

**ARCADIA CASINO LIMITED**  
**POLICIES & PROCEDURES**

<b>Version</b>	<b>Date</b>	<b>Drafted/Reviewed by</b>
1	May 2020	Debbie Bollard
2	April 2025	Debbie Bollard

## **GAMBLING REGULATORY COMPLIANCE**

### **Introduction**

The Company is licensed to operate AGC premises

The Director and Company acknowledge their obligations to uphold the licensing objectives set out in the Gambling Act 2005 and the requirement to comply with the Licensing Codes and Conditions of Practice (LCCPs) as amended from time to time. The Company will comply with any relevant social responsibility provision of a code of practice issued by the Gambling Commission.

If it became clear that the Company was unable to fulfil its responsibilities under the Operating Licence the Director would notify the Gambling Commission immediately and comply with any requirements of the Gambling Commission

### ***Licensing Objectives***

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

### ***Licensing Conditions and Codes of Practice***

The latest version of the LCCPs can be found online at

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

Compliance with the *Social Responsibility Codes* is a condition of the Company's Operating Licence, and any breach may lead the Commission to review an Operator's Licence with a view to suspension, revocation or the imposition of a financial penalty. This could also expose the Company to the risk of prosecution.

*Ordinary Code Provisions* do not have the status of Operator Licence conditions but set out good practice. The Company can adopt alternative approaches provided it considers the ordinary code provision and can demonstrate that an alternative approach is reasonable in the circumstances; or that by taking an alternative approach it is acting in a similarly effective manner. Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by the Company may be taken into account by the Commission on a licence review but cannot lead to imposition of a financial penalty.

## **REPORTING REQUIREMENTS**

The Company will disclose to the Commission anything that is likely to have a material impact on its business or ability to conduct licensed activities compliantly. In particular it will report any of the Key Events listed in the Licence Condition 15.2.

**A key event** is an event that could have a significant impact on the nature or structure of an Operator's

business. Operators are required to notify the Commission of the occurrence of key events as soon as reasonably practicable and in any event within five working days of becoming aware of the event's occurrence.

Operators must as soon as reasonably practicable, provide the Commission with any information that they know relates to or suspects may relate to the commission of an offence under the Gambling Act 2005, including any breaches of the Licence Conditions and Codes of Practice.

Full details of notifiable key events can be found in the Licence Conditions and Codes of Practice at condition 15.2 and include the following:

- The Company becoming insolvent;
- Any change in key personnel;
- Any disciplinary sanction, including dismissal, against the holder of a personal licence;
- Submission of a suspicious activity report (SAR) to the NCA pursuant to the Proceeds of Crime Act 2002 or Terrorism act 2000;
- Any breach of the Company's information security that adversely affects the confidentiality of customer data; and
- Any change of the Company's alternative dispute resolution (ADR) provider

The Company acknowledges its duty as set out in Licence Code 15.3.1 to, and will, provide the Gambling Commission with any information it requests in Regulatory Returns or otherwise relating to operations including the type of gambling activities provided, the numbers of staff employed and the policies in relation to, and the experience of, problem gambling.

## **RESPONSIBILITY FOR THIRD PARTIES**

The Company will be responsible for any third parties that it contracts with relating to the operation of its premises or the supply of gaming machines and will require any third party to act in accordance with the LCCPs. It will require any third party to provide any information that it may need to comply with its information reporting and other obligations to the Gambling Commission. Any contract with such a third party will include a provision to terminate the contract if in the Company's opinion the third party is in breach of its obligations.

## **ACCESS TO PREMISES**

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

- The Company must provide the Gambling Commission or Police with any information that it suspects may relate to the commission of an offence under the Gambling Act 2005, including

an offence resulting from a breach of an operating licence condition or a code of practice provision having the effect of a licence condition.

- The Company must provide the Gambling Commission with such information as the Commission may require from time to time including the range of gambling activities provided by the licensee and the licensee's policies in relation to, and experience of, problem gambling.
- The Company must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, complies with the Consumer Rights Act 2015.
- Staff will co-operate with Enforcement Officers and Police in the proper performance of their compliance functions; senior management will ask the visiting officer for a written report of the inspection.

Staff are trained on induction and during refresher training on this policy and the rights of entry to premises by the Gambling Commission's Enforcement Officers, the Police or an Authorised Officer of the Local Authority.

- Suspected Offence - 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.
- Inspection of Gambling - A constable, enforcement officer or authorised person may enter premises if they reasonable suspect that unlawful facilities for gambling (other than private and non-commercial gaming) or better may be being provided, may be about to be provided or have been provided.
- Inspection of Operating Licence Condition Compliance - A constable or enforcement officer may enter premises that they reasonably believe to be used by the holder of an operating licence in connection with licensable activities, to determine whether the licensed activities are being carried out in accordance with the conditions of the operating licence.
- Licensed Premises - A constable, enforcement officer or authorised person may enter a premises where an application for a premises licence has been made to assess the likely effects of activity carried on under a premises licence.

## **ANTI-MONEY LAUNDERING RISK ASSESSMENT POLICY & PROCEDURES**

### **LICENCE REQUIREMENTS**

Under LCCP 12.1.1 in order to prevent money laundering and terrorist financing, licensees must:

- Conduct an assessment of the risks of their business being used for money laundering or terrorist financing;
- Review the risk assessment at least annually;
- Have appropriate policies, procedures and controls in place to prevent money laundering; and
- Implement those policies effectively taking into account learning or guidelines published by the Gambling Commission.

The appropriate guidance from the Gambling Commission can be found at:

<https://www.gamblingcommission.gov.uk/manual/duties-and-responsibilities-under-the-proceeds-of-crime-act-2002>

The Company is licensed for non-remote Bingo, AGC and the supply maintenance and repair of gaming machines and is therefore not within the regulated sector under the Money Laundering (Information on the Payer) Regulations 2017 (as amended). However, the Company must comply with its obligations to prevent commission of offences under the Proceeds of Crime Act 2002 (POCA) and also comply with the LCCP.

### **MONEY LAUNDERING**

Money laundering is a term referring to offences involving the proceeds of crime or terrorism funds. Criminals attempt to launder money by disguising the source and/or changing the form of the funds or moving them to a place where they are less likely to attract attention.

The following are acts of money laundering:

- Concealing, disguising, converting, transferring criminal property, or removing from the UK (section 327 of the Proceeds of Crime Act (POCA) 2002).
- To enter into or become concerned in an arrangement which you know, or suspect will assist the acquisition, retention, use or control of criminal property or on behalf of another person (POCA section 328).
- Acquiring, using, or possessing criminal property.

### **ANTI-MONEY LAUNDERING**

Anti-money laundering (AML) is a term used to describe the legal controls that require financial institutions and other regulated entities to prevent, detect, and report money laundering activities.

An effective AML program requires:

- The criminalisation of money laundering with powers given to regulators and the police to investigate and prosecute;
- Financial institutions to identify their customers, establish risk-based controls, keep records and report suspicious activities;
- The ability to share information with other jurisdictions as appropriate.

## REGULATION

Employees working in the gambling industry are required to make a report in respect of any information that comes to them in the course of their business:

- when they know
- when they suspect
- when they have reasonable grounds for knowing or suspecting that a person is engaged in money laundering or terrorist financing, including criminal spend.

