou qu'elles perdent de l'argent.

Elles dépenseront leur argent et celui des autres pour pouvoir continuer à jouer. Le jeu domine leur vie et d'autres aspects peuvent en pâtir : vie familiale, vie professionnelle et autres intérêts.

Le jeu devient un problème lorsque :

- · Vous jouez jusqu'à ne plus avoir un sou.
- · Vous empruntez ou volez de l'argent pour continuer à jouer.
- · Vous jouez pour regagnez vos pertes.
- · Vous mettez de côté vos autres intérêts, votre famille et vos amis pour jouer.

## GARDER LE CONTRÔLE

À chaque fois que vous jouez sur des machines à sous, souvenez-vous que :

#### **VÉRIFIONS**

Une personne qui pense être dépendante au jeu doit se demander si :

- Elle consacre du temps au jeu au détriment de ses études ou de son travail.
- Elle joue pour gagner de l'argent afin de rembourser des dettes ou de résoudre des problèmes financiers.
- Après avoir perdu, elle ressent le besoin de revenir dès que possible pour regagner le montant perdu.
- · Elle joue jusqu'à ne plus avoir un sous en poche.
- · Elle emprunte de l'argent pour jouer.
- Elle se montre réticente à dépenser « son argent pour le jeu » pour des dépenses normales
- · Elle a commis ou a déjà pensé à commettre un acte illégal pour financer son jeu.
- Elle a déjà eu ou pensé à des comportements autodestructeurs en raison de sa dépendance au jeu.

#### À QUI DEMANDER DE L'AIDE ?

Si vous êtes dépendant aux jeux d'argent ou si vous connaissez quelqu'un qui a besoin d'aide, appelez la ligne d'assistance GamCare.

#### GamCare: 0808 8020 133

GamCare est le centre national qui offre des informations, des conseils et de l'aide concernant l'impact social des jeux d'argent.

Du personnel qualifié répond aux appels sur la ligne d'assistance nationale. Ils fournissent des conseils, des informations et de l'aide aux personnes dépendantes aux jeux d'argent, ainsi qu'à leur famille et leurs amis. Des informations sur l'aide disponible aux personnes dépendantes au jeu sont peuvent être fournies sur demande.

- · Vous achetez un divertissement, vous n'investissez pas de l'argent.
- Vous devriez miser uniquement des sommes que vous pouvez vous permettre de perdre.
- Avant de jouer, vous devez fixer des limites strictes concernant les sommes que vous dépenserez.
- · Vous aurez des problèmes si les machines à sous dominent votre vie.
- · Jouer ne devrait occuper qu'une petite partie de votre temps et de votre esprit.
- · Jouer dans la limite de vos moyens peut être amusant et passionnant.
- Dépenser au-delà de vos moyens peut créer des PROBLÈMES pour vous et les autres.
- Vous ne devriez pas jouer pour échapper à vos inquiétudes et au stresse.

#### **CALCULAR EL RIESGO**

El juego es una forma de entretenimiento divertida y emocionante que aporta una agradable experiencia.

Jugar con las máquinas tragaperras es una forma interesante para arriesgarse siempre que el riesgo se mantenga bajo control.

La gran mayoría de las personas que juegan con máquinas tragaperras o de otras formas disfruta de la experiencia sin problema, pero un número muy reducido pierde el control de lo que hace.

Para estos jugadores deja de ser divertido.

El juego puede dominar sus vidas.

#### PROBLEMAS CON EL JUEGO

Los jugadores con problemas seguirán jugando, ganen o pierdan.

Usarán su propio dinero y el de los demás para seguir jugando. A medida que el juego se apodera de sus vidas, pueden sufrir muchas otras cosas, como la vida familiar, el trabajo y otros intereses.

El juego se convierte en un problema cuando:

- · juegas hasta perder todo el dinero;
- · pides o robas dinero para seguir jugando;
- · juegas para intentar recuperar las pérdidas;
- · descuidas otros intereses, a la familia y a los amigos por jugar.

## MANTENER EL CONTROL

Cuando juegues a las máquinas es conveniente que recuerdes lo siguiente:

#### **DARSE CUENTA**

Alguien que piensa que puede tener un problema con el juego debe preguntarse a sí mismo si:

- · pierde tiempo en los estudios o en el trabajo por jugar;
- juega con la intención de ganar dinero para pagar deudas o resolver problemas financieros:
- · después de perder cree que tiene que volver lo antes posible para recuperar las pérdidas;
- · juega hasta perderlo todo;
- · pide dinero prestado para financiar el juego;
- se niega a usar el «dinero del juego» para gastos habituales;
- ha cometido o ha considerado cometer un acto ilegal para financiar el juego;
- · ha considerado el comportamiento autodestructivo como resultado del juego.

