

Appendix B

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

4th 5th August 2023

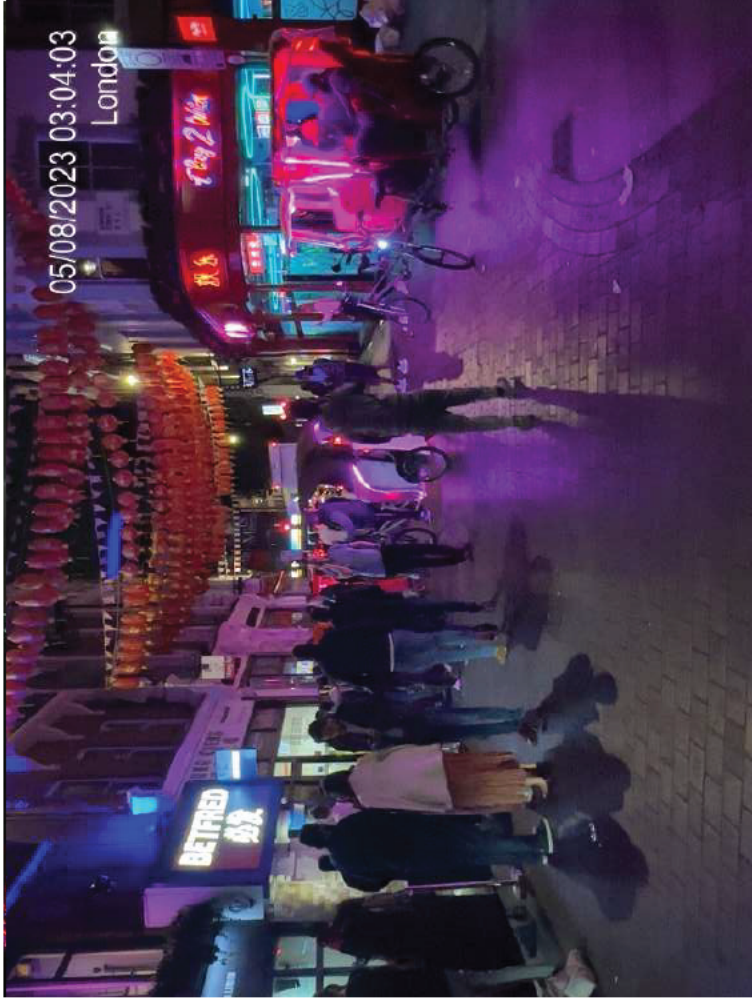


Image B51

03:04hrs

O'Neill's Bar Wardour Street



Image B52

03:05hrs

Gerrard Street looking east

Appendix B

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA
4th 5th August 2023

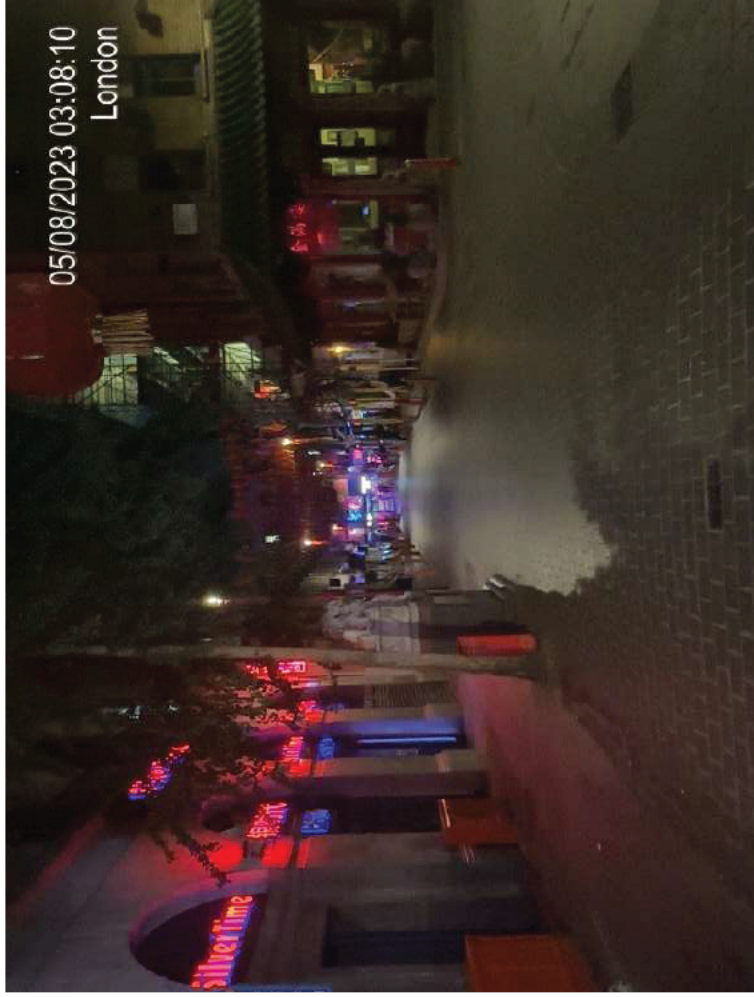


Image B53

03:08hrs

Gerrard Street looking west



Image B54

03:29hrs

Outside Experimental Cocktail Bar
13A Gerrard Street W1D 5PT



Appendix C

Observation Images

2nd - 3rd September 2023

Silvertime

Chinatown

32 Gerrard Street

London

W1D 5QA

Leveche Associates Ltd

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1HQ

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA
2nd 3rd September 2023



Image C1

19:59hrs

Gerrard Street looking east



Image C2

19:59hrs

Gerrard Street looking west

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023



Image C3

20:00hrs

Macclesfield Street looking north



Image C4

20:02hrs

Macclesfield Street looking south

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023



Image C5

20:05hrs

Gerrard Street j/w Wardour Street looking east



Image C6

20:05hrs

Wardour Street looking north

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023



Image C7

20:05hrs

Play 2 Win AGC
Wardour Street



Image C8

20:05hrs

O'Neill's Bar
Wardour Street

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023



Image C9

20:10hrs

Hare Krishna Group
Gerrard Street j/w Newport Place



Image C10

20:24hrs

Wardour Street looking north
towards O'Neill's bar

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023



Image C11

20:29hrs

Las Vegas AGC
Wardour Street



Image C12

20:40hrs

Hare Krishna Group outside Silvertime

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023



Image C13

20:46hrs

Hare Krishna Group, Gerrard Street
walking towards Wardour Street



Image C14

20:49hrs

Uber Eats Delivery Riders
Macclesfield Street

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA
2nd 3rd September 2023



Image C15

21:00hrs

Silvertime entrance



Image C16

21:34hrs

Gerrard Street looking east

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023



Image C17

21:34hrs

Gerrard Street looking west



Image C18

21:44hrs

Macclesfield Street looking south

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023



Image C19

22:47hrs

Gerrard Street looking east



Image C20

22:52hrs

Gerrard Street j/w Macclesfield Street

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA
 2nd 3rd September 2023

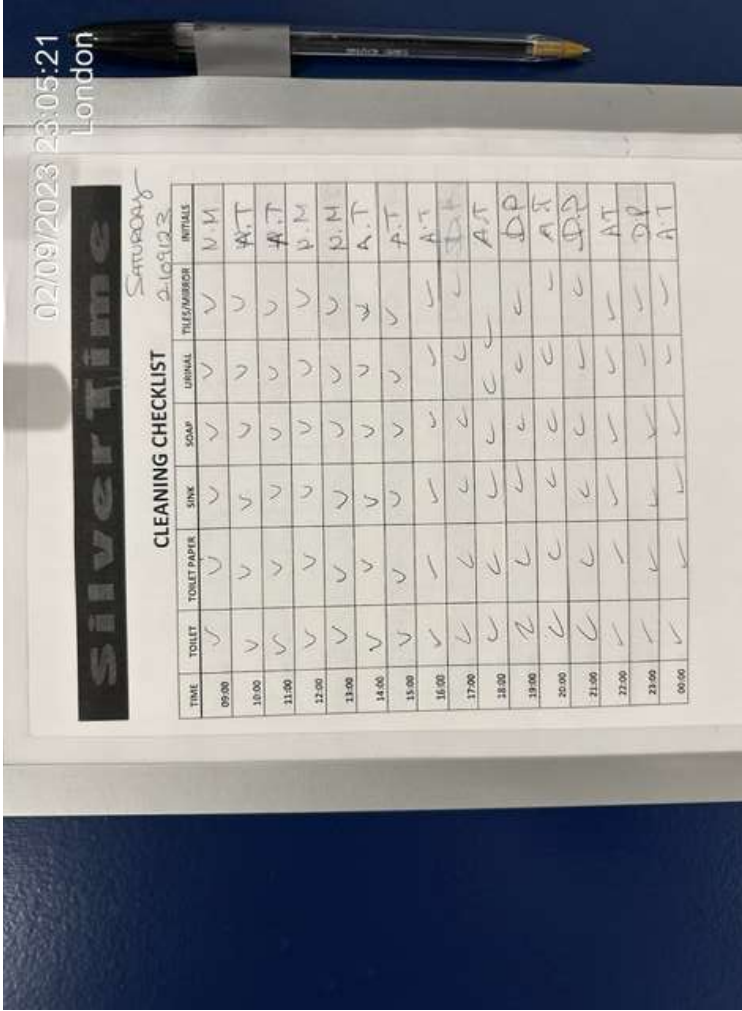


Image C21
 23:05hrs

Silvertime Chinatown
 Toilet Check Sheet

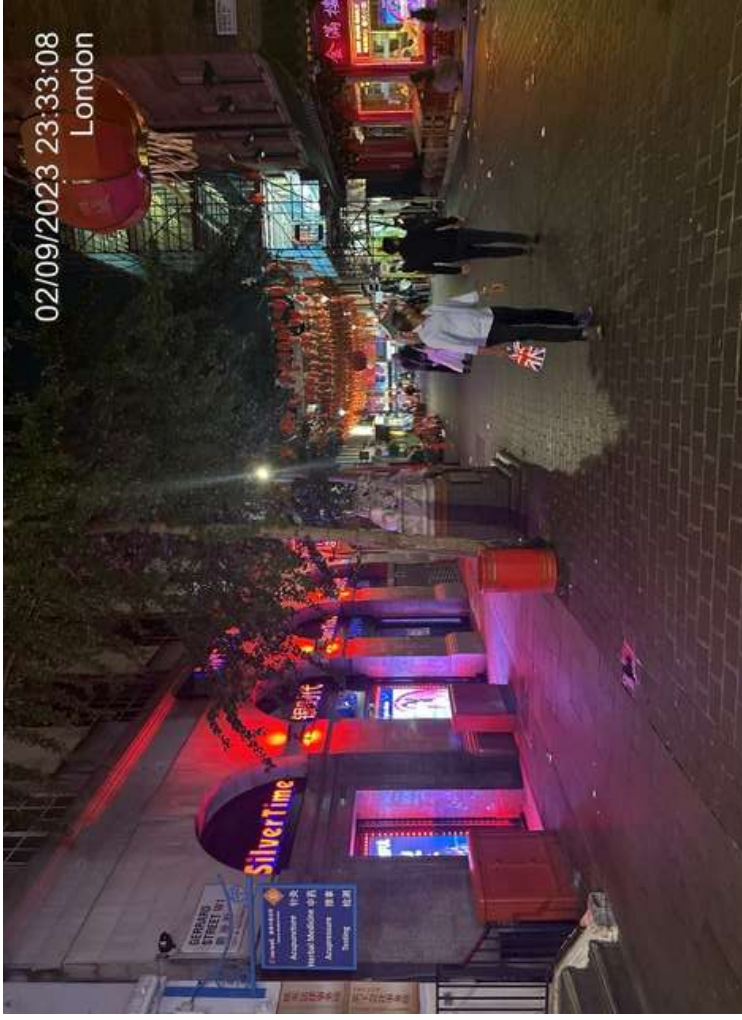


Image C22
 23:33hrs

Gerrard Street looking west

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA
2nd 3rd September 2023



Image C23

23:33hrs

Gerrard Street looking east

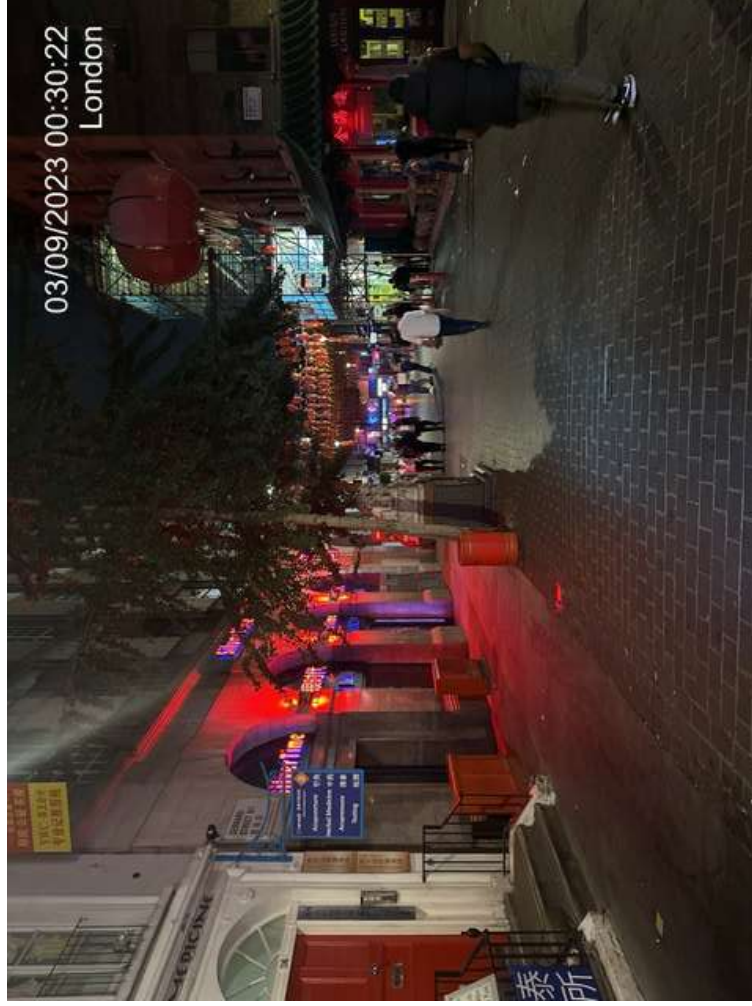


Image C24

00:30hrs

Gerrard Street looking west

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023



Image C25

00:30hrs

Gerrard Street - Refuse collection



Image C26

00:34hrs

O'Neill's Bar Wardour Street

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023



Image C27

00:35hrs

Play 2 Win AGC
Wardour Street



Image C28

00:35hrs

Wardour Street j/w Gerrard Street

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA
2nd 3rd September 2023

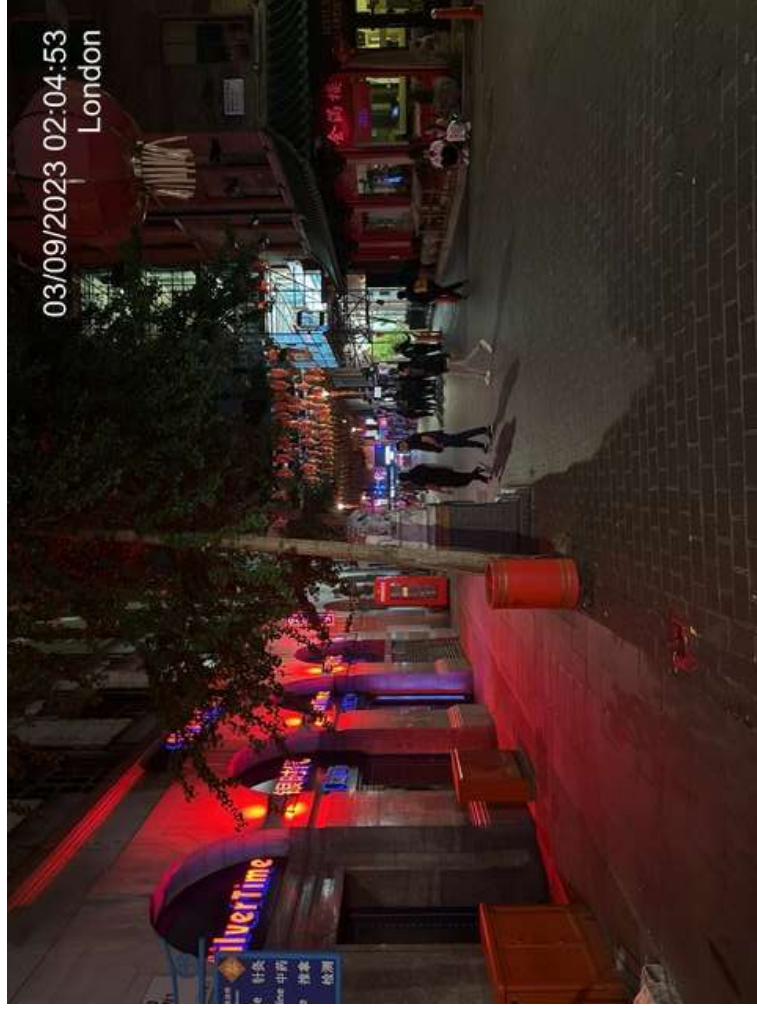


03/09/2023 00:39:06
London

Image C29

00:39hrs

Las Vegas AGC
Wardour Street



03/09/2023 02:04:53
London

Image C30

02:04hrs

Gerrard Street looking west

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023



Image C31

02:09hrs

O'Neill's Bar Wardour Street



Image C32

02:13hrs

Las Vegas AGC
Wardour Street

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023



Image C33

02:18hrs

Gerrard Street looking east



Image C34

02:30hrs

Gerrard Street looking west

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023



Image C35

02:31hrs

Gerrard Street looking east



Image C36

03:04hrs

Wardour Street j/w Gerrard Street

Appendix C

Silvertime Chinatown, 32 Gerrard Street, London, W1D 5QA

2nd 3rd September 2023

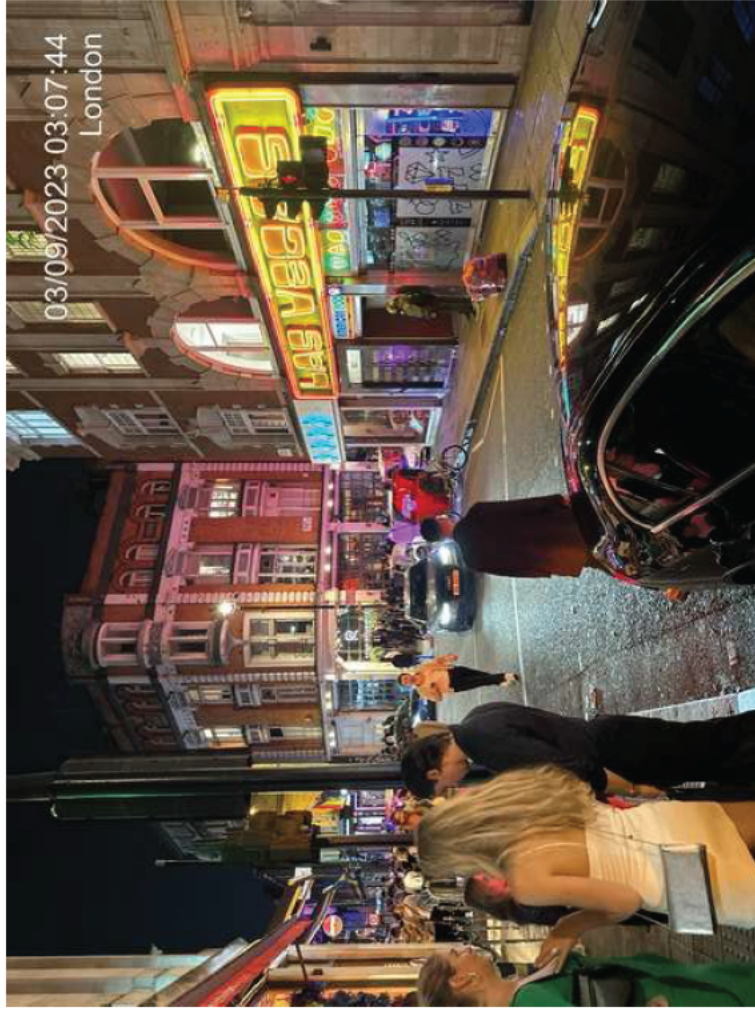


Image C37

03:07hrs

Las Vegas AGC
Wardour Street

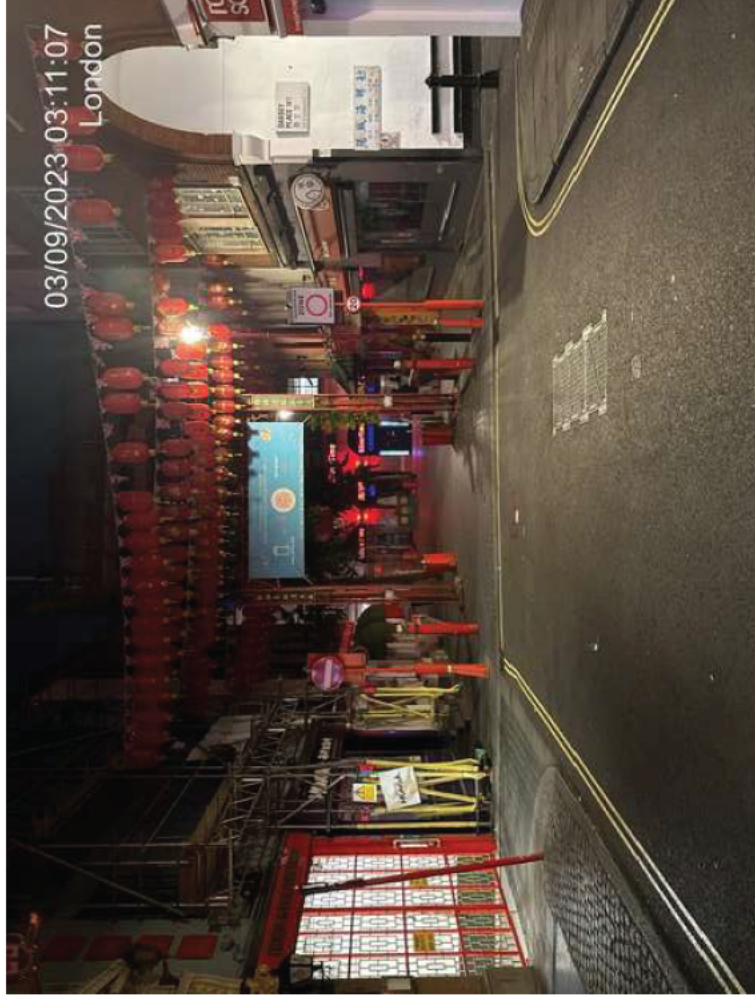


Image C38

03:11hrs

Macclesfield Street looking south

Appendix C

SilverTime Chinatown, 32 Gerrard Street, London, W1D 5QA
2nd 3rd September 2023



Image C39

03:29hrs

Gerrard Street looking west



TAB 9

Variation Application of a Gambling Premises Licence in respect of 32 Gerrard Street, W1D 6JA

WITNESS STATEMENT OF METO PARMACHKI

I, **METO PARMACHKI**, of [REDACTED] **AS FOLLOWS**

1. I am the Operating Director for Silvertime and have been with the company for 15 years.
2. I make this statement in connection with a variation application to extend the hours for an Adult Gaming Centre Gambling Act 2005 Premises Licence at 32 Gerrard Street. I have direct knowledge of the contents of this statement, which are true.

SILVERTIME BACKGROUND

3. Silvertime Amusements Limited ("**Silvertime**") was set up in the 1990s. At this time, they were not AGCs, but were amusement arcades. It is a family company owned by Ed Reed, who has been in the business 25 years. Ian Reed, his father, is still a director of the company and maintains an advisory role within it.

SILVERTIME AMUSEMENTS LIMITED

4. Silvertime obtained its operating licence from the Gambling Commission ("GC") on 1 January 2009. All of our policies, procedures, business plans, management structure and training proposals were approved by the GC in the course of this application.
5. In all the time that Silvertime has been operating, it has never had a gambling application refused or a premises licence reviewed.

CHRONOLOGY OF VENUES WITHIN THE BUSINESS

6. The first Silvertime venue was an amusement arcade at Watling Avenue, Burnt Oak. This venue was then moved to 116 Burnt Oak, Broadway, Burnt Oak, Edgware HA8 0BB, into the old

Barclay's bank, whereby it was converted into an amusement centre on the bottom floor, and the upstairs floors were converted into flats.