These obligations are collectively referred to as grounds for knowledge or suspicion. The Company must be able to demonstrate, with supporting evidence, that a risk assessment is and has been undertaken prior to entering into business relationships with customers and that adequate customer due diligence is conducted in order to ensure that customers' transactions are consistent with the level of risk presented.

The Company must also be able to demonstrate the extent of ongoing monitoring which is conducted on a risk-sensitive basis and retained any records necessary to reflect this, with risk profiles being properly maintained. This policy identifies additional measures that will be applied to carry out risk monitoring and when it will be necessary to obtain a declaration as to the source of funds from customers in situations which present a high risk with the potential for money laundering.

The Company and its Directors are committed to ensuring that compliance is embedded in all aspects of the business.

## AML RISK ASSESSMENT

### COUNTRY/GEOGRAPHIC RISK

#### Risks

- Residents of some countries can pose an inherently elevated risk of money laundering; the Financial Action Task Force has identified several High-Risk Jurisdictions on their Black List and a number of countries that are under increased monitoring on their Grey List <https://www.fatf-gafi.org/en/countries/black-and-grey-lists.html>
- Customers can present a higher risk as a result of their citizenship, business or residency.

#### Risk assessment

- There is a possibility that customers may originate from countries on the FAFT list.
- The majority of customers will be known to staff working in the premises through everyday customer interactions
- Staff are trained to be alert to any suspicious activity and to report suspicions to their line manager.
- Where the Company has suspicion that an unknown customer may come from a country on the Blacklist they will be asked to provide proof of residency and the Company will undertake further monitoring for any suspicious activity.
- Where the Company has suspicion that an unknown customer may originate from a country on the Grey List the Company may undertake further monitoring for any suspicious activity.

**Risk assessment = LOW**

**CUSTOMER RISK****Risks**

- Unknown or anonymous customers
- High spenders
- Disproportionate spenders
- Casual or regular customers
- Forged or stolen identities,
- From jurisdictions on the Blacklist or the Grey List or on sanctions lists.

**Risk assessment**

- The majority of customers will be known to staff through everyday customer interactions.
- Staff are trained to be aware of any suspicious activity and to report suspicions to their line manager.
- Where there is any doubt about the identity of a customer, they will be asked to verify their identity against their passport or driving licence photo.

**Risk assessment = LOW**

**TRANSACTION RISK (INCLUDING MEANS OF PAYMENT)****Risks**

- Money used to bet/gamble may be the proceeds of crime.
- Cash may be used that is difficult to trace and is associated with criminal activity.
- Customers may deposit criminal proceeds into gaming machines and then withdraw the funds with no gambling activity.

**Risk assessment**

- Staff are trained to be aware of any suspicious activity and to report suspicions to their line manager.
- The maximum stake on gaming machines is £2.
- Wins over £300 in value are paid out from the counter where no TITO so staff can interact with the customer and identify any suspicious activity.

**Risk assessment = LOW**

**PRODUCT RISK****Risks**

- Some gambling products such as gaming machines, and automated ticket redemption machines can pose a higher risk of money laundering.

**Risk assessment**

- The Company offers low-stake gaming machines with a maximum stake of £2 and maximum prize of £500.
- Wins over £300 in value are paid out from the counter where no TITO so staff can interact with the customer and identify any suspicious activity.

**Risk assessment = MED.**

**RISK ASSESSMENT - OVERALL**

- The Company has assessed its risk of being used to launder criminal proceeds to be **LOW/MED** overall.
- Its business is offering low stake gaming machines and bingo with a limit of £2 maximum stake.

- Winnings of over £300 are paid out by staff where no TITO instead of from the gaming machine to help identify suspicious activity
- Any stakes credited to a machine and then withdrawn with no gambling activity are flagged as suspicious to the MLRO.

The Company assesses that its risk of money laundering is LOW.

The Company acknowledges that higher value gambling activity carries a higher risk of money laundering and staff are trained to be alert to any such activity and to report it to their line manager.

**Updated May 2025**

### **CRIME & DISORDER AND AML POLICY**

This policy is based on the following principles and practises:

- The development of systems and controls that are appropriate for the business and comply with all legal and regulatory requirements;
- The assessment of any money laundering risks to the business at least annually and the adoption a risk-based approach that is flexible, effective, proportionate and cost effective;
- A commitment from, and responsibility resting with, the senior management;
- Regular assessment of the systems and controls in place;
- The maintenance of transactions records that meet the needs of law enforcement investigations tackling money laundering and terrorist financing;
- Initial and ongoing training for all relevant employees;
- Providing the nominated Money Laundering Reporting Officer (MLRO) with the resources and authority to operate objectively and independently.

### **RISK MANAGEMENT**

The Company has a policy and procedures in place in relation to risk assessment and management, as required under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (the Regulations). This risk-based approach involves a number of discrete steps in assessing the most proportionate way to manage and mitigate the money laundering and terrorist financing risks:

- Identifying any money laundering and terrorist financing risks that are relevant to its business;
- Designing and implementing policies and procedures to manage and mitigate these assessed risks;
- Monitoring and improving the effective operation of these controls; and
- Recording what has been done, and why.

This risk-based approach focuses the effort where it is most needed and will have most impact. It requires the full commitment and support of senior management, and the active co-operation of all employees. The Company has conducted an assessment of its risk exposure to money laundering, which considers the threat, and its impact.

### **MLRO**

The designated Money Laundering Reporting Officer (Harpreet Chattha) takes responsibility for SARs in respect of the prevention and detection of money laundering, counter terrorism financing and the Company's obligations under the Proceeds of Crime Act 2000

The MLRO has responsibility for:

- Deciding whether to establish or continue a business relationship with a customer;
- Suspending or terminating a business relationship;
- Deciding whether the Company has any knowledge or suspicion of money laundering in relation to a customer's betting activity; and
- Submitting a Suspicious Activity Report (SAR) to the National Crime Agency (NCA) using [www.nationalcrimeagency.gov.uk](http://www.nationalcrimeagency.gov.uk).
- Seeking a defence (where appropriate); and
- Keeping a record of the decision-making process and all SARs submitted to the NCA.

The MLRO has the authority to act independently in carrying out their responsibilities and has access to sufficient resources to carry out their duties.

### **SUSPICIOUS ACTIVITY**

Suspicious activity includes any suspicious transactions, extreme customer profiles, and where deposits contradict the circumstances. Where the Company identifies a customer that requires additional risk monitoring it will conduct enhanced due diligence checks and may ask them to provide the following as evidence of identity:

- Passport or ID card.
- Utility bill.
- Bank statement.
- Other proof of identity.

Enhanced Due Diligence Checks are based on a customer's profile and the risk they pose to the Company's business. Where it is determined that a customer may be a risk the Company will conduct risk monitoring which will include checks of where the customer lives and works, and the value of their home and whether it's comparable to the level of customer spending.

### **SUSPICIOUS ACTIVITY REPORTS (SARS)**

The law imposes a duty on businesses to make a Suspicious Activity Report (SAR) about any actual or suspected money laundering or terrorist funding. Any employee who has any information that comes to them in the course of working for the Company that they know, suspect, or have reasonable grounds to know or suspect a money laundering activity is occurring should report their suspicions promptly to the MLRO using the form below. Any employee failing to do so, will be subject to disciplinary action and is liable to criminal prosecution.

No further enquiries should be made about the suspected money laundering after reporting to the MLRO and no further steps in any transaction relating to the suspected money laundering should be made without authorisation from the MLRO.

