



The Gambling Act 2005

Policies & Procedures Manual

GAMBLING ACT 2005

Licence Conditions and Codes of Practice

Policies and Procedures

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Managers and 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 to this effect and to keep a copy of the policies for future reference.

The original of the signature sheet is retained on the employee's personnel file.

Date: January 2012

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1. PRINCIPAL CONCEPTS

Statement

The Company recognises its responsibility and obligation to comply with the licensing objectives of the Gambling Act 2005 set out below and the Licensing Conditions and Codes of Practice. Managers and staff will be trained on social responsibility awareness and compliance with Company policies and procedures will be monitored.

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 person from being harmed or exploited by gambling.

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- The Company makes donations to The Great Foundation which contributes towards the prevention and treatment of problem gambling, public education on the risks of gambling and how to gamble safely and the identification and treatment of problem gamblers.
- We operate an on-going training programme for staff to ensure awareness of the Licensing Objectives and compliance of our social responsibility obligations. 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) Self-exclusion
 - (i) Cash related matters including money laundering, suspicious transactions and cash handling
- 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 where appropriate, designed to minimize the risk of crime such as money laundering.
- We communicate to our Head Office any information which we know relates to or suspect may relate to any breach of the Gambling Act (including any breach of the Company policies) of which we are aware so that such information can be provided to the Gambling Commission where relevant to a breach of the Gambling Act, licence condition or code provision.
- Customer complaints are managed transparently and fairly.
- Gaming machines comply with the Gambling Commission's Technical Standards or are registered as Legacy Machines.
- We do not provide credit in connection with gambling or participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

- We seek to prevent systematic or organized 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 if they become aware of them.
- We do not:
 - Allow under 18s in our Adult Gaming Centres (AGC), adult areas of licensed Family Entertainment Centres (FEC) or to play bingo and we display relevant posters at entrances to each such premise;
 - Allow alcohol to be consumed in our AGC and FEC and display relevant posters at entrances to each such premise;
 - Deliberately provide gambling facilities in AGC and adult-only gaming areas in FEC in such a way as to appeal to children and young persons.
- Contravention of the Company's policies and procedures which support these principal concepts will result in an investigation and may result in disciplinary action up to and including dismissal.

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2. ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

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Adult Gaming Centre, adult-only gaming area and bingo.

- Any person known to be under 18 years of age or who admits to being under 18 years of age will be refused entry to any Adult Gaming Centre, adult-only gaming area or to play bingo.
- Any person who appears to be under 21 years of age, and who has not previously provided satisfactory proof of age, will be challenged at the point of entry. If in doubt - we 'think 21'.
- If the person admits to being under 18, they will be refused entry or to play bingo.
- If they claim to be 18 or over and we have any doubt about such a claim, satisfactory proof of age will be requested and will have to be provided before entry is allowed into an Adult Gaming Centre, adult-only gaming area or to play bingo.
- 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. Citizencard, Validate and the Government's own Connexions card); a driving licence (including a provisional licence) with photograph, or a passport.
- Where the person cannot produce proof of age, they will be advised that they will not be permitted to enter the premises or play bingo until such time as they provide such proof.
- They will be shown, have explained to them and be given a 'proof of age card' application form or offered an explanation on how to apply for a card.
- Should the person then refuse to leave, they will be advised that the age restriction is a legal requirement.
- If they still will not leave, the Duty Manager will be contacted to take over the situation.
- Any attempts by under-18s to enter or gamble in our Adult Gaming Centre, adult-only gaming area or to play bingo will be brought to the attention of the Duty Manager immediately and recorded as an entry on a log retained on the premises. The Duty Manager will review the log periodically.
- Stakes must be returned to under-18s attempting to gamble in an Adult Gaming Centre, adult-only gaming area or to play bingo and under-18s will not be allowed to retain any prize.
- Consideration will be given to permanently excluding from our Adult Gaming Centre or adult-only gaming area any adult who has previously and repeatedly attempted to gain entry when accompanied by a child or young person or should entry have been gained, if the offence was committed knowingly or recklessly. In such instances, consideration will be given to reminding such adult customers of their parental responsibilities in this respect. Notwithstanding, that adult will be required to stop gambling immediately and will be told to leave the premises.