#### ¿QUIÉN PUEDE AYUDAR?

Si tienes problemas con el juego o conoces a alguien que los tenga y quieres ayudar, llama al teléfono de asistencia GamCare:

#### GamCare: 0808 8020 133

GamCare es el centro nacional de información, asesoramiento y ayuda práctica en relación al impacto social del juego.

El teléfono de asistencia nacional es atendido por personal cualificado. Pueden ofrecer orientación, información y asesoramiento para los problemas del juego, a la familia y a los amigos de un jugador. La información sobre el asesoramiento para jugadores con problemas está disponible previa solicitud.

- · compras entretenimiento. Apostar no es invertir dinero;
- · solo debes gastar el dinero que puedas permitirte perder;
- antes de jugar, debes establecer límites estrictos sobre la cantidad que gastarás;
- surgirán problemas si las máquinas se convierten en la parte más importante de tu vida:
- jugar solo debe ocupar una cantidad relativamente pequeña de tu tiempo e interés;
- jugar dentro de tus posibilidades puede ser divertido y emocionante;
- gastar por encima de tus posibilidades puede ocasionar problemas para ti y para los demás;
- no debes jugar para huir de preocupaciones o presiones.

#### **DAS RISIKO KALKULIEREN**

Glücksspiel ist eine spannende und kurzweilige Form der Unterhaltung.

Der Einsatz an Spielautomaten ist eine attraktive Möglichkeit, ein Risiko einzugehen, solange dieses kontrolliert wird..

Die meisten Menschen, die Spielautomaten oder andere Glücksspielformen nutzen, haben dabei keine Probleme. Es gibt jedoch eine sehr geringe Anzahl von Spielern, die die Kontrolle darüber verlieren, was sie tun.

Für diese Spieler hört der Spaß auf.

Ihr Leben kann vom Spielen bestimmt werden.

#### **SPIELSUCHT**

Personen mit Spielsucht spielen immer weiter, unabhängig davon, ob sie gewinnen oder verlieren.

Sie verwenden ihr eigenes Geld und das anderer Personen, um weiter spielen zu können. Wenn das Spielen einen immer größeren Stellenwert in ihrem Leben einnimmt, können viele andere Dinge darunter leiden: Familienleben, Arbeit und andere Interessen

Glücksspiel wird zum Problem, wenn Sie:

- · spielen, bis Sie Ihr gesamtes Geld verspielt haben.
- · Geld leihen oder stehlen, um weiter spielen zu können.
- · spielen, um Ihre Verluste wieder reinzuholen.
- · Ihre anderen Interessen, Ihre Familie und Freunde vernachlässigen, um zu spielen.

## DIE KONTROLLE BEHALTEN

Wenn Sie Spielautomaten benutzen, ist es sinnvoll, daran zu denken, dass:

#### **SELBSTTEST**

Menschen, die denken, dass sie ein Glücksspielproblem haben, sollten sich folgende Fragen stellen:

- · Fehlt mir wegen des Glücksspiels Zeit für Bildung oder Arbeit?
- Spiele ich, um Geld zu bekommen, mit dem ich Schulden zahlen oder finanzielle Probleme lösen kann?
- Muss ich nach dem Verlieren so schnell wie möglich wieder zurück, um den Verlust reinzuholen?
- · Spiele ich, bis mein letzter Euro weg ist?
- · Leihe ich mir Geld, um das Glücksspiel zu finanzieren?
- · Widerstrebt es mir, "Spielgeld" für normale Ausgaben zu verwenden?
- Habe ich jemals etwas Illegales gemacht, um mein Glücksspiel zu finanzieren, oder habe ich dies vor?
- ich als Folge meines Glücksspielverhaltens jemals selbstzerstörerisches Verhalten erwägt?

#### **WER KANN HELFEN?**

Wenn Sie denken, dass Sie Probleme mit dem Spielen haben oder jemanden kennen, der Hilfe wünscht, rufen Sie die telefonische Anlaufstelle von GamCare an::

#### GamCare: 0808 8020 133

GamCare ist das nationale Zentrum in Großbritannien, das Informationen, Ratschläge und praktische Hilfe zu den sozialen Folgen von Glücksspiel bietet.

Die nationale telefonische Anlaufstelle ist mit geschulten Mitarbeitern besetzt. Sie bieten Beratung, Informationen und Ratschläge für Personen mit Spielsucht, deren Angehörigen und Freunde. Informationen zur Beratung von Personen mit Spielsucht sind auf Anfrage verfügbar.