7. The second Silvertime venue was in Harlesden and opened 24 years ago. Initially, Silvertime had 10 Bank Buildings, Harlesden, NW10 4LT, but this was moved to 53 High Street, Harlesden, NW10 4NJ. Again, it was an old bank. A similar conversion took place, in that there was an amusement arcade on the ground floor and then flats above it, with the company being the landlord. The lease for 10 Bank Buildings, Harlesden, was given up and, for a period of 10 years, it was just 53 High Street, Harlesden and 116A Burnt Oak, Broadway venues that were in operation.
8. In 2008, Silvertime took over an existing AGC at 10 Pembridge Rd, Notting Hill, W11 3HL, having purchased the lease from the existing operator.
9. In 2011, Silvertime bought the freehold of 446 High Road, Wembley, HA9 7RP, which was an old Woolwich bank, and again, Silvertime put flats above it and are the landlord. This premises is run under a bingo premises licence.
10. In 2012, Silvertime leased 10 Bank Buildings, Harlesden back from the landlord. This premises is operated as an AGC.
11. In 2013, Silvertime took the lease of 527 High Road, Wembley, HA0 2DH. This premises is operated as an AGC.
12. In 2014, Silvertime took the lease for 426 Edgware Road, London, W2 1EG, from an existing AGC operator. This is a 24 hour licence without added conditions. Silvertime have traded there for 9 years now without any issues and so have significant experience of trading successfully within Westminster, including during night time hours.
13. In 2018, Silvertime leased 169 Earls Court Rd, London SW5 9RF from an operator. This premises is operated as an AGC.
14. In March 2020, just prior to lockdown, Silvertime leased 509 High Road, Wembley, HA0 2DH from an operator. This premises is operated as an AGC.

15. In August 2022 we opened the 32 Gerrard Street, London, W1D 6JA premises, the subject of this application. This premises is operated as an AGC.
16. In March 2023 we opened 48-50 High Street, Watford, WD17 2BS. This premises is run under a bingo premises licence.
17. Silvertime is a member of BACTA (British Amusement Catering Trade Association) which is a trade association for amusements and gaming machines covering pubs, clubs, family entertainment centres, bingo halls and Adult Gaming Centres. We adopt and agree to their policies and procedures in the same way that most national operators do. I attend and am involved in the BACTA meetings.
18. As Operations Director for Silvertime, I cover all 11 sites. I have been working for Silvertime since November 2008.
19. As the estate grew, the management and compliance team grew with it. Ed Reed the owner operator of the premises has worked for the company for 25 years, he is the CEO of the company and is in overall charge of the company and its operation.
20. Phil Wheeler, the Commercial Director has been with Silvertime since December 2014; he is currently responsible for compliance as a whole for the company, including health and safety and contracting with staff.
21. Silvertime have recently appointed Eden Abraha as a Compliance Manager specific to 'gambling regulation'. Eden has been with the company for 12 years and is the manager at 53 High Street, Harlesden.
22. The general staffing arrangements for each premises include 1 Venue Manager, 1 Deputy Manager, 1 Assistant manager and Cashiers. This is a similar structure to others in the industry; however, we don't have layers of middle management between myself, compliance and these managers.
23. In today's industry, an individual cannot possibly manage a venue unless they have experience and have trained under another manager. This also allows us to use our managers as part of our

training process. In terms of recruitment, this is all done internally and people progress up the chain. For example, they start as Cashiers, then move to Assistant Manager, then to Deputy Manager and then to Venue Manager. Those exceptional Venue Managers will then be brought in to do additional tasks as has happened with Eden Abraha. The way the system works is that our experienced managers train up deputy managers until those deputy managers are ready to take over their own premises.

24. A venue will always have an experienced member of management. This is how all of our venues operate. 32 Gerrard Street has a very experienced general manager, who has been with Silvertime for 5 years.
25. In terms of my hands-on approach, I ensure that I visit all venues across the estate as much as possible. On average I would expect to visit each venue every week.

STAFF TRAINING

26. Staff are initially trained by spending 3 to 4 weeks training in an existing venue under an experienced manager. However, due to the importance of this site, experienced staff at all levels are employed. Indeed, there is a condition on the current premises licence stating that *“all members of staff shall have a minimum of three months experience working for the Licensee”*.
27. Training on policies and procedures, the licensing objectives and all ancillary legislation is carried out by Venue Managers. Training is conducted by presentation format, quiz tests and one to one interaction with staff. Once the presentations and training have taken place, both the relevant manager and member of staff sign off the paperwork to demonstrate understanding.
28. Refresher training is provided at regular intervals, normally every 3 months. Again, this is conducted by the Venue Managers. A quiz will be done by the member of staff to ensure that they have understood the training. There are a number of different quizzes that staff undertake. The following Exhibit contains all of the quizzes:

Exhibit 1 - Silvertime Whole Training Quizzes

The completed tests are signed off by both the venue manager and member of staff. These are then kept in the training files on the premises. The reason being that, in the event that these premises are then visited by any responsible authorities, records are available for inspection in line with company policy.

29. Eden Abraha is the custodian of all training materials and it is her and my responsibility to ensure that it is kept up to date. Eden Abraha uses amongst other things the following documents which form part of the staff training:

Exhibit 2 - BACTA HandBook 2023

Exhibit 3 - BACTA Social Responsibility Charter and Practice

Exhibit 4 - BACTA Self-Exclusion Guide

Exhibit 5 - BACTA Complaints & Disputes Policy & Procedure

30. All of our policies and procedures were initially approved when we applied for and were granted our operating licence. We have had no Gambling Commission requests for updated material, nor as part of any general assessment. We believe that it is because we operate at the highest levels without regulatory concern.

31. As a member of BACTA, we utilise the BACTA age verification testing, which is commissioned by them. Across the estate we also use an independent company named 'Check Policy' to conduct third party Age Verification Testing. Silvertime run the testing programme on a monthly basis to ensure consistent performance.

32. If at any time staff are informed that they have been the subject of an underage test by the Gambling Commission and/or the Local Licensing Authority, this is immediately reported to the Senior Compliance Team.

33. Eden Abraha will conduct our own company venue audits to ensure compliance. During a venue audit, Eden will attend in person to that venue, and use the Gambling Commission AGC Inspection Guide (Exhibit 6) to inspect the premises as if she were 'in the shoes' of a licensing

officer. For example, she will check the CCTV, the signage, that the licence is displayed, in fact everything that would be looked at during a local authority inspection.

SIGNAGE WITHIN VENUES

34. All of our venues have very clear signage on the exterior which is replicated within the venues themselves, for example front door signage.

Exhibit 7 - Front Door Signage at 32 Gerrard Street

As can be seen, these stress: no smoking, no alcohol and over 18s only. We also have leaflets and posters throughout the venue highlighting the Challenge 25 policy and staying in control, including:

Exhibit 8 - Stay in Control Poster

Exhibit 9 - Stay in Control Pamphlet

Exhibit 10 - Think 25 Poster

Exhibit 11 - Alcohol Consumption Warning

35. My uniform experience of working in AGCs for 15 years, and indeed of those of my competitors, is that this type of premises just does not attract children and those under 18. The reasons being that there are no televisions to watch, no events taking place, no places to hang about, no comfortable seating, no loud noises or music, no video games, etc. Neither the atmosphere of the premises nor the products are congenial in nature to minors. A distinction from betting offices is that we have trained members of staff regularly floor-walking, rather than sitting behind desks. The emphasis is on supervision and customer service, not taking and paying out bets.

36. The standard of management is high and children wouldn't be able to get past the front door even if they did approach. It should be made clear that AGCs are very different to betting venues in that there is no counter or screens that staff sit behind. In AGCs, they are on the floor walking and monitoring the customers. It is a company policy and common across the industry that the moment you walk into an AGC venue a member of staff comes straight over to greet you and, if required, request proof of age.

37. We are highly experienced operators in dealing with what can be perceived to be difficult locations. In all of our venues, we ensure that a risk assessment is undertaken and where deemed necessary, we employ SIA trained door staff. In addition, loitering of any kind is not permitted and just does not occur. There are simply the machines which customers use. Given that we have no communal seating areas, and no sports shown on screens, there is no incentive for people to hang around before or after participating. For that reason, loitering has not been an issue in Gerrard Street.
38. The conditions on the Gerrard Street premises licence state that there should be a SIA licensed door supervisor on the premises between 6pm and midnight and the need for a SIA licensed door supervisor at other times will be risk assessed. As an operator we have decided to have a SIA licensed door supervisor employed at the front entrance to the premises whenever the premises is open (namely 09:00-Midnight). We would continue to have a SIA licensed door supervisor whenever the premises is open, if the extra hours were granted.

OTHER AGCs IN THE AREA

39. There are three other AGCs in the vicinity:
- a. Play 2 Win at 32 Wardour Street, this premises licence has no additional conditions attached to it;
 - b. Las Vegas, 89 - 91 Wardour Street, this premises licence has no additional conditions attached to it.
 - c. Little Macau, 3-5 Wardour Street, the most recently granted premises licence, that does contain conditions offered by the operator.

THIS VARIATION APPLICATION

40. As the Sub-Committee will be aware, there is no police representation.
41. The Westminster Local Area Profile for Gambling Risk within Westminster analysis has been scrutinised in great detail for the updated LARA. The premises has now been trading for 14months and it has been very positive, we have built many relationships with local residents

and businesses. We have also worked together with the local police providing them with CCTV footage when they request it.

42. I am a member of the local police ward panel and attend their quarterly meetings, the most recent meeting was at the Genting Casino on 14 July 2023. They do appreciate our input into the community and were also thankful to Silvertime for displaying images on our digital displays of their joint work on cutting crime with Westminster City Council.
43. It has been mentioned above that we have also operated without issue on the Edgware Road for many years. The point being that we have experience in operating within Westminster, in an area that is deemed to be an area of greater risk.
44. This venue, along with all of the estate, has GamCare posters up (in English, simplified and traditional Chinese), and staff will interact with customers as they have been trained to do. The customer interactions are 3 step: identify, interact and evaluate. These interactions may result in self-exclusion being suggested, and if the customer refuses to self-exclude, but the member of staff feels the customer is at risk, they will bar them.
45. If a customer self-excludes from a Silvertime site, they are also excluded from all AGCs in the locality. We appreciate the need and understand the locality surrounding our premises, and always strive to ensure our risk assessment reflects this.

LOCAL NEIGHBOURHOOD LIAISON

46. We have adhered to the condition on our premises licence to invite local residents and local associations to meet to discuss the operation. Please see letters sent out (Exhibit 12). From these invitations we have had the Chinese Information and Advice Centre engage with us and attend training.
47. We have written to all those that made a representation to the application in order to reach out to them to have a meeting to discuss their concerns. Please see Exhibit 13. It should be noted that there are only four local representations, far fewer than when we initially applied for the

premises licence originally. As with all our sites, Silvertime are very keen to work with local residents and the neighbourhood to ensure that we form part of the local community.

48. We have reached out to all the locally sensitive premises in the area. We used the Westminster City Council Local Area Profile Map for Gambling Risk to do this, as well as our own personal experience, having operated the premises for a period.
49. There is a Soup Kitchen at WC2H 7BX, approximately 500ft from the premises. This being the Notre Dame de France Church at 5 Leicester Place, London. We have offered to volunteer at the kitchen and have made a donation.
50. There is a Drug and Alcohol Addiction Treatment Centre at W1D 6QT within 300ft from the premises, Turning Point at 32a Wardour St, London W1D 6QT). (The Westminster Local Area profile map is incorrect, as it stated there was a Drug and Alcohol Addiction Treatment Centre at W1D 5NF). We have a good relationship with this premises, we now use their literature at the premises.
51. There are no pay day loan shops, pawn brokers or cash chequing locations within a 250m Radius. The Westminster Local Area profile map is incorrect, as it stated there was a Pawn Broker at 29 Frith Street, W1D 5LG. This premises is a now a fast food premises.
52. I met with [REDACTED] on 23 August 2023, he submitted a representation to the variation application. From this meeting he confirmed that he was now content that we were interacting well with the local community. We have offered and have sponsored a number of local Chinese community events that are run by [REDACTED]. Including the Mid-Autumn Moon Festival organised by the North London Chinese association on 28 September 2023 and then this same festival this time organised by the Chinese Information and Advice Centre on 29 September 2023.
53. For our Gerrard Street premises we would like to have a member of staff from the local Chinese community. We have reached out to the Chinese Information and Advice Centre. They confirmed the best way to recruit would be through word of mouth and through

www.indeed.com . We have placed an advert in 'indeed' and will hopefully be interviewing candidates shortly.

WESTMINSTER CITY COUNCIL NEW GAMBLING POLICY

54. We are aware from operating in Westminster and as part of the application process that Westminster have adopted a new Gambling Policy. We have considered the new policy and ensured that we adhere to all the new elements of it. We have submitted to the Council and Police as part of the application our WCC Policy Consideration document that sets out and highlights how Silvertime meet the requirements of the new WCC Gambling Policy. In particular, new policies have been drafted to deal with these highlighted elements, for example the Counter Terrorism Policy.

CONCLUSION

55. I have considered carefully all of the representations and prior to making this application, have considered in detail previous decisions of the Licensing Sub-Committee for this area. I wanted to ensure that all matters within the representations, especially that of the Licensing Authority, were dealt with.
56. Specifically, you will note that we work closely with the Police and there have been no issues with the operation of the premises over the last 14 months.
57. Liaison has taken place with the local residents that submitted representations, including sending them a letter asking them to meet and see the premises.
58. We are not aware of any evidence that suggests that this style of premises has had any significant issues within the area.
59. We do not experience issues with those under the age of 18 and will have our experienced staff at these premises who understand how to deal with the young and the vulnerable.
60. This premises licence application is in accordance with the Gambling Commission Guidance and the licence conditions and codes of practice. I am certain that the premises will have no impact on the 3 licensing objectives and indeed will promote them.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Name: Meto Parmachki

Signature:

Date: 09 October 2023

TAB 10

SilverTime

Name:

Date:

1. ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

1. What is Challenge 25? (Tick 1 box)

- A bonus game of Bingo
- Part of the Gambling Act 2005
- Challenging anyone who looks under 25 to prove that they are over 18

2. What proof of age documents are acceptable? (Tick 3 boxes)

- Passport
- National Insurance Card
- European Photograph Driving Licence
- Bank Card
- PASS Accredited Proof of Age Scheme (Citizen Card)

3. What are you looking for when checking proof of age documents? (Tick 5 boxes)

- Does the ID clearly show a Date of Birth (D.O.B)?
- What is the date of issue?
- Does the ID document look as if it has been tampered with?
- Is there a Hologram?
- Is there a photograph?
- Is there an address shown?

4. You ask someone to provide ID, but they have none. What do you do? (Tick 1 box)

- Let them carry on playing but ask them to bring their ID in next time
- Ask them politely to leave and come back with their ID.
- Call the Police.

5. An under-age person places money (stake) into a gaming machine and then wins? What do you do? (Tick 2 boxes)

- Permit them to play off the credits, collect any winnings and ask them to leave.
- Ask them to leave straight away and give them nothing
- Stop them from playing the machine immediately and return any money staked and withhold any winnings they may have accumulated, then politely ask them to leave
- Record the incident on the AV Log on the smart Tablet.

6. How can we prevent under-age people from entering licenced premises? (Tick 3 boxes)

- Being aware of all customers within our premises.
- Pro-actively thinking 'Challenge 25' and asking for proof of age when necessary
- Standing by the cash desk at all times, away from the front door/s
- Ignoring customers and forgetting to ask for proof of age
- By adhering to the 'staff rotation method' and having one member of staff continually by the front door

7. You refuse entry to a customer because they have no ID that can prove their age. What could you give them? (Tick 1 box)

- Advice on how to look older
- A Let's Keep It Fun leaflet (located at the front door)



2. ACCESS TO PREMISES BY THE STATUTORY AUTHORITIES

8. What must you do if someone from the Statutory Authorities visits the shop? (Tick 3 boxes)

- Check their ID
- Be polite and co-operative towards them and ask them to sign in
- Ignore them and then ask them to come back another time
- Notify Management asap after they have left

9. Who are the 3 Statutory Authorities? (Complete the three lines below)

- 1.
- 2.
- 3.

10. One of these bodies may ask to see your Premises Licence. Where is this kept? (print below)

.....
.....

3. ADVERTISING STANDARDS AND MARKETING

11. When dressing our windows, should we be mindful that we do not use marketing materials that could be perceived to be attractive to young persons. (Tick 1 box)

- Yes
- No

12. Is it permissible to use children in our advertising material? (Tick 1 box)

- Yes
- No

4. CUSTOMER INTERACTION

13. What two things should you do if a customer asks where to get help or information about their gambling? (Tick 2 boxes)

- Ignore them and tell them to come back when the Manager is on duty
- Give them a Let's Keep It Fun leaflet
- Give them some Free Plays
- Make a record within the Smart Interaction app on the Smart Tablet.

14. How would you approach someone who might be considered vulnerable? (Tick 1 box)

- Start talking to them and ask if they are OK
- Ask them to leave
- Give the helpline number and tell them they have a gambling problem
- Turn their machine off

15. What actions should always be recorded on the Smart Tablet within the Smart Interaction app? (Tick 2 boxes)

- Complaints related to Gaming Machines
- Faulty air-conditioning
- Damage to machines by an aggressive customer
- Giving help or advice in relation to problem gambling (customer interaction)

16. Where should we keep the Stay in Control leaflets? (Tick 2 boxes)

- At the front door
- In all customer/public toilets
- In the cash desk cupboard

17. Is the same customer able to have multiple Interactions logged on the Smart Tablet? (Tick 1 box)

- Yes
- No

18. Whose responsibility is it to deal with customer Interactions (Tick 1 box)

- The Operations Manager
- All staff members
- The venue Manager
- Not mine

5. EMPLOYMENT OF CHILDREN AND YOUNG PERSONS

19. What is the Minimum age for employees to work in an AGC/Bingo premises? (Tick 1 box)

- Twenty Five years of age
- Eighteen years of age

20. Gaming machines in Licensed Premises should be switched off, if children and/or young persons are working on the premises, outside the normal opening hours? (Tick 1 box)

- True
- False

21. You are in the shop working and a friend, a member of your family, or one of your work colleagues arrives with their baby/children with them. Can they 'pop in' to see you for a few minutes? (Tick 1 box)

- Yes
- No
- Sometimes

6. FAIR AND OPEN PRACTICE AND DISPUTE RESOLUTION

22. What should you do if a customer makes a complaint about a gambling related issue? (Tick 1 box)

- Ignore them
- Ask them to leave because they are not allowed to complain
- Take details and complete an IRF form, then notify your line manager accordingly



23. If a Supervisor/Duty Manager is unable to resolve a complaint, who would the customer be referred to? (Tick 1 box)

- The Supervisor/Duty Manager's Line Manager
- Arbitrator
- Gambling Commission
- The local Council

24. In the event of a customer complaint relating to gambling, what else should you do? (Tick 1 box)

- Tell other customers
- Ensure a record is made on the Smart Tablet.
- Do nothing at all

25. Where should we keep the leaflets regarding the company's Complaints & Disputes Policy? (Tick 1 boxes)

- On the wall at the front entrance
- In the customer toilets
- In the cash desk, not in public view, but readily available

26. Complete the following four sentences by filling in the blank spaces, using each of these words:

Thank / customer / apologise / four / manager / resolution
solution / gaming / positive / record / operations manager / listen

The Gambling Commission requires the company to all complaints that are specifically about AGC's and FEC's. If it is the case that the complaint cannot be resolved in the first instance we operate a Stage complaints procedure. Should a wish to complain about any aspect of the Operation, you should deal with it.

Firstly, then for the experience. It is important to find out what the customer would like as a and do what you can to achieve a outcome. If the customer is happy then them and return to your work. If the customer is not happy at this stage of the complaints procedure then you must call your who will attempt to resolve the issue at the second stage.

Should the customer still be unhappy, they are asked to complete a complaint or dispute form. This must also be recorded in the log at the shop. The customer is then given a copy of the complaints leaflet which gives the details of the

If the complaint is not satisfactorily resolved, the final stage is one where an Alternative Dispute Resolution entity will talk to the customer in an attempt to negotiate a to the complaint.

7. INFORMATION ON HOW TO GAMBLE RESPONSIBLY AND HELP FOR GAMBLERS WITH PROBLEMS

27. Which leaflet could you give a customer to give them advice on problem gambling? (Tick 1 box)

- Yellow Citizen Card application form
- Let's Keep It Fun leaflet
- Complaints and Disputes leaflet

SilverTime

28. A vulnerable person is someone who may potentially experience problems with their gambling. You may be concerned about someone who...

(Tick 3 boxes)

- Is laughing and joking all the time
- Looks agitated
- Is shouting and swearing at the gaming machine
- Is visibly upset

29. If a customer asks for help because they are concerned about their gambling, where should you report this?

(Tick 2 boxes)

- Leave a message on a blank piece of paper
- Inform the duty manager
- Complete the Incident Report Form (IRF) within the Smart Interaction app on the Smart Tablet

30. Which of the following may indicate a problem gambler? (Tick 1 boxes)

- Agitated and argumentative
- Borrowing money from other players
- Excessive spending
- All of the above

31. To ensure the company promotes Responsible Gambling, what else should we do? (Tick 1 box)

- Ensure appropriate leaflets are available at all entrances
- Ensure appropriate leaflets are available in all customer toilets
- Display posters at all entrances and on digital screens (where possible)
- All of the above

32. What does ADR stand for? (Tick 1 box)

- Any Different Response
- All Day Racing
- Alternative Dispute Resolution
- A Different Reason

8. MONEY LAUNDERING

33. Who would you notify if you suspected a customer of money laundering? (Tick 1 box)

- Everybody
- No one
- Your Duty Manager

34. Who is the Money Laundering Officer (MLO) for the company? (Write your answer below)

.....

35. How can you help prevent gaming machine fraud? (Tick 3 boxes)

- Be mindful of 'new' faces playing the gaming machines
- Ignoring customers and failing to be observant to customers in the shop
- Avoid groups of players gathering around one machine
- Ensure that gamblers are not placing their legs up on the pay-out trays

36. Where should all incidents of potential Money Laundering be recorded? (Tick 1 box)

- On a paper form
- We don't bother recording them
- Within the AML app on the Smart Tablet
- All of the above

37. What attention must be paid during all cash transactions? (Tick 1 box)

- Authenticity of notes and coins
- Notes undamaged and not "dyed"
- Sudden increases to spending patterns of customers
- All of the above

9. SELF-EXCLUSION

38. Where do we record Self Exclusions? (Tick 1 box)

- Fill in a paper Self Exclusion form
- On the Smart Tablet
- On a scrap of paper

39. What is the minimum length of time a customer can choose for self-exclusion? (Tick 1 box)

- 3 months
- 6 months

40. What is the maximum length of time a customer can choose for self-exclusion? (Tick 1 box)

- 12 months
- 12 years
- Life

41. When a customer excludes from a Bingo licensed premises they are excluded from all Bingo premises in the UK. Is this

the same for AGC's? (Tick 1 Box)

- Yes
- Sometimes
- No

42. How often should the tablet be checked for Self-Exclusion information updates? (Tick 1 box)

- Once per week
- Once per day
- Every session

43. Who is responsible for checking the tablet for Self-Exclusion updates and ensuring the battery is charged? (Tick 1 box)

- Just the Manager
- Supervisors
- All staff on duty

SilverTime

44. A customer who is Self Excluded enters your premises and tries to play a machine, but you stop them. Where do you

Record this breach of Self Exclusion? (Tick 1 box)

- On the appropriate paper form
- Don't record it, just ask them to leave.
- On the Smart Tablet within the Self Exclusion app.