An employee must not, under any circumstances, disclose or discuss any AML concern with the person or persons subject to an investigation, or any other person for that matter. Disclosure (also known as "tipping off") is strictly prohibited and carries with it serious legal penalties.

Furthermore, and in order to keep ourselves protected as much as possible, no remark should ever be left on an account that would give any indication that money laundering is suspected, a customer being

entitled, at any point in time, to request the full notes/remarks on their account.

## **EMPLOYEES**

The Directors are fully committed to and responsible for the implementation of this policy. They understand their individual personal liability for consenting to or contributing to the commission of offences under the Regulations, or where such offence is attributable to any neglect on their part.

### **Staff training**

All staff will receive training on their obligations to report any knowledge or suspicions of money laundering to the MLRO and are aware of the procedures in place for doing so. Relevant employees will receive training on how to follow Company procedures for:

- Client due diligence (CDD), including enhanced requirements for high-risk clients,
- reporting suspicious activity to the MLRO and seeking appropriate consent to payout winnings where applicable.

## **RECORD KEEPING**

The Company will ensure that there is an audit trail to assist in any financial investigation by a law enforcement body. Its record keeping policy and procedure covers records in the following areas:

- Details of how compliance has been monitored by the MLRO;
- Delegation of AML tasks by the MLRO;
- MLRO reports to senior management;
- Information not acted upon by the MLRO including an explanation as to why no further action was taken;
- Customer identification and verification information;
- Supporting records in respect of business relationships or occasional transactions;
- Employee training records;
- Internal and external SARs;
- Contact between the MLRO and police or the NCA, including records connected to appropriate consent.

## **OFFENCES**

All employees are made aware of their risk of committing the following related offences.

- Failing to report suspicious activity under POCA and the Terrorism Act
- Failing to make a disclosure to the MLRO as soon as they are in receipt of information giving rise to the knowledge or suspicion.
- Failing, as the MLRO to make a disclosure to NCA of information giving rise to the knowledge or suspicion.
- Disclosing information that a SAR has been submitted and that is likely to prejudice an investigation,
- Disclosing information that an investigation into allegations that an offence under POCA or the Terrorism Act has been committed, and that is likely to prejudice the investigation.
- Falsifying, concealing, destroying, or disposing of any documents that are relevant to an investigation into an offence under POCA or the Terrorism Act

**VETTING PROCEDURES FOR NEW EMPLOYEES**

The Company undertakes a number of vetting procedures when staff are employed through proper identification checks and verifies the identity and credentials of employees using at least two independent references. It will also seek to verify any further personal information or background information.

**PROTECTING EQUIPMENT FROM INTERNAL CRIME AND CRIMINAL MISUSE**

The Company understands that a keyway to combat fraud is to first identify where its most valuable assets are. Processes and controls have been built into the routine business of the Company to minimise the risk of any of the gaming machines being misused.

**ENSURING OTHER COMPANIES ARE TRUSTWORTHY AND REPUTABLE**

The Company is committed to promoting strong principles of business and professional ethics at every level.

All new suppliers will be subject to a rigorous approvals process and all information supplied by them will be verified and assessed to consider the risks associated with the supplier. The company also ensures that any third parties it contracts with understand the compliance obligations under the relevant customer jurisdictions.

**RESPONSIBILITIES UNDER THE PROCEEDS OF CRIME ACT (POCA)**

The Company is fully aware of its obligations set out in the Proceeds of Crime Act 2002 and has appropriate policies and procedures in place.

**INTERNAL RECORD KEEPING**

- Records of all customer transactions will be retained for a minimum of 6 years after the transaction has taken place.
- Records of customer details, regardless of their value state or open/blocked status, will be kept for a minimum of 6 years after the relationship with the customer was terminated.
- Records of money laundering investigations and suspicious activity reports will be kept for 6 years after the investigation was completed.

**FURTHER INFORMATION**

Further information can be obtained from the following sources:

- National Crime Agency (NCA) <https://www.nationalcrimeagency.gov.uk/>
- National Crime Agency (NCA) - Suspicious Activity Reports (SARs): <https://sarsreporting.nationalcrimeagency.gov.uk>
- National Crime Agency (NCA) - Guidance on submitting better quality Suspicious Activity Reports (SARs) <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/650-guidance-on-submitting-better-quality-suspicious-activity-reports-sars-v9-0/file>
- Money Laundering Regulations: report suspicious activities: <https://www.gov.uk/guidance/money-laundering-regulations-report-suspicious-activities>
- Gambling Commission - Anti-money laundering hub: <https://www.gamblingcommission.gov.uk/licensees-and-businesses/aml>

**For completion by the employee suspicious of activity**

CONFIDENTIAL

From: \_\_\_\_\_

[insert name of employee]

**Details of suspected offence:**

<p><b>Names(s) and address(es) of person(s) involved:</b> [if a company/public body please include details of nature of business]</p>
<p><b>Nature, value and timing of activity involved:</b> [Please include full details e.g., what, when, where, how. Continue on a separate sheet if necessary]</p>
<p><b>Nature of suspicions regarding such activity:</b> [Please continue on a separate sheet if necessary]</p>

**Has any investigation been undertaken (as far as you are aware)?** (Please tick the relevant box)

Yes  No

**If yes, please include details below:**

**Have you discussed your suspicions with anyone else?**

(Please tick the relevant box)       Yes    No

**If yes, please specify below, explaining why such discussion was necessary:**

**Signed:** \_\_\_\_\_ **Dated:** \_\_\_\_\_

**Please do not discuss the content of this report with anyone you believe to be involved in the suspected money laundering activity described. To do so may constitute a tipping off offence, which carries a maximum penalty of five years' imprisonment.**

**For completion by the Money Laundering Reporting Officer (MLRO)**

**THE FOLLOWING PART OF THIS FORM IS FOR COMPLETION BY THE MLRO**

**Date report received:** \_\_\_\_\_

**Date receipt of report acknowledged:** \_\_\_\_\_

**CONSIDERATION OF DISCLOSURE:**

**Action plan:**

**OUTCOME OF CONSIDERATION OF DISCLOSURE:**

**Are there reasonable grounds for suspecting money laundering activity?**

**If there are reasonable grounds for suspicion, will a report be made to NCA?** [Please tick the relevant box]  Yes  No

**If yes, please confirm date of report to NCA: \_\_\_\_\_ and complete the box below:**

**Details of liaison with NCA regarding the report:**

**Notice period:** \_\_\_\_\_ to \_\_\_\_\_

**Moratorium Period:** \_\_\_\_\_ to \_\_\_\_\_

**Is consent required from NCA to any ongoing or imminent transactions which would otherwise be prohibited acts? [Please tick the relevant box]       Yes  No**

**If yes, please confirm full details in the box below:**

[Empty box for providing full details of consent]

**Date consent received from NCA:** \_\_\_\_\_

**Date consent given by you to employee:** \_\_\_\_\_

**If there are reasonable grounds to suspect money laundering, but you do not intend to report the matter to NCA, please set out below the reason(s) for non-disclosure:**

[Please set out any reasonable excuse for non-disclosure]

**Date consent given by you to employee for any prohibited act transactions to proceed:**

\_\_\_\_\_

**Other relevant information:**

**Signed:** \_\_\_\_\_

**Dated:** \_\_\_\_\_

**THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS**

## **PROTECTION OF BUSINESS FROM BEING A SOURCE OF CRIME OR DISORDER**

### **CASH HANDLING POLICY**

#### **Licensing Requirements**

- LCCP Condition 5.1.1 requires Operators to implement appropriate policies and procedures concerning the usage of cash and cash equivalents (by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
- LCCP Condition 15.3.1 requires Operators to report their gross gambling yield from each category of gaming machine within 28 days of the end of each quarterly period.