- In instances where a child or young person repeatedly attempts to gamble in an Adult Gaming Centre, adult-only gaming area or to play bingo, or where repeated oral warnings have been issued, consideration will be given to reporting the matter immediately to the Gambling Commission and, where appropriate, police. Information on problem gambling will be made available to such children and young persons.
- Service will be refused in all circumstances in an Adult Gaming Centre or adult-only gaming area where any adult is accompanied by a child or young person.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and the accompanying log.

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2.(a) Under Age Incidents Log

Incidents of and Attempts by persons under the age of 18 years to enter an Adult Gaming Centre or Adult Gaming Area/gamble in an Adult Gaming Centre or Adult Gaming Area

Park:

Consideration will be given to permanently excluding from the Adult Gaming Centre(s) or Adult Gaming Area(s) or the playing of Bingo any adult who has previously and repeatedly attempted to gain entry to the Adult Gaming Centre(s) or Adult Gaming Area(s) when accompanied by a child or young person or, should entry be gained, if the offence was committed knowingly or recklessly, or allowed a child or young person knowingly or recklessly to attempt to play Bingo.

In instances where a child or young person repeatedly attempts to gamble on premises or in designated area(s) restricted to adults, or where repeated oral warnings have been issued, consideration will be given to reporting the matter to the Gambling Commission and, where appropriate, the police or local education welfare department.

Date	Time	Attempt to Enter or Play Description of circumstances	Attempt to Gamble Description of circumstances	Incident of gaining Entry Description of circumstances	Incident of Gambling Description of Circumstances	Identity or Description of Person	Action, Outcome & Preventative Measures Adopted	Member of Staff, Name and Signature	Duty Manager Name and Signature

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3. Access to Premises by Gambling Commission Compliance Officers

Policy and Procedures:

The Company acknowledges its obligation to ensure that staff co-operate with the Gambling Commission's Compliance Officers in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises and to request/inspect appropriate records as contained under Part 15 of the Gambling Act 2005, and that on request the Company must provide the Gambling Commission with such information as the Commission may require which may include information about whether:

- Appropriate licences are held in respect of the provision of gambling facilities;
- Facilities are provided in accordance with the terms and conditions of licences issued;
- Licensed activities are being carried on in accordance with the terms and conditions of the licence;
- Gaming machines, games and software and arrangements for their use, comply with the requirement of the Gambling Act and regulations

And about the use of facilities provided such as the:

- Range of gambling activities provided by the licensee and the numbers of staff employed in connection with them.
- Licensee's policies in relation to and experience of problem gambling.
- Numbers of people making use of the facilities and the frequency of such use.

The Company has complied with Part 15 of the Gambling Act 2005 by forming and putting into effect procedures which include:

- Contact information containing the names of senior managers approved to attend a Gambling Commission Officer in the event of a visit to the premises.
- Members of staff are aware of the Access to Premises policy;
- In the event of a visit by a Gambling Commission Officer, relevant member of staff to contact one of the senior managers identified in the Contact information.
- Senior Manager to attend the Gambling Commission Officer without delay and to check the Officer's ID;
- Gambling Commission Officer will produce an Inspection Request Form in order for the inspection to proceed:
- Senior manager to request a copy of the Inspection Record from the Gambling Commission Officer;
- The Operations Director and CEO are to be notified of the inspection;
- The Operations Director will ensure that a copy of the Inspection Record is obtained from the Gambling Commission, issued to appropriate persons, actioned and retained on file.

Relevant managers and staff are trained as part of their induction process in the understanding of and the strict adherence to this policy.

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4. ADVERTISING STANDARDS AND MARKETING

Policy and Procedures

All advertising and marketing by the Company conforms to current and relevant guidelines of the Advertising Standards Authority and Committee of Advertising Practice (CAP), and the Broadcast Committee of Advertising Practice (BCAP) gambling advertising rules, as applicable. For media not explicitly covered, the principles of those codes will be applied as if they were explicitly covered. Any issued industry codes of practice on advertising will also be applied.

We will apply the general principles that our advertising:

- (a) is legal, decent, honest and truthful.
- (b) is prepared with a sense of responsibility to consumers and to society.
- (c) respects the principles of fair competition generally accepted in business.
- (d) is not intended to bring advertising into disrepute.