45. A customer is complaining/shouting about a gaming machine and states they wish to Self-Exclude, what do you do? (Tick 1 box)

- Do nothing at all and ask them to leave
- Refuse the Self-Exclusion process – Explaining to them that because they are making a complaint relating to gaming, we must follow the complaint in-line with the company's four stage complaints procedure policy
- Shout back at them

46. In-line with the above what else would you do? (Tick 3 boxes)

- Empathise and listen to what the customer has to say, remaining calm and collected at all times
- Tell them to get stuffed, it's not your job to help them
- Pull them to one side and try to have a meeting with them as discreet as possible and away from other customers
- Hand them a Let's Keep It Fun leaflet and explain exactly what Self-Exclusion process applies

47. A customer wishes to return to gambling after a Self-Exclusion has expired. How long is a "cooling off" period? (tick 1 box)

- 24 hours
- 48 hours
- There is no cooling off period
- 72 hours

48. The tablet incurs a fault and blocks you from completing the Self-Exclusion process. What do you do now? (Tick 2 boxes)

- Nothing as the tablet will be fine later in the day
- Report ASAP to the Area/Operations Manager, explaining the fault with the tablet
- Complete a manual Self-Exclusion Form (noting day, date, time, plus brief description of customer)
- Ask the customer to return at a time convenient to them

49. When a customer Self Excludes in a Silvertime AGC or Bingo premises can they also Exclude from Betting Shops at the same time, whilst in our venue? (Tick 1 box)

- Yes
- No

50. When a Self-Exclusion is requested, who is the person that should control all of the information on the tablet/form?

(Tick 1 box)

- The Customer
- Duty Manager/Supervisor (or member of staff)
- The customers friend

51. A customer asks you about where they can obtain information to give help and advice for anyone with concern over their gambling, what do you do? (Tick 2 boxes)

- Ask them to come back another day when the Manager is on duty
- Inform them and show them where the Let's Keep It Fun leaflets are kept
- Record this Customer Interaction within the App on the Smart Tablet

52. A customer has been playing a gaming machine for a long period of time, part of our obligations in operating gambling facilities is to be 'aware' of who is playing and for how long. By going over to customers and asking if they are ok this simply opens a line of conversation. From their response back to us, what should we be looking for in the customer?

(Tick 1 box)

- Do they look agitated
- Did they reply to you in an aggressive manner
- Did they appear to be calm and polite and in control
- All of the above

10. LARA

53. The LARA is located where? (Tick 1 box)

- At head office
- In the cash desk somewhere
- The Compliance Manual (Back of House)

54. An after-school club opens up very close to the AGC/Bingo Club, should this be noted within the LARA? (Tick 1 box)

- Yes
- No

55. What does LARA stand for?

(Tick 1 box)

- Losses Are Rarely Acceptable
- Local Area Risk Assessment
- A character in an old video game

56. Supposing you notice that a 'Gamblers Anonymous' meeting room has opened very close to the AGC/Bingo club where you work. What do you do upon discovering this? (Tick 1 box)

- Nothing at all because you don't have the need for Gamblers Anonymous
- Report to the Operations Manager immediately so the Local Area Risk Assessment can be updated accordingly.

11. SHOP SECURITY & GENERAL KNOWLEDGE

57. What could you do if you think someone is trying to tamper with a gaming machine? (Tick 3 boxes)

- Notify the duty manager (or senior management team)
- Turn a blind eye to the situation and do nothing at all until they have left
- Approach them and ask them what they are doing
- Watch them discreetly using the CCTV system, to observe their behaviour



58. What can happen if you don't follow the company policy and procedures relating to gaming operations? (Tick 1 box)

- Company could lose operating licence and individual staff could be fined
- You would be praised for having done such a good job
- None of the above

59. If a customer comes in wearing a cap/hat, what should you do? (Tick 1 box)

- Say nothing at all
- Politely ask the customer to remove their hat/cap
- Inform them you like their hat and ask them to leave it on

60. Should we be mindful, not to be talking too loudly about money on the shop floor and how much we have in our floats?

(Tick 1 box)

- Yes, it is important that we are not 'broadcasting' information to any customers whatsoever
- No, it doesn't really matter if any customers hear us

61. How should you react in best practice, in order to deal with an aggressive/argumentative customer? (Tick 2 boxes)

- Shout loudly back at them and tell them to get out
- Tell them they are barred
- Empathise, listen to their complaint and take some details from them (including contact information)
- Advise them that you will follow up on their complaint and try to resolve for them

62. Can members of staff participate in any forms of gambling, within Silvertime premises? (Tick 1 box)

- Yes
- No

63. A customer has a big machine win and offers you a tip. Are you allowed to accept gratuities (tips)? (Tick 1 box)

- Yes
- No

64. A Licensing Officer from the Council visits the shop whilst you are working and asks to see the Compliance Folder. Where is it kept? (Tick 1 box)

- Cash desk
- Staff room
- Managers office

.....
.....

Score: / 64

Percentage %

Pass: YES NO

Trainers Signature:

Re-test Date if needed:

TAB 11

BACTA HANDBOOK

Adult Gaming and Licenced Family Entertainment Centres

Designed for Company Directors
and Senior Management

Effective Jan 2023



GAMBLING ACT 2005

Licence Conditions & Codes of Practice

Policy Procedure Documents and Key Events

Source of Reference: The Gambling Commission

Introduction

- Your Operating Licence is subject to certain conditions and codes of practice (LCCP) that must be complied with to protect your licence.
- Codes of practice are either:
 - social responsibility code provisions which must be adhered to by all licence holders
 - Therefore, any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution.
- **ordinary code** provisions – these do not have the status of licence conditions but failure to take account of them can be **used as evidence in criminal or civil proceedings**.
- There are four types of licence condition, and they have different status in law, but you need to comply with them all:
 - General licence conditions can be applied by the Gambling Commission to an individual operating licence or a class of operating licence (for example, all AGC operating licences).
 - Individual licence conditions can be applied by the Gambling Commission to an individual operating licence. They are likely to address matters concerning an individual operator and their activities.
 - Conditions imposed by the Secretary of State may be applied to a class of operating licence using statutory instruments (amendments to the law).
 - Statutory conditions imposed by the Gambling Act 2005 may be applied to a class of operating licence.
- This Handbook is designed to incorporate the conditions for licensees to ensure compliance with any relevant social responsibility provision of a code of practice issued by the Gambling Commission and is applicable to:
 - Gaming Machine General: Adult Gaming Centre Licences, and
 - Gaming Machine General: Family Entertainment Centre Licences
- All key requirements necessary to ensure compliance are incorporated but it is important that you also refer to the most up to date LCCP version published by the Commission, currently:
 - **LCCP link:** [Licence Conditions and Codes of Practice - Gambling Commission](#)
- It is absolutely right that licensees themselves should determine how to apply LCCP requirements when formulating their company policies and procedures and how to assimilate into operational systems. This Handbook suggests policy and procedure documents that incorporate requirements, together with a series of logs for the necessary recording of incidents. In addition, there are suggested procedures and forms for dealing with and recording complaints and disputes, suspicious monetary transaction, and other relevant matters.
- The Handbook is amended from time to time, reflecting changes made to LCCP by the Commission, therefore it is imperative that operators ensure they have the most up-to-date version, currently:
 - Bacta/2021/Jan/01
- The version reference is printed at the bottom left corner of the cover page and repeated on each page of the Handbook. All previous versions are not fit for purpose and should be deleted from files and systems.

- The Handbook is principally intended for licensees and senior management. Staff training, more appropriate for junior members of staff who interface with customers - can be obtained from bacta.

-

GAMBLING ACT 2005

The Licensing Objectives

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

GAMBLING ACT 2005: Licence Conditions and Codes of Practice

PRINCIPAL CONCEPTS

- Statement
- The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice and monitoring of the following policies and procedures are regularly reviewed and subject to change as part of our ongoing risk assessment. We are members of bacta and are bound by its Code of Conduct and Social Responsibility Charter.
- Licensing Objectives
 1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
 2. Ensuring that gambling is conducted in a fair and open way.
 3. Protecting children and other vulnerable persons from being harmed or exploited by gambling.
- Policy and Procedures
- We put into effect policies and procedures intended to promote socially responsible gambling that includes making an annual financial contribution for education and research into the prevention and treatment of gambling-related harm, the development of harm prevention measures and the treatment of those with gambling related disorders.
- We operate an on-going training program for staff to ensure awareness and compliance of our social responsibility and other statutory requirements. Individual written policies and procedures are in place and adhered to in respect of:
 - a) Access to Gambling by Children and Young Persons
 - b) Access to Premises by the Gambling Commission's Enforcement Officers
 - c) Advertising Standards and Marketing
 - d) Customer Interaction
 - e) Employment of Children and Young Persons
 - f) Fair and Open Practice and Dispute Resolution
 - g) Information on how to Gamble Responsibly and Help for Problem Gamblers
 - h) Suspicious Monetary Transactions and Cash Handling
 - i) Self-Exclusion
- We operate our business with integrity, due care, and diligence with necessary systems in place to combat crime and disorder. Written policies and procedures are in place concerning the handling of cash and cash equivalents designed to minimise the risk of crime, such as money laundering and the avoidance of illicit credit.
- Conflicts of interest between the Company and our customers are managed transparently and fairly, and, where complaints related to the outcome of gambling are not resolved to the satisfaction of both parties, we will refer the complainant to an approved alternative dispute resolution (ADR) entity.
- Gaming machines comply with the Gambling Commission's technical standards; exhibit the applicable maximum stake and monetary prize levels, and the chances of winning. Gambling general terms and conditions are displayed.
- We do not provide credit in connection with gambling nor participate in, arrange, permit, or knowingly facilitate the giving of credit in connection with gambling.

- We seek to prevent systematic or organised money lending between customers on the premises, and staff are trained to be alert to such practice, and to report any instances of substantial money lending to the Duty Manager should they become aware of such instances.
- It is prohibited to consume alcohol on our premises.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to these policies and accompanying logs, they are required to sign the training log to this effect, a copy of which will be retained for future reference.

INDEX

COVER PAGES

INTRODUCTION

- Licensing Objectives 4
- Principal Concepts 5

INDEX

POLICY DOCUMENTS

- Access to Gambling by Children and Young Persons 8
- Age Verification Testing 9
- Access to Premises by the Gambling Commission's Enforcement Officers 10
- Advertising Standards and Marketing 12
- Customer Interaction 14
- Employment of Children and Young Persons 15
- Fair and Open Practice and Dispute Resolution 16
- Information on how to Gamble Responsibly and Help for Problem Gamblers 18
- Money Laundering, Cash Handling & Suspicious Transactions 20
- Self-Exclusion 22

CODE PROVISIONS

- Responsibility for Third Parties (Code Provision 1.1.2) 25

GENERAL CONDITIONS

Qualified Persons 25

- Personal Licences 25

KEY EVENTS

- .Operator Status 26
- .Relevant Persons and Positions 27
- .Financial Events 27
- .Legal or regulatory proceedings or reports 28
- .Gambling Facilities 29
- .Other Reportable Events 29
- .GENERAL & REGULATORY RETURNS 29
- .PAYMENT 30
- .Cash and Cash Equivalents, Payment Methods and Services 30
- .Provision of Credit by Licensees and the use of Credit Cards 30
- .REPORTING SUSPICION OF OFFENCES 30
- .RESPONSIBLE PLACEMENT OF DIGITAL ADVERTS 30

GAMBLING ACT 2005: Licence Conditions and Codes of Practice

ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

- It is illegal for any person who is under 18 years of age to be permitted entry to an Adult Gaming Centre or Adult Gaming Area.
- Policy and Procedures
- Our policies and procedures with regard to age restriction take into account the structure and layout of our gambling premises so as to prevent access to gambling by children and young persons, and that our facilities do not appeal to children and young persons.
- Clear and prominent signage is placed at the entrance(s) to our Adult Gaming Centre(s) and adult area(s) stating that it is illegal for persons under the age of 18 years to enter and for the Company to permit entry.
- It is a matter of gross misconduct if a member of staff knowingly allows entry by any person who is under the age of 18 years to our Adult Gaming Centre(s) or Adult Gaming Area(s).
- Any person known to be under 18 years of age is refused entry.
- Any person who appears to be under 18 years of age and has not previously provided satisfactory proof to the contrary, is asked to provide appropriate identification when it comes to the attention of staff and before an attempt to gamble. Members of staff are trained to 'think 25' as a minimum.
- If the person admits to being under the age of 18, they are refused entry.
- Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and has to be provided before entry is allowed. Incidents involving suspected forged documents will be recorded and reported.
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction.
- Acceptable forms of identification include those that carry the PASS logo (e.g., Citizen card); a driving licence (including a provisional licence) with photograph; a passport or a military identification card. A range of digital proof of age apps are now available (e.g., Yoti) which are robust and helpful in providing evidence of age. Any app which is unfamiliar should be investigated to satisfy the venue that it is genuine. A note of app should be made in the AV log.
- Where there is still doubt and the person cannot produce proof of age, they are advised that they will not be permitted to enter until such time as they provide such proof.
- They will be shown, have explained to them, and be given a 'proof of age card' application form or offered an explanation on how to apply for a card or directed to a digital proof of age app.
- Should the person then refuse to leave, they are advised that the age restriction is a legal requirement.
- If they still will not leave, the Duty Manager is immediately contacted to take over the situation.
- Any attempts by under-18s to enter the premises or designated adult area(s) and gamble are brought to the attention of the Duty Manager immediately and recorded as an entry on a log retained on the premises for this purpose.
- Details of the entry in the AV log to include date, time, identity and date of birth of the individual if known - or detailed description if unknown - member of staff dealing, action

taken, the outcome and measures put in place to prevent a re-occurrence. Log to be countersigned by the Duty Manager.

- Service is refused in all circumstances where any adult is accompanied by a child or young person.
- All gaming machines, other than category 'D' machines, are inscribed with a notice prohibiting play by persons under the age of 18 years, although it should be noted that bacta members have voluntarily introduced a Code of Conduct provision which prohibits those under 18 years of age playing on cash pay-out reel-based Category D machines.
- Stakes are returned to under-18s where they have been identified as gambling in AGCs or adult-only areas and are not permitted to retain any monetary prize.
- Link: [LCCP Condition - Gambling Commission](#) (SR Code)
- [LCCP Condition - Gambling Commission](#) (Ordinary Code)

AGE VERIFICATION TESTING

- Companies in Operating Licence fee category C or higher, whereby they are permitted to operate AGCs, or more licenced FEC premises.
- It is a requirement to conduct ongoing age verification testing or take part in collective age verification testing programs so as to provide reasonable assurance that policies and procedures to prevent underage gambling are effective.
- It is a further requirement that the results of age verification tests carried out by the Company are provided to the Gambling Commission. You must send the results within 42 days of the end of the financial quarter when the test purchasing activity was conducted.
-
- Test results must be submitted using the Excel spreadsheet as detailed in the below link. The link provides detailed guidance to operators regarding age verification testing:
- <https://www.gamblingcommission.gov.uk/guidance/guidance-to-operators-for-age-verification-test-purchasing-non-remote>
- Note: It is a condition of bacta membership that age verification tests are carried out by all AGC licensees, and that the results of testing are shared with the Commission.
- Bacta's protocol for age verification testing is accredited by a Unitary Authority (Reading Borough Council); the protocol is appended to this Handbook.
- Operators also need to satisfy the below Ordinary Code provisions depending on the type of venue:

AGC – Ordinary Code 3.2.4

- Companies in Operating Licence fee category A & B, whereby they are only permitted to operate AGCs, or licenced FECs.
- It is a requirement that Licensees should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling, for example through collective test purchasing programs, and be able to explain their approach.
- The Commission considers acceptable forms of identification to include any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.

- Licensees should put into effect procedures that require their staff to check the age of any customer who appears to them to be under 21.
- Licensees should consider permanent exclusion from premises for any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.
- Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission⁴ and the police, and making available information on problem gambling.
- Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
- In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

FEC – Ordinary Code 3.2.5

1. The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
3. Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission⁴ and the police, and making available information on problem gambling to the child or young person concerned.
5. Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
6. Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
7. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

GAMBLING ACT 2005: Licence Conditions and Codes of Practice

ACCESS TO PREMISES BY THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS

- Policy and Procedures
- The Company acknowledges its obligation to ensure that staff openly co-operate with the Gambling Commission in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises contained under Part 15 (S.303 to S.326) of the Gambling Act 2005 (refer to page 2 of this document) and that:
- The Company must provide the Gambling Commission with any information that the Commission would reasonably need to be aware of in exercising its regulatory functions or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code of practice provision having the effect of a licence condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating Licence.
- The Company must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as:
 - i. the numbers of people making use of the facilities and the frequency of such use;
 - ii. the range of gambling activities provided by the licensee and the number of staff employed in connection with them; and
 - iii. the licensee's policies in relation to, and experience of, problem gambling.
- The Company must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises and will attend to the Officer without undue delay. Staff will always co-operate with the Commission's Enforcement Officers.
- **Link:** [LCCP Section - Gambling Commission](#)

GAMBLING ACT 2005

PART 15

- Members of staff are to always co-operate with the Commission's enforcement officers in the proper performance of their compliance functions.
- The officers' rights of entry to premises are contained in Part 15 of the Act which deals with inspection (Sections 303 to 326). A constable, enforcement officer or authorised person under the Act may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed. A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed (Section 306). Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating licence or premises licence is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating licence (Section 307).
- Entry may also be made to assess the likely effects of activity when application has been made for a premises licence. A constable or enforcement officer may require the holder of an operating licence to produce, within a specified period, a copy of the authorisation (Section 316). Failure to comply without reasonable excuse to a request to produce a copy of the authorisation may result in an offence and be liable on summary conviction to a fine not exceeding level 2. Section 317 sets out powers of the constable, enforcement officer or authorised person and include inspection of any part of the premises or any machine on anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions. Section 20 provides that the power of inspection must be exercised only at a reasonable time. The enforcement officer or authorised person must provide evidence of his identify and authority (Section 321). Section 323 provides that a constable, enforcement officer or authorised person may use reasonable force to enter a premises. Section 326 provides that it is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.
- Compliance Assessments
 - If you are required to take part in a compliance assessment the Gambling Commission will contact you by phone first and follow up with a letter.
 - The letter will explain which type of assessment you will take part in:
 - full assessment
 - targeted assessment
 - thematic assessment
 - You will need to contact the Gambling Commission to confirm you can make the assessment. If you cannot attend it's important you let them know as soon as possible.
 - There may be circumstances where your business could be involved in an unannounced compliance visit from Gambling Commission staff.

GAMBLING ACT 2005: Licence Conditions and Codes of Practice

ADVERTISING STANDARDS AND MARKETING

- Policy and Procedure
 - All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP), the Broadcast Committee of Advertising Practice (BCAP) and the Gambling Advertising Code.
 - We ensure that our marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008), including 'free bet' offers, do not amount to, or involve misleading actions or misleading omissions within the meaning of those regulations.
 - We adopt the general principles that our advertising is:
 - legal, decent, honest and truthful;
 - prepared with a sense of responsibility to consumers and to society;
 - respectful to the principles of fair competition generally accepted in business; and
 - not intended to bring advertising into disrepute.
 - Specifically, we ensure that:
 - advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise;
 - advertisements and promotions are socially responsible and do not encourage excessive gambling
 - care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable;
 - advertising is not directed at people under the age of 18 years through the selection of media, style of presentation, content, or context in which they appear. No medium is used to advertise gambling if more than 20% of its audience is under 18 years old;
 - persons shown gambling are not, nor do they appear to be, under 25 years of age;
 - there is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or pay-out ratio that applies to the gambling on offer;
 - advertising and promotional material carries a reference for the need to keep gambling under control;
 - it is never suggested or implied that gambling is a means of getting out of financial difficulty;
 - advertising and marketing material should not appear on any primary web page/screen or micro-site that provides advice or information on responsible gambling;
 - we follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.
 - Useful links:
 - [ASA - Advertising Standards Authority](#)
 - [IGRG-6th-Edt-Draft-FINAL.pdf \(bacta.org.uk\)](#)
 - Marketing and Promotion
- 1) If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services, or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:

- a) the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
 - b) neither the receipt nor the value or amount of the benefit is:
 - i) dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - ii) altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
 - c) if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
 - d) if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.
- 2) If a licensee makes available incentives or reward schemes for customers, designated by the licensee as 'high value, 'VIP' or equivalent, they must be offered in a manner which is consistent with the licensing objectives.
- Before any operator makes a customer a VIP, from it must:
 - Establish that spending is affordable and sustainable as part of the customer's leisure spend
 - Assess whether there is evidence of gambling related harm, or heightened risk linked to vulnerability
 - Ensure the licensee has up to date evidence relating to identity, occupation and source of funds, and;
 - Continue to verify the information provided to them and conduct ongoing gambling harm checks on each individual to spot any signs of harm.
 - Operators will appoint a senior executive who holds a personal management licence (PMLs) to oversee their respective scheme - making individuals personally accountable.
 - **Link:** [High Value Customers: Industry guidance - Gambling Commission](#)

Document: [High Value Customers: Industry Guidance](#)

GAMBLING ACT 2005: Licence Conditions and Codes of Practice

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

- Policy and Procedures
- Members of staff are required to interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This includes:
 - 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 the effectiveness of their actions and approach.
- Staff must also take into account the Commission's guidance on customer interaction.
- On occasions customers act in a disruptive, anti- social or aggressive manner. Staff will attempt to interact and provide suitable interventions including self-exclusion when those actions relate to problem gambling. If a customer refuses to accept help or support or their actions are not problem gambling related consideration can be given to refusing service or barring a customer.
- On some occasions Police may be called to deal with an incident. A Police Incident log is required to be completed when the incident is directly related to gambling activity (including those where Police have been unable to attend).
- This policy document is to be read in conjunction with the additional Customer Interaction guide for managers and staff (see part 2 of Handbook) together with the Gambling Commission formal guidance on customer interaction for premises- based operators. Operators may have arrangements in place for staff to refer any issues to a Duty Manager.
- There is an obligation for all operators to record and act upon any customer interaction and the Bacta portal ensures that members comply with the LCCP.
- The Portal is browser based and works on tablet, mobile and desktop and is compatible with all major operating systems.
- The Bacta Portal is available to members and will be used to record all customer interactions and self-exclusion of customers from the operators own site and other AGC's and MSA's.
- **Link to Bacta Portal: [BactaExclusion \(bacta-selfexclusion.org.uk\)](https://bacta-selfexclusion.org.uk)**
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GAMBLING ACT 2005: Licence Conditions and Codes of Practice

EMPLOYMENT OF CHILDREN AND YOUNG PERSONS

- Policy and Procedures
- It is an offence for children (under-16s) and young persons (those aged 16 and 17) to be engaged, or permitted to be engaged in:
- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on Adult Gaming Centre licensed premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence.
- All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.
- It is strict Company policy that:
- Children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place.
- Gaming machines sited in Adult Gaming Centres or adult gaming areas are turned off if children and/or young persons are working on the premises outside the hours when the premises are open for business.
- Due diligence is given to verifying the age of all new members of staff where there is reason to doubt authenticity of birth dates supplied.
- The movement of children and young persons employed on the premises are carefully monitored and supervised so as to ensure compliance.
- LCCP link re FEC: [LCCP Condition - Gambling Commission](#)
- LCCP link re AGC: [LCCP Condition - Gambling Commission](#)
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GAMBLING ACT 2005: Licence Conditions and Codes of Practice

FAIR AND OPEN PRACTICE - COMPLAINT AND DISPUTE RESOLUTION

- Complaints Procedure
- The Company is committed to providing a high quality, accessible and responsive service to customers and the local community. However, dissatisfied customers may communicate a complaint to us either verbally or in writing. All complaints are taken seriously, investigated thoroughly, and handled in a confidential manner. If the complaint cannot be resolved to the satisfaction of both parties on site, a copy of our written procedure for dealing with complaints, together with a complaint form, is supplied to the complainant at the earliest opportunity together with the name and status of the Company representative delegated to deal with the complaint.
- Licence holders should allow customers to raise complaints for at least 6 months from the date of the incident and provide customers with an acknowledgement of the complaint as soon as reasonably possible, but in any case, within three working days of receiving it or if they offer 24hr gambling facilities within 24hours of receiving it.
- Complainants should provide us with a comprehensive description and nature of the complaint; whether it is an original complaint, or where the outcome of a previous complaint was found unacceptable, and their name and postal address including a contact telephone number. We deal with complaints in a timely, fair, open, and transparent way.
- A 'complaint' means an expression of dissatisfaction, whether spoken or written, about any aspect of the way the licensee conducts their licensed activities. For example, a complaint:
 - a) about the outcome of a gambling transaction
 - b) about the way a gambling transaction has been managed
 - c) that concerns the way the licence holder carries out its business in relation to the three licensing objectives.
- A 'dispute' is any complaint which:
 - a) is not resolved under the Company's complaints procedure; and
 - b) relates to the outcome of the complainant's gambling transaction.
- In the first instance, the Company will endeavour to resolve the complaint to the satisfaction of both parties within eight weeks.
- In the event that a complaint relating to the outcome of a customer's gambling is unable to be satisfactorily resolved between the Company and the complainant, the complainant will be given contact details of an Alternative Dispute Resolution (ADR) entity within the eight-week period mentioned above.
- Bacta members can use, free of charge, the bacta ADR Service.
- Link: <http://pegasusadrservice.org.uk>
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- Complainants also have the means and opportunity of submitting their own version of events.
- The dispute is investigated in full by the ADR entity.
- The services of any such ADR entity must be free of charge to the customer.
- Both parties are notified in writing of the review outcome with suggestions of a resolution if appropriate.