The Company acknowledges that there is a risk of internal and external crime including the theft of monies from its premises and the use of the business to launder money and/ or finance terrorism. The Company has there put in place the following cash handling policy for all its premises.

#### **Principles:**

- The receipt of money from gaming machines must be properly accounted for in all circumstances.
- Any concerns about money laundering should be immediately reported to senior management and the Money Laundering Reporting Officer and documented.
- All cash collections must be carried out by appropriately trained individuals.
- All cash collected must be securely stored and banked.
- Full records of all gaming machine collections must be maintained, including
  - the meter readings for each machine;
  - the category of gaming machine;
  - the location of the gaming machine.

#### **Procedures:**

- Gaming machines are emptied by the senior management and meter readings are recorded.
- All money is immediately taken to the site office where it is counted and the details together with the meter readings are recorded electronically to ensure that the same correspond.
- The Directors and senior managers are solely responsible for issuing refloats after the machines have been emptied and all floats are recorded and signed for at the time.
- The Directors and senior managers are responsible for banking;
- Any cash is kept stored securely in the safe in the site office until it is banked

#### **Credit & Money lending**

The Company does not permit the use of credit cards for gambling in its premises whatsoever.

The Company does not provide credit in connection with gambling nor participate in, arrange, permit, or knowingly facilitate the giving of credit in connection with gambling. Staff are trained to be alert to and to prevent collusion between customers. Disciplinary action will be taken against any member of staff involved.

The Company does not permit customers to lend money to one another and staff are trained to be alert to and identify any attempts and to report instances of substantial lending to a director. Customers will be asked to cease the practice and in certain circumstances they may be excluded from the premises if the behaviour continues.

### **Internal crime**

The Company acknowledges that there is a risk of internal crime in the form of theft or money laundering by employees. Although this is assessed as being low, to mitigate the risk, the Company has adopted the following policy.

- The Premises are constantly monitored by CCTV which is recorded and available to download and review at any time.
- Only senior management are responsible for emptying and refloating the machines and which is conducted on a weekly basis at which time meter readings are taken and recorded; these are then checked to ensure that the same correspond.
- Any cash is kept stored securely in the safe in the office together with the keys to all the gaming machines with access by senior management only.
- Staff and their family are not permitted to use the gaming machines or electronic bingo terminals in its premises.

The Company can make the following gaming machines available for use in its Premises:-

- Category B3– max stake £2 max prize £500
- Category B4 – max stake £2 max prize £400
- Category C – max stake £1 max prize £100
- Category D – max stake 10p max prize £5

The Company will ensure that on its Premises it only operates 1 category B3/4 machine for every 4 category C/D machine unless it has premises with grandfather rights when it can operate a maximum of 4 category B3/4 machines. Where applicable, to maintain the 20% rule staff are trained to switch off a category B3/4 machine if a category C/D machine becomes unserviceable.

### **External Crime**

The Company maintains an asset register recording:

- Details of its gaming machines including serial numbers
- The location of each gaming machine and the relevant authorisation for its operations
- Details of any maintenance including software updates
- Details of disposal

The Company ensures that all gaming machines operated and supplied by the Company have:

- Independent metering to monitor activity.
- Coin and note acceptors that reduce the risk of counterfeit monies being used in the machines.
- Security locks with access to keys limited to the Company and authorised staff.
- Alarms and programs designed to shut the machine down in the event of an attempt tamper with them.

The Company audits transactions and accounts and makes regular checks for any unusual or suspicious activities.

The Company uses CCTV and has staff monitoring its equipment to prevent crime and criminal misuse.

The Company carries out due diligence checks on other businesses that it deals with to ensure they are trustworthy and reputable and comply with any industry regulations and standards. This includes where appropriate that a supplier holds a valid Operating Licence. If there are any concerns about the conduct of a third party that the Company does business with he will, where appropriate, terminate any contract immediately.

The Company only sources gaming equipment supplied by other businesses that hold Operating Licences and regularly checks to ensure that the equipment complies with the Gambling Commission's technical standards.

## **ENSURING THAT GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY**

The Company recognises its responsibility and obligations to ensure that the gambling facilities provided are operated in a fair and open way as is required by the licensing objectives and the LCCPs.

The Company offers gambling on fair and open terms; none of the terms on which gambling is offered are unfair terms within the meaning of the Consumer Rights Act 2015 and, where applicable, meets the reasonableness test under the Unfair Contracts Act 1977. Terms of play are benchmarked against these legal requirements.

Staff are trained on induction, that it is essential that the Company is seen to be operating in a fair and open way and that any queries should be immediately referred to the management. Staff are trained on how to deal with the complaints, and which includes logging all complaints in the log at the Premises. All records and reports, including the outcome of each dispute, are submitted annually to the Gambling Commission.

The Terms and Conditions of use of the facilities in Premises are clearly displayed at the Premises and include details of how to self-exclude and make a complaint. Paper copies of the terms and conditions and the complaints procedures are made available for customers to take away. Any changes will be notified to customers through additional signage prior to any change taking place.

Where the Company offers customers free or discounted alcoholic drinks for consumption in its Bingo premises, such promotions will not be linked to whether, or when, the customer begins, or continues, to gamble. Furthermore, the Company will not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

The Company carries sufficient float in its safe on its Premises to cover all gambling transactions and financial obligations.

The Company acknowledges its responsibility for third parties that it contracts with linked to its licensed activities and will ensure that the terms of any such contracts: -

- require a third party to act in accordance with the LCCPs applicable to any activities conducted on behalf of the Company.
- require a third party to provide all information that the Company may need to comply with its information reporting and other obligations to the Gambling Commission
- permit the Company to terminate the contract if in its reasonable opinion a third party is in breach of contract particularly relating to terms pertaining to the LCCPs and licensing objectives.

The Company will ensure that there are sufficient facilities for playing Bingo through Electronic Bingo Terminals so that Bingo remains the Primary activity on the Premises. The layout and design of the Premises are such that anyone entering will be able to identify that they are in a Premises licensed to offer Bingo.

## ARCADIA CASINO LIMITED - TERMS AND CONDITIONS

### Who we are and our contractual relationship

1. These Premises are operated by Arcadia Casino Limited (“us” or “we”) under the authority of an AGC Operating Licence (57175) granted by the Gambling Commission.
2. When you use the gambling facilities on our premises you are entering into a legal contract with us, the terms of which are set out here (the “Terms”). As soon as we provide or display amended Terms then the amended Terms will apply from that point onwards unless we make any material changes in which case, we will display a notice in our premises informing customers of the changes to Terms before they come into effect.
3. When you are on our premises, we expect you to treat our staff and other customers with courtesy. We may ask you to leave if, in our opinion, your behaviour is rude, threatening, or abusive; or you are under the influence of alcohol or other substances. We may refuse admission to our premises at any time without giving reasons.