Specifically we ensure that:

- Our advertisements will contain nothing that is likely to lead people to adopt styles of gambling that are unwise.
- Our advertisements and promotions are socially responsible, will be undertaken in a socially responsible manner, and will not encourage excessive gambling.
- Care will be taken not to exploit the young, the immature or those who are mentally or socially vulnerable.
- Our advertisements will not be directed at people under 18 through the selection of media, style of presentation, content or context in which they appear. No medium is used to advertise betting and gaming if more than 20% of its audience is under 18 years old.
- People shown gambling in our advertisements or playing a significant role in them will not be, nor will they appear to be, under 25 years of age (such restriction need not be applied to point of sale material providing that the images used depict the sporting activity available for gambling on and not the gambling activity itself, subject to principles of advertising codes).
- There will be honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer.
- Advertising and promotional material will carry a reference to the need to keep gambling under control or a similar message.
- It will not be suggested or implied that gambling is a means of getting out of financial difficulty.

Marketing and Promotion

- Any incentive or reward scheme or other arrangement under which the customer or potential customer may receive money, goods, services or other advantage (including the discharge in whole or in part of any liability (the benefit)) will be designed to operate, and be operated, in such a way that the circumstances and conditions of the benefit available are clearly set out and readily accessible to the customers to whom it is offered and that neither the receipt nor the value or amount of the benefit is:
 - (a) dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - (b) altered or increased if the qualifying activity or spend is reached within a period of time which is shorter than the whole period during which the benefit is offered.
- a. 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.
- b. If the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at a particular Adult Gaming Centre or Family Entertainment Centre, the terms on which it is offered will not be directly related to the level of the customer's prospective gambling.
- c. Incentives and rewards will be proportional to the type and level of the customer's gambling.

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5. CUSTOMER INTERACTION

Policy and Procedures

If members of staff have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager must be informed at the earliest available opportunity. Indicative behaviour may include intense mood swings, hysteria, remorse and perhaps even damage to property and violence or the threat of violence to staff or other customers.

- The Duty Manager is required to observe the individual and make a judgement as to whether it is appropriate to provide information or to direct the customer to appropriate guidance and sources of advice about the nature of their gambling activity or have the process of self-exclusion explained for consideration.
- If the customer refuses such information and behaves in a manner which could reasonably be considered to be disruptive or puts the staff or other customers in potential danger, the Duty Manager will implement the Company's procedures for dealing with anti-social situations as described below.
- Notwithstanding any other action that may have to be taken immediately to prevent an incident from worsening, the Duty Manager will record all instances of inappropriate customer interaction in the relevant log with details of that interaction.
- The interaction will be conducted between the Duty Manager and the customer in a confidential and meaningful manner.
- As a result of this interaction, The Duty Manager may give consideration to refusing service at and/or barring the customer from the premises and, in extreme situations, contacting police for assistance. Whenever police are called to the premises for assistance in handling an incident, an entry will be made in the log 'Customer incidents requiring police assistance' whether police attend or not.
- Alternatively, dependent on circumstances, the customer may be encouraged to contact an appropriate care agency and have the process of self-exclusion explained for consideration.
- Members of staff must be aware of the identity of the Company representative specifically designated to deal with requests for self-exclusion, and to whom customers can be directed for matters relating to problem gambling and from confidential advice should any member of staff be approached for help.
- This policy and procedure is consistent with, and implemented with due regard to, the Company's duty in respect of the health and safety of members of staff.
- In incidents of customer interaction, should a customer display disruptive and/or anti-social behaviour, a senior member of staff will be alerted and will, ensuring that they do not put themselves or other persons present at risk:
 - Identify and speak to the person responsible for the nuisance;
 - Explain to the person responsible that they are acting in an anti-social way and causing disruption and/or upset to others (and damage if applicable);
 - Attempt to divert the person responsible away from anything or any person in danger;
 - Call for assistance from site security if necessary;
 - In extreme situations, seek police assistance.
- Managers and staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying logs.

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5.(a) CUSTOMER INTERACTION

Park:

To be completed in circumstances when a customer has either requested information on who to contact for help with the extent or nature of their gambling or where an appointed member or management considers it to be appropriate to interact with a customer in relation to the person's gambling activity.

An entry should also be made where an approach has been made by a relative or friend of a customer considered by them to be experiencing difficulties with their gambling.

Date	Time	Circumstances	Number of customers involved	Identity or Customers (if known)	Referred to GamCare	Self-Exclusion Explained (and leaflet given)	Notes including Outcome	Duty Manager

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5.(b) CUSTOMER INCIDENTS ON GAMBLING PREMISES REQUIRING POLICE ASSISTANCE

Park:

Ref	Date	Time	Nature of Incident	Time Police Called	Time Police Arrived	Outcome (including Crime Ref Number if Known)	Duty Manager

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