- This procedure may, but need not, provide for the ADR entity's resolution of the dispute to be binding on both parties.
- In addition to referring complainants to ADR process, we do not introduce terms which restrict or purport to restrict the customers' right to bring proceedings against the Company in any court of competent jurisdiction.
- The Company is obliged to keep a record of all complaints and disputes, other than those considered to be trivial, including all disputes referred to the ADR entity that are not resolved at the initial stages of the complaints procedure. There is a requirement to submit reports of the outcome of disputes referred to the ADR entity to the Gambling Commission at intervals determined by the Commission either by the ADR entity or by the Company.
- The Company is satisfied that the terms on which gambling is offered are not unfair within the meaning of the Consumer Rights Acts 2015 and is compliant with those terms.
- An accurate summary of the contractual terms on which gambling is offered is available to customers who are notified of material changes to terms before they come into effect.

GAMBLING ACT 2005: Licence Conditions and Codes of Practice

INFORMATION ON HOW TO GAMBLE RESPONSIBLY AND HELP FOR GAMBLERS WITH PROBLEMS

- Stay in control advice
- Without breaching the principle that customers are responsible for their own gambling, the nature of the activity suggests that they should be reminded of the need to exercise caution. Accordingly, signage in the form of an appropriate number of posters or other appropriate means is displayed on our premises:
- Giving clear guidance that in order to keep gambling a fun social activity the customer needs to 'stay in control'.
- Drawing attention to further information, such as leaflets that are available on the premises.
- Indicating sources of help such as the National Gambling Helpline operated by GamCare.
- Large enough and written in language so as to be easily seen and understood.
- Prominently displayed.
- Maintained in a clean and tidy condition, preferably within a glass fronted frame.
- Advertising sources of help
- At the core of exercising a duty of care is the principle of assisting customers who may wish to express concern about their gambling. This tenet is drawn to the attention of customers on our premises in the following ways:
- The prominent display of 'Responsible Gambling' or 'Stay in Control' information.
- There are holders or racks containing leaflets in appropriate places that emphasise the need to keep gambling under control and where to seek help should anyone be concerned about their own or a family member's gambling. These leaflets are available to be taken away from the premises without the necessity of having to ask for them.
- The leaflets are available at all times for customers to take discreetly without having to ask a member of staff and are located in the gambling area either near to exit doors, ATMs or toilets. We endeavour to maintain an effective stock control system to ensure that such leaflets are always available to supply. Signposting Information may also be made available through the use of links for online or smart technology.
- Details of GamCare, giving the National Helpline telephone number is inscribed on all appropriate categories of gaming machines.
- Protecting those who seek assistance
- Responding to someone who admits to having a problem with their gambling is a delicate matter that has to be timely and needs to be approached sensitively. It is our policy that:
- rules and procedures relating to a policy of responding to problem gamblers are clearly formulated and incorporated into our day-to-day operation;
- at least one member of staff who has been trained to deal with situations that might require a response is on duty at any one time, or available without undue delay;
- Staff will engage with customers as they deem necessary to provide advice and support in their interactions. A number of gambling management options will be considered including self-exclusion for those who have lost control. (Refer to full guidance on customer interaction and self-exclusion).
- we draw to the attention of relatives who express concern about a family member's gambling the options available to that person should they wish to address the extent of their gambling;
- members of staff do not collude with customers when asked to lie on their behalf, and

- where services are marketed in one or more foreign languages, we make available information on how to gamble responsibly, access to help, guides to the playing of any game, and a summary of the contractual terms on which gambling is offered in that, or those, foreign languages.
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GAMBLING ACT 2005: Licence Conditions and Codes of Practice

MONEY LAUNDERING, CASH HANDLING AND SUSPICIOUS TRANSACTIONS

- Introduction
- As part of its procedures for compliance with the requirements in respect of the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, the Company takes into account the Commission's advice on the Proceeds of Crime Act 2002, Duties and responsibilities under the proceeds of Crime Act 2002 – Advice for operators (excluding Casino operators).
- Money Laundering Definition
- Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. This definition of money laundering means that potentially any employee could contravene the Regulations if they were to become aware of or suspect the existence of criminal property and continue to be involved in a matter which relates to that property without reporting their concerns.
- Policy
- The Company is committed to ensuring that all necessary safeguards are in place with regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.
- The Company has appointed a Designated Money Laundering Officer (MLO)
- All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions, including the systematic, organised, or substantial money lending between customers to the MLO for the purpose of informing the relevant authorities.
- Disclosure Procedure
- Where it is suspected by a member of staff that money laundering activity is taking/has taken place, a disclosure must be made to the MLO as soon as possible. Because of the importance attached to the process, notification should normally take place immediately by telephone or, where that is not possible, by any other expedient means.
- No discussion will take place with colleagues as confidentiality is paramount.
- The MLO will determine whether or not to submit - online or otherwise - a suspicious activity report (SAR) to the National Crime Agency (NCA) and will maintain records of all notifications received detailing the method of verification used to identify the suspected person.
- Cash Handling
- Operating policies and procedures are in place with regard to accounting practices and record keeping in respect of:
 - i. Monetary stakes introduced to machines (gross takings),
 - ii. Money introduced to re-float machines
 - iii. Token transactions
 - iv. Customer refunds due to machine malfunctions.
 - v. Money removed from machines (net takings)
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- Anti-Money Laundering

- Prevention of money laundering and terrorist financing
- Licence Condition 12.1.1
- 1. Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
- 2. Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures, and controls to prevent money laundering and terrorist financing.
- 3. Licensees must ensure that such policies, procedures, and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.
- As part of their procedures for compliance with the requirements in respect of the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, Duties and responsibilities under the Proceeds of Crime Act 2002 - Advice for operators (excluding casino operators).
- HM Treasury has decided to exempt all gambling sectors from the EU 4th Anti-Money Laundering Directive with the exception of non-remote and remote casinos.
- This means that only remote and non-remote casinos will have to comply with the new Money Laundering Regulations introduced in June 2017.

GAMBLING ACT 2005: Licence Conditions and Codes of Practice

SELF-EXCLUSION

- Policy and Procedures
- Licensees and operators must have procedures in place for self-exclusion for their customers. You must take all reasonable steps to prevent an individual who has been self-excluded from participating in gambling.
- You must be able to offer customers the opportunity to self-exclude not only in your venue but also similar gambling facilities in the locality.
- Systems available for the AGC and other sectors are known as Multi Operator Self-Exclusion Schemes (MOSES).
- This policy document is to be read in conjunction with the additional Customer Interaction guide for managers and staff together with the Gambling Commission formal guidance on customer interaction for premises-based operators. Operators may have arrangements in place for staff to refer any issues to a Duty Manager.
- MOSES system overview
- Bacta operates its own scheme called Bacta Self-Exclusion Services Ltd (BSESL)
- The bacta (MOSES) system is now incorporated within the bactaPortal.
- There is an interactive bactaPortal training manual / user guide available to assist operators, managers, and staff in the use of relevant modules including self-exclusion and customer interaction.
- Other MOSES systems are available for use by AGC operators.
- Historically BSESL has offered the opportunity for customers to exclude in the locality at various geographical distances up to 1Km. The present system only allows you and your staff to self-exclude in a 1Km radius from your premises. Regardless of which MOSES system you use all customers who self-exclude will be shown as excluded from all AGC premises within the exclusion area. In practice this means that a customer can exclude from multiple premises without visiting those other premises to self-exclude.
- For Motorway Service Areas (MSAs) who operate AGCs the locality for exclusions on the MOSES system is individual or multiple service areas on motorways or relevant A roads. A self-excluder who wishes to exclude from MSAs and High St AGCs will need to do so separately.
- LCCP requirements
- Duty Managers and all staff should be trained in self-exclusion.
- 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 can be offered for a period between 6 – 12 months. The period can be extended at the end of that period for one or more periods of 6 months.
- Staff should take into account specific requests from the customer including where they live, work and travel to gamble.
- A customer should be given the opportunity to self-exclude immediately without any form of cooling-off period or later return to the premises. However, if the customer wishes to consider self-exclusion further, they may return at a later date. It must be stressed that this process should entail a meaningful conversation. Operators should ensure that they have suitable staffing in place at all times.

- Self-excluders should be removed if found gambling or attempting to gamble at the premises. Staff are informed of breach alerts in venue and those within the locality on the MOSES system. Structure and layout of the premises should be taken into account when preventing access by self-excluders.
- Although difficult to identify, staff are also asked to consider instances of self-excluded individuals who get another person to gamble on their behalf.
- 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 in order to gamble again. This process is known as reinstatement. The reinstatement process will normally take place in person. There is facility to allow this process to take place by telephone. Records of self-excluders are to be retained for this period. Although the GC does not expect any particular assessment or judgement to be made on reinstatement it does expect staff 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.
- Self-excluders still have the opportunity to self-exclude from other premises owned by a company. This system is administered by individual companies and sits outside of MOSES. If companies do decide to use this system, they should consider the use of multiple locality self-exclusions on the MOSES system which may be more desirable and appropriate for the customer in terms of their problem gambling needs.
- All reasonable steps should be taken to prevent any marketing materials being sent to self-excluders and to have the individual removed from marketing databases within 2 days.
- OTHER INFORMATION
- Problem Gamblers
- Most customers are able to enjoy and control their gambling. Some customers are at risk of problem gambling and others have more complex needs in terms of managing their gambling habits. On occasions some customers will express a wish to self-exclude beyond the locality of 1Km or across a number of geographical areas. The system to carry out extended self-exclusions is explained in the bactaPortal User Guide.
- Requirement for MOSES system
- Some licensees operate the only premises within a 1Km locality and have historically carried out a self-exclusion system which is not compatible with a MOSES system. As above in exceptional circumstances some customers will self-exclude across a large geographical area. All AGC operators must therefore be part of a MOSES system, or they will be in breach of LCCP requirements. Being part of a MOSES system is likely to be a bacta code of conduct provision.
- High St Bingo
- Operators who have a bingo licence are required to use the Bingo Assoc self-exclusion scheme. The scheme does not exclude someone from AGCs. Consideration is being given to integrate High St Bingo into Bacta Self-Exclusion and the Portal.
- Self-exclusion without entering premises
- Arcade staff carry out interactions and conversations about self-exclusion in an empathetic manner and as best they can in a confidential manner without interruption from other customers. However, some customers express a wish to self-exclude away from gambling premises. Operators should have arrangements in place to meet customers off site away from their venue. Operators will have necessary risk assessments completed to support staff in this process.

- GDPR
- BSES complies with General Data Protection Regulation. As an operator you must have your own systems and processes in place to control personal data. As a member of a MOSES scheme, you will have completed a service agreement including issues around GDPR.
- Business Continuity
- The bactaPortal has a system of safeguards in place including server protection which means the self-exclusion system is always available in an electronic format.
- As an operator you must have your own systems in place to ensure that you can get access to the system including suitable Wi Fi coverage in venues. Therefore, paper systems are no longer provided to assist with the self-exclusion process.
- A self-exclusion appointment letter is available in some circumstances and with the consent of the customer when the self-exclusion cannot be carried out there and then for operational reasons.
- Licensed FECs
- All licensed FECs are required to have systems in place for self-exclusion. Although not required under LCCP most licensed FEC operators choose to be part of a MOSES scheme including the Portal and Bacta Self-Exclusion Services.
- It must be noted that there is the same requirement for licensed FECs to provide data for regulatory returns for number of self-exclusions, breaches and those returning to gambling etc.
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- CODE PROVISIONS
- Responsibility for Third Parties
- Licensees must take responsibility for third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities and ensure that the terms on which they contract with such third parties:
 - a) require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b) oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c) enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives.
- Notes:
 - The Commission is not interested in cleaning activities etc unless that has an impact on the licensed activities.
 - Operators must also build in terms to those contracts to enable termination of the contract when things go wrong.
 - There can be dispute resolution procedures which apply when these termination clauses are invoked.
- GENERAL CONDITIONS
- Qualified Persons
 1. In this condition the terms 'small-scale operator', 'qualifying position' and 'qualified person' have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
 2. Schedule X lists those individuals notified to the Commission as qualified persons.
 3. If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act for amendment of the details of the licence set out in Schedule X.
 4. An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
 5. In this condition 'qualified person' has the same meaning as in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
- PERSONAL LICENCES
 1. Subject to 6 and 7 below, licensees must ensure:
 - that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter 'a personal management licence'); and
 - that at least one person occupies at least one of those offices.
 2. The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an

unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:

- a. the overall management and direction of the licensee's business or affairs
 - b. the licensee's finance function as head of that function
 - c. the licensee's gambling regulatory compliance function as head of that function. The Commission makes explicit the approach that the head of compliance will not normally occupy (without Commission approval) any other specified management office, such as head of marketing. This LCCP requirement does not apply to small scale operators
 - d. the licensee's marketing function as head of that function
 - e. the licensee's information technology function as head of that function in so far as it relates to gambling-related information technology and software
 - f. oversight of the day-to-day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area
 - g. in the case of casino and bingo licences only, oversight of the day-to-day management of a single set of premises licensed under Part 8 of the Act.
3. The person responsible for the licensee's gambling regulatory compliance function as head of that function shall not, except with the Commission's express approval, occupy any other specified management office.
 4. Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder's personal management licence.
 5. Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual's work and any requirements of the Commission in respect of such matters applicable during the period of the review.
 6. Paragraphs 1 to 5 above shall not apply to a licensee for so long as the licensee is a 'small-scale operator' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 ('the Regulations').
 7. During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs 1 to 6 above shall apply subject to the proviso that the phrase 'each individual' in paragraph 1a shall not include any individual who was a 'qualified person' (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.
- KEY EVENTS
 - A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, or ensure the Commission is notified, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence.
 - If any key event happens within your business, you must tell the Gambling Commission about this, Key events can be reported securely online at the Commission's website through our eServices system
 - Alternatively, for operators unable to access this system, you can report a key event by email to: key.events@gamblingcommission.gov.uk
 - Operator status
1. In the case of licensees which are companies, a petition being presented for their winding up or the winding up of any group company of theirs, or they or any group company being placed in

administration or receivership or their directors proposing to creditors a composition in satisfaction of its debts or a scheme of arrangement of its affairs.

2. In the case of licensees which are bodies corporate, but not companies, any event substantially equivalent to those listed at 1 above.
3. In the case of a licensee who is an individual (or a partner in a partnership licensee) their being presented with a petition for their bankruptcy or sequestration or their entering into an individual voluntary arrangement.
 - Relevant persons and positions
4. In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.
5. Any investment in a licensee which is not by way of subscription for shares.
6. The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.
7. The entering into an arrangement whereby a third party provides services to, or grants any licence concession or permission to, the licensee other than for full value: full details of the arrangements must be supplied.
8. The appointment of a person to, or a person ceasing to occupy, a 'key position': a 'key position' in relation to a licensee is:
 - a. in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
 - b. in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c. a position the holder of which is responsible for the licensee's anti-money laundering procedures, including suspicious activity reporting
 - d. any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)
9. Any change to the structure or organisation of the licensee's business which affects a 'key position' or the responsibilities of its holders
 - Financial events
10. Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
11. Any breach of a covenant given to a bank or other lender.
12. Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
13. Any court judgments (in whatever jurisdiction) against the licensee or, where the licensee is a body corporate, a group company, remaining unpaid 14 days after the date of judgment.
14. Where the licensee is required to have their accounts independently audited, any qualification to an auditors' report; and any unplanned change of auditor including a change prompted by a dispute or resulting from auditors being unable or unwilling to sign an unqualified audit report.
15. Any change in the licensee's arrangements for the protection of customer funds in accordance with the general licence condition 4 relating to the protection of customer funds (where applicable).

16. Where the licensee holds customer funds in a separate bank account, any deficit on reconciliation of such bank account.
17. Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).
- Legal or regulatory proceedings or reports
18. The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
- 19.
- a) Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities in relation to the licensed entity of a personal licence holder or a person occupying a qualifying position employed by them, where such an investigation could result in the imposition of a sanction or penalty which, if imposed, could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
 - b) Any criminal investigation by a law enforcement agency in any jurisdiction in relation to which:
 - the licensee is involved (including, but not limited to investigations of crimes allegedly committed against the licensee or involving the gambling facilities provided under the licence), AND
 - the circumstances are such that the Commission might reasonably be expected to question whether the licensee's measures to keep crime out of gambling had failed.
 - Notification of the event must occur as soon as practicable after the licensee becomes aware of any such investigation in which the licensee is involved, and measures may have failed.
20. The receipt of any report from a professional, statutory or other regulatory or government body (in whatever jurisdiction) of the outcome of a compliance assessment in relation to the gambling activity of the licensee or, where the licensee is a body corporate, of any group company in which at least one person who holds a key position in or in respect of the licensee holds a key position: a copy of the report should be provided where available to the licensee.
21. The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor) about the provision of facilities for gambling which are expressed (in whatever terms) as requiring attention as a high priority: a summary of the nature of the concerns must be provided.
22. The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
23. The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
24. The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number.

Gambling facilities

25. Any breach in the licensee's information security that adversely affects the confidentiality of customer data or prevents customers from accessing their accounts for longer than 24 hours.
26. Any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
27. The reference of a dispute to an ADR entity other than one in respect of which contact details were given in accordance with the social responsibility code provision on complaints and disputes; the reason for selection of that ADR entity should be given.
28. In the case of remote gambling, the commencement or cessation of trading on website domains (including mobile sites or mobile device applications) or broadcast media through which the licensee provides gambling facilities.
 - In this condition:
 - 'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof
 - in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
 - a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.
 - Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, or ensure that the Commission is so notified, as soon as reasonably practicable of the occurrence of any of the following events:
 - a) the conclusion of a dispute referred to an ADR entity and, in such case, providing the Commission with a copy of the decision or note of the outcome.
 - b) any outcome adverse to the licensee of any proceedings taken against the licensee (in whatever jurisdiction) by a customer in relation to a gambling transaction; but excluding proceedings allocated to the County Court small claims track or equivalent in jurisdictions outside England and Wales.
 - c) their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised.
 - GENERAL AND REGULATORY RETURNS
 - 1. On request, licensees must provide the Commission with such information as the Commission may require about the use made of facilities provided in accordance with this licence, and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on, including in particular information about:
 - a. the numbers of people making use of the facilities and the frequency of such use
 - b. the range of gambling activities provided by the licensee and the numbers of staff employed in connection with them
 - c. the licensee's policies in relation to, and experiences of, problem gambling.
 - 2. In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit a Regulatory Return to the Commission containing such information as the Commission may from time to time require.
 - **Link:** [Family Entertainment Centre - Gambling Commission](#)
 - **Link:** [Adult Gaming Centre - Gambling Commission](#)
 -

- PAYMENT
- Cash and cash equivalents, payment methods and services
- Licence condition 5.1.1
- 1. Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (e.g. bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimize the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
- 2. Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.
- Provision of Credit by Licensees and the Use of Credit Cards
- Licence Condition 6.1.1
- 1. Licensees must neither:
 - a. provide credit themselves in connection with gambling; nor
 - b. participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.
- REPORTING SUSPICIOUS OFFENCES
- Licence Condition 15.1.1
- Licensees must as soon as reasonably practicable provide the Commission or ensure that the Commission is provided with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.
- **Link:** [LCCP Condition - Gambling Commission](#)
- This information is to be reported to the Commission via the LCCP notifications part of the [eServices digital service \(opens in a new tab\)](#) on their website. You must select **LCCP Notification: Reporting offences/breaches** when entering this LCCP notification on eServices:
- RESPONSIBLE PLACEMENT OF DIGITAL ADVERTS
- Licence Condition 16.1.1
- 1. Licensees must:
 - a. ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
 - b. take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
 - c. ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

PART 2

-
- Gaming General Terms and Conditions (Customer Notice) 32

LOGS

- Age Verification Log 33
- Customer Interaction 34
- Customer Interaction Example 37
- Incidents Requiring Police Assistance 40
- Self-Exclusion 41
- Summary Of Staff Training 42

FORMS & STATEMENTS

- Cat D guidance, Access to Gambling 43
- FEC Age Verification Log 44
- Age Verification Testing Methodology 45
- Customer Interaction Process 46
- Complaints Terms & Conditions 50
- Complaint Procedure Document 52
- Complaint Form - Customer 53
- Record of Complaints & Disputes 56
- Record of Suspicious Monetary Transactions 57

EVALUATIONS

- Compliance Evaluation 58
- System Checklist 64
- Risk Assessment Guidance Document 66
- Risk Assessment Template (Example) 78
- Risk Assessment Template 84
- Bacta Member Terms and Conditions 87

CUSTOMER NOTICE

Gaming General Terms & Conditions

-
- These Terms and Conditions (the “Generic Terms”) apply to all gaming transactions entered into on these premises (the “Premises”) except for Promotions which are covered by separate terms and conditions available on the premises.
-
- Any gaming transactions entered into on the premises shall be between the customer taking part in the particular transaction (the “Customer”) (1) and (the “Company”) (2)
-
- In these General Terms, the terms/conditions/rules displayed on the particular gaming machine are referred to as the “Specific Terms”.
-
- Customers are strongly advised to read the Specific Terms. By entering into any gaming transaction by use of the particular gaming machine, the Customer shall be deemed to have read and accepted the Specific Terms applying.
-
- Minimum and maximum stakes and maximum prizes/wins are those displayed on the gaming machine in the Specific Terms.
-
- Members of staff have no authority to vary or amend the General Terms or the Specific Terms and any assistance or advice offered by them in relation to any gaming transaction shall be without prejudice to that position.
-
- In the event of a disputed outcome to any game, the Company complaint procedure will apply, a copy of which is available from a member of staff or from the Company at the address below:
-
-
- Company:
-
- Registered Address:
-
-
-

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

Age verification log

Note: This log is to be used where a person has been challenged before they were able to gamble and were not able to provide satisfactory identification that they were 18 years of age or older and in instances where a person has gambled and has been unable to provide satisfactory identification that they are 18 years of age or older.

Please tick appropriate box. 1 Challenged on entry. 2 Challenged while browsing. 3* Challenged during play (To be used for regulatory returns). 4 Challenged on exit

Examples of satisfactory identification include photo ID such as: Driving Licence, Passport, Military ID, Citizen card and digital ID, e.g., YOTI

Date	Time	1	2	3	4	Identity or Description	Action, outcome & preventative measures adopted	Member of Staff requesting Identification	Duty Manager Informed (signature)

TO BE RETAINED ON THE PREMISES To be used in conjunction with the Company’s policy and procedure concerning ‘Access to Gambling by Children & Young Persons’.

CUSTOMER INTERACTION

Gambling Act 2005 - Licence Conditions and Codes of Practice (SR Code 3.4.1 2019)

All Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling.
 This must include: **Identifying** customers that may be at risk of or experiencing harms associated with gambling.
Interacting with customers who may be at risk of experiencing harms associated with gambling.
Evaluating the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.

Interaction	Date: / / Time: : hrs			
Name/ Nickname/ Description/Other identifier <small>*May affix photo</small>				
Previous interactions	Y <input type="checkbox"/>	N <input type="checkbox"/>	Record No:	/ /
Observation & indicators	Staff Observation <input type="checkbox"/> Customer Led <input type="checkbox"/> Comments:			
Action	Comments:			

Review Period	4 weeks <input type="checkbox"/> 8 weeks <input type="checkbox"/> 12 weeks <input type="checkbox"/> None <input type="checkbox"/> Review date / /
Person Completing	Name.....Signed..... Date / /
1st Review Discussion should outline action and activity since previous interaction. Any management tools used? Any positive change in behaviour? Has pattern of gambling changed?	Date / / Comments: 4 weeks <input type="checkbox"/> 8 weeks <input type="checkbox"/> 12 weeks <input type="checkbox"/> None <input type="checkbox"/> Review date / /
Person completing 1st review	Name.....Signed..... Date: / /
Supervisor/ Manager *	Name..... Signed Date:

<p><u>Further Review:</u></p>	<p>Date / /</p> <p>Comments:</p>
<p><u>Review Period</u></p>	<p>4 weeks <input type="checkbox"/> 8 weeks <input type="checkbox"/> 12 weeks <input type="checkbox"/> None <input type="checkbox"/></p> <p>Review date / /</p>
<p><u>Person completing review</u></p>	<p>Name..... Signed Date:</p>
<p><u>Supervisor/ Manager *</u></p>	<p>Name..... Signed Date:</p>

CUSTOMER INTERACTION EXAMPLE

Gambling Act 2005 - Licence Conditions and Codes of Practice (SR Code 3.4.1 2019)

All Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling.
 This must include: **Identifying** customers that may be at risk of or experiencing harms associated with gambling.
Interacting with customers who may be at risk of experiencing harms associated with gambling.
Evaluating the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.