### Underage gambling

4. Entry to our Premises is only for those aged 18 years and older. Our staff are required to check your age if you appear to be under the age of 25. You may be asked to show ID proving your age.
5. We will only accept a valid, legible, and current form of ID that is an original not a copy and which contains a photograph capable of identifying you and which must also state your date of birth. Any ID’s which show signs of tampering will be rejected. Acceptable forms of ID include any identification carrying the PASS logo (for example Citizencard or Validate), a military identification card, a driving licence (including a provisional licence) with photocard, or a passport.
6. We may refuse you entry and/or remove you from our Premises if you appear to be under-age and cannot or will not produce an acceptable form of ID.
7. If we discover that a child (under 16 years) or young person (16 or 17 years) has gambled on any gaming machine (other than a Category D (i.e. stake of no more than 10p and maximum prize of £5 cash), then we will return the payment to play, and no prize winnings will be paid out.
8. If you are over 18 and are accompanied by a person who is under the age of 18 then we will refuse both of you entry to our Premises. If you enter or try to enter more than once when accompanied by a person who is under the age of 18 years, then we may exclude you from our premises permanently (even if not accompanied by a child or young person).

### Responsible gambling and self-exclusion

9. You agree that we may approach and speak to you where we believe you may have an issue with your gambling and that we may refer you to sources of help with problem gambling. We may record those discussions with you and may also give details of our concern to the Gambling Commission – this will be in general terms and no personal data will be shared with the Gambling Commission. You may want to contact GAMCARE which provides information, advice and counselling to individuals, their family and friends who have concerns about problem gambling. The Helpline number for GamCare is 0808 802 0133. We are a member of the Boomerang SmartEXCLUSION national self-exclusion scheme.
10. This means that you may exclude yourself from gambling with us and from other participating premises for an initial minimum period of between 6 and 12 months. Please inform a member of staff if you wish to discuss self-exclusion. Where possible we will try to discuss this with you in private.
11. In order to self-exclude, you will be expected to sign a paper or digital self-exclusion form accepting the terms and conditions of your self-exclusion and provide us with personal information such as your name, address and contact details, as well as photo identification and any other personal details we reasonably consider necessary to implement this self-exclusion. You do not have to enter our premises to do this and may communicate with us in writing. You agree that we may share the information you provide and the fact of your self-exclusion with IHL who operate the self-exclusion scheme and other local AGC premises. More details will be provided by our staff if you choose to self-exclude.
12. If you have self-excluded yourself from our venue, then we will try to make sure that you are not allowed to enter our premises. If we find you inside our premises, then we will ensure that you leave as quickly as possible. **However, if you still manage to gamble during a period of self-exclusion then we will not be responsible for your gambling losses, nor will we have to refund any monies lost.** We will record any attempt by you to breach your self-exclusion agreement.
13. At the end of the period chosen by you, the self-exclusion will remain in place for a further 6 months unless you take positive action in order to gamble again by requesting a member of staff to allow you to do so. If you reinstate yourself to gambling in this way you will not be able to gamble for a further 24 hours – this is called a cooling off period and is required by Gambling Commission Regulations. You may also request a renewal of the self-exclusion when it expires by contacting a member of our staff.
14. If you do not renew your self-exclusion, nor request to be re-instated to gambling then your self-exclusion

will automatically continue for a further six months. After this time, you will no longer be self-excluded.

15. We reserve the right to exclude you from the premises without your consent if you we consider that you are unable to control your gambling or are abusive to staff, are disruptive or fail to comply with any other terms of entry.

#### **Credit and loans**

16. We do not permit the use of credit cards in our Premises

17. We do not provide any form of credit in connection with gambling.

17. We do not permit any loans or other arrangements on our premises where credit is given to another person for any gambling activities. We will ask anyone to leave our premises and will exclude from entry in the future anyone who we discover is making loans on our premises on a commercial or organised basis.

#### **Promotions and reward schemes**

18. Any promotions, loyalty, or other reward schemes we offer will be subject to separate terms and conditions.

#### **Refunds**

19. If any gaming or other machine fails to work or work properly then, at the discretion of the venue, you will be entitled to is a refund of the stake you wagered. If we believe a machine is operating incorrectly, we may stop any further play on it. Any wins from a faulty machine will be void and you will not be entitled to collect any winnings accrued on a faulty machine.

#### **Complaints and disputes**

20. In this section, a "complaint" means a complaint about any aspect of our operation of our licensed gaming activities. A "dispute" is any complaint which is not resolved at the first stage of our complaints process. A copy of our complaints and disputes procedure is available on request.

21. If you have any complaints about any of the facilities for gambling that we provide, you should raise it as soon as possible with the Manager. If your complaint is not resolved to your satisfaction by the Manager, please put your complaint in writing, setting out the circumstances and send with any supporting information to Harpreet Chattha, Arcadia Casino Limited, 15-17 Upper George Street Luton LU1 2RD within 21 days.

22. We aim to respond in writing to your complaint within 14 days of receiving your written complaint.

23. If your complaint remains unresolved after receiving a written response from us, then we treat it as a dispute, and you have the option to refer it to the independent alternative dispute resolution ("ADR") entity that we use. This entity is called CEDR and can be contacted via its website <https://www.cedr.com>

4. There is no charge or cost to you in referring your complaint to CEDR, but it will not deal with your complaint until you have been through our complaint's procedure. In referring a dispute to ADR, you accept that any determination is binding on you and us.

#### **Cheating and advantage play**

25. If you are found cheating or if it is determined by us that you have employed or made use of a system (including any apparatus) designed to gain an advantage over the random operation of any gaming machine, you will not be paid out any prizes and will be barred from entering the premises in the future.

#### **Data protection and privacy**

26. We operate CCTV facilities at our premises for the purposes of detection and prevention of crime, and to ensure that our staff are able to work in a safe environment. CCTV recordings may be disclosed to the police or used in dealing with any complaints.

27. If you have opted into the self-exclusion scheme then your personal data will be made available to our staff, and the Boomerang as well as other participating AGC and Bingo sites.

28. In order to fulfil our regulatory obligations, we may undertake various checks of your identity, residence, income and wealth and may require you to supply us with information or documents in this regard.

## TECHNICAL STANDARDS

### GAMING MACHINE TECHNICAL STANDARDS

LCCP 2.3.1 requires Operators to comply with the Commission's technical standards and with requirements set by the Commission relating to the timing and procedures for testing.

The Gambling Commission's technical standards can be found at:

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/page/gaming-machine-technical-standards>

The Company acknowledges that its Operating Licence permits it to operate the following gaming machines:-

- Cat B2 - max stake £2 max prize £500 to Casinos & Betting shops
- Cat B3 – max stake £2 max prize £500 to the above Bingo sites and AGCs
- Cat B3A – max stake 32 max prize £500 to members clubs etc
- Cat B4 – max stake £2 max prize £400 to all the above
- Cat C – max stake £1 max prize £100 to all the above FECs, pubs and commercial clubs
- Cat D AWP – max stake 10p max prize £5 to all above & uFECs
- Cat D non-money - max stake 30p max prize value £8 to all above
- Cat D Prize – max stake £1 max prize value £50 to all above
- Cat D crane – max stake 10p max prize £8 to all above
- Cat D combined money & non-money max stake 20p max prize £20 to all above
- Cat D coin pushers and penny falls to all of the above

Gaming machines operated by the Company are either manufactured or supplied by Operators licensed by the Gambling Commission. The Company will, where appropriate, seek assurances from its suppliers that the gaming machines and parts supplied comply with the latest technical standards.

