



Walsall Council

Document Pack

Licensing Sub – Committee

29 March 2023 at 10:30am

Admiral 9- 11 Park Street, Walsall,
WS1 1LY

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Item No 5.



Walsall Council

REPORT OF THE DIRECTOR OF PUBLIC HEALTH

LICENSING SUB – COMMITTEE

29 March 2023

**APPLICATION FOR A PREMISES LICENCE UNDER
SECTION 159 OF THE GAMBLING ACT 2005**

**Admiral
9-11 Park Street
Walsall
WS1 1LY**

1.0 Summary of Report

- 1.1 The purpose of this report is for the Licensing Sub-Committee to consider and determine an application for a premises licence, authorising the use of 9-11 Park Street, Walsall, WS1 1LY as an Adult Gaming Centre, under the provisions of the Gambling Act 2005 (The Act).
- 1.2 The application is made by Luxury Leisure, Fifth Avenue Plaza, Queensway, Team Valley Trading Estate, Gateshead, Tyne & Wear, NE11 0BL.
- 1.3 In accordance with Section 162(1)(a) of the Gambling Act 2005, the application must be determined by the Licensing Sub-Committee, where representations have been made by an interested party or responsible authority under Section 161, and not been withdrawn.

2.0 Recommendations

- 2.1 That the Licensing Sub-Committee determine whether to the representations received are relevant, if so then to:
- grant the licence as applied for;
 - grant the licence with additional modified conditions; or
 - reject the application.

3.0 Application

3.1 An application for an Adult Gaming Centre premises licence was received from Luxury Leisure on 23 August 2022.

3.2 *Application Form*

The application form is attached at **Appendix 1**.

3.3 *Hours of Operation*

The application does not detail hours of operation as there are no statutory restrictions on opening hours for Adult Gaming Centres.

3.4 *Plans*

The location map and licensing plan of the premises are attached as **Appendix 2**.

3.5 *Prescribed Advertising Requirements*

In their letter of 23 August 2022, the applicant confirmed in that the prescribed requirements of section 160 of the Gambling Act 2005 had been complied with. The letter is provided as **Appendix 3**.

Section 160 of the Act requires that notice of application be given in three ways:

3.6a notice must be placed outside the premises for 28 consecutive days in a place where it can be read conveniently;

3.7 in a newspaper or newsletter of local relevance, on at least one occasion within ten days of the application being made; and

3.8 the notice must be served on all responsible authorities with seven days of the application being made.

3.9 Paragraph 3 of Appendix 3 outlines the intention of the applicant, should this application be successful, to relocate their existing Walsall-based business and surrender the current premises licence.

As you know, we have long operated another site within Walsall through our company Talarius Ltd: Admiral, 2A-3A Bradford Street, Walsall, WS1 1NX. If the current application is granted, we will close the existing site and surrender the existing premises licence once we have transferred the business to the new site.

3.10 Also detailed in the Appendix 3 is a list of the voluntary measures proposed by the applicant to support and evidence compliance with the licensing objectives. A full list of the measures is provided on pages 2 – 4 of the letter, but in summary, these include:

Prevent gambling being a source of crime and disorder, being associated with crime and disorder, or being used to support crime:

- Local Area Risk Assessment – Local knowledge mapping
- Installation and operation of CCTV
- Controlled security entry system for later hours
- At least two members of staff on duty at any time
- Easy access to emergency contact details – also displayed within premises
- Regular security reviews with Police Crime Reduction Officer, on request
- Refusal policy for intoxicated persons (both alcohol and drugs)
- Lighting inside and outside premises designed to deter conflict and organised crime and disorder
- Staff equipped with portable alarm activators and premises fitted with live monitored hold-up alarm

Ensure gambling is conducted in an open and fair way:

- Although primarily a matter for the Gambling Commission, the applicant confirms that the layout, lighting, and fitting out of the premises will provide good lines of sight and ensure the objective is supported.
- Management measures and procedures are detailed and transparent, supporting this objective, with all codes of practice issued by the Gambling Commission being adhered to.

Protect children and vulnerable persons from being harmed or exploited by gambling:

- Definition of 'vulnerable' is that suggested by the Gambling Commission
- Protection measures detailed in the Local Area Risk Assessment explained below and attached as Appendix 6.
- Layout, lighting and fitting out of the premises intended not to be attractive to children and vulnerable people
- Challenge 25 age verification policy adopted, staff trained in its implementation, and appropriate signage displayed within the premises
- Third-party independent test purchasing organisation, Serve Legal, employed to conduct unannounced test purchases of all age restricted sites
- Record of refusals maintained and reviewed regularly
- Continuous control and observation of the gaming floor, including interactions and engagement with customers by staff trained to recognise signs of vulnerability.
- Implementation of a self-exclusion scheme

- I-beacon technology adopted to operate the GambleWise app for customers who wish to manage time spent inside the premises
- Leaflets and posters promoting available help in relation to gambling harms.

3.11 **Advertising**

The display of the notice on the premises and the publication of the newspaper notice ensure that any 'interested parties' are made aware of the application and of their opportunity to make comments to the licensing authority.

3.12 'Interested parties' includes those living sufficiently close to the premises to be likely to be affected by authorised activity, or persons having business interests that could be affected by the authorised activities.

3.13 In respect to of this application, a copy of the newspaper advertisement, published in the Express and Star on 25 August 2022, is attached as **Appendix 4** and the notice of application, attached as **Appendix 5**, was displayed on the premises for 28 consecutive days, from 23 August to 19 September 2022.

3.14 **Local Area Risk Assessment (LAR)**

To improve the exchange of information between licensing authorities and operators, the Gambling Commission introduced Social Responsibility provisions, requiring operators of premises-based businesses to conduct local risk assessments to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises.

3.15 The Local Risk Assessment (LAR) is required to inform the premises' policies, procedures and control measures to mitigate those risks. The LAR provided with the application is attached at **Appendix 6**.

3.16 The Social Responsibility Policies and Procedures and procedures submitted with the application are provided as **Appendix 7**, together with supporting information about the corporate Personal Development Plan also within **Appendix 7**.

3.17 The application was valid, having met the application requirements specified in Section 159 of the Act.

4.0 **Representations**

4.1 Under Section 160, an interested party or responsible authority may make representations, which must be received by the licensing authority within the prescribed consultation period of 28 days.

- 4.2 In response to this application, no representations were received from any responsible authorities.
- 4.3 As mentioned, Section.158 of the Act defines interested parties as including persons who live sufficiently close to the premises to be likely to be affected by the authorised activities, or who have business interests that might be affected by the grant of the application.
- 4.4 Under s.162 of the Act, licensing authorities are required to filter all representations they receive under the to ensure they identify those that are relevant, and those that are irrelevant.
- 4.5 Representations that are likely to be deemed relevant by licensing authorities are those that relate to at least one of the licensing objectives. They may also be found relevant if they raise issues of concern connected to the content of the licensing authority's own statement of policy or any of the Commission's guidance or codes of practice. This is set out at s.153 of the Act.
- 4.6 Under section 1 of the Gambling Act 2005, the three licensing objectives, which guide the way that the licensing authorities perform their functions and the way that gambling businesses carry on their activities, 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; and
 - protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 4.7 Four written representations were received from 'interested parties', which are attached at **Appendix 8**.

The representations are all made on the grounds that the grant of the application could undermine the licensing objective of 'preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime', by increasing anti-social behaviour in the area.

5.0 Resource Considerations

5.1 **Financial:** Application fees are set by the Licensing Authority.