Interaction	Date: 17/01/21 Time: 13 : 10 hrs			
Name/ Nickname/ Description/Other identifier *May affix photo	Brenda. White female 40-50 yrs. Dark hair. Known to staff. Photo refused.			
Previous interactions	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	Record No: 3 /19	/
Observation & indicators	Staff Observation <input checked="" type="checkbox"/> Customer Led <input type="checkbox"/> Comments: Brenda has been coming into the arcade for about 6 years. Previous interaction was recorded and there was a discussion about how much time she was spending playing. Brenda was in the arcade for 3 hrs today. I spoke to her as she seemed a little upset whilst playing and not her normal self. She stated that she was spending too much time and money playing machines.			
Action	Comments: Brenda had a break from playing. She was given a help leaflet and we discussed self-exclusion. She did not wish to self-exclude as she enjoyed the social play with her friends. Brenda agreed that she would reduce the number of visits to the arcade and play the lower Cat C machines and spend less time on B3s. No formal limited exposure agreement recorded, and she has been provided with info on problem gambling. I have made staff aware of the issue recorded today.			

Review Period	4 weeks <input checked="" type="checkbox"/> 8 weeks <input type="checkbox"/> 12 weeks <input type="checkbox"/> None <input type="checkbox"/> Review date 14 / 2 /21
Person Completing	John Smith Name.....Signed..... Date 17 / 1 /21
1st Review Discussion should outline action and activity since previous interaction. Any management tools used? Any positive change in behaviour? Has pattern of gambling changed?	Date 23/2/21 Comments: Spoke to Brenda who has been visiting the arcade periodically since 17/1. She continues to enjoy playing and states that she is playing within her means. She continues to play both Cat C and Cat B3 machines but spends less time playing on her visits since our intervention. Brenda states that she does not chase her losses anymore and seems happier to walk away after a reasonable win. No further action required. 4 weeks <input type="checkbox"/> 8 weeks <input type="checkbox"/> 12 weeks <input type="checkbox"/> None <input checked="" type="checkbox"/> Review date / /
Person completing 1st review	Name..... John Smith Signed Date: 23/2 / 21
Supervisor/ Manager *	Name..... James BrownSignedDate: 28/2/21

<p><u>Further Review:</u></p>	<p>Comments:</p>
<p><u>Review Period</u></p>	<p>4 weeks <input type="checkbox"/> 8 weeks <input type="checkbox"/> 12 weeks <input type="checkbox"/></p> <p>None <input type="checkbox"/></p> <p>Review date / /</p>
<p><u>Person completing review</u></p>	<p>Name..... Signed Date:</p>
<p><u>Supervisor/ Manager *</u></p>	<p>Name..... Signed Date:</p>

•

Company: _____ Site Address: _____ Site Ref: _____ Serial No. _____ / _____

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

INCIDENTS REQUIRING POLICE ASSISTANCE

- To be used for recording gambling related incidents that require police attendance to the premises.

Ref	Date	Time	Nature of Incident	Time Police Called	Time Police Arrived	Outcome	Duty Manager
1							
2							
3							
4							
5							
6							
7							
8							

TO BE RETAINED ON THE PREMISES: To be used when police are called to the premises to assist the licensee whether they attend or not.

Company: _____ Site Address: _____ Site Ref: _____ Serial No. _____ / _____

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

SELF-EXCLUSION LOG FOR RECORDING DETAIL IF NO IMMEDIATE ACCESS TO THE BACTA WEB-BASED SCHEME

Ref	Name	Start Date	Attempts to Enter Date(s)	Attempts to Gamble Date(s)	Preventative Measures Deployed	End Date	'Cooling off' (Y/N)	Resumed Gambling Y/N
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								

• TO BE RETAINED ON THE PREMISES: To be used in conjunction with the Company's policy and procedure concerning 'Self-Exclusion'.

Company: _____ **Site Address:** **GAMBLING ACT 2005** **Site Ref:** _____ **Serial No.** _____ /
Licence Conditions and Codes of Practice

SUMMARY OF STAFF TRAINING

Management and Staff, as appropriate, declare that they have read and understood the following documents, are fully aware of Company policy and procedures and their own respective requirements in relation to them:

- 1. Access to Gambling by Children and Young Persons
- 2. Access to Premises by the Gambling Commission's Enforcement Officers
- 3. Advertising Standards and Marketing
- 4. Customer Interaction
- 5. Employment of Children and Young Persons
- 6. Fair and Open Practice and Dispute Resolution
- 7. Information on how to Gamble Responsibly and Help for Gamblers with problems
- 8. Money laundering, Cash handling & Suspicious Transactions
- 9. Self-Exclusion

Name	Position	Interval not to exceed 7 days			Tick against relevant Policies														
		Joining Date	Training Date	Signature	Leave Date	1	2	3	4	5	6	7	8	9					

TO BE RETAINED ON THE PREMISES

Access to Gambling CAT D cash pay-out fruit machines by under 18's in an FEC

- The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice and monitoring of policies and procedures are regularly reviewed and subject to change as part of our ongoing assessment of risk.
- As a member of bacta we voluntarily restrict access to cash pay-out Category D fruit machines to people aged 18 years of age or older.
- Any visitor entering our FEC, where a member of staff believes their age to be under 18 years of age and playing a **CAT D cash pay-out fruit machine**, must be challenged, and asked to provide identification as verification of their age.
- Policy and Procedures
 - ✓ Clear and prominent signage is placed within the areas of an FEC where CAT D cash pay-out machines are located and, on each machine individually if spread across the FEC floor, stating that persons under the age of 18 years must stop playing.
 - ✓ All cash Cat D cash pay-out fruit machines to display the designated warning sticker, these, along with signage can be obtained from bacta.
 - ✓ As this is a policy adopted by bacta members and not a legislative requirement, any person found playing a **CAT D cash pay-out fruit machine** who appears to be under 18 years of age should be allowed to play off any credits and retain any winnings.
 - ✓ Any customer thought to be under 18 years of age playing a Cat D cash pay-out fruit machine is to be instructed to stop playing and invited to play any other machines within the FEC.
 - ✓ Staff are not required to remove these customers from the premises.
 - ✓ Where there is a doubt about a person's age, and they are unable to provide ID a common-sense approach should be taken. They are not permitted to play a CAT D cash pay-out fruit machine until such a time they can prove they are over 18 years of age.
 - ✓ The young person should be given a Citizen Card application form and an explanation on how to apply for an 18+ card.
 - ✓ All challenges must be recorded on the FEC Age Verification Log.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log.
- To be used for recording staff training carried out by the Company.

Company: _____ **Site Address:** _____

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

FEC AGE VERIFICATION LOG

Note: This log is to be used in an FEC where a member of staff has challenged a person, they believe to be under 18 years of age who is playing a Cat D cash pay-out fruit machine.

Date	Time	Checked while playing Cat D	Identity or Description	Action, outcome & preventative measures adopted	Member of Staff requesting Identification	Duty Manager Informed (signature)

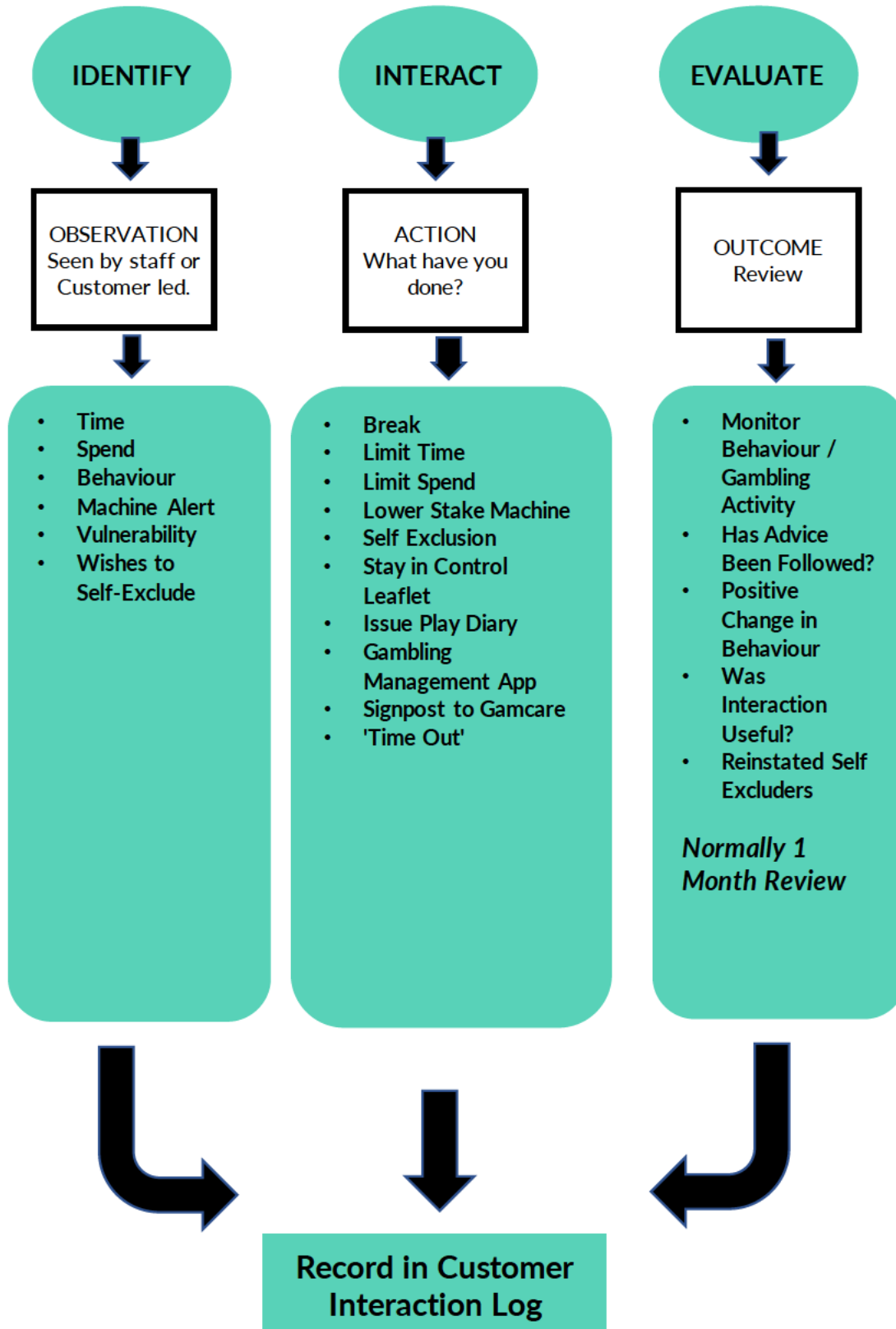
TO BE RETAINED ON THE PREMISES: To be used in conjunction with the Company's policy and procedure concerning 'Access to Gambling by Children & Young Persons'.

AGE VERIFICATION TESTING METHODOLOGY

-
- Testers
- Testers should be 18 or 19 years old and look younger than their years. They will have provided proof of identity which will be verified by Check Policy. They will undertake appropriate training to fully understand the test procedure, awareness of categories of machines and site safety when conducting tests.
- Test Procedure
- The test will be conducted in accordance with the Primary Authority protocol. The test will be conducted realistically and appropriate to behaviour that could be reasonably expected from any member of the public entering and seeking to gamble on licensed premises, but also with a view to simulating the behaviour that could be reasonably expected from a young person (under 18 years of age) attempting to gain access to an age-restricted premises. There will be no overt interaction between the tester and members of staff such as asking to exchange notes for coins, neither will they attempt to hide themselves from view. Testers do not carry means of identification (proof of age) on their person. Testers will, wherever possible, play on a category D or category C machine rather than higher stake gambling products, namely category B3.
- Testers will be wearing a face covering, to comply with Covid 19 regulations, which they will remove on request for the purpose of identification.
- **Stage 1.** The Tester will enter the premises
- **Stage 2.** The Tester will browse for at least 1 minute to identify a machine that offers a prize of £25 or more to ensure that they are in an age restricted area. The selected machine should be, preferably, away from other customers.
- **Stage 3.** If not already challenged for ID, the tester will play the machine for a further 5 minutes, adding credit as required to continue the test, but no more than £5 used to play the machine, the selected machine should be, preferably, away from other customers.
- **Stage 4.** If not challenged for ID, the tester will exit the premises and complete the test data.
- Summary of stages at which ID is checked
- **Stage 1** – Upon entering the premises or close to the threshold - PASS
- **Stage 2** – Browsing the premises but NOT inserting stake money - PASS
- **Stage 3** – Inserting money into the machine and playing - FAIL
- **Stage 4** – After 5 minutes / leaving / exiting the premises - FAIL
- No Challenge is a FAIL
- Further Test Adherence
- 1. If ID is challenged the tester should respond they do not carry ID on them
- 2. If asked for their age, the Tester should respond accordingly and give their true age
- 3. Testers will leave the premises should they be asked to do so.
- 4. If the Test AGC is located within a Family Entertainment Centre (FEC), the test will commence when the Tester enters the AGC.
- 5. Upon exiting the premises, the Tester will complete the test
- Testing Schedule
- Clients will not be informed of a test date or a scheduled test event.

CUSTOMER INTERACTION PROCESS

- From 31st October 2019 LCCP requires staff to interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. Licensees and staff must take into account GC guidance in this area. This must include 3 key outcomes:

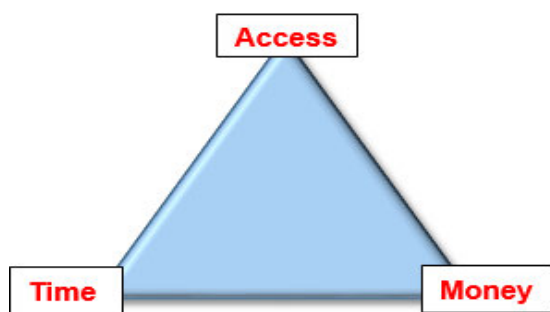


- What is a good customer interaction?
- **SEE** what is happening
- **LISTEN** to your customers
- Where appropriate **DO** something about it
- **RECORD** what you have done
- **REVIEW** what has happened
- Is there a **POSITIVE OUTCOME** & did it work?
- Who are our problem gamblers?
- Problem gambling can affect anyone.
- Any age, gender, or ethnic background.
- Violence, alcohol and drug abuse, isolation, and mental health.

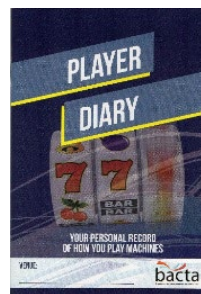


- How to intervene?
- Consider your staff training.
- Have a plan in your mind. How would you start? What would you say? How will you end the conversation?
- Customers can make their own decisions. You are able to help.
- Problem gamblers appreciate early interventions.
- Do not miss 'THE INVITATION'. Sometimes problem gamblers just want a little bit of help at the right time. Do not miss the opportunity.
- You will normally do 'THE RIGHT THING'.
- Record Keeping
- Paper or electronic logs can be used to record customer interaction entries.
- Bacta Portal is available to record customer Interaction and self-exclusion records. The Portal provides a training manual with further Information.
- Record where an interaction has been considered and ruled out.
- Record an interaction which takes place at a later date.
- Encourage the customer to provide their name and as much information as possible so you can give them help and support. Nicknames/ identifiers help to identify repeat entries. Bacta Portal also allows you the facility to upload an image of all customers you interact with.
- Check records for previous customer interactions.

- Vulnerability
- Is a customer experiencing any mental health issues or learning difficulties?
- Have they got poor physical health through addiction?
- Does a customer show any signs or indications they may be living with dementia? Consider dementia training for your staff. Persons with some forms of dementia have increased gambling compulsions.
- None of the above is always apparent, it may just be that they enter your arcade with a carer. A professional carer will have completed a risk assessment for their client to play and gamble in an arcade.
- Persons who are vulnerable can still enjoy gambling in an arcade.
- Consider if recording the interaction is appropriate with regard to vulnerable persons.
- Limited Exposure
- Gambling management apps such as Gamblewise & Playright can assist customers by providing “time out” options.
- Paper versions are available which assist customers to reduce time and spend in an arcade.
- The issue of a play diary will help a customer to track and control gambling activities.



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- Time Out & Barring
- On occasions you will observe customers who are high staking or gamble higher than the average amount. These customers do not normally exhibit any obvious indicators of harm and are not spending a significant amount of their discretionary income.
- You may wish to complete a customer interaction entry for any of these individuals as an assessment of their play without any indication of gambling harms. This will form part of your 'Know the Customer' process.
- Signposting & support
- Your staff training, leaflets and posters will help you to explain the role of any support service such as a GamCare provider.
- There will be increased empathy if you are able to explain the process of initial contact and support provided by any support agency.
- Providing contact details for your local GamCare provider will help in this process.
- The customer may wish to complete the 'GamCare Self- Assessment Tool' to assist in their decision making during any interaction conversation.

- Self-exclusion
- Self-exclusion is a last resort.
- If a customer wishes to self- exclude a meaningful customer interaction conversation will take place.
- Having considered the options and various gambling management tools self-exclusion may no longer be the right option for the customer.
- If self- exclusion is the right option, then self-exclude.
- Always complete customer interaction entry for a self -exclusion.
- Self-excluders who have returned to gambling should be observed and monitored in the short term for any indicators of risk of harm. It is suggested that all returning self-excluders will be subject of a one- month review.
- What is the role of the Manager?
- Each company will have its own staff training and policy in relation to customer interactions.
- In some cases, staff will observe and note activity and report to a manager who will then complete the action and review process.
- Managers should note records, provide guidance, and give some direction particularly around the requirement and completion of any review and evaluation process.
- What is the role of the Company or Licence holder?
- Assess customer interactions to evaluate the effectiveness of your overall approach.
- Understand what works well and is effective for your customers.
- The following indicators may be used:
 - Customer retention.
 - Reduction in complaints.
 - Increased staff awareness.
 - Number of interactions recorded & quality of the records.
- LCCP Guidance for Customer Interaction
- 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.
- Useful Links
- Customer interaction LCCP:
- [LCCP Condition - Gambling Commission](#)
- Customer interaction advice from the Gambling Commission:
- [Formal guidance under SR Code 3.4.1: Customer interaction: formal guidance for premises-based operators - Gambling Commission](#)

GAMBLING ACT 2005: Licence Conditions and Codes of Practice

Customer Complaints – terms and conditions

- Policy & Procedure
- These are the Company's Terms and Conditions by which customer complaints are dealt with. Also included is the Company's policy and procedure document and complaint form. Copies of the complaint procedure and form are available on site for the benefit of customers making a complaint about the outcome of their gambling where the complaint has not been resolved on-site in the initial stages.
- A 'complaint' means a grievance about any aspect of the licensee's conduct of the licensed gambling activities, and should be raised with the company as follows:
- The complaint should initially be raised with an available member of staff at the venue at the time of the incident giving cause for complaint. **Stage 1**
- If the member of staff approached is unable to deal with the complaint or the matter is not resolved to the customer's satisfaction, then it should be directed to the duty manager at the venue at the earliest opportunity. **Stage 2**
- Should the matter still not be resolved, the customer will be provided with a copy of the policy & procedure document, together with a complaint form that should be completed by the customer and submitted to the Company for consideration by a director or appointed senior manager. **Stage 3**
- If the matter remains unresolved, the customer should be referred to an alternative dispute resolution (ADR) entity with whom the Company has registered. The complaint will not be considered by the ADR entity unless:
 - the matter relates to the outcome of the complainant's gambling transaction; and
 - it is not resolved during the three-stage complaint procedure as outlined above.
- It is permissible for an ADR entity to have terms enabling it to reject complaints referred for dispute resolution if the complaint is frivolous or vexatious, but the Company will not refuse to refer disputes on those grounds.
- The Company will ensure that:
 1. information about the complaint procedure is set out in these terms and conditions;
 2. such information is readily accessible on our gambling premises to be taken away;
 3. information includes details of how to make a complaint to the Company and the identity and contact details of the person deputed to handle the complaint;
 4. the information names the ADR entity to whom disputes can normally be referred and, where necessary, details of any limitation on the nature and subject matter of disputes with which a particular ADR entity deals.
 5. customers are given a copy of the complaint policy and procedure document on request or on making a complaint; and
 6. all complaints are handled in accordance with the procedure.
- Should the Company refer a complaint to ADR entity other than one in respect of which contact details were given in accordance with 1 to 6 above it will, at the same time as making the reference, inform the Commission of the reference and reason for selection of the ADR entity concerned.
- The Company keeps a record of all complaints that are not resolved at the initial three-stage complaint procedure.

- The Company arranges for a copy of the decision on, or a note of the outcome of, each dispute referred to an ADR entity to be provided to the Commission, either by the ADR entity or by the Company. This information is provided in such format and within such timescale as the Commission may from time to time specify.
- The Company also arranges for any outcome adverse to the Company of any proceedings taken against the licensee (in whatever jurisdiction) by a customer in relation to a gambling transaction to be notified to the Commission as a key event; but excluding proceedings allocated to the County Court small claims track or equivalent in jurisdictions outside England and Wales.
- **Under no circumstances are members of staff put in physical danger** nor will they be subjected to abuse. If a customer is threatening, then that person will be offered the complaint policy & procedure document together with a complaint form and be referred to the Company's strict policy of 'No Abuse'. If the customer continues to be threatening the circumstances will be treated in accordance with a disturbance on the premises, and the person will be asked to leave, and the police contacted to assist if necessary.
- Which complaints are covered?
- A complaint, in the context of the LCCP, means a complaint solely about the conduct of the Company's activities. A dispute means a complaint which has not been resolved by the operator's complaints procedure to the satisfaction of both parties and relates to the outcome of a gambling transaction.
- Responsibility of the Employer.
- The Company has a written procedure in place to:
 - advise employees of the name of the appointed person who is to be contacted about complaints;
 - ensure that all complaints are handled in accordance with the procedure throughout the investigative process;
 - have arrangements in place for reference by a customer of a dispute to an alternative dispute resolution service for disputes (an 'ADR entity'); and
 - maintain a record of all complaints, and those that evolve into disputes. All instances where the complaint is referred to an ADR entity will also be recorded together with the outcome.
- Responsibility of the Employee
 - Members of staff not authorised to deal with complaints, or where the customer is not satisfied with the initial outcome, will ensure that:
 - the complainant is informed of the name of the appointed Company representative who will deal with the complaint, together with the appropriate contact details of that person;
 - the complainant is issued with the Company's complaint policy & procedure document and complaint form;
 - the circumstances are recorded as contemporaneous notes as soon as possible following the incident and the notes are signed, dated, and timed by the member of staff dealing. The notes are to be comprehensive and a true record of events, and
 - members of staff, unless properly authorised by the Company, are not allowed to voice their own opinion as to the merits or otherwise of a complaint. Procedure is strictly adhered to.
-

Complaint Procedure

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

- (name)..... who is (job title)
.....

- At
(address).....
.....

-
-

- Email Address:
.....

- How to make a complaint
- Complaints, which we will deal with confidentially, should be submitted in writing, by letter or e-mail.
- The attached form should be used to record and submit complaints.
- Give as much detail as possible including details of independent witnesses and any other relevant information in order to assist the Company in the investigative process.
- Complaints should be raised within 6 months of the incident.
- What happens next?
- The Company will acknowledge receipt of your complaint within 3 days.
- The company will investigate and provide a full explanation of what we have done within 8 weeks of receiving a complaint. If this is not possible, we will explain why and give a date by which a full response can be expected. 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 the ADR entity this company is registered with requesting that the matter be reviewed and submitting all previous correspondence relating to your complaint, including the 'deadlock' letter referred to above.
- The ADR entity will acknowledge receipt of your correspondence without undue delay and, after 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.
- This Company is registered with the following ADR entity:
- Name of ADR Entity: Pegasus ADR Service

- Email Address: enqs@pegasusadrservice.org.uk
- Website: <http://pegasusadrservice.org.uk>
- Postal Address: 29-30 Ely Place, London EC1N 6TD
- It is highly recommended that you visit the ADR entity's website (as above) so that you are fully aware of the procedural rules and other related information.