Gaming machines operated by the Company that are manufactured after September 2007 are fully compliant with the Gambling Commission's technical standards.

Gaming machines operated by the Company that are manufactured after September 2007 contain meters which record information on the games played and this information will be the basis for dispute resolution.

Gaming machines operated by the Company declare if they are 'random' or 'compensating'.

- If it is a random machine it will state on the machine that 'This machine is random'
- If it is a compensating machine it will state on the machine that 'this game is compensated and may be influenced by previous play'
- If it is a compensating machine which has a feature which may invite a player to make a choice which may offer a low chance of success (e.g. a Hi/Low or gamble button) the machine will state 'this game is compensated and may be influenced by previous play and offer the player a choice where there is little chance of success'.

Gaming machines operated by the Company display the percentage payout. This is calculated over a very long run, normally 100,000 plays.

- If the game does not depend on player strategy the machine will display the following notice 'this machine has an average percentage payout of at least [insert value] %'.
- If the payout depends on player strategy the machine will state 'the return to player based on best strategy is [insert value] %'
- If the payout, for example of a feature, does not reflect the true odds the machine will display the following message 'the outcome of any game of feature is not necessarily that shown by the odds displayed'.

Gaming machines operated by the Company state whether a malfunction will either void a game or voids all pay-outs and games.

Gaming machines operated by the Company state when a machine has a minimum payout level and will also state if it is not possible to have certain winning combinations available in every game.

## MARKETING POLICY

In accordance with Social Responsibility Code 5.1, where the Company offers any customer or potential customer an incentive or reward it will ensure that the scheme makes clear:

- the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
- that neither the receipt nor the value or amount of the benefit is dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered;
- that if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases;

The Company will ensure that all marketing is undertaken in a socially responsible manner and complies with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable.

The Company will also ensure that any marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations; that all significant conditions which apply to any marketing incentives are provided transparently and prominently to consumers and that significant conditions are displayed at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive. Where limitations of space make this impossible information about the significant conditions will be included to the extent that it is possible to do so, and the advertising will clearly indicate that significant conditions apply with a link to a webpage where the significant conditions are displayed in full. Such terms will be made available for the full duration of the promotion.

The Company will not send direct electronic marketing to consumers without their informed and specific consent and will cease sending such marketing if consent is withdrawn.

## COMPLAINTS AND PLAYER DISPUTE RESOLUTION

Under SR Code provision 6.1.1 licensees must:

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

## POLICY AND PROCEDURE FOR INVESTIGATING A CUSTOMER COMPLAINT

Where a customer raises a complaint about the use of a gambling product provided by the Company it will invoke its complaints procedure as follows:-

- In the first instance the member of staff receiving the complaint will assess whether it can be solved immediately without further intervention from the Company and the matter will be recorded in the Premises complaints' log - **Stage 1**
- If a member of staff is unable to resolve the matter immediately the matter will be referred to the Manager who will try to resolve it - **Stage 2**
- Where the Manager is unable to resolve the matter within 48 hours one of the Directors will review the complaint and provide an acknowledgement to the customer within 3 days, by any reasonable communication method requested - **Stage 3**
- If the complaint cannot be resolved to both parties' satisfaction within 8 weeks the customer will be advised to refer the complaint to CEDR ADR Service and provided with contact details
- The Company will provide CEDR with any additional information it requires to investigate the complaint within 10 working days of a request,
- A record of the referral and its outcome will be reported to the Gambling Commission.

**The Company will ensure that:**

- Its terms and conditions include information about how to make a complaint;
- Information about how to make a complaint is readily accessible to customers and in a paper format that can be taken away;
- The information includes: -
  - details of how to make a complaint and the contact details of the person who will handle the complaint;
  - CEDR's contact details for referring any disputes that cannot be resolved within 8 weeks by the Company;
- Customers are provided with a copy of the complaints policy and procedure on request or when making a complaint
- All complaints are handled in accordance with the procedure;
- A record of all complaints is kept in its complaints log and a copy of the outcome and any decision of a referral to CEDR.
- Its complaints policy and procedure are implemented with effective staff training, kept under review to ensure that they remain effective and comply with the requirements of LCCP 6.1.1 and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
- It notifies the Gambling Commission about any change to its ADR provider.

## **ARCADIA CASINO INFORMATION**

Arcadia Casino Limited tries to provide a high-quality service to its customers and members of staff are trained how to deal with complaints at the initial stage. However, if you believe that things have gone wrong, and your complaint was not resolved to your satisfaction then please inform us as we take such reports seriously. We will review your complaint and will be dealt with by:

- Harpreet Chattha who is a director
- Email Address: [harcadia@gmail.com](mailto:harcadia@gmail.com)
- Tel: 07957005316

### **How to make a complaint**

- Complaints, which we will deal with confidentially, should be submitted in writing, or e-mail.
- The attached form should be used to record and submit complaints.
- Give as much detail as possible and any other relevant information to assist us in the investigative process.
- Complaints should be raised within 6 months of the incident.

### **What happens next?**

We will acknowledge receipt of your complaint in writing within 3 days, we will investigate and provide a full explanation of what we have done within 8 weeks of receiving a complaint. If this is not possible, for example because of a delay in you providing additional information we have requested, we will give a date by which a full response can be expected, and which will only take into account any such delays. Should your complaint not be resolved between us we will provide you with a 'deadlock' or final outcome letter that you will need to submit if you go to Alternative Dispute Resolution (ADR).

### **If you are not satisfied with our response**

If you are still not satisfied with our response to the complaint, you may consider contacting CEDR, the ADR entity this company is registered with, and request that the matter be reviewed. You should submit all previous correspondence relating to your complaint, including the 'deadlock' letter referred to above.

CEDR will acknowledge receipt of your correspondence without undue delay and, after a review, inform you of its findings and recommendation usually within a maximum of 90 days. The review process is thorough and based upon the information that both parties and other independent sources provide.

CEDR's ADR Service contact details are as follows:

- Email Address: [applications@cedr.com](mailto:applications@cedr.com)
- Website: [www.cedr.com/consumer/lotteries-gambling/gambling/](http://www.cedr.com/consumer/lotteries-gambling/gambling/)
- Telephone: 020 7536 6000
- Postal Address: 100 St. Paul's Churchyard, London EC4M 8BU

It is recommended that you visit CEDR's website so that you are fully aware of the procedural rules and other related information

## Complaint Form - CUSTOMER

Name: .....

Address: .....

.....

Postcode .....

Daytime Telephone No.....

E-mail address: .....

Signature: ..... Date: .....

Is this an initial complaint or a follow up to a previous incident?

.....

.....

.....

Name of staff member that you initially raised your complaint with:

.....

Date of Incident: .....

Time of Incident: .....

A clear and comprehensive account of the complaint and what you are seeking as redress to resolve the matter:

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Please use continuation sheet(s) if required.

Signed..... (Complainant)

Date: .....

For Office Use Only

Director dealing with complaint: .....

Complaint Acknowledged (Y/N): Date: .....

Details of action to resolve taken by Company:

.....

.....

.....

If complaint still unresolved by Company

Complainant referred to ADR Entity (Y/N); Date.....

.....

Company Complaint Policy & Procedure Document given to Complainant (Y/N): Date.....