5.2 **Legal**

5.2.1 *Section 163 – Determination of application*

(1) On considering an application for a premises licence (whether at a hearing or not) a licensing authority shall —

- (a) grant it, or
 - (b) reject it.
- (2) A licensing authority shall not determine an application for a premises licence made in reliance on section 159(3)(b) until the relevant operating licence has been issued (in a form which authorises the applicant to carry on the activity in respect of which the premises licence is sought).

5.2.2 **Section 164 – Grant of application**

- (1) Where a licensing authority grants an application for a premises licence they shall, as soon as is reasonably practicable—
- (a) give notice of the grant to—
 - (i) the applicant
 - (ii) the Commission,
 - (iii) any person who made representations about the application under section 161,
 - (iv) in England and Wales, the chief officer of police for any area in which the premises are wholly or partly situated,
 - (v) in Scotland, the chief constable of the police force maintained for a police area in which the premises are wholly or partly situated, and
 - (vi) Her Majesty's Commissioners of Customs and Excise,
 - (b) issue a premises licence to the applicant, and
 - (c) give the applicant a summary of the terms and conditions of the licence in the prescribed form.
- (2) A notice under subsection (1)(a) —
- (a) must be in the prescribed form,
 - (b) if the licensing authority have attached a condition to the licence under section 169(1)(a) or excluded under section 169(1)(b) a condition that would otherwise have attached by virtue of section 168, must give the authority's reasons, and
 - (c) if representations were made about the application under section 161, must give the authority's response to the representations.
- (3) In this section “prescribed” means—
- (a) in relation to authorities in England and Wales, prescribed by regulations made by the Secretary of State, and
 - (b) in relation to authorities in Scotland, prescribed by regulations made by the Scottish Ministers.

5.2.3 **Section 165 – Rejection of application**

- (1) Where a licensing authority reject an application for a premises licence they shall, as soon as is reasonably practicable, give notice of the rejection to—
 - (a) the applicant,
 - (b) the Commission,
 - (c) any person who made representations about the application under section 161,
 - (d) either—
 - (i) in England and Wales, the chief officer of police for any area in which the premises are wholly or partly situated, or
 - (ii) in Scotland, the chief constable of the police force maintained for a police area in which the premises are wholly or partly situated, and
 - (e) Her Majesty's Commissioners of Customs and Excise.
- (2) A notice under subsection (1)—
 - (a) must be in the prescribed form, and
 - (b) must give the authority's reasons for rejecting the application.
- (3) In this section “prescribed” means—
 - (a) in relation to authorities in England and Wales, prescribed by regulations made by the Secretary of State, and
 - (b) in relation to authorities in Scotland, prescribed by regulations made by the Scottish Ministers.

5.2.4 **Section 169 – Conditions imposed or excluded by the licensing authority**

- (1) Where a licensing authority issue a premises licence they may—
 - (a) attach a condition to the licence;
 - (b) exclude a condition that would otherwise be attached to the licence by virtue of section 168.
- (2) A condition attached to the licence under subsection (1)(a) may, in particular, address a matter addressed by a condition excluded under subsection (1)(b).
- (3) A condition attached to the licence under subsection (1)(a) may apply in relation to the premises generally or only in relation to a specified part of the premises.
- (4) A licensing authority may not attach a condition to a premises licence which prevents compliance with a condition of the operating licence which authorises the holder to carry out the activity in respect of which the premises licence is granted.

- 5.2.5 Any representations received must considered in terms of their relevance under the Act.

5.2.6 To be relevant the representation must relate to one or more of the licensing objectives, or must raise issues under the licensing authority's statement of policy or the Gambling Commission's Guidance or Code of Practice.

5.3 **Walsall Council Statement of Principles**

5.3.1 Part B of Walsall Council's current Statement of Principles outlines how the authority will approach decision making in respect of premises licences.

5.4 **Gambling Commission Guidance to Licensing Authorities Last updated 01 May 2021**

For ease of reference, the relevant parts of the Gambling Commission guidance in this section are attached at **Appendix 9**.

5.4.1 Walsall Council recognises that in considering and determining applications, it must have regard to the following guidance issued by the Gambling Commission, under Section 24 of the Act, which states:

Licensing Authorities' functions – Principles to be applied

1.26 In exercising its functions under the Act, s.153 states that the licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it:

- a) in accordance with any relevant code of practice under s.24*
- b) in accordance with any relevant guidance issued by the Commission under s.25*
- c) reasonably consistent with the licensing objectives (subject to a. and b. above), and*
- d) in accordance with the licensing authority's statement of licensing policy (statement of policy) (subject to a. to c. above).*

1.27 The 'aim to permit' framework provides wide scope for licensing authorities to impose conditions on a premises licence, reject, review or revoke premises licences where there is a potential conflict with the relevant codes of practice, relevant Guidance issued by the Commission, the licensing objectives or the licensing authorities own statement of policy.

1.28 Licence conditions are one method by which it is possible to mitigate risks associated with particular premises. The imposition of licence conditions might be prompted by local risk to the licensing objectives, for example the proximity of gambling premises to a school.

1.29 *However, licensing authorities may first wish to have proactive engagement with local operators to encourage them to effectively mitigate risks to the licensing objectives. Such engagement can facilitate an open and constructive partnership, which, in turn, can improve compliance and reduce regulatory costs. Engagement with operators should be prompted by justifiable concerns or in pursuit of the principles set out under s.153.*

1.30 *To reflect the breadth of licensing authority discretion, licensing authorities are entitled to request such information from operators as they may require in order to make effective licensing decisions.*

The Act requires that an application must be accompanied by a minimum level of information (detailed in Part 7 of this Guidance). In the Commission's view, however, this does not preclude reasonable requests from licensing authorities for additional information to satisfy themselves that their licensing decision is reasonably consistent with the licensing objectives and the commission's codes. That information may include, for example, a suitable business plan or the operator's own assessment of risk to the licensing objectives locally.

5.4.2 Walsall Council must also take into consideration the Gambling Commission's Guidance below, which explains that moral objections to gambling, unmet demand, and low-level disorder/nuisance are not valid reasons to reject applications for premises licences.

Objective 1: Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

5.3 *Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective.*

For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc. the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6.

5.4 *A licensing authority will need to consider questions raised by the location of gambling premises when:*

- *formulating its statement of licensing policy*
- *receiving relevant representations to an application*

- *dealing with applications as a responsible authority in its own right*

5.5 *In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.*

5.6 *Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.*

5.7 *Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003 / Licensing (Scotland) Act 2005, in which context they have wider powers to also take into account measures to prevent nuisance.*

5.8 *In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in Part 9 of this Guidance.*

5.9 *There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. Further information can often be found on the website of industry trade associations.*

5.10 *Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime.*

The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

- 5.4.3 Additionally, also in relation to decision-making, Walsall Council must take into account the Gambling Commission's Guidance, points 5.31 – 5.34, below:

Other considerations

- 5.31 *Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions. In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.*
- 5.32 *Licensing authorities must ensure that the application is in accordance with the relevant codes of practice, this guidance, the licensing objectives and the licensing authority's own policy statement. There is, therefore, significant scope for licensing authorities to request additional information from the applicant where they have concerns about both new applications and variations.*
- 5.33 *Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in Part 9.*
- 5.34 *Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives.*

An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

- 5.4.4 This point is further clarified at point 6.40 as follows:

- 6.40 *For example, licensing authorities may wish to explain in their policy statements that any objections to new premises or requests*

for a review should be based on the licensing objectives of the Act.