Complaint Form - CUSTOMER

-
- Name:
.....
.....
- Address:
.....
.....
-
- Postcode
.....
-
- Daytime Telephone No.:
.....
-
- E-mail address:
.....
-
- Signature: Date:
.....
-
- Is this an initial complaint or a follow up to a previous incident?
.....
.....
-
-
.....
-
- VENUE WHERE COMPLAINT OCCURRED
-
- Reference (if known):
.....
-
- Company:
.....
-

- Name of Premises:
.....
-
- Address:
.....
-
-
-
- Name(s) of staff member(s) that you initially raised your complaint with:
.....
-
-
-
- Date of Incident:
.....
-
- Time of Incident:
.....
-
- Names & Addresses or contact telephone numbers of any independent witnesses:
.....
-
-
-
-
-
-
-
-
-
- Name and Category of Gambling Machine subject of complaint:
.....
-
-
-
- A clear and comprehensive account of the complaint and what you are seeking as redress to resolve the matter:
.....
-
-
-

- For Office Use Only
- Appointed Manager dealing: Mobile Number).....
-
- 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
.....
-
- Name of ADR Entity:
.....
-
- Company Complaint Policy & Procedure Document given to Complainant (Y/N):
.....
-
- Date.....

Record of Suspicious Monetary Transactions

TIME	LOCATION	CIRCUMSTANCES	REPORTED TO MLO	SAR SENT TO NCA	OUTCOME
Day: Date: Time:	Site: Address: Ref:	Notes: Photographs/CCTV Y/N Identity, if known, or description:	Day: Date: Time:	Day: Date: Time:	Notes:
Day: Date: Time:	Site: Address: Ref:	Notes: Photographs/CCTV Y/N Identity, if known, or description:	Day: Date: Time:	Day: Date: Time:	Notes:

•

Company:

Site Reference:

Serial No.

/

GAMBLING ACT 2005
Licence conditions and Codes of Practice

COMPLIANCE EVALUATION

- Section 1 - Observation
 - Please circle either 'Y' (yes) or 'N' (no) as appropriate
 -
1. Are age restriction signs displayed prominently at the entrances to Adult Gaming Centres, (AGCs) clearly stating that it is illegal for persons under the age of 18 years to enter the premises or, equally prominent with the same clear message, at the entrances to adult gaming areas within a Licensed Family Entertainment Centre (Lic. FECs)? Y N
 2. Are entrances to AGCs and/or adult gaming areas appropriate so as not to attract children or young persons from entering? Y N
 3. Are the entrances to AGCs or adult gaming areas effectively monitored, controlled and supervised taking into account the structure and layout of the premises so as to ensure that age restriction is adhered to? Y N
 4. Are the barriers separating different licensed premises within the parameters one 'building' of a solid construction, including the unlicensed areas separating different licensed premises? Y N
 5. 'Stay in Control' posters prominently displayed, preferably framed, so as to be easily seen and read by all customers? Y N
 6. 'Stay in Control' leaflets available in a dedicated rack, preferably below 'Stay in Control' poster and discretely accessible to customers without the need to be asked for, and available for taking away? Y N
 7. Are approved 'Proof of Age' application forms readily available for distribution, or are alternative and suitable schemes adopted to assist with compliance of age restriction policy? Y N
 8. Do advertising, marketing and promotional notices comply with advertising standards? Y N
 9. Is the Premises Licence clearly displayed (summary is sufficient)?
 10. Is the Company registered for MGD? Y N
 11. Are machines correctly and clearly labelled according to category of machine? Y N
 12. Are 'No Alcohol' signs clearly displayed? Y N
 13. Are 'No Smoking' signs clearly displayed? Y N
 14. Is the operation fully compliant with gaming legislation and other regulatory requirements, e.g., only the correct category of gaming machines provided on site; stake and prize levels appropriate for the type of premises; correct number of machines? Y N
 15. Is the National Gambling Helpline telephone number on all categories of machines? Y N
 16. Are labels displayed on gaming machines (with the exception of Category 'D' machines located in Licensed FECs) stating that under 18s are prohibited from playing? Y N

Company:

Site Reference:

Serial No.

/

GAMBLING ACT 2005
Licence conditions and Codes of Practice

COMPLIANCE EVALUATION

- Section 2 – Management

• Company: ..

• Site: .. Date: ..
 .. Time: ..

• Manager: .. Length of Service: ..
 ..

- Please circle either 'Y' (yes) or 'N' (no) as appropriate

-
- 1. Are you aware of, and understand, the three licensing objectives?
- 2. Are you aware of procedures on how to respond to 'authorised persons' who properly identify themselves on the premises. Y N
- 3. Are the following Licence Conditions and Codes of Practice written policy and procedure documents fully understood and available for inspection?
 - Principal Concepts Y N
 - Access to gambling by children and young persons Y N
 - Access to premises by the GC's Enforcement Officers Y N
 - Advertising standards and marketing Y N
 - Customer interaction Y N
 - Employment of children and young persons Y N
 - Fair and open practice and dispute resolution Y N
 - Information on how to gamble responsibly and help for those with problems Y N
 - Money laundering, cash handling and suspicious transactions Y N
 - Self-exclusion Y N
- 4. Are the following logs up-to-date and available for inspection?
 - Attempted child or young person entry Y N
 - Customer interaction Y N
 - Incidents requiring police assistance Y N
 - Self-exclusion Y N
 - Staff training summary Y N
- 5. Are the following systems in place to demonstrate staff training and awareness of Company policies and procedures?
 - Policy and procedure records. Training Log signed by staff Y N
 - Complaints and dispute resolution records Y N
 - Training attendance certificates Y N
- 6. Can the Company demonstrate robust risk assessment of age-verification and restriction by regularly conducting test purchases or other satisfactory and appropriate methods? Y N

7. Is age restriction policy strictly adhered to, and are members of staff effectively trained in its implementation?	Y	N
8. Are members of staff aware that it may be construed to be an act of 'gross misconduct' should they knowingly allow persons under the age of 18 years to enter an Adult Gaming Centre or adult gaming area(s) within a Licensed FEC, and is this a clause included in their contract of employment?	Y	N
9. Has a 'proof of age' scheme been adopted, and are approved application forms available?	Y	N
10. Are customers not inappropriately encouraged to play on gaming machines?	Y	N
11. Is there is a policy in place that precludes staff colluding with customers who ask them to lie on their behalf?	Y	N
12. Is it company policy to allow customers to change coins back to notes?	Y	N
13. Are relevant staff members trained to respond positively to customers who exhibit distress, say they have a problem with their gambling, or wish to be self-excluded?	Y	N
14. Is it accepted that the initial minimum period for self-exclusion is not less 6 months, nor more than 12 months and are you aware of the requirement of implementing a 24-hour 'cooling off' period thereafter?	Y	N
15. Are all members of staff who interface with customers familiar with the AGC sector self-exclusion web-based scheme and know what to do if a self-excluded person attempts to enter the gaming area or attempts to gamble before the period of the self-exclusion agreement expires?	Y	N
16. Do stock control procedures ensure that 'Stay in Control' leaflets are always in the rack(s) and that a reserve supply is always available?	Y	N
17. Are you aware of how to order new stocks of 'Stay in Control' leaflets and posters?	Y	N
18. Are you aware of the requirements relating to advertising, marketing, and promotions?	Y	N
19. Are copies of self-exclusion request forms retained on site and readily available for supply should the web-based system fail for any reason?	Y	N
20. Are all members of staff aware of requirements concerning young Persons who may be employed by the Company?	Y	N
21. Can you demonstrate that annual financial contributions (RET) are being paid to GambleAware or other appropriate care agencies?	Y	N
22. Are you aware of the requirement to submit an annual regulatory Return to the Gambling Commission, and what information is required?	Y	N
23. Are you aware of procedures necessary under money laundering regulations, and has the Company appointed a designated money laundering officer (MLO)?	Y	N
24. Has the Company participated in a recognised social responsibility awareness course?	Y	N
25. Are you aware that stakes must be returned to under-18s who have gambled in AGCs and adult areas and that they are not permitted to retain any monetary prize paid out?	Y	N
26. With regard to customer complaints and disputes, do you have a written policy and complaint form available to be handed to a complainant, and have you registered with an approved ADR entity?	Y	N
27. Are you aware of the importance of ensuring the ongoing process of staff training in respect of adhering to the requirements of the LCCP, and the need to train new members of staff if when they are recruited to the Company?	Y	N
28. Are you aware of your obligations to inform the Gambling Commission should there be any 'key event' changes to your Operating Licence?	Y	N
29. Has a Local Risk Assessment Document been written and is it available on site for Inspection if requested?	Y	N
30. Has an Anti-Money Laundering Risk Assessment been written and is it available on site for the benefit of staff and inspection if requested?	Y	N
•		
•		

- Comment:
-
- Please comment on all instances where 'N' is circled, giving a full explanation and what measures are to be adopted so as to comply with requirements.

GAMBLING ACT 2005
Licence conditions and Codes of Practice

COMPLIANCE EVALUATION

- Section 3 – Members of Staff
 - Company: Site:
 - Date: Time:
 - Member of Staff: Length of Service:
 -
 - Please circle either 'Y' (yes) or 'N' (no) as appropriate
 -
1. Do you have a good understanding of the following Licensing Conditions and Codes of Practice written policies and procedures where they are relevant to your particular duties?

• Access to gambling by children and young persons	Y N
• Access to premises by the GC's Enforcement Officers	Y N
• Customer interaction	Y N
• Employment of children and young persons	Y N
• Fair and open practice and dispute resolution	Y N
• Information on how to gamble responsibly	Y N
• Money laundering	Y N
• Self-exclusion	Y N
 2. Are you aware of and understand the content and maintenance of the following logs?

• Attempted child entry	Y N
• Customer interaction	Y N
• Incidents requiring police assistance	Y N
• Self-exclusion	Y N
• Staff training summary	Y N
 3. Do you understand the systems in place to demonstrate staff training and awareness of the following Company policies and procedures?

• Written policy and procedure records signed by staff	Y N
• Staff training summary sheet	Y N
• Complaints and dispute resolution records	Y N
 4. Is age restriction policy known to you and applied? Y N
 5. What 'Proof of Age' scheme is in use and are you aware of where the application forms are located? Y N
 6. Are you instructed that customers are not inappropriately encouraged to play on gaming machines? Y N
 7. Are you aware that you must not collude with customers who ask you to lie on their behalf? Y N
 8. Are you aware that it is an act of 'gross misconduct' if you knowingly allow a person under the age of 18 years to enter an Adult Gaming Centre or adult gaming area(s) within a FEC? Y N
 9. Do your instructions permit that a customer may change coins back into notes? Y N

- | | | |
|---|---|---|
| 10. Are you aware of what your actions should be if you were to be approached by a customer who asks for help to deal with a gambling problem to do with themselves or with a relative or friend? | Y | N |
| 11. Do you know which member of staff has been appointed by the Company to supervise 'customer interaction' and 'self-exclusion' issues? | Y | N |
| 12. Are you aware of what behaviour might be characteristic in a person whose gambling is out of control, and what your actions should be if you observe a customer displaying such behaviour? | Y | N |
| 13. Are you aware that the Company offers a web-based self-exclusion scheme for customers who are experiencing difficulties with their gambling; that the minimum period of self-exclusion is 6 months and that excluders can also be excluded from other company premises offering a similar style of gambling in the locality, and have you been shown and understand the guide to the self-exclusion scheme? | Y | N |
| 14. Are you aware of the requirement of a 24-hour 'cooling off' period following a term of self-exclusion? | Y | N |
| 15. Are you aware of what your actions must be should a self-excluded customer enter the gambling area or attempt to gamble during the course of their self-exclusion period? | Y | N |
| 16. Are you aware that 'Stay in Control' leaflets should always be available in the racks, and where replacement stock is stored? | Y | N |
| 17. Are you aware of where the self-exclusion request forms are kept in the event that the web-based scheme cannot be accessed? | Y | N |
| 18. Do you know what your actions must be when a Gambling Commission enforcement officer or other authorized person enters the premises? | Y | N |
| 19. Are you aware of the employment limitations with regard to children and young persons employed by the Company? | Y | N |
| 20. Are you aware of procedures required under the money laundering regulations and who the Company appointed MLO is? | Y | N |
| 21. Have you received LCCP training? | Y | N |
| 22. Are you aware that stakes must be returned to under-18s who you have identified as having gambled in the AGC (or adult area) and that they are not permitted to retain any monetary prize? | Y | N |
| 23. Are you aware of the company's policy in dealing with complaints and disputes and where written copies of this policy and complaint forms are kept? | Y | N |
| 24. Do you know what the three Licensing Objectives are? | Y | N |
| 25. Do you feel that you have received sufficient training in what is expected of you in respect of knowledge and implementation of gambling law requirements? | Y | N |
| 26. Do you have copy of the staff training booklet provided by bacta and have you completed the training modules? | Y | N |
| 27. Have you been shown and understand the local risk assessment and money laundering risk assessment documents? | Y | N |

System Checklist

Premises signage

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

Machine Signage

Under 18s				
GamCare				
Category Labels				
Legacy Labels				

Posters (P) & Leaflets (L)

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

Licences

Premises Licence				
Operating Licence				
Personal Licence				
Link Licence				

Forms

Self-Exclusion				
Complaints & Dispute				

Policy & Procedure Documents

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

Logs

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

Entitlement

B3 Numbers				
Stakes & Prizes				

Misc.

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

Risk Assessment Documents

Local Risk				
Money Laundering				
Guide to bacta SE Scheme				

Registrations

ADR Entity				
Self-Exclusion Scheme				
Age Verification Testing				
Primary Authority				

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Guidance on Undertaking Local Gambling Risk Assessments

Gambling Act 2005

Contents

1. Executive Summary	67
2. Introduction	68
3. Background	69
4. Risk assessment triggers	70
4.2 New premises	70
4.3 Significant changes in local circumstances	70
4.6 Significant changes to the premises	71
4.9 Variation of the premises licence	71
4.11 Regular review of risk assessments	72
5. Local risk and control measures	72
5.4 Local area risks	72
5.5 Gambling operational risks	72
5.8 Premises design risks	73
5.10 Interior design risks	73
5.12 Exterior design risks	73
5.13 Control measures	73
6. Undertaking a local risk assessment	74
6.3 Who should undertake the assessment	74
6.4 Step 1: The local area	74
6.7 Step 2: The gambling operation	75
6.8 Step 3: The design of the premises	75
6.9 Step 4: Control measures	75
6.10 Completed assessment	76
7. Appendix A	76
Evaluating Risk Assessment Chart and Useful Links	76

1. Executive Summary

- 1.1 As of 6 April 2016, all AGC and FEC licenced operators must identify risks to the Licensing Objectives posed by the provision of the gambling facilities they offer in a specific locality and compile a report document outlining any potential risks and the measures put in place to mitigate them.
- 1.2 Thereafter, operators must review their risk assessments if significant changes in local circumstances occur and ensure that members of staff are trained at appropriate intervals of time to reflect such changes.
- 1.3 A separate report will have to be prepared for each and every licensed venue and should reflect classified areas of heightened risk identified by licensing authorities within their Statement of Licensing Principles in addition to those risks that may have been identified by, or brought to the attention of, the licensee.
- 1.4 Licensees are required to share their risk assessments with licensing authorities when applying for a new premises licence, when applying for a variation to an existing licensed premises, **or otherwise on request**.
- 1.5 Risk assessment reports should identify potential risks associated with company operating systems, the exterior design of the premises, interior layout of the premises and outside influences so as to minimise possible breaches the 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, and
 - Protecting children and other vulnerable persons from being harmed or exploited by gambling.

1.6 The Licence Conditions and Codes of Practice (LCCP) sets out the requirements by which the Licensing Objectives are protected. Local risk assessment seeks to identify whether there are additional risks specific to the geographical locality in which the premises is located that need to be highlighted and taken into consideration.

Link to the Gambling Commission's LCCP on Risk Assessments

[Local area risk assessments \(gamblingcommission.gov.uk\)](http://gamblingcommission.gov.uk)

- 1.7 Due to the challenges of providing generic guidance when the intention of local risk assessment is specifically aimed at individual site locations, it should be borne in mind that this document seeks to cover many contingencies so as to benefit a wide range of companies and their differing requirements. Therefore it is stressed that operators should tailor this guidance and the supporting example (template) report so as to be relevant to their individual and specific circumstances. Similarly Appendix 'A' (Evaluating Risk) is purely suggested as a means of assessing a level of risk, and Companies may deem other matrixes to be more appropriate for their specific needs.
- 1.8 A template, appended to this document, giving examples of identified risks and the measures that have been put in place to mitigate harm to the Licensing Objectives should be considered in a similar light.
- 1.9 The writing of this document has taken into account the views expressed by the Gambling Commission and Local Authority Licensing sources.

2. Introduction

- 2.1 The Gambling Commission (the Commission) has introduced new provisions in its social responsibility codes (10.1.1 & 10.1.2) within the Licence Conditions and Codes of Practice (LCCP), which require gambling operators to assess local risks to the Licensing Objectives posed by the provision of gambling facilities at each of their premises and to have policies, procedures and control measures in place to mitigate those risks. This change in national policy is intended to provide a well evidenced and transparent approach to considering and implementing measures to address the risks associated with gambling.
- 2.2 The introduction of new provisions in the social responsibility code within the LCCP encourages local authorities and the Commission to work in partnership with the industry to address local issues and concerns. Bacta's expectation is that a risk-based approach to regulation by licensed operators will free up local authorities to prioritise their resources where they are most needed and can be most effective.
- 2.3 A risk based approach provides a better understanding, and enables a proportionate response, benefiting the well-being of both the licenced company and its customers. Such an approach should include looking at future risks and thinking about risks in a probabilistic way. Risk is not necessarily related to an event that has happened; risk is related to the probability of an event happening and the likely impact of that event. In this case it is the risk of any impact on the Licensing Objectives.
- 2.4 Bacta, having due regard to input received from local authority sources and the Commission, has developed this guidance to assist its membership in undertaking and preparing their local (premises) risk assessments. This guidance document seeks to provide a framework for the local risk assessment process that is aimed to promote, as far as it is possible, a uniform approach across the Adult Gaming Centre (AGC), Family Entertainment Centre (FEC) and Bingo sectors. This will benefit licensing authorities under the Gambling Act 2005 when applications are forthcoming for new premises licences and variations to existing premises and enable local authorities to move to a more proportionate compliance inspection regime.
- 2.5 Licenced gambling operators will be required to undertake a risk assessment for all of their existing premises by 6 April 2016. Following that date, operators must also undertake a review of those assessments when certain triggers are met. These triggers, along with local authority expectation on what would instigate either a new assessment or the review of an existing one are detailed within this guidance document.
- 2.6 The local risk assessment process is not the same as other forms of risk assessment undertaken by gambling operators, such as Health and Safety at Work, Fire Safety and Food Hygiene. These local risk assessments are specific to the potential harm that gambling premises can have on one or more of the Licensing Objectives under the Act. They are specific to the premises, the local area and the local community.

3. Background

- 3.1 Councils are licensing authorities under the Act. A licensing authority is responsible for considering and determining applications for premises licences which offer gambling facilities within their respective jurisdictions. Licensing authorities also have a role in gambling regulation by ensuring compliance with the Act.
- 3.2 The Act contains three Licensing Objectives which guide the way that gambling operators conduct their activities and how licenced authorities perform their functions. They are:
- **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.**
- 3.3 The Act places a legal duty on licensing authorities to aim to permit gambling in so far as they consider it reasonably consistent with the Licensing Objectives. The effect of this duty is that licensing authorities must approach their functions in a way that seeks to regulate gambling by using vested powers where appropriate rather than by setting out to prevent gambling altogether.
- 3.4 Licensing authorities set out how they intend to carry out their functions under the Act in Statements of Licensing Principles, also known as Licensing Policies. These statements are kept under review and updated every three years (as a minimum).
- 3.5 The Gambling Commission is responsible for issuing operating licences to gambling operators who are deemed suitable and competent to provide facilities for gambling. As a requirement of these operating licences, operators must ensure that they comply with and meet the requirements of the Licence Conditions and Codes of Practice (LCCP).
- 3.6 In February 2015, following consultation period with relevant stakeholders the Commission introduced a new social responsibility code provision making it a requirement for certain gambling operators to assess possible local risks to the Licensing Objectives posed by each of their 'land-based' gambling venues. The Commission also introduced an ordinary code provision relating to sharing local risk assessments. The provisions of the codes are:

Social Responsibility Code Provision 10.1.1.

Assessing Local Risk

All non-remote casino, Adult Gaming Centre, Bingo, Family Entertainment Centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

This provision comes into force on 6 April 2016

- 1 Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.

2 Licensees must review (and update as necessary) their local risk assessments.

- To take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy.
- When there are significant changes at a licensee's premises that may affect the mitigation of local risks.
- When applying for a variation of a premises licence.
- In any case, undertake a local risk assessment when applying for a new premises licence.

Ordinary code provision 10.1.2

Sharing local risk assessments

All non-remote casino, Adult Gaming Centre, Bingo, Family Entertainment Centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

This provision comes into force on 6 April 2016

- 1 Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

4. Risk assessment triggers

4.1 The local risk assessment code provisions provide a number of triggers for when a new assessment is required and for when an existing one requires review. This section relates to what these triggers may be and when operators should provide a copy of their assessments to a licensing authority.

New premises

4.2 If an operator intends to apply for a new premises licence under Part 8 of the Act, then a local risk assessment must be carried out. The assessment should be based on how the premises are proposed to operate at the venue location and must take into account the local area. The completed assessment should be provided with the application for a new premises licence upon submission to the licensing authority.

Significant changes in local circumstances

4.3 Operators are required to review their local risk assessment if significant changes in local circumstances occur. Changes to local circumstances happen frequently and can be either temporary or permanent depending on the change, how long that change will remain in place and how it affects the local area. However, the requirement for review of the risk assessment is only applicable when that change is significant.

4.4 The following lists sets out some examples of what the Licensing Authority may consider being significant changes in local circumstances.

- The local area is classified or declassified by the Licensing Authority as being an area of heightened risk within its Statement of Licensing Principles.

- An increase of educational facilities in the local area. This may occur as a result of the construction of a new school/college, or where a significant change is made to an existing establishment.
- The local area is identified as a crime hotspot by the police and/or licensing authority.
- Venues relating to the care of vulnerable groups are opened in proximity to gambling premises (e.g. additional homeless hostels or when gambling or mental health care/support facilities are opened in the local area).

4.5 The list above is not an exhaustive list of significant changes in local circumstances. Licensing authorities may provide information to gambling operators when it feels a significant change has occurred in the local area and set out what that change is and any specific concerns they may have that should be considered by operators. However, operators themselves must also consider what is happening in their local areas and it is their responsibility to identify significant changes which may require a review and possibly an amendment to their risk assessment. A significant change can be temporary and any temporary changes should be considered and adjustments made to the local risk assessment if necessary.

Significant changes to the premises

4.6 From time to time operators will undertake refurbishment of a premises layout and décor which, in itself, is unlikely to prompt a review of the risk assessment for that premises. However, where there is a significant change at the premises that may affect the mitigation of local risks, then an operator must review its risk assessment and if necessary update it, taking into account the change and how it may affect one or more of the Licensing Objectives.

4.7 The following list sets out some examples of what local authorities may consider being significant changes to premises (some of which may also require a variation to the existing premises licence). As with the examples of significant changes in local circumstances set out above, the following list is not an exhaustive list of significant changes to premises - operators must consider whether any change that they are proposing to their premises is one that may be considered significant.

- Any building work or premises refit where gambling facilities are relocated within the premises.
- The premises licence is transferred to a new operator who will operate the premises with procedures and policies which are different to those of the previous licensee.
- New gambling facilities are made available on the premises which were not provided previously.

4.8 Licensing authorities will probably not, as a general practice, request a copy of the reviewed risk assessment if a significant change to the licensed premises has occurred, unless the change is one that will necessitate a variation application.

Variation of the premises licence

4.9 Variations to premises licences are only those required to be made under section 187 of the Act and will not include changes of circumstances such as a change of premises' name or a change of licensee's address.

4.10 When preparing an application to vary the premises licence the operator must undertake a review of the local risk assessment and update it if necessary. Operators submitting a variation application to a licensing authority will, in all probability, be asked to provide a copy of the reviewed local risk assessment when submitting the application.

Regular review of risk assessment

- 4.11 As a matter of best practice operators should consider establishing a regular review regime in respect of their local risk assessments.

5. Local risks and control measures

- 5.1. There are two specific parts to the risk assessment process; the assessment of the local risks and the determination of appropriate mitigation to reduce those risks.
- 5.2 The risks that operators must identify relate to the potential impact a gambling premises and its operation may have on the Licensing Objectives. Gambling operators will be expected to identify and list all of the local risks within the assessment. The level of such risks can range from being low to very high depending on the potential impact they can have on the licensing objectives. The level of any given risk will have a direct impact on the type and extent of the control measures necessary to mitigate such risk.
- 5.3 Operators will be familiar with identifying risks in relation to health and safety and food hygiene legislation. The local risk assessment process - although similar- requires a broader range of considerations. Operators must consider the local area in which the premises are situated, the gambling operation and the premises both internally and externally.