## **PROTECTION OF CHILDREN AND VULNERABLE PEOPLE POLICY**

The Company recognises its responsibility and obligation to protect children and other vulnerable persons from being harmed or exploited by gambling as is required by the licensing objectives and the LCCPs.

### **Access To Gambling by Children and Young Persons**

#### ***Licence Requirements***

- Under s.46 Gambling Act 2005 it is an offence to permit a person under 18 to gamble.
- Under SR Code 3.2.5 licensees must:
  - Have and put into effect policies and procedures designed to prevent underage gambling.
  - Policies must include verifying the age of a customer.
  - Warn customers that underage gambling is an offence.
- Under SR Code provision 3.2.5 policies must also include:
  - checking the age of apparently underage customers
  - refusing entry to an adult only area to anyone unable to produce an acceptable form of identification.
  - taking action when there are unlawful attempts to enter the adult-only areas.

### **POLICY AND PROCEDURE TO PREVENT UNDERAGE GAMBLING**

All the Company promotional material makes it clear that under 18's are not permitted to enter its Premises.

The Company has a think 25 policy, and anyone entering its Premises that is suspected of being underage or believed to be under 25 is asked to produce valid photographic ID as proof of age which includes their date of birth and has no visible signs of tampering or reproduction. The Company will accept the following as evidence of proof of age:

- A passport; or
- A driving licence; or
- An Armed Forces identity card

Anyone found to be or unable to prove their age will be asked to leave the Premises or refused admission. Forged ID may be retained and handed to the police.

Staff are trained as part of their induction that they are under no circumstances to permit access to Premises by anyone who appears to be under the age of 25 and who cannot prove that they are over the age of 18. Notices are displayed at the entry to the Premises stating that no one under the age of 18 is permitted to enter or gamble.

The Company ensures that it does not offer gambling in a style that is intended to or likely to appeal to anyone under 18.

If a person under 18 repeatedly attempts to gamble at Company premises staff will offer that person information on problem gambling and issue an oral warning that further attempts will be reported to the police. If the said person continues to try to enter the premises for the purpose of gambling the

incident will be reported to the police, recorded in the incident log, and recorded in the Company's annual regulatory return.

If the Company identifies an adult who is complicit in encouraging or assisting someone under the age of 18 to enter and gamble in the premises a director will issue a warning and may consider excluding the adult from Company premises on a temporary or permanent basis.

An entry of any incident will be recorded in the incident log kept at the Premises and reported to the Gambling Commission on an annual basis.

The Company participates in a collective test purchasing scheme as part of its underage gambling prevention strategy with testing undertaken a minimum of once a year. The results of any test purchase will be recorded in the Company's logs as 'challenge before gambling activity', 'challenge during gambling activity', 'challenge after gambling activity', or 'unchallenged' and reported to the Gambling Commission. Where a premises fails a test purchase a further test purchase will be arranged and the results recorded.

### **Employment of children and young people**

Employment of children and young people

- Under s.51 of the Gambling Act 2005 it is an offence to employ anyone under 18 to provide facilities for gambling
- Under s.54 of the Gambling Act 2005 it is an offence to employ anyone under 18 to work on gaming machines that are sited in gambling premises
- Under s.55 it is an offence to employ anyone under 18 in an AGC unless closed
- Under Ordinary Code Provision 3.6.2 Licensees should have policies and procedures in effect designed to ensure that
  - Children and young people are not asked to provide facilities for gambling.
  - All staff are instructed on the laws relating to access to gambling by children and young people.

The Company does not employ anyone under the age of 18 to work in its Premises. All staff have been trained about the laws relating to access to gambling by anyone under the age of 18 and which forms part of the induction training for all staff. It is strict Company policy that no gambling facilities are made available for use at the Company's Premises if anyone under the age of 18 is working on the premises outside the hours when the premises are open for business.

## SOCIAL RESPONSIBILITY POLICY AND PROCEDURES

### Licence Requirements

- Under SR Code 3.1.1 licensees must:
  - Have and put into effect policies and procedures to promote socially responsible gambling;
  - Make an annual financial contribution to organisations to prevent and treat gambling related harms.
- Under SR Code 3.3.1 licensees must:
  - Make information readily available to customers on how to gamble responsibly and how to access information about problem gambling (e.g., monitoring or controlling gambling by duration or money spent, timers, self-exclusion options or further advice or information)
- Under SR Code 3.4.1 licensees must:
  - Interact with customers by (a) identifying customers who may be at risk or experiencing gambling harm (b) interacting with those customers and (c) understanding the impact of the interaction;
  - Take into account the Commission's guidance on customer interaction <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/customer-interaction-formal-guidance-for-premises-based-operators?msckid=8e1bb2c1b4f411ec9bf242e2b502fe58>
- Under SR Code 3.5.1 licensees must:
  - Have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
  - Signpost individuals that self-exclude to counselling and support services.
- Under SR Code 3.5.6 licensees must:
  - Offer customers entering into a self-exclusion agreement at their Premises the ability to self-exclude from other similar local Premises operated by other licensees, by participating in a multi-operator self-exclusion schemes.

### SR Triggers

The Company will use the following trigger points that it can monitor to identify those at risk of problem gambling: -

- An increase in the time spent gambling;
- An increase in the amount of money spent on gambling;
- Chasing losses;
- Complaints made by the customer about not winning or talking about the negative impact of their gambling;
- Signs of distress, agitation or other changes that might indicate that gambling is having a negative impact on the customers wellbeing;
- Threatening self-harm or suicide;
- A customer's known vulnerability.

### SR Procedures

The Company makes an annual financial contribution to an organisation approved by the Gambling Commission to prevent and treat gambling related harms. A decision as to the recipient is made on

an annual basis.

As a result of the triggers set out above, where the Company becomes aware that a customer may be at risk of problem gambling, staff will provide the customer with responsible gambling information including the option to have a time-out from gambling or to self-exclude, or other options.

The Company's procedure includes staff monitoring customer activity and interacting early and quickly to minimise the risk of customers experiencing harm associated with gambling. This takes into account the following 3 key outcomes:

- **Identifying** anyone who appears to be gambling beyond their means or displays behaviour such as agitation distress intimidation or aggression that may indicate problem gambling. Staff are trained to know the
- **Interacting** with anyone displaying signs of problem gambling by first asking them if they are open to a discussion about their behaviour and offering the following:
  - Taking a break from gambling;
  - Setting a limit on the time spent gambling;
  - Setting a limit on the amount that they spend on gambling;
  - Suggesting they play on a lower stake machine;
  - Self-exclusion;
  - Stay in Control Leaflet';
  - The use of a play diary to monitor their gambling;
  - Use of a Gambling Management App such as Gamblewise and Playright;
  - Information on how to contact to Gamcare for further help;
  - Taking a 'Time Out'.
- **Evaluating** the outcome of the interaction by monitoring the customer's behaviour/gambling activity to see if the advice has been followed and whether there has been a positive change. This should normally be done monthly and after a self-excluder opts to start gambling again. Where there are any further concerns about irresponsible gambling (even if triggers are not hit) further interaction will take place.

The Company acknowledges that staff have an important role in reducing the risk of customers suffering harm associated with gambling. The Company's training includes providing staff with the necessary tools, skills, and support to monitor customer activity and behaviour and interact at the earliest opportunity. Staff are trained to know regular customers' gambling habits and to recognise any changes that might indicate a problem. Staff are also trained to observe new customers for any signs of problem gambling.