The policy statement could make it clear that – unlike the Licensing Act 2003 (opens in new tab) and the Licensing (Scotland) Act 2005 (opens in new tab) – the Act does not include the prevention of public nuisance and anti-social behaviour as a specific licensing objective.

6.0 Compliance and enforcement matters

6.1 Finally, in relation to compliance and enforcement, the guidance states:

36.44 There are various local authority and police powers to manage issues such as street drinking and anti-social behaviour, and licensing authorities should look to these powers in the first instance as being more appropriate remedies than the Gambling Act 2005.

7.0 Licence Conditions

7.1 *Mandatory Licence Conditions*

Under Regulation 12, Schedule 3 of the Act, default mandatory conditions apply to all premises licences authorised for use as Adult Gaming Centres.

7.2 The mandatory conditions applicable to this licence application are provided as **Appendix 10**.

7.3 *Conditions imposed or excluded by the Licensing Authority*

Section 169 of the Act makes provision for the Licensing Authority to:

- a) attach a condition to the licence; and/or
- b) exclude a condition, that would otherwise be attached, from the licence.

7.4 In respect of the exclusion or addition of conditions, the Licensing Authority must have regard to the following guidance, published under Section 24 of the Act, by the Gambling Commission:

9.28 Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153.

They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this Guidance, or their own statement of policy. Conversely, licensing authorities should not

turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.

9.29 Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.

9.30 Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.

9.31 Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:

- relevant to the need to make the proposed building suitable as a gambling facility;*
- directly related to the premises (including the locality and any identified local risks) and the type of licence applied for; and*
- fairly and reasonably related to the scale and type of premises reasonable in all other respects.*

7.5 Conditions that may not be attached to premises licences by licensing authorities

Guidance published by the Gambling Commission under Section 24 of the Gambling Act 2005 states:

9.32 The Act sets out certain matters that may not be the subject of conditions:

- S.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition;*
- S.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation;*
- S.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated); and*

- *S.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.*

8.0 Decision

- 8.1 The Licensing Sub-Committee may resolve to:
- grant the application as requested
 - grant with additional/modified conditions attached to the premises licence; or
 - reject the application.
- 8.2 Where the applicant, responsible authority, or other persons is aggrieved by the decision of the licensing authority, appeal is to Magistrates Court where the reasonableness or otherwise of the decision will be tested.

9.0 Staffing issues

None arising from this report.

10.0 Citizen Impact

Residents, businesses, or their representatives ('interested parties') have had the opportunity to submit 'relevant representations'.

11.0 Community Safety

Issues raised in relation to potential crime and disorder and public nuisance are addressed by committee through the decision-making process.

12.0 Environmental Impact

Nothing arising from this report.

13.0 Performance and Risk Management Issues

Nothing arising from this report.

14.0 Equality Implications

Nothing arising from this report.

15.0 Consultation

The consultation and advertisement of the application has been conducted in accordance with the prescribed statutory regulation.

16.0 Associated Papers

Appendix 1	Premises licence application
Appendix 2	Premises Licence Plan
Appendix 3	Application cover letter
Appendix 4	Newspaper Notice
Appendix 5	Public Notice and Responsible Authority Notice
Appendix 6	Local Area Risk Assessment
Appendix 7	Social Responsibility Docs
Appendix 8	Representations from interested parties
Appendix 9	Relevant Gambling Commission Guidance
Appendix 10	Mandatory Adult Gaming Centre Conditions

17.0 Contact Officer

Sayful Alom, Licensing Team Leader – Sayful.alom@walsall.gov.uk

**Application for a premises licence
under the Gambling Act 2005 (standard form)**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

Part 1 – Type of premises licence applied for

Regional Casino

Large Casino

Small Casino

Bingo

Adult Gaming Centre

Family Entertainment Centre

Betting (Track)

Betting (Other)

Do you hold a provisional statement in respect of the premises? Yes No

If the answer is “yes”, please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual applicant

1. Title: Mr Mrs Miss Ms Dr Other (please specify)

2. Surname: _____ Other name(s): _____

[Use the names given in the applicant’s operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

3. Applicant’s address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant’s operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation:

LUXURY LEISURE

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence.]

7. The applicant's registered or principal address:

**FIFTH AVENUE PLAZA
QUEENSWAY
TEAM VALLEY TRADING ESTATE
GATESHEAD
TYNE AND WEAR**

Postcode: **NE11 0BL**

8(a) The number of the applicant's operating licence (as given in the operating licence):

000-001876-N-103087-024

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

9. Tick the box if the application is being made by more than one organisation.

[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known):

ADMIRAL

11. Address of the premises (or, if none, give a description of the premises and their location):

**9-11 PARK STREET
WALSALL**

Postcode: **WS1 1LY**

12. Telephone number at premises (if known): **N/A**

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

THE PREMISES ARE LOCATED ON THE GROUND FLOOR OF A THREE STOREY BUILDING WITH STORAGE AND OFFICES ABOVE IN A HIGH STREET PARADE OF RETAIL AND MIXED USES.

14(a) Are the premises situated in more than one licensing authority area?

NO *[delete as appropriate]*

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, **other than the licensing authority to which this application is made:**

Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? **NO** *[delete as appropriate]*
[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]

15(b). If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon	<i>hh:mm</i>	<i>hh:mm</i>	
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:

Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): *(dd/mm/yyyy)*

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? **NO** *[delete as appropriate]*

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a). Do you hold any other premises licences that have been issued by this licensing authority?

YES

19(b). If the answer to question 19(a) is yes, please provide full details:

ADMIRAL, 2A-3A BRADFORD STREET, WALSALL, WS1 1NX
ADULT GAMING CENTRE PREMISES LICENCE WS/GPL/0072

20. Please set out any other matters which you consider to be relevant to your application:

THE PREMISES WERE PREVIOUSLY LICENSED AS A BINGO VENUE.

WE ARE A NATIONAL OPERATOR WITH EXTENSIVE EXPERIENCE AND HOLD ALL NECESSARY LICENCES UNDER THE GAMBLING ACT 2005.

Part 6 – Declarations and Checklist (Please tick)

I/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. I/ We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

I/ We confirm that the applicant(s) have the right to occupy the premises.

Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- I/ we understand that if the above requirements are not complied with the application may be rejected
- I/ we understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

Part 7 – Signatures

21. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:



Print Name: **ELIZABETH JANE SPEED**

Date: **23RD AUGUST 2022** Capacity: **GROUP GENERAL COUNSEL**

22. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: _____

Date: _____ (dd/mm/yyyy) Capacity: _____

[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]

[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]

Part 8 – Contact Details

23(a) Please give the name of a person who can be contacted about the application:

ELIZABETH JANE SPEED – GROUP GENERAL COUNSEL

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

07808 571 588

24. Postal address for correspondence associated with this application:

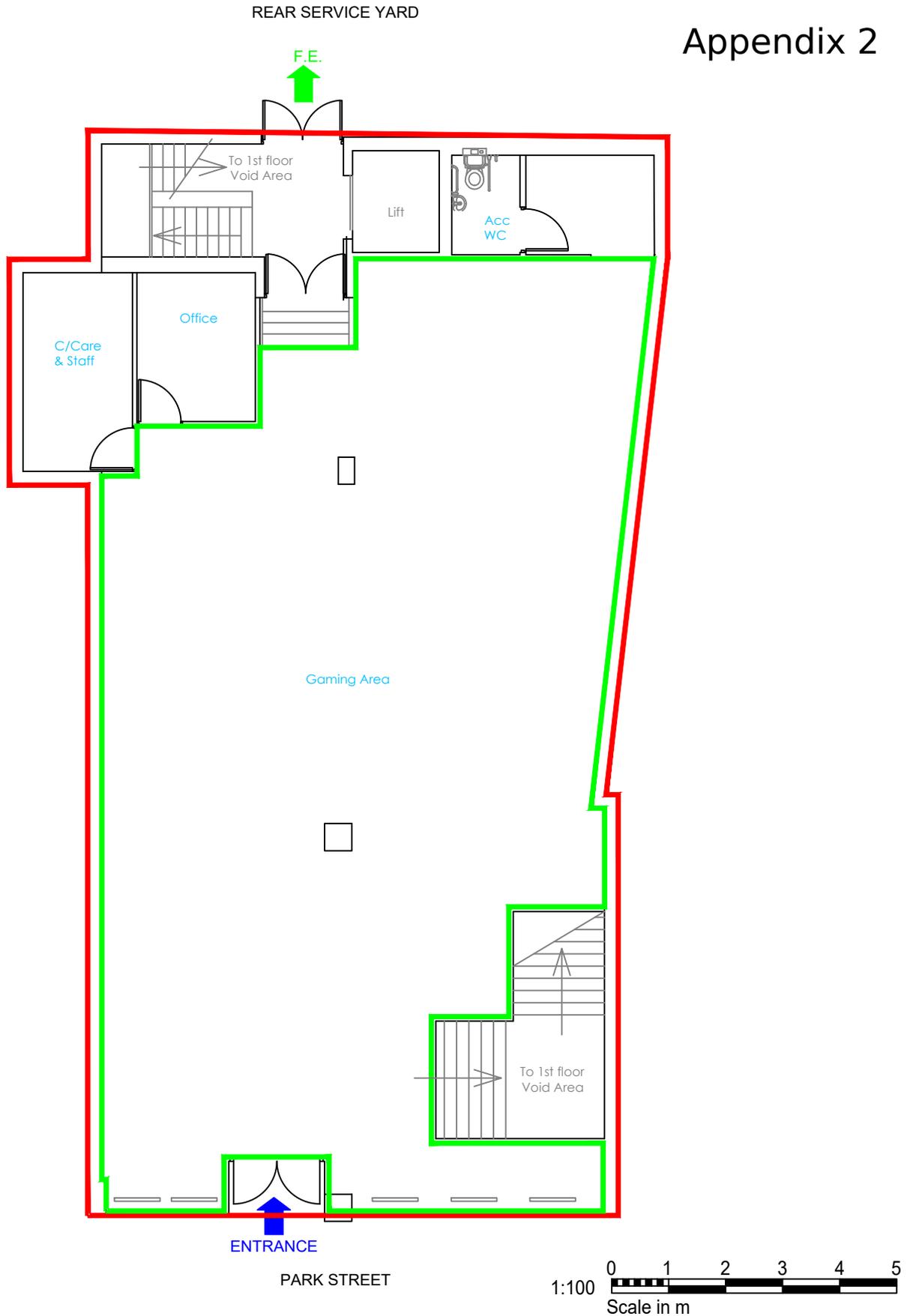
**LUXURY LEISURE
FIFTH AVENUE PLAZA
QUEENSWAY
TEAM VALLEY TRADING ESTATE
GATESHEAD
TYNE AND WEAR**

Postcode: **NE11 0BL**

25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

espeed@novomatic.co.uk

Appendix 2



RECORD

DWG NO: **WAL_002**
 CLIENT:
 PROJECT: **9 - 11 Park Street
 WALSALL
 West Midlands
 WS1 1LY**

TITLE: **LICENSING PLAN
 GAMBLING ACT 2005**
 Revision: **REV** CHECKED:
 SCALE: **1:125@A4** DATE: **22/08/22**

NOVOMATIC
 Luxury Leisure, Talarus & Rac. Ltd.
 Fifth Avenue Plaza, Queensway
 Team Valley Trading Estate
 Gateshead, NE11 0BL
 +44 (0)191 497 8200 / WWW.ADMIRALSLOTS.CO.UK / WWW.NOVOMATICUK.COM

23rd August 2022

Licensing Team
Walsall Council
Civic Centre
Darwall Street
Walsall
WS1 1TP

Our Ref: TCR/GA05/AGC-new

By e-mail only:-
licensing@walsall.gov.uk
cc: reba.danson@walsall.gov.uk

Dear Sirs

**Re: Gambling Act 2005 (“the Act”)
Application for an Adult Gaming Centre Premises Licence (‘AGC’) for
Admiral, 9-11 Park Street, Walsall, WS1 1LY
Applicant – Luxury Leisure**

I refer to our conversation with Reba Danson, in which we explained that we wish to apply for an AGC premises licence at 9-11 Park Street, Walsall, WS1 1LY (the “Premises”).

You have confirmed that you are happy to receive this application by e-mail and that on filing Tracey Rose can pay the application fee of £1,280.00 by credit card.

As you know, we have long operated another site within Walsall through our company Talarius Ltd: Admiral, 2A-3A Bradford Street, Walsall, WS1 1NX. If the current application is granted, we will close the existing site and surrender the existing premises licence once we have transferred the business to the new site.

The Premises are currently closed, having previously operated as a branch of Luda high street bingo. You have confirmed that Luda surrendered their premises licence in 2019. We have applied for planning permission to operate the Premises as an AGC, although that of course has no bearing on this application.

This application is being made by Luxury Leisure, which is a sister company of Talarius Limited. It operates the same regime and has the same management and policies and procedures as Talarius Ltd. Together, they form the largest operator of AGCs in the UK.

We are long established, having held operating licences since the inception of the Gambling Commission and are now part of the global Novomatic Group of companies. We have a long record of effective and responsible management throughout Great Britain. We are founder members of the industry trade association BACTA, where we are members of the governing committees, I am the past Chairman of the AGC division and am the current Chairman of its Social Responsibility committee.

- 1 -

We have a good relationship with GambleAware, to whom we make substantial annual contributions towards research, education and the treatment of gambling harm.

We place a high premium on excellent staff training which is refreshed regularly and the grant to Luxury Leisure of its operating licence evidences the Gambling Commission's satisfaction with its integrity, competence, finances and operating model. All required personal management licences (including but not limited to those for every director, regional manager and area manager, (as well as for our head of compliance, our Risk and Compliance Director) are in place and maintained centrally.

We have been audited by the internationally recognised expert body, Global Gambling Guidance Group (G4) and are proud to have been the first land-based operator in the UK to have gained the G4 accreditation for Responsible Gambling. We have recently been re-audited and again been certified and accredited.

As with all of our sites, the operation of the Premises will be fully compliant with applicable legislation, including compliance with the relevant mandatory and default conditions set out in the Gambling Act 2005 (Mandatory and Default Conditions (England and Wales) Regulations 2007). Our operations at the Premises will reinforce the licensing objectives and in particular in the following ways:-

1. Prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
 - a) A local risk assessment (enclosed) has been prepared for the site using the details contained in the Authority's Statement of Principles, local knowledge and a third-party mapping tool.
 - b) As with our existing local site, the Premises will have a fully up to date CCTV system with records kept for an appropriate length of time and signage to indicate the presence of the system. I refer you to the details of the local risk assessment.
 - c) A Maglock entry system will be in use during later opening hours.
 - d) At least two members of staff will be on duty at any time.
 - e) All of our staff will be provided with local and emergency contact details for emergency services and these will be displayed clearly in the office areas of the Premises.
 - f) We will as appropriate hold regular security reviews with a Crime Reduction Officer within the local police team if requested by them.
 - g) Our cash handling processes are detailed, safe and secure and all staff are trained in recognising individuals who might be under the influence of drink or drugs. It is our policy to refuse entry to people apparently intoxicated.

We provide a safe system for payment of winnings. The majority of the machines in the Premises will be "ticket in ticket out" (TITO), which is a system that gives tickets on winning, which can be redeemed for cash at the customer's convenience and time of choosing.

- h) The Premises will have adequate lighting inside and out and the lighting, layout and fitting out will be designed to minimize conflict and opportunities for organized crime and disorder.
- i) Staff will be provided with portable alarm activators, and the Premises will be fitted with a live monitored hold-up alarm system.

2. Ensure that gambling is conducted in a fair and open way

- a) As you are aware, adherence to this licensing objective is primarily a matter for the Gambling Commission and the operator and the Gambling Commission granted Luxury Leisure an operating licence for the relevant activities as soon as the regime was implemented in 2007. Nonetheless, I confirm that the layout, lighting and fitting out of the premises will provide good lines of sight and ensure that this licensing objective is supported.
- b) Our management measures and procedures are detailed and transparent. All Machine Technical Standards issued by the Gambling Commission are adhered to - for example, the details of return to player percentages are provided for each game. Similarly, all Codes of Practice issued by the Gambling Commission are adhered to.
- c) We have good relations with the police and other enforcement areas wherever we operate.

3. Protect children and other vulnerable persons from being harmed or exploited by gambling

- a) For these purposes, we adopt the definition of "vulnerable" as suggested by the Gambling Commission and this Licensing Authority.
- b) Again, our local risk assessment is enclosed and refers to the protection measures we will put in place.
- c) The layout, lighting and fitting out of the premises will be designed to enhance this objective and so not to attract children or other vulnerable people.
- d) As with all of our national AGC operations we will operate a **Challenge 25** policy at the Premises and are happy to agree to a condition to that effect and that notices advising customers of the same are displayed at this venue. Training on this policy will be given to all members of staff and refreshed regularly.

- e) We retain the services of a third-party independent test purchasing organisation, Serve Legal, to conduct unannounced test purchases at all of our age restricted sites and this will apply to the Premises. As you are aware, the results are reported to the relevant local authority and to the Gambling Commission. Our “pass rate” is higher than the industry average and indeed higher than testing for other age restricted products. Any issues are investigated promptly and dealt with. For information, all tests that have been carried out by Serve Legal at our Admiral, 2A-3A Bradford Street, Walsall, WS1 1NX venue in the last three years have been passes.
- f) As above, minimum of two staff members will be on rota'd on duty at any time.
- g) A refusals book will be maintained and reviewed at least monthly, actions recorded and signed off.
- h) Staff will be trained in relation to customer interaction and records of customer interactions will be maintained. Our model (and indeed that of AGCs generally) differs from that of betting premises. Our staff constantly patrol the gaming floor, speaking with and observing customers. Observation and interaction are key parts of our bespoke staff training and staff observe customers' patterns of play as part of getting to know and supporting them. They are also trained to recognise customers who may be experiencing difficulties or stress and are able to signpost individuals to external support services as part of such an interaction. I deal further with training generally as a separate item below.
- i) As we do at all of our AGC sites in accordance with our operating licence conditions, we will offer self-exclusion to customers who experience difficulties with gambling. We are members of a multi-operator self-exclusion scheme for AGCs administered by BACTA. At the end of any self-exclusion period, the self-exclusion will remain in place for a further 6 months unless the customer takes positive action in order to gamble again. Furthermore, our policies go beyond the requirements of our licence conditions in that following the expiry of the further 6-month period, the customer will be given one day to cool off before being allowed to access gambling facilities, regardless of when they choose to gamble again (ie not just within the 6-month period following the end of the self-exclusion period as set out in the LCCP). In any event, when the customer makes a request to return to gambling, a meeting will first be held with a trained member of staff before re-admittance is agreed and again, this will apply regardless of when the customer seeks to return to gamble.
- j) We will install i-beacon technology to operate the GambleWise app for customers who wish to use it to help manage their time spent in the venue. We operate this system throughout our national estate, offering the service to customers free of charge.
- k) Appropriate amounts of problem gambling leaflets and posters will be available on the Premises, both within the gaming areas and for collection in more discreet locations, such as the toilet areas.

To the extent necessary or appropriate (given the above, our LRA and the fact that they were originally applied 11 years ago) we are prepared to agree to the conditions that currently apply to our existing premises licence on Bradford St.

Amongst the notices on the Premises and in compliance with legislation, there will be notices displayed in a prominent place at the entrances to the Premises stating that no persons under the age of 18 will be permitted to enter and that the consumption of alcohol will not be permitted on the Premises at any time.

In terms of training generally, our staff are provided with detailed tuition (both through e-learning and face to face) as part of their induction and is refreshed at regular intervals. Training covers a wide range of areas including legislative and licence requirements and matters of social responsibility (such as categories and numbers of gaming machines; stakes and prizes; age verification procedures; identification of and interaction with vulnerable persons; signposting; and the importance of not encouraging customers to enter into harmful gambling activity).

We are additionally very proud of our bespoke training and career development programme developed with Blackpool and Fylde College, called Admiral Academy, which will be available to all of our staff employed at this venue. For your information I enclose a short introductory brochure.

I believe that the above and the enclosed LRA are fulsome, but in the event that you would like to explore further detail, we would be pleased to discuss that with you.

Defibrillator

Finally, we are delighted to confirm that the venue will house a public access defibrillator, supplied by the British Heart Foundation and registered on the national defibrillator network. This is part of our national project, of which we are particularly proud.

I trust that the above will provide you with the information you require to process the application, but if anything further is required, please let me know.

On the basis of the above, I accordingly enclose:-

- an application form;
- a drawing referenced WAL_002. You will see that the drawing is coloured to show the boundary of the premises marked red and the gaming machine area marked green. We draw your attention to the notes on the drawing;
- a Local Risk Assessment for the site. As you will note, it has been prepared as if we were trading at the Premises;
- Our current G4 certificate;
- Our Social Responsibility Policies and Procedures; and
- A brochure on the Admiral Academy professional development programme.

I confirm that within 7 days of the date on which the application is made (ie today on receipt of your confirmation and payment is made), the Responsible Authorities (details of which have been kindly confirmed by your licensing officers) will be served with notice of the application in statutory form. The requisite press notice will be published in the Express & Star within 10 working days, starting on the day after the date the application is made. The requisite site notice will, from the date on which the application is made, be displayed for 28 consecutive days, again in accordance with regulations.

We will contact you in early course to discuss the application in more detail and to answer any outstanding questions. Once the consultation period has run its course, we will need to liaise with you with regard to the date of issue of the licence to allow for the relevant internal fit out works.

In the meantime, please acknowledge receipt of the application and confirm that it is in order.

Yours faithfully



Elizabeth Speed
Group General Counsel
Novomatic UK
For Luxury Leisure
Mobile+44 (0) 7808 571 588
espeed@novomatic.co.uk

Enclosures

NOTICE OF APPLICATION FOR A PREMISES LICENCE UNDER THE GAMBLING ACT 2005

Notice is hereby given that: Luxury Leisure of the following address: Fifth Avenue Plaza, Queensway, Team Valley Trading Estate, Gateshead, Tyne and Wear, NE11 0BL is applying for an Adult Gaming Centre premises licence under Section 159 of the Gambling Act 2005.

The application relates to the following premises: Admiral, 9-11 Park Street, Walsall, WS1 1LY

The application has been made to: Licensing Team, Walsall Council, Civic Centre, Darwall Street, Walsall, WS1 1TP

Information about the application is available from the licensing authority, including the arrangements for viewing the details of the application.

Any of the following persons may make representations in writing to the licensing authority about the application:

- A person who lives sufficiently close to the premises to be likely to be affected by the authorised activities;
- A person who has business interests that might be affected by the authorised activities
- A person who represents someone in any of the above two categories

Any representations must be made by the following date:

19/09/2022

It is an offence under section 342 of the Gambling Act 2005 if a person, without reasonable excuse, gives to a licensing authority for a purpose connected with that Act information which is false or misleading.

NOTICE OF APPLICATION FOR A PREMISES LICENCE

This notice is issued in accordance with regulations made under section 160 of the Gambling Act 2005

Notice is hereby given that:

Luxury Leisure

of the following address:

*Fifth Avenue Plaza
Queensway
Team Valley Trading Estate
Gateshead
Tyne and Wear*

Postcode: *NE11 0BL*

whose operating licence reference is *000-001876-N-103087-024*

has made an application for an *Adult Gaming Centre* premises licence.

The application relates to the following premises:

*Admiral
9-11 Park Street
Walsall
WS1 1LY*

The application for a premises licence has been made to the following licensing authority:

*Licensing Team
Walsall Council
Civic Centre
Darwall Street
Walsall*

Postcode: *WS1 1TP*

Website: www.walsall.gov.uk

Information about the application is available from the licensing authority, including the arrangements for viewing the details of the application.

The following person connected with the applicant is able to give further information about the application:

Elizabeth Speed: espeed@novomatic.co.uk

Any representations under section 161 of the Gambling Act 2005 must be made no later than the following date:

19/09/2022

Selected Location Types

Banks

Name: HSBC

Address: The Bridge, Walsall

Name: Halifax

Address: The Bridge, 6 Sister Dora Buildings, Walsall

Name: Nationwide Building Society

Address: 18 Bridge Street, Walsall

Name: Barclays Bank

Address: 20-22 Park Street, Walsall

Name: Lloyds Bank

Address: The Bridge, Walsall

Name: Santander

Address: 1 Park Street, Walsall

Name: NatWest

Address: 33 Park Street, Walsall

Name: Tesco Bank ATM
 Address: TESCO EXTRA, Littleton Street West, Walsall

 **Betting shops**

Name: Ladbrokes (custom)
 Address: 10-12 Bridge Street, undefined, WS1 1HP

Name: William Hill (custom)
 Address: 39 Bridge Street , undefined, WS1 1DP

Name: Betfred - Walsall (The Bridge)
 Address: 9, The Bridge, Walsall

Name: Paddy Power
 Address: 85 Bradford St, Walsall

 **Casino/AGC**

Name: Admiral (custom)
 Address: 9-11 Park Street, undefined, WS1 1LY

Name: Playland (custom)
 Address: Old Square Shopping Centre, undefined, WS1 1QU

Name: Pot Luck Gaming (custom)
Address: 6 Bridge Street , undefined, WS1 1HP

Name: Playland (custom)
Address: 1-4 Park Street Arcade, , undefined, WS1 1NJ

Name: Admiral Casino: Walsall
Address: 2a, Bradford Place, 3a Bradford Street, Walsall

Name: Buzz Bingo and Slots Room Walsall
Address: Jerome Retail Park, Midland Road, Walsall

Doctors Surgery

Name: Boots Opticians
Address: 58 Park Street, Walsall

Name: Dr F Mahmood - Mahmood & Verma
Address: 133 Hatherton Street, Walsall

Name: Dr S Ismail - Lichfield Street Surgery
Address: 19 Lichfield Street, Walsall

Name: Specsavers Opticians and Audiologists - Walsall

Address:	17 Park Street, Walsall
Name:	Amplifon
Address:	5, Bradford Mall, The Saddlers Shopping Centre, Walsall
Name:	Neat Feet
Address:	Unit 3 The Crossing At St Pauls, Darwall Street, Walsall
Name:	Boots Hearingcare
Address:	58 Park Street, Walsall
Name:	Boots hearingcare
Address:	1 Townend Street, Walsall
Name:	Dr A Alex - Walsall walk-in Health Centre
Address:	Market Square, Walsall
Name:	Dr S Hassan - Walsall walk-in Health Centre
Address:	Market Square, Walsall
Name:	Dr R Punati - Walsall walk-in Health Centre
Address:	Market Square, Walsall
Name:	Dr A Ukpong - Walsall walk-in Health Centre

Address: Market Square, Walsall

Name: Saddlers Health Centre

Address: 133 Hatherton Street, Walsall

Name: Lichfield Street Surgery

Address: 19 Lichfield Street, Walsall

Name: Dr N Ohri - Lichfield St Surgery

Address: 19 Lichfield Street, Walsall

Name: Dr M Stevens - Lichfield St Surgery

Address: 19 Lichfield Street, Walsall

Name: Dr R Hobson - Lichfield St Surgery

Address: 19 Lichfield Street, Walsall

Name: Dr T Lee - Lichfield St Surgery

Address: 19 Lichfield Street, Walsall

Name: Dr Cormac Denihan

Address: 19 Lichfield Street, Walsall

Drug and Alcohol Treatment facilities

Name: CGL-The Beacon Integrated Substance Misuse Service

Address: 67 Bradford St, Walsall

Name: T3 Young Persons Substance

Address: Jervis Court, 21 Dog Kennel Ln, Walsall

Name: Seasons Rehabilitation Centre

Address: Oak House, Lysways St, Walsall

Hostels

Nurseries

Name: St Matthews Little Monkeys

Address: 45 New St, Walsall

Name: Toddler Town Nursery @ Little Hooligans Soft play Centre

Address: 8a The Quarter, Lower Hall Ln, Walsall

Name: Grandma's House Childcare

Address: 206a, 208 Stafford St, Walsall

Name: Hideaway Day Nursery

Address: 25A Station St, Walsall

Name: Little Hooligans Soft Play Centre
Address: 8a, The Quarter, Lower Hall Ln, Walsall

 Pawn Shops

Name: H&T Pawnbrokers
Address: 8, The Bridge, Walsall

Name: Cash It
Address: 5 Bradford St, Walsall

Name: Cash Converters
Address: 84 Bradford St, Walsall

Name: Cash Generator Walsall
Address: 18 Bradford St, Walsall

 Payday Loan Shops

Name: Everyday Loans Walsall
Address: Fourth Floor, Townend House, Walsall

Name: Street UK Loans
Address: 28, Bradford Mall, Saddlers Centre, Walsall

Name: **Today's Solutions**
Address: **JJ, 52 SMITHBROOK KILNS CRANLEIGH GU6 8, Cranleigh**

Place of worship

Name: **Baitul Muqet Mosque Walsall**
Address: **22 Vicarage Place, Walsall**

Name: **The Crossing at St Pauls**
Address: **Darwall Street, Walsall**

Name: **Hatherton URC Church**
Address: **Hatherton Street, Walsall**

Name: **Saint Pauls Church**
Address: **Darwall Street, Walsall**

Name: **Walsall Community Church**
Address: **The Goldmine Center, 14A Lower Hall Lane, Walsall**

Name: **The Potters House Christian Centre, Walsall**
Address: **29-31, Next to NCP Car Park, Old Square, Freer Street, Walsall**

Name: **Bethel United Church Of Jesus Christ**

Address: Caldmore Road, Walsall

Name: Bath Street Centre

Address: 46 Bath Street, Walsall

Name: Walsall Independent Evangelical Church

Address: Bath Street Centre, Bath Street, Walsall

Pubs and Bars

Name: Walsall Brewers Fayre

Address: Waterfront, Wolverhampton Street, Walsall

Name: Revolution Vodka Bar

Address: Bridge House, 47-55 Bridge Street, Walsall

Name: Dream Blue Grill, Dessert & Shisha Lounge

Address: 40 Bradford Street, Walsall

Name: Manhattan's

Address: 133 Lichfield Street, Walsall

Name: Bella Italia - Walsall

Address: 6 Waterfront Way, Walsall

Name: Waterfront
Address: Waterfront North Leisure 4, Wolverhampton Street, Walsall

Name: The Black Country Arms
Address: Black Country Arms The Bridge, High Street, Walsall

Name: The Pitch Sports Bar & Grill
Address: 1, Bridge House, 47-55 Bridge Street, Walsall

Name: The Red Lion
Address: 69 Park Street, Walsall

Name: The Registry Walsall
Address: 23-29 Leicester Street, Walsall

Name: The Tap & Tanner
Address: Darwall Street, Walsall

Name: The Bridge
Address: 27 Bridge Street, Walsall

Name: St. Matthew's Hall
Address: Lichfield Street, Walsall

Name: Bar10
Address: 10 Wolverhampton Street, Walsall

Name: Specialist Real Ale Pub
Address: United Kingdom

Name: After Dark
Address: 42-46, 42-46 Bridge Street, Walsall

Name: The Lounge
Address: Freer Street, Walsall

Name: Oak Inn
Address: 336 Green Lane, Walsall

Name: modus vivendi bar
Address: 85 Bridge Street, Walsall

Name: Lexx Jerkz Bar & Grill
Address: 75 Bridge Street, Walsall

Name: Equator
Address: 132 Lichfield Street, Walsall

Name: The Flying Tiger bar
Address: 49 Bradford Street, Walsall

Name: The Builders Arms
Address: 3 Albert Street, Walsall

School

Name: Walsall Council School Admissions
Address: Civic Centre, 2nd Floor, Darwall Street, Walsall

Name: Second Chances School
Address: 33 Lower Hall Lane, Walsall

Name: Francis martyyn high school
Address: Bridle Court, 1-5 Hatherton Road, Walsall

Name: Toddler Town Nursery @ Little Hooligans Soft play Centre
Address: 8a The Quarter, Lower Hall Lane, Walsall

Name: Little Hooligans Soft Play Centre
Address: 8a, The Quarter, Lower Hall Lane, Walsall

Name: St Francisc college

Address:	Walsall
Name:	North Walsall primary school
Address:	Derby Street, Walsall
Name:	Dragon Football Academy
Address:	Walsall
Name:	Honeypot Nursary Walsall
Address:	Walsall
Name:	Walsall Studio School
Address:	The Goldmine Centre, 14a Lower Hall Lane, Walsall
Name:	The Ladder School
Address:	Millennium House, Lower Hall Lane, Walsall
Name:	methoDrum
Address:	Behind Fletchers Cake Studio, 233A Stafford Street, methoDrum
Name:	Walsall Whizz Kids Club
Address:	Caldmore Road, Walsall
Name:	Plumbing College

Address: 51 Goodall Street, Walsall

Name: One

Address: 73 Bridge Street, Walsall

Transport nodes

Name: Walsall

Address: United Kingdom

Name: Walsall railway station

Address: United Kingdom

Name: Hatherton Rd

Address: United Kingdom

Name: Saddlers Centre (Stop R)

Address: United Kingdom

Name: Saddlers Centre (Stop Q)

Address: United Kingdom

Name: Saddlers Centre (Stop S)

Address: United Kingdom

Name: Newport St (Stop V)
Address: United Kingdom

Name: Newport St (Stop W)
Address: United Kingdom

Name: Walsall
Address: Station Street, Walsall

Name: Newport St (Stop X)
Address: United Kingdom

Name: Hatherton Rd (Stop WD)
Address: United Kingdom

Name: The Wharf
Address: United Kingdom

Name: Hatherton Rd (Stop WE)
Address: United Kingdom

Name: Upper Bridge St
Address: United Kingdom

Name: Council Car Park
Address: United Kingdom

Name: Town Hall (Stop WH)
Address: Walsall

Name: Town Hall
Address: United Kingdom

Name: The Wharf
Address: United Kingdom

Name: Green Lane Council Car Park
Address: United Kingdom

Name: Walsall Town Hall (Stop WG)
Address: United Kingdom

Name: The Wharf
Address: United Kingdom

Name: The Prince
Address: United Kingdom

Name: The Prince
Address: United Kingdom

Name: Walsall Town Hall (Stop WF)
Address: United Kingdom

Name: Council Car Park
Address: United Kingdom

Name: Mews Shops
Address: United Kingdom

Name: Darwall St
Address: United Kingdom

Name: Dudley St
Address: United Kingdom

Name: The Prince
Address: United Kingdom

Name: Littleton St. Youth And Community Centre
Address: United Kingdom

Name: Queen St
Address: United Kingdom

Name: Queen St
Address: United Kingdom

Name: Queen St
Address: United Kingdom

Name: Watmos Homes
Address: United Kingdom

Name: Blue Lane West
Address: United Kingdom

Name: Blue Lane West
Address: United Kingdom

 Other

LCCP & Social Responsibility Policies & Processes

Version effective from 31st October 2021

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1

Introduction and Overview

Introduction

Luxury Leisure and RAL Ltd (hereafter 'the companies') operate Family Entertainment Centres and Bingo premises using a number of brands as well as Adult Gaming Centres and non-remote Casino's in Great Britain (GB) under the Admiral brand: Admiral Slots; and Admiral Casino.

Gambling in GB is governed by The Gambling Act 2005 and regulated by the Gambling Commission and its *Licence Conditions and Codes of Practice* (LCCP) which sets out mandatory rules and good practice for all operators. These fall into two broad categories, operating licence conditions and codes of practice provisions. The codes of practice are either ordinary code provisions or social responsibility code provisions, which have the same force as licence conditions.

This document sets out how we comply with the conditions of our licence's and the measures we employ to ensure that we operate in a way that complies with the relevant code provisions.

The Licensing Objectives

The foundation stone of the Gambling Act are the licensing objectives (below). These provide operators with three core principles with which to interpret the Act and to guide all gambling operations.

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.

Overview

Whilst gaming in an Admiral venue is intended to be a fun and enjoyable leisure experience, we recognise and embrace our responsibility to ensure that our customers are protected from the potential harms associated with problem gambling. To this end we employ a range of measures to prevent our customers suffering from gambling related harms and also signpost those whose gambling is having an adverse impact on other aspects of their life, to the best sources of help.

Safer gambling and our broader social responsibilities are at the heart of everything we do and we have in place policies and processes to ensure compliance with all of our regulatory obligations.

We ensure that safer gambling and our regulatory compliance as a whole is embedded vertically within the companies through process and culture. This starts with company directors as permanent members of the compliance review panel.

The companies make 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 ensure that our terms and practices are fair and transparent within the meaning of the Consumer Rights Act 2015.

Customer complaints 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.

We operate our business responsibly, with integrity and we have appropriate systems in place to deter and detect crime and disorder.

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 money lending.

Our gaming machines comply with the Gambling Commission's technical standards, displaying the applicable maximum stake and monetary prize levels, and the chances of winning. Gambling general terms and conditions are displayed.

It is prohibited to consume alcohol in our AGC and FEC premises, and we refuse entry to these premises to those apparently intoxicated.

We invest heavily in staff training and in particular are proud of our Admiral Academy eLearning facility.

Policies and Procedures

Compliance can only be achieved through clear policy and effective processes. To meet our regulatory obligations and to promote safer gambling we have policies and processes in particular relating to the following categories:

Operating Licence Conditions

- Personal licences
- Technical standards
- Money Laundering and Terrorist Financing
- Cash and cash equivalents & Provision of credit
- Information Requirements
- Access to Premises
- Fair and Open Practice

Codes of Practice

- Customer Interaction
- Combating Problem Gambling (Information on how to Gamble Responsibly and Help for Problem Gamblers)
- Self-Exclusion
- Advertising Standards and Marketing
- Complaints and Dispute Resolution
- Assessing Local Risk
- Access to Gambling by Children and Young Persons (Including Employment of Children and Young Persons)

Operating Licence Conditions



Personal Licences



Section 2.1 Overview

2.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to Licence condition 1.2 and the general suite of conditions attached to personal licences, ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

2.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licensed activities. The Companies strive to uphold the Licensing Objectives as set out in the Gambling Act 2005 and with particular relevance to this policy, that gambling is conducted in a fair and open way. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

2.1.3 Linked Documentation

Internal records are held relating to those company personnel who hold a personal licence as well as the licence holder themselves holding and managing the licence through the Gambling Commission eServices portal. This policy also forms part of the companies wider social responsibility policy and procedures document.

Section 2.2 Key Terms & Definitions

Personal management licence (PML) – It is a condition of our operating licences that individuals occupying certain management roles in connection with the licenced activity have a licence themselves authorising them to perform the functions of that office.

Specified management offices – The roles which are designated specified management offices are where the occupier is responsible for:

- Overall management and direction of the licensee's business or affairs.
- The licensee's finance function as head of that function.
- The licensee's gambling regulatory compliance function as head of that function.
- The licensee's marketing function as head of that function.
- The licensee's information technology function as head of that function in so far as it relates to gambling-related information technology and software.

- Oversight of the day to day management of the licensed activities at an identified number of premises or across an identified geographical area.
- In the case of casino and bingo licences only, oversight of the day to day management of a single set of premises.

Personal functional licence (PFL) – It is also a condition of our Casino operating licence that any individual performing one of a number of specified operational functions has a licence themselves authorising them to perform that function.

PFL operational functions – The roles for which a PFL is required are: a dealer in respect of casino games; cashier; inspector; security staff employed to watch gaming; and supervisor of gaming activities.

Section 2.3	Policy
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2.3.1 The companies recognise and acknowledge their obligations in respect of this condition of their operating licence.

2.3.2 The companies have designated a large number of roles within the organisation as requiring a personal licence in order to comply with this condition of our operating licences.

2.3.3 The following roles are required by the companies to hold a PML:

- Chief Executive Officer
- Chief Operating Officer
- Gaming and Service Director
- Head of Risk and Compliance
- Financial Controller
- Head of Marketing
- National IT & Systems Development Manager
- National Technical Services Manager
- Regional Operations Directors
- Regional Operations Managers
- Area Managers
- Casino General Manager
- Assistant Casino Managers
- Bingo Premises Managers

2.3.4 The Head of Risk and Compliance does not hold another specified management office position.

2.3.5 The following roles in our Casinos are required by the companies to hold a PFL:

- Cashier

- Pit boss
- Surveillance staff employed to watch gaming
- A dealer in respect of casino games

2.3.6 It is company policy that staff in our AGC Casino venues are prohibited from accepting tips and this includes licensed staff.

Section 2.4 Key processes

2.4.1 PML and PFL holders must confirm to the legal department that they have in place the relevant licence. Details of licences held by staff are held on the company HR management system and staff are reminded when their licence is due for renewal.

2.4.2 Our HR leavers process ensures that any person fulfilling a specified management position that leaves is flagged to the compliance department so that a key event can be reported, naming the new holder of the, role even if just in the interim, and so that it is submitted within 5 working days.

2.4.3 Personal licence holders manage their own licence renewal through the Gambling Commission's personal licence management portal but fees associated with their personal licence are reimbursed by the company.

Section 2.5 Training

2.5.1 All staff receive training relating to the licence conditions and codes of practice relevant to our licences during induction and also regular refresh training.

2.5.2 PML holders are also required to complete an additional training module specifically on the topic of their responsibilities as personal licence holders. This is delivered by the compliance team.

Section 2.6 Review

2.6.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

Technical Standards



Section 3.1 Overview

3.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to Licence conditions 2.1, 2.2, 2.3, 3.1 and SR code 9.1, ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

3.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licensed activities. The Companies strive to uphold the Licensing Objectives as set out in the Gambling Act 2005, and with particular relevance to this policy, ensuring that gambling is conducted in a fair and open way. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

3.1.3 Linked Documentation

- a. The Commissions gaming machine technical standards.
- b. The Commissions remote gambling and software technical standards.
- b. The Commissions specification for bingo equipment.
- c. The Commissions specifications for casino equipment.
- d. Commercial agreements with licensed suppliers of equipment and software.
- e. Minutes of quarterly compliance reviews at which technical compliance is monitored and reviewed.
- f. This policy also forms part of the companies wider social responsibility policy and procedures document.

Section 3.2 Key Terms & Definitions

Key equipment – Schedule R of a remote casino licence lists equipment the licensee is permitted to operate. This cannot be added to or moved to a different jurisdiction without an application to vary that detail.

Hosting – The provision of facilities for gambling in circumstances in which they do not contract directly with any of the participants using the facilities.

Section 3.3 Policy

3.3.1 The companies recognise and acknowledge their obligations in respect of these conditions of their operating licence.

3.3.2 The companies will put in place processes for effective monitoring and reporting of technical standards.

3.3.3 In respect of our remote-casino licence we will not add to or change the location of key equipment as set out in schedule R of our licence without first applying to vary that detail.

3.3.4 In respect of our remote-casino licence we will permit an enforcement officer, upon request, to inspect our key equipment and/or provide data held on such equipment.

3.3.5 The companies only use suppliers who hold the appropriate licences including gambling software operating licences where necessary.

3.3.6 The companies require the following roles hold a personal licence -

- Gaming and Service Director
- National IT and Systems Development Manager
- National Technical Services Manager

3.3.7 The companies will comply with the Commissions specification for bingo equipment.

3.3.8 The companies will comply with the Commissions specifications for casino equipment.

3.3.9 Where the Companies host facilities for gambling, they have in place clear arrangements to allocate and handle complaints and where necessary share data in order to ensure they discharge their obligations regarding: the prevention of money laundering; the investigation of cheating; combating problem gambling; and the investigation of customer complaints.

3.3.10 The Gaming and Service Department will comply with the Testing strategy for compliance with remote gambling and software technical standards, ensuring that the products have the required certification.

3.3.11 The Gaming and Service Department will comply with all Gaming Machine Technical Standards.

3.3.12 The Gaming and Service Department will ensure all Gaming Machines comply to all technical standards. Gaming Machines will be supplied by a licensed manufacturer.

3.3.13 The Gaming and Service Department will ensure all Gaming Software complies to all technical standards. Gaming Machines will be supplied by a licensed manufacturer.

Section 3.4 Key processes

3.4.1 Metrics relevant to technical standards are included in our compliance review framework and therefore reported to board members on a quarterly basis as a minimum.

3.4.2 The Gaming and Service Director reports into board members on technical standards through a monthly board report and quarterly through the compliance review framework.

Section 3.5 Training

3.5.1 All staff receive training relating to the licence conditions and codes of practice