Local area risks

- 5.4 There is a number of factors relating to the local area that operators will need to consider which is independent of who the operator believes is their target market. A few examples of these factors are listed below.
- Categories of neighbouring premises and how they are operated in the locale.
 - The footfall in the local area, for example, does it predominately comprise residents, workers or visitors; is it a family orientated area, popular with children and young people?
 - Educational facilities.
 - Residential accommodation for the vulnerable.
 - Hospitals, mental health or gambling care providers.

Gambling operational risks

- 5.5 The gambling operation relates to how the premises will be run and the business model. It will include the operator's policies and procedures, which have been put in place to meet the requirements of the business, the Act and/or specific code provisions within the LCCP. It will also include other elements such as:
- The type of gambling products it provides in the premises.
 - Marketing material within the premises.
 - Security and crime prevention arrangements.
 - The provision of information to customers.

- 5.6 It is likely that the identification of risks associated with this element of the assessment will be very similar across the sector with slight variations depending on any specific factors that relate to the premises or the local area.
- 5.7 The control measures that operators will put in place to mitigate any risk associated with the gambling operation will be dependent on the type of gambling activities provided, how the company operates and the size of the organisation.

Premises design risks

- 5.8 The design of the premises is an important factor when considering local risks. For example, age controlled premises which are located within an area which has a high number of children and young people present throughout the day will want to ensure that children and young people are not attracted in to any adult only premises.
- 5.9 As part of the design process, the layout of the premises is a major consideration to ensure effective monitoring of age restricted premises and areas and the prevention of crime on the premises.

Interior design risks

- 5.10 The internal design and layout of the premises reflects the premises operation and the type of gambling facilities that it offers. For some premises the design will be subject to certain limitations due to mandatory conditions on the gambling premises licence.
- 5.11 Operators will need to assess the risk presented by the internal layout of the premises and the location of gambling facilities within them. For example, if a gaming machine is placed within the direct line of sight of the cashier counter then staff will be able to monitor player behaviour. Staff can also monitor the use of the machines and can challenge any customers who are believed to be under the age of 18 (think 25), or who damage the machines, or who appear to be attempting to launder money. By a simple assessment of the optimum location for these machines, operators can significantly reduce the risk to the licensing objectives.

Exterior design risks

5.12 The exterior of premises will be a major advertisement for the gambling operator. However, the design will need to be assessed based on any possible associated risks. Operators will identify the risk associated with the design and introduce control measures based on that perceived risk. For example, if the premises have a large amount of glass frontage in an area prone to criminal damage, operators may consider the risk of damage to the standard toughened glass to be high and introduce a control measure such as roller shutters and/or external CCTV cameras.

Control measures

- 5.13 Depending on the nature of the risk factors, the control measures identified to mitigate the perceived risk may be a combination of systems, design and physical measure. Control measures that relate to systems will be measures that have been put in place through policies and procedures. These can either be systems that apply to all of the operator's premises or systems that have been developed specifically for particular premises to deal with a specific local risk factor. System control measures will include staff training, security policies and procedures.
- 5.14 Design control measures are measures that are built into the design of the premises. These can include the location of gambling facilities and the design and location of cashier counters within the premises, and the

exterior design of premises. For example, a control measure for the interior of the premises could involve positioning a cashier counter from the rear of the premises to the front next to the main entrance or realignment of CCTV cameras/mirrors where entrance(s) can be effectively monitored for age verification, the detection of crime and customer interaction purposes.

- 5.15 The final control measures relate to specific physical measure that will address an identified risk factor. These physical control measures may, for example, include intruder alarms, exterior CCTV cameras, reinforcement of doors, time locks on safes, window shutters.
- 5.16 As already indicated, the control measures identified to mitigate a perceived risk may involve a combination of systems, design and physical measures. For example to address the risk factors relating to children gaining access to an over 18 restricted gambling premises, the operator may identify the following control measures:

Systems: PASS card or age verification policies, challenge 21 scheme, and staff training.

Design: Exterior design which will not attract children into the premises, the entrance layout will enable staff to monitor those entering the premises and when appropriate, challenge them on the grounds of age.

Physical: CCTV and electronic sensors.

6. Undertaking a local risk assessment

- 6.1 A local risk assessment of gambling premises should be carried out through a step-by-step approach. One suggested approach is to first assess the local area and identify the relevant risk factors, then to assess the gambling operation and finally to assess the premises design, both internal and external. Once the risk factors have been identified, the control measures to mitigate the risks should be considered. These control measures will either already be in place or will need to be implemented.
- 6.2 To assist, bacta has designed a suggested local risk assessment template that guides and encompasses a step-by-step approach to the assessment (See Appendix A). The template also enables the assessor to identify actions such as the installation or production of control measures, the individual made responsible for carrying out those actions and to record when those actions were completed.

Who should undertake to write the risk assessment?

- 6.3 It will be the responsibility of the gambling operator to assign the assessor for assessing the local risks for their premises. The person assigned as the assessor must be competent to undertake this role as failure properly to carry out this function could be seen to constitute a breach of the provisions of the LCCP. The assessor must understand how the premises operate or will operate, its design and where it is located. The assessor will need to understand the local area and can use staff or area managers to assist in gaining an understanding of that local area. In addition websites are available to assist in the process.

Step 1: The local area

- 6.4 Operators will be expected to identify the local risk factors surrounding the premises. The risk factors will differ from location to location so an understanding of the specific characteristics of the local area and the people who live, work or visit that area is important.

- 6.5 To assist in assessing the local area the licensing authorities may produce a Local Area Profile within its Statement of Licensing Principles. The Local Area Profile sets out the demographic profile of areas of the City and the specific concerns and risks that the Licensing Authority has identified in relation to gambling in those areas.
- 6.6 The first step is to identify the local risk factors associated with the local area in which the premises are located. Local risk factors are risks that affect one or more of the Licensing Objectives. Licensing authority Statements of Principles will identify some of these risk factors which are considered to be of significance within the curtilage of their responsibility.

Step 2: The gambling operation

- 6.7 In assessing the risk factors associated with a gambling operation the assessor should take into account the local risks which are commonly accepted by broader stakeholders and how that gambling operation may affect that risk. The assessor may wish to consider:
- How the gambling operation will relate to how the operator conducts the business.
 - What gambling products it provides on the premises.
 - The staffing levels within the premises.
 - The level and requirement for staff training.
 - The policies and procedures it has in place in relation to regulatory requirements of the Act or to comply with the LCCP.
 - The security and crime prevention arrangements it has in place.
 - How it advertises locally and on the premises.
 - The marketing material within the premises.

Step 3: The design of the premises

- 6.8 The design and layout of the premises is a key consideration as this could have an impact on the risk to the licensing objectives. The design, both internal and external should be considered and specific risk factors identified and noted. For example:
- The premises may have a number of support pillars which the assessor identifies as obstructing the view of the gaming machines from the cashier counter.
 - The positioning of CCTV is such that effective coverage ensures identification of those carrying out machine related crime, self-excluded persons and to assist with age verification.

Step 4: Control measures

- 6.9 Once the risk factors have been identified, the assessor should seek to identify control measures that would mitigate the identified risks. Such control measures will relate to one of the three categories of control measures mentioned above (systems, design and physical). Some risk factors may require a combination of control measures to adequately mitigate the risk.

Completed assessment

- 6.10 The control measures must be implemented on the premises and if applicable, staff on the premises should be trained in their use or trained on any new policy or procedure. The assessment must be retained and should be reviewed whenever a trigger occurs or as part of a regular review regime (see part 3 above).
- 6.11 Licensing authorities may assess the risks identified and the measures implemented to mitigate those risks. When a completed assessment is provided with a new application or with a variation application, the authority will consider the assessment in the course of determining whether to grant the application or not.

7. Appendix 'A'

Evaluating Risk

Likelihood

How likely is it that the local circumstances may result in harm?

- Highly Unlikely
- Unlikely
- Possible
- Probable
- Certain

Severity

If exposure to risk does result in harm, how severe is the harm likely to be?

- Trivial adverse effect
- Minor adverse effect but self-manageable with minimal or no intervention
- Troublesome effect manageable by intervention with customer
- Major effect requiring outside intervention
- Serious adverse effect requiring immediate remedial action

		L I K E L I H O O D				
		1	2	3	4	5
S E V E R I T Y	1	1	2	3	4	5
	2	2	4	6	8	10
	3	3	6	9	12	15
	4	4	8	12	16	20
	5	5	10	15	20	25

- a) To assess a risk ranking, multiply the likelihood by the severity
- b) After the multiplication you will be left with a number from 1 to 25 which you can match against the following table to get the Residual Risk i.e. the risk that remains after the controls are in place.

Priority

1	Urgent Action	Range 5 - 25
2	High Priority	Range 10 - 12
3	Medium Priority	Range 5 - 9
4	Low Priority	Range 2 - 4
5	Very Low Priority	Range 0 -1

Useful Links to Assist Local Gambling Risk Assessment

Crime

<https://www.police.uk>

<https://ukcrimestats.com>

<https://www.gov.uk/government/collections/crime-statistics>

Fair & Open

<http://www.gamblingcommission.gov.uk/ADR-Blog/List-of-applicants.aspx>

Protection of Children and the Vulnerable

<http://www.carehome.co.uk/>

<http://findmyschool.co.uk/results.aspx>

Risk Assessment Template (Example)

Premises

Premises Name:	Amusements
Premises Address:	1 The High Street, Denton, West Yorkshire
Premises Post Code:	AA1 0BB
Premises Licence Number:	D/12324/2015
Category of Premises:	AGC

Company

Operating Company:	Newton Leisure Ltd
Operating Licence Number:	23976

Assessment Writer

Name of Person Writing this Assessment:	Mr John Smith
Position within Company or Name of Authorised Agent:	Managing Director
Date that Original Assessment was Written	30 th December 2020

Requirement to Comply

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

Effective as at 6 April 2016

Social responsibility code provision 10.1.1

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at **each of their premises**, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.

2. Licensees must review (and update as necessary) their local risk assessments.
 - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. when applying for a variation of a premises licence; and
 - d. in any case, undertake a local risk assessment when applying for a new premises licence.

Ordinary code provision 10.1.2

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

Local Area Profile

The AGC is located in the town centre within a primary shopping centre and adjacent to an underground railway station on one side and a newsagent on the other. There is a wide range of retail outlets in the close vicinity including banks, licensed betting offices, fast food outlets and a church. There are no public houses, night clubs schools or colleges in the immediate vicinity.

The venue is large, in the shape of a square, with a twenty-foot frontage but just the one door opening on to the footway. No auxiliary activities or facilities are offered other than gambling machines of category B3, C and D.

There are no known local problems with crime or anti-social behaviour linked to gambling but there is a certain amount of anti-social behaviour such as litter and graffiti. Vandalism/criminal damage has been of concern historically but reinstated regular police patrols in the town centre have had a positive effect, especially during evenings.

Our regulatory return data does not reflect any specific problems associated with consumer complaints, the need to call police for assistance or attempts by children and young persons to enter the premises.

Gambling Act 2005 – The Licensing Objectives

The Gambling Act 2005 sets out the three licensing objectives (LO), which are:

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

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Children entering site unnoticed or unchallenged.	(C)	Low	Severe to business Severe to child	Interior Design Exterior Design Physical	*Effective monitoring of entrance by floor walkers with well positioned cash desk having direct line of site of the entrance. *Frontage of venue designed so as not to be attractive to children. *Electronic sensor beams across entrance. CCTV coverage of entrance linked to office and cash desk. Mirrors reflecting entrance positioned for maximum effectiveness. *Think 25 policies in place and implemented. *Use of bacta's resources for age verification testing. *Regular staff training (quarterly) both in-house and by bacta. *Adherence to bacta's Handbook and staff handbook. *Clear & prominent premises signage and machine labelling. *Think 25 material displayed. * Monthly review of return data. *Policy of preventing the wearing of hoods. *Policies & Procedures in place and regularly reviewed.	2021 Jan 2021 Jan 2021 Jan
Out of control gambling by other vulnerable persons.	(C)	Low	Moderate to business Severe to vulnerable	Systems Interior Design Physical	*Customer interaction policy & procedure/log adhered to. * Liaison with management of nearby care home. *Conducive for effective monitoring of customers – adjustment made to one CCTV camera (2015 December 3). *Machine maintenance carried out by qualified engineer. *Machine turned off immediately should fault be identified. *Machines only acquired from licensed suppliers.	2021 Jan 2021 Jan 2021 Sep
Failure to deal with Consumers making complaints about the outcome of Gambling.	(B)	Moderate	Moderate to business Severe to customer	Physical		

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Failure to deal with consumers making complaints about the outcome of Gambling (continued).	(B)	Low	Moderate to business Severe to customer	Systems	*Complaints procedure & forms available on premises. *Quarterly staff training on company policy. *Registered with ADR Entity – Pegasus ADR Service. *Compliant with Company P & P – bacta Handbook .	2021 Oct
Failure to provide information to players on responsible gambling.	(C)	Low	Severe to business Severe to customer	Physical	*Stay in Control posters displayed prominently. *Sufficient quantity of posters. *Additional signposting adjacent to ATM. *New posters will incorporate QR codes *Stay in Control leaflets available in racks, discretely located. *Machine labelling displaying national gambling helpline.	2021 Jan
				Systems	*Stock control system in place for leaflets. *Ensure adherence with P & P – bacta Handbook *Regular audit to ensure systems in place.	2021 Jan
Failure to recognise signs associated with problem gambling or substantial changes in gambling style.	(C)	Moderate	Severe to business Severe to customer	Interior design	*Player positions effectively monitored. *Player's behaviour closely monitored.	2021 Jan
				Systems	*Staffed trained in customer interaction in line with bacta's Handbook . *Clear policy to record the procedure for interaction and level of staff that are authorised to intervene.	2021 Jan
Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements.	(C)	Low	Severe to business Severe to customer	Physical	*CCTV effectively positioned at entrance to benefit identification of known excluders.	
				Interior Design	*Consideration given to internal layout so as to ensure effective monitoring of customers entering the premises and those that might enter in order to gamble on behalf of a self-excluder.	
				Systems	*All data subject to quarterly review. *Ensure that self-exclusion forms are always available for supply. *Digital camera always available on the premises to take photograph of customers wishing to self-exclude. *File of excluders kept and maintained on premises. *Company keeping abreast of the developments of bacta's national sector SE scheme with commitment to engage by 6 April 2016. *Compliant with P & P and log in bacta's Handbook .	
Risk Assessment	LO	Level of Risk	Impact	Control	Risk Management	Reviewed

Failure to identify attempts to launder money on the premises (e.g. dye stained notes) and to follow correct reporting procedure.	(A)	Low	Severe to business Low to Customers	Interior Design	*Effective monitoring of customers' behaviour by good lines of sight from static staff, and well positioned CCTV.	2021 Jan
				Physical	*Change machines and note acceptors regularly inspected. *TITO tickets not transferable to other premises.	2021 Jan
				Systems	*Fully compliant with LCCP requirements. *Comply with bacta's P & P in Handbook, in particular the reporting procedure to NCA by way of SARs.	2021 Jan
Poor security increasing vulnerability to crime.	(A)	Low	Severe to business Severe to customers	Physical	*Static panic alarms. *Staff provided with personal attack alarms. *Intruder alarm installed and regularly serviced. *Effective CCTV coverage with data stored for 30 days. *Time lock safe installed	2021 Jan
				Exterior Design	*Roller shutters fitted to frontage of premises and used during 'out of business' hours. *Toughened glass windows and door to limit criminal damage. *Local authority/police CCTV in close proximity to premises.	2021 Jan
				Systems	*Staff personal floats limited to £100.00. *Key storage and authorisation of use policy in place. *Regular liaison with local law enforcement agencies. *Log maintained should police be called to assist. *Partner of 'Local Shop Watch'. *Keep abreast of local crime trends. *Subscribe to bacta's crime bulletins.	2021 Jan
Awareness of heightened local crime in the local area.	(A)			Systems	In line with national urban levels. No heightened risk. https://www.police.uk https://ukcrimestats.com https://www.gov.uk/government/collections/crime-statistics	2021 Jan
Awareness of student learning facilities (schools & colleges) in the local area.	(C)			Systems	*No schools in immediate vicinity but aware of locations in area. *Partner of local anti-truancy scheme. *Contact details of Education Welfare Officer kept on premises. Entrance monitoring given extra resources between 3pm and 4pm on school/college days.	2021 Jan
Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed

Awareness of residential facilities for the vulnerable in the local area.	(C)			Systems	*No care homes or other residential facilities for the vulnerable in the vicinity. http://www.carehome.co.uk	2021 Jan
Awareness of gambling care agencies in the local area.	(C)			Systems	*No facilities for problem gambling in the vicinity. www.gamcare.org.uk www.gordonmoodys.org.uk	2021 Jan

Notes:

- It is stressed that this is an example report of what is expected to satisfy the requirements of producing a local risk assessment. Factors will inevitably vary from location to location so it is important to carry out a local area profile where your businesses are located.

Risk Assessment Template

Premises

Premises Name:	
Premises Address:	
Premises Post Code:	
Premises Licence Number:	
Category of Premises:	

Company

Operating Company:	
Operating Licence Number:	

Assessment Writer

Name of Person Writing this Assessment:	
Position within Company or Name of Authorised Agent:	
Date that Original Assessment was Written	

Requirement to Comply

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

Effective as at 6 April 2016

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2. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at **each of their premises**, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.
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 - e. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - f. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - g. when applying for a variation of a premises licence; and
 - h. in any case, undertake a local risk assessment when applying for a new premises licence.

Ordinary code provision 10.1.2

2. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

BACTA MEMBER TERMS & CONDITIONS¹

These terms contain important provisions. Please read them carefully as they will apply to your gambling and use of our facilities.

Who we are and our contractual relationship

1. The [adult gaming centre/family entertainment centre] at [address] is operated by [name of company] (“us” or “we”) under the authority of an [adult gaming centre/family entertainment centre] operating licence (licence no. [licence number]) granted by the Gambling Commission of Great Britain
2. When you use the gaming machines or any other 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.

Under age gambling

4. [Entry to our premises/the adult only area of our premises/use of the gaming machines (other than Category D i.e. those with a maximum stake of 10p and maximum prize of £5 cash or £8 non-monetary prize)]² 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 required to show a form of ID proving your age.]³
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 or £8 non-monetary prize])⁴, 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. 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).]⁵

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 bacta’s national self-exclusion scheme (please see www.bacta.org.uk).

¹ Notes: THESE TERMS ARE INDICATIVE OF SOME OF THE TERMS BACTA’S MEMBERS COULD CONSIDER USING. HOWEVER, MEMBERS MUST TAKE INDEPENDENT LEGAL ADVICE.

² Notes: Please select one of the three options and complete as necessary.

³ Notes: For adult AGC’s only.

⁴ Notes: Please insert values.

⁵ Notes: Only for adult AGC’s or adult only areas.

10. This means that you may exclude yourself from gambling with us and from other participating adult gaming centre 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. If we can we will try to discuss this with you in private.
11. In order to self-exclude, you will be expected to sign a 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 bacta, other adult gaming centres and family entertainment centres. 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 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 then, in the first instance, you should raise it as soon as possible with the Duty Manager. If your complaint is not resolved to your satisfaction by the Duty Manager then please put your complaint in writing, setting out the circumstances and send it together with any supporting information to [name and address] within [21] days.
22. We will 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 callee bacta ADR Services. It is independent of bacta and can be contacted via its website <http://pegasusadrservice.org.uk>

24. There is no charge or cost to you in referring your complaint to bacta ADR Service, but it will not deal with your complaint until you have been through our complaints 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, to bacta and other participating adult gaming centres. More information is provided on the bacta website: www.bacta.org.uk.
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.

•

TAB 12



SOCIAL RESPONSIBILITY CHARTER AND CODE OF PRACTICE

2018

1. Introduction

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

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

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

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

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

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

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

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

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

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

2. Our Values

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

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

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

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

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

3. Executive Commitment

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

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

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

4. Our commitments in detail

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

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

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

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

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

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

Pledge 2 Informed customers and trained employees

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

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

Pledge 3 Accreditation

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

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

Pledge 4 Self-exclusion

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

Pledge 5 Promoting and supporting research, education and treatment

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

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

Pledge 6 - Using our technology

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

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

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

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

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

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

Pledge 8 Helping people to gamble responsibly

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

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

Pledge 9 Not bringing the industry into disrepute

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

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

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

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

Pledge 11 Amusement Device Inspection Procedure Scheme (ADIPS)

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

Pledge 12 Quality Premises

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

Pledge 13 Evaluation

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

5. Summary

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

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

6. Failure to Comply

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

APPENDIX A – BACTA’S PREMISES EVALUATION CHECK LIST

Premises Signage

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

Machine Signage

No Under 18s				
GamCare				
Category Labels				
Legacy Labels				

Posters (P) & Leaflets (L)

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

Licences

Premises Licence				
Operating Licence				
Personal Licence				
Link Licence				

Forms

Self-Exclusion				
Complaints & Dispute				

Policy & Procedure Documents

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

Logs

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

Entitlement

B3 Numbers				
Stakes & Prizes				

Misc.

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

Risk Assessment Documents

Local Risk				
Money Laundering				

Registrations

ADR Entity				
Self-Exclusion Scheme				
Age Verification Testing				
Primary Authority				

Administration

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

Notes

APPENDIX B – CHARTER DISCIPLINARY PROCEDURE

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

TAB 13



Bacta Self-Exclusion Services Application

USER MANUAL GUIDE

Purpose of the document

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

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

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

Contents






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

1. PRESENTATION OF THE SOLUTION

1.1 BRIEF DESCRIPTION

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

1.2 DESCRIPTIVE ICONS

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

All Mandatory fields in the application are marked with *

1.3 SUPPORT

For any support request please contact bacta.