- · Sie für Unterhaltung zahlen, nicht Ihr Geld investieren.
- Sie nur mit Geld spielen sollten, das Sie auch verlieren DÜRFEN.
- Sie sich vor dem Spielen feste Grenzen stecken, wie viel Sie ausgeben möchten.
- Sie Probleme bekommen, wenn Spielautomaten zur wichtigsten Sache in Ihrem Leben werden.
- Sie Glücksspiel nur einen verhältnismäßig kleinen Teil Ihrer Zeit und Aufmerksamkeit widmen sollten.
- das Spielen innerhalb Ihres finanziellen Rahmens SPASS machen und spannend sein kann
- Spielen außerhalb Ihres finanziellen Rahmens Ihnen und anderen Personen Probleme verursachen kann.
- · Sie nicht spielen sollten, um Ihren Sorgen und Problemen zu entkommen.

#### VYPOČÍTÁNÍ RIZIKA

Sázení je zábava a vzrušující forma pobavení, která přináší příjemné zážitky.

Hraní na hracích automatech je přitažlivý způsob podstoupení rizika, dokud máte toto podstoupené riziko pod kontrolou.

Převážná většina lidí, kteří hrají na hracích automatech nebo sází jiným způsobem, si tyto zážitky užívá bez jakýchkoli problémů, ale velmi malý počet hráčů ztratí kontrolu nad tím, co dělají.

Pro tyto hráče to přestává být zábava.

Jejich životu může dominovat gamblerství

#### PROBLEMATICKÉ GAMBLERSTVÍ

Problematičtí gambleři budou pokračovat v hraní, ať vyhrávají nebo prohrávají.

Budou používat své peníze i peníze jiných lidí, aby mohli pokračovat v hraní. Jejich život řídí hraní a mnoho ostatních věcí může trpět: rodinný život, jejich práce a další zájmy

Hraní se stává problémem, pokud:

- · Hrajete, dokud nepřijdete o všechny peníze.
- Půjčujete si nebo kradete, abyste mohli v hraní pokračovat.
- · Hrajete, abyste dohnali ztráty.
- · Zanedbáváte ostatní zájmy, rodinu a přátele kvůli hraní.

## MĚJTE TO POD KONTROLOU

Vždy, když hrajete na automatech, měli byste mít na paměti, že:

#### **KONTROLA**

Lidé, kteří se domnívají, že by mohli mít problém s gamblerstvím, by se měli sami sebe zeptat, jestli:

- Zanedbávají práci nebo vzdělání kvůli hraní.
- Hrají, aby získali peníze na zaplacení dluhů nebo vyřešení finančních těžkostí.
- · Když prohrají, mají pocit, že se musí co nejdříve vrátit a vyhrát prohrané peníze zpět.
- · Hrají, dokud nepřijdou o poslední peníze.
- · Půjčují si, aby mohli financovat své sázení.
- · Zdráhají se používat "peníze na hraní" na běžné výdaje.
- Dopustili se nebo uvažovali, že by se dopustili, protiprávního jednání, aby získali peníze na sázení.
- Už někdy uvažovali o sebedestrukčním chování jako důsledku sázení.

#### KDO MŮŽE POMOCI?

Pokud máte problémy se sázením, nebo znáte někoho, kdo je má, a chcete pomoc, obratte se na linku pomoci GamCare:

#### GamCare: 0808 8020 133

GamCare je státní centrum pro informace, poradenství a praktickou pomoc týkající se společenských dopadů gamblerství.

Na státní lince pomoci pracují vyškolení pracovníci. Mohou poskytovat poradenství a rady problémovým hráčům, rodinným příslušníkům a přátelům gamblerů. Informace ohledně poradenství pro problémové gamblery jsou k dispozici na vyžádání.

- · Kupujete si zábavu, neinvestujete peníze.
- Měli byste utratit pouze peníze, o které si můžete dovolit přijít.
- Před zahájením hraní byste si měli určit přesné limity, kolik peněz chcete utratit.
- · Problém nastane, pokud se hrací automaty stanou nejdůležitější částí vašeho života.
- · Hraní by mělo zabírat relativně malé množství vašeho času a zájmu.
- · Hraní v rámci vašich možností by mělo být zábavné a vzrušující.
- · Utrácení nad vaše možnosti pravděpodobně způsobí problémy vám i ostatním.
- · Hraní by pro vás nemělo být únikem před starostmi či tlaky.

 $\exists : :$