The Company recognises that customers should be always protected and monitors footfall to ensure that adequate staffing is available to cover busier periods.

### **Record Keeping**

The Company will maintain records of all customer interactions through its paper/electronic logs, including details of when an interaction was considered and ruled out and if an interaction took

place later. Details will include: -

- the behaviour or activity before the interaction;
- the change in behaviour or prompt for the interaction
- what form the interaction took including any advice or suggestions;
- the outcome of the interaction.

Customers will be encouraged to provide their name and any other information considered necessary to provide further help and support and identify previous interactions. Personal data held by the Company will be in accordance with the requirements of the Data Protection Act 2018.

### **Training**

Staff will receive training on the Company's Social Responsibility Policy and Procedures on induction and then at least annually on how to identify customers at risk, how to interact with customers, depending on the circumstances and to evaluate whether the interaction has been effective. Training will either be provided in-house by senior management.

Staff will be monitored to ensure that they have understood the training and implemented the procedures. Additional training and remedial training will be provided when considered necessary.

### **Responsible Gambling Information**

The Company provides information to its customers through prominently posters and leaflets, on how to gamble responsibly including how to monitor and control gambling such as: -

- restricting the amount of time spent gambling;
- restricting the amount of money they can spend;
- self-exclusion.

The Company provides information to its customers through prominently posters and leaflets, on how to access further help and advice for problem gambling. The information is: -

- displayed in all places where gambling facilities are provided and adjacent to any ATMs;
- available in a form that can be taken away;
- located where customers can obtain it discreetly;

### **Self-exclusion**

The Company understands that whilst most customers can enjoy and control their gambling, it has a duty of care to those who cannot. The Company therefore provides a self-exclusion facility for customers on request.

Self-exclusion is a last resort for customers looking to address their needs around problem gambling. Staff will engage in the customer interaction process where it may be deemed necessary to self-exclude. Sufficient information should be provided so that the consequences of the process are fully understood.

Self-exclusion is for a fixed period, that lasts for a minimum of six months; customers can request extensions to their self-exclusion for one or more periods of six months.

The Company will make arrangements for customers to self-exclude without entering its Premises but require a face-to-face meeting with the customer. Customers are given an explanation, where possible in private, about the consequences of the self-exclusion. The Company will take into account any specific requests from customers such as where they live, work and travel to gamble and encourage customers to self-exclude from other local sites.

Customers are given the opportunity to self-exclude immediately and informed that the Company does not permit a cooling off period. If the customer wishes to consider self-exclusion further, they may return to initiate self-exclusion later.

Customers are informed that self-exclusion has an immediate effect once initiated and lasts a minimum of 6 months; customers can extend a period of self-exclusion on request by periods of a minimum of 6 months.

A Self-Exclusion Request form will be completed, and the customer asked to assist by providing an up-to-date photograph showing a good likeness. A copy of the self-exclusion form will be given to the customer together with information on counselling and support services; a copy will be retained on site for the duration of the exclusion and a further 6 months.

The Company is enrolled in and a participant of the IHL SmartExclusion multi-operator self-exclusion scheme and customers self-excluding from the Premises will also be informed of the scheme and encouraged to participate.

An entry of the self-exclusion is made in the self-exclusion log and recorded on the Company's next annual regulatory return. The customer's details will be removed from any marketing database to ensure that no marketing materials are sent to the customer during the period of self-exclusion.

The Company has taken into account its structure and layout to prevent access by self-excluders, monitoring of the entrance by staff and using CCTV. Self-excluders will be removed if found gambling or attempting to gamble at the premises and staff are informed of breach alerts on site and at other locations through MOSES.

Staff are also trained to be alert to a self-excluder asking a third party to gamble on their behalf although it is acknowledged that this is often difficult to identify.

At the end of the self-exclusion period the exclusion will remain in place for a further 6 months unless the customer takes positive action to gamble again. This process is known as reinstatement and will normally take place in person. The Company is not required to make an assessment as to whether a reinstatement should take place, but staff are required to check that the person has considered the implication of their return to gambling.

Where a customer chooses to reinstate and return to gambling, they are subject of a 24hr cooling-off period. The self-exclusion will only end at the end of 'cooling off' period and staff are trained not to permit entry to the Premises to anyone during their self-exclusion period and to immediately remove any self-excluded customer.

### **Assessment of Social Responsibility Policy and Procedure**

The Company assesses customer interactions to evaluate the effectiveness of its policy and procedures. Indicators of an effective policy will include:

- Customer retention
- Reduction in complaints
- Increased staff awareness
- An increase in the number of interactions recorded and the quality of the records.

Managers are required to monitor and assess staff interactions and provide additional training where it is deemed appropriate. Managers are also required to regularly check the Customer Interaction log to ensure that staff are recording all interactions and take appropriate steps to reinforce the need for all interactions to be recorded.

The Company will regularly review this policy and procedures and where it identifies areas for improvement changes will be made and implemented. These will be backed up by additional staff training and monitoring to ensure the changes have been embedded.

### **Staff Gambling Policy**

It is the Company's policy that no member of staff is permitted to gamble on its Premises. This is to protect both the Company and employees against any issues that can arise from the effect of problem gambling.

Should the Company become aware of any staff member breaching these rules, the staff will be dealt with under the Company's disciplinary procedure, which may result in sanctions including dismissal.

The Company is committed to protecting staff in the event of any gambling issues brought to its attention by an employee or a member of their close family. If the Company directors become aware of a member of staff with a gambling problem, they will suggest the staff member seek help through GamCare on 0808 8020 133 and will offer the same support by way of leaflets and contact numbers that is provided to customers.

### **Local Area Risk Assessment**

The Company understands its obligation under SR Code 10.1.1 to and will conduct a local risk assessment for each premise that it operates. Such local risk assessment will be reviewed from time to time if the Company identifies any changes in circumstances. The Company will also share its local risk assessment with the local authority when applying for a new premises licence or when applying to vary or transfer an existing premises licence.

## **IMPLEMENTING, REVIEWING AND ASSESSING POLICIES AND PROCEDURES**

The Company will keep up to date with the gambling industry and changes to LCCPs via regular visits to the Gambling Commission website and will subscribe to the Gambling Commission's fortnightly E-Bulletin.

The Company will ensure that all policies are implemented and undertake regular checks to ensure that they are still adhered to. Staff are given training by senior members of the team on induction as to the Company's policies and they are asked to sign a log to confirm their understanding.

Training includes information on the contents of these policies including:

- The protection of the business from being a source of crime and disorder;
- Anti-money laundering;
- Ensuring fair and open gambling;
- Protection of children and vulnerable people;
- Ensuring the promotion of Social Responsibility in gambling.

Existing staff are required to review and re-familiarise themselves with the current policies and procedures at least once every six months. Staff will be constantly monitored to ensure they have understood the training. Further individual training is given if there has been a breach of any policy and/or when felt necessary to ensure staff are kept up to date with legislation and regulatory requirements.

Where changes to LCCPs are implemented, the Company will review the existing policies to ensure that they are still compliant and meet with the current LCCPs. Where changes are necessary these will be made as soon as is reasonably practicable and additional staff training will take place where necessary.

The Company will review the policies at any time that there is found to have been a breach of compliance and will put in place any necessary measures to prevent a further breach and will arrange for any further staff training necessary.