2. CONNECTING TO THE APPLICATION

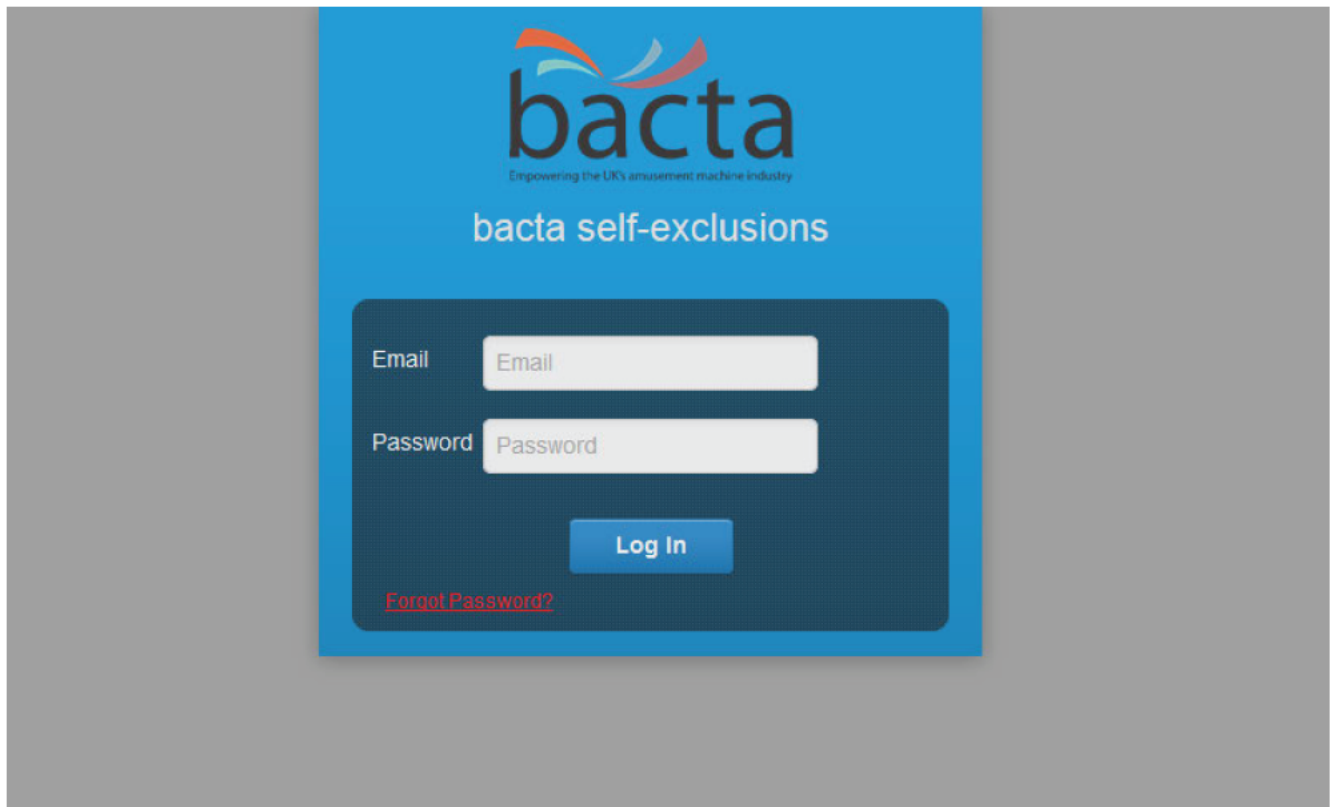
2.1 ADDRESS

You must connect to the application using the following address:

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

2.2 AUTHENTICATION

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



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

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

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

Change Password

Password Expired / You changed password externally

Current Password:

New Password:

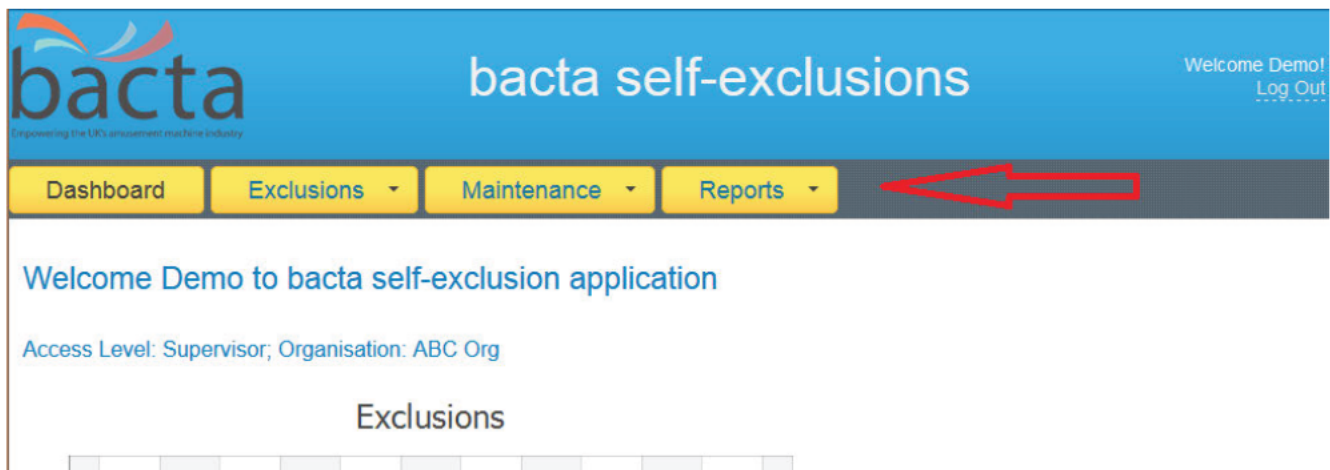
Confirm New Password:

Change Password

3. STRUCTURING OF THE APPLICATION

3.1 LAYOUT

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



3.2 FUNCTIONALITIES

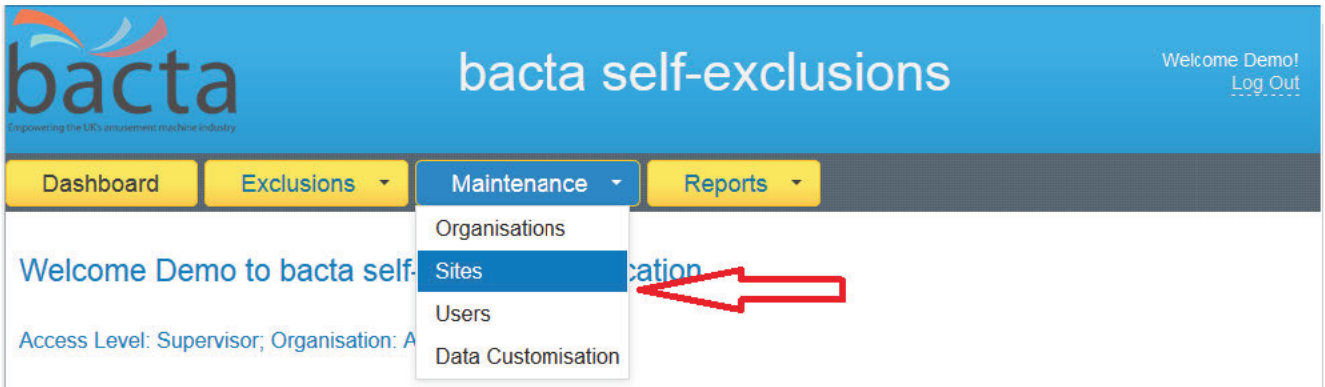
The functionalities that will be described in this document are:

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

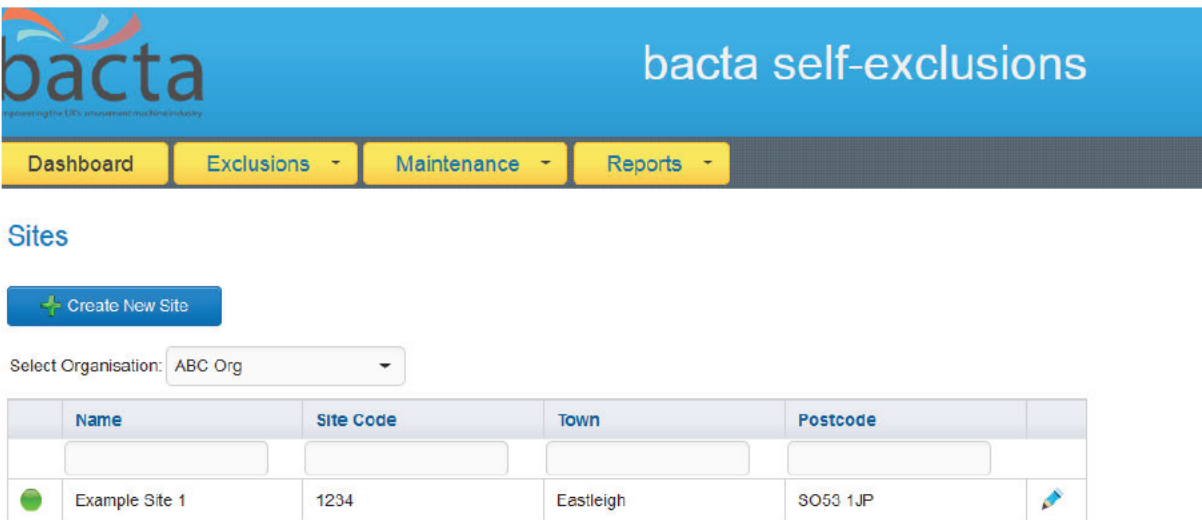
4. ADD/UPDATE SITES

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

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



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



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



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

New Site

[← Back to Sites List](#)

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

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

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

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

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

Update Site Details

[← Back to Sites List](#)

Details

Site Name*:

Site Code*:

Organisation*:

Site Type*:

Location Code*:

Status*:

Region Code:

District Code:

Address

Postcode*:

Address 1*:

Address 2:

Address 3:

Town/City*:

County:

Opening Times

Sunday: To

Monday: To

Tuesday: To

Wednesday: To

Thursday: To

Friday: To

Saturday: To

Site Contacts



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

To Update Site Details:

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

Sites

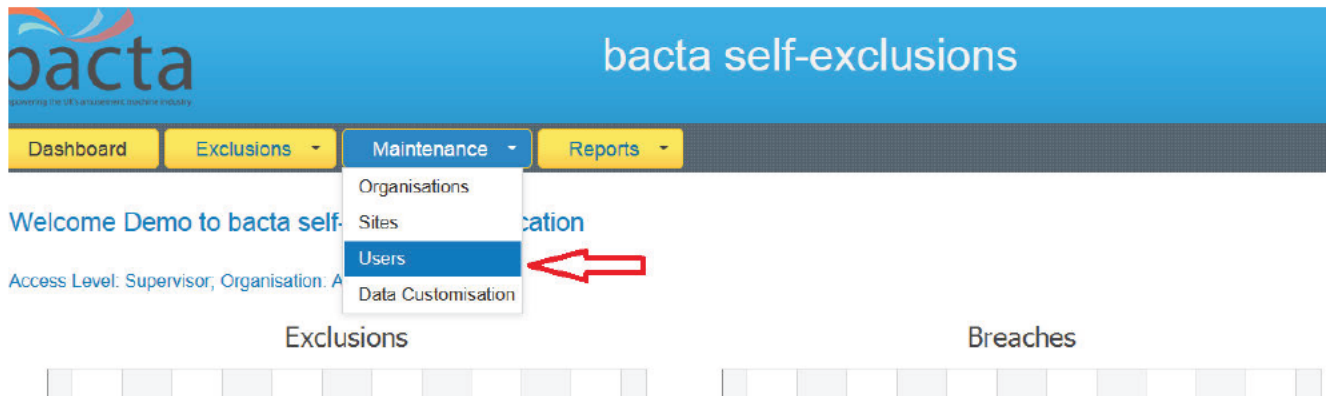
Select Organisation:

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

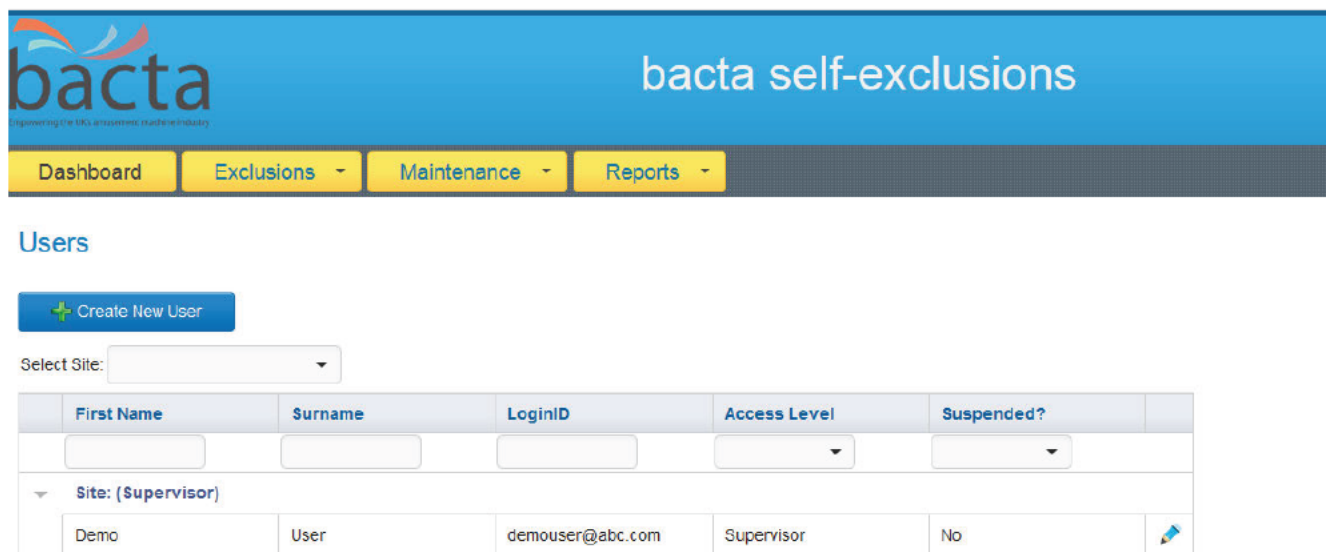
5. ADD / UPDATE USERS

Only Supervisors can add other users.

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



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



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



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

Details

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

Login Details

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

Features

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

Reports

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

 Save

NOTES:

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

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


To Update User Details:

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

Users

[+ Create New User](#)

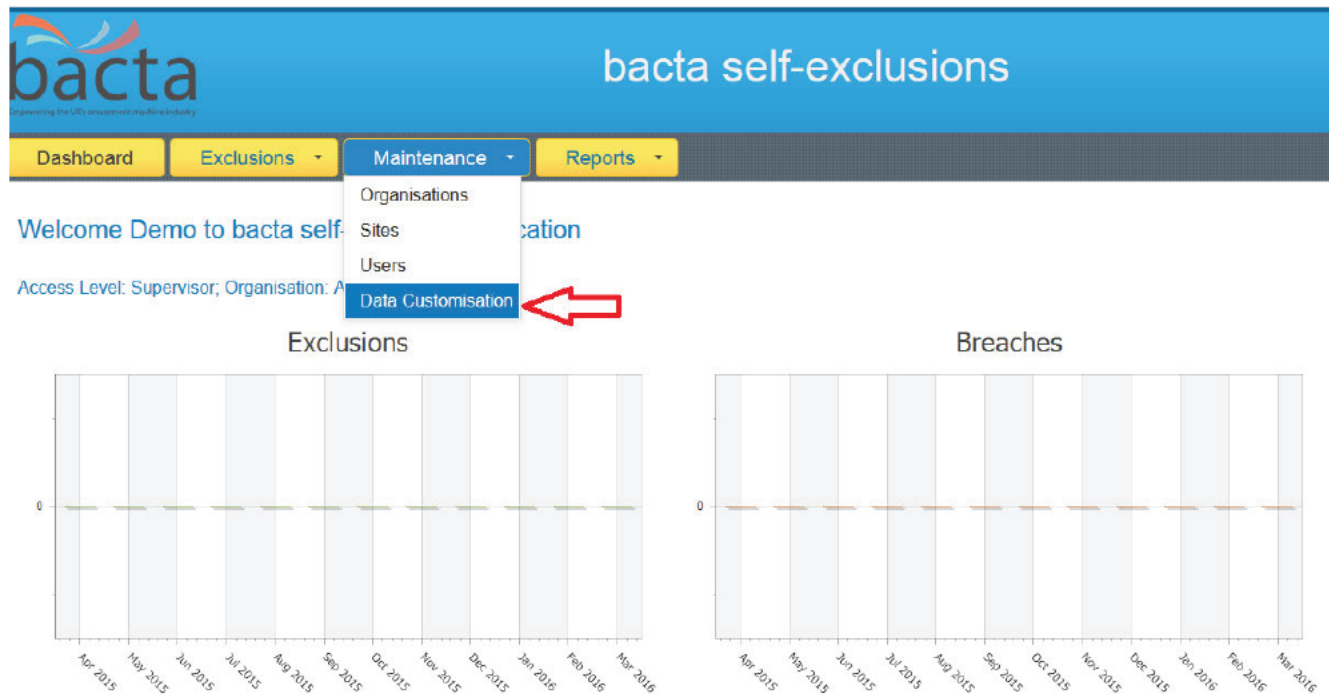
Select Site:

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


6. DATA CUSTOMISATION

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



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



The screenshot shows the application's top navigation bar with 'bacta self-exclusions' and a menu containing 'Dashboard', 'Exclusions', 'Maintenance', and 'Reports'. The 'Maintenance' dropdown is open, showing 'Organisations', 'Sites', 'Users', and 'Data Customisation', which is highlighted with a red arrow. Below the menu, there are two bar charts: 'Exclusions' and 'Breaches', both showing zero activity from April 2015 to March 2016.



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

Example 1: Setting Birth Date As Non Mandatory

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

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

Example 2: Setting Birth Date Not To Display

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

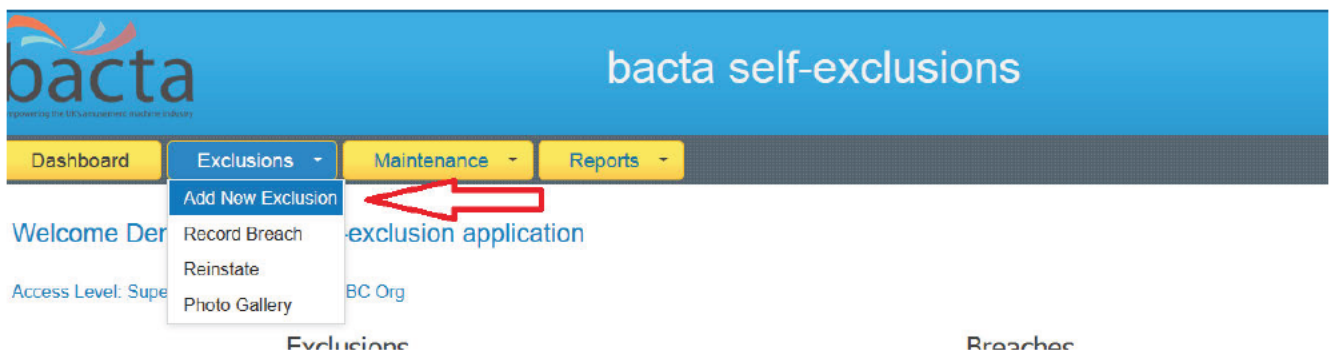
On doing so, the birth date field is not displayed in the exclusion form and hence this information cannot be recorded for the exclusion.

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

7. ADD EXCLUSION

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

STEP 1: Navigate to Exclusions > Add New Exclusion



STEP 2: Enter all exclusion details in the form displayed

New Exclusion

Customer Details

Title*: Gender:


First Name*: Surname*:

Birth Date*: Mobile*:

Telephone*: Email*:

Car Reg*: Other Info*:

Photo



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

Customer Address

Postcode*: Line 1*:

Line 2*: Line 3*:

Town/City*: County:

Exclusion Details

Start Date*: Period In Months*:

Exclusion Reason*:

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

Exclusion Zone

Organisation*:

Site*:

Radius*:


[List](#) [Map](#)


Declaration


ID Check*: Email Confirmation*:

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

Signature*:

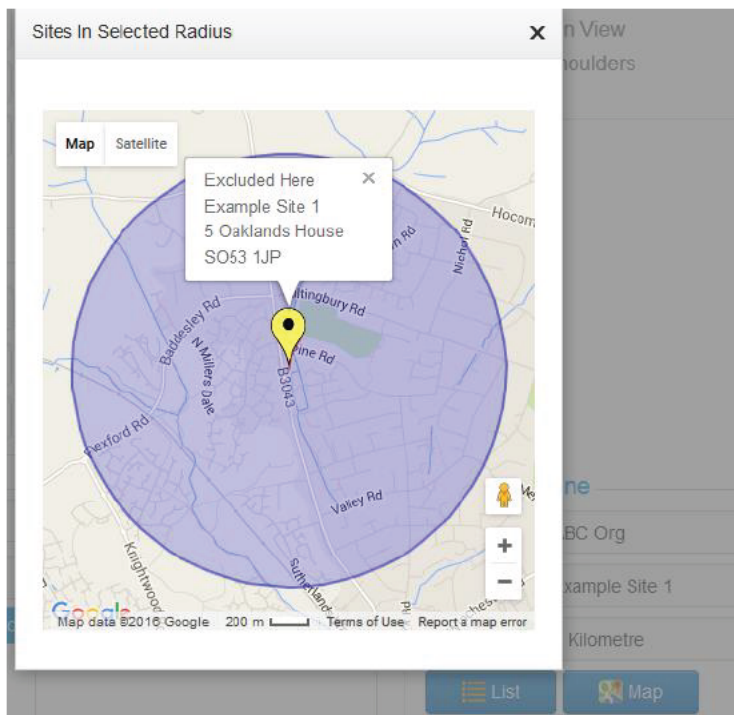
 Redo Signature





NOTES:

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



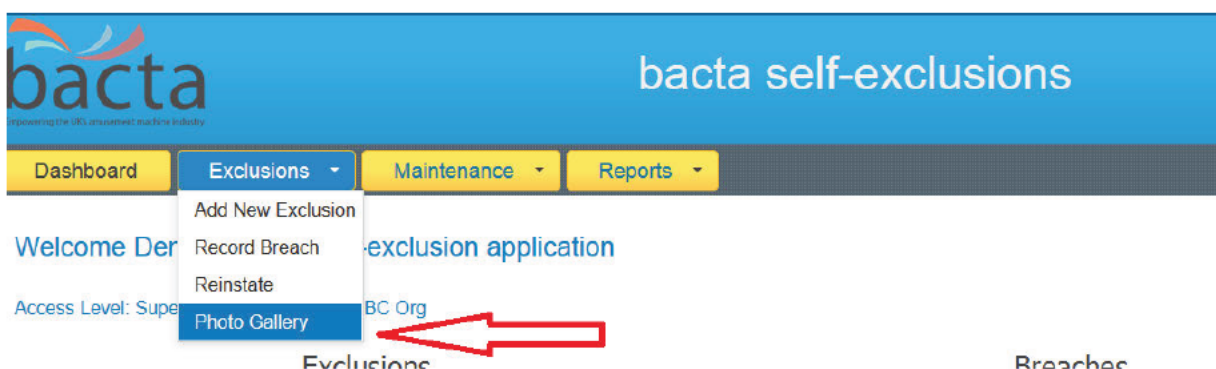
- To write the signature on a tablet, just click on the signature panel and draw your signature pattern
- To write the signature on personal computer, move the mouse cursor into the signature panel, right click (do not release the click) and draw a pattern.
- Use the print button to view a printable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

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

8. PHOTO GALLERY

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

Photo Gallery can be accessed from Exclusions > Photo Gallery



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

Excluded Customers Photo Gallery

Organisation:
 Site:
 Sort Order:



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



Mr Lion Zoo

Ref: 5J2643L614
 Building 1000
 Lakeside North Harbour
 Western Road
 Portsmouth
 PO6 3EZ
 HAMPSHIRE
 07885151910
 lion@zoo.com
 Exclusion: 24/03/2016 - 24/11/2016
 Site: Example Site 1, SO53 1JP

Click on the Close button to view the gallery back.

NOTES:

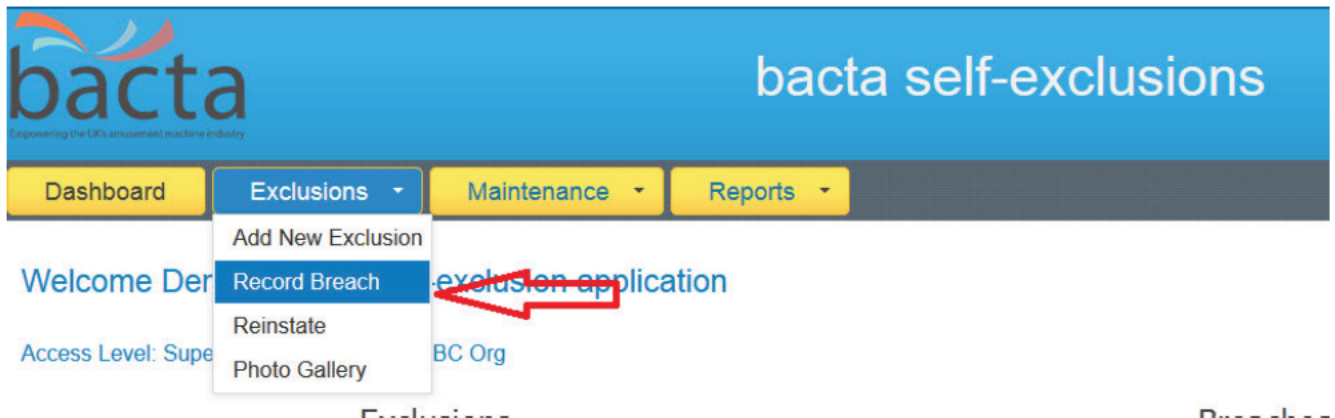
- Any new up to 5 days will be shown in green back ground colour in the gallery
- Any exclusions with breaches will be highlighted with red border in the gallery
- Any exclusions in the hiatus period will be shown in blue back ground colour in the gallery. Users can then reinstate this customer if they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

9. RECORD BREACH

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

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

STEP 1: Navigate to Exclusions > Record Breach



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

Search Exclusions to Record Breach

Search By Reference


Self-Exclusion Reference:

OR

Search By Details

Surname: Birth Date:

Postcode: Mobile:




Ref: 5J2643L6I4
 Mr Lion Zoo
 Building 1000
 Lakeside North Harbour
 Western Road
 Portsmouth
 PO6 3EZ
 HAMPSHIRE
 07985151910
 lion@zoo.com
 Exclusion: 24/03/2016 - 24/11/2016
 Site: Example Site 1, SO53 1JP

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

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

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



Record Breach



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

Breach Details

Organisation*: ABC Org
Site*:
Breach Date*:
Breach Time*: 00:00
Duration*: 00:00
Played*:
Breach Details:

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

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

Excluded Customers Photo Gallery

Organisation: ABC Org Site: -- All Sites -- Sort Order: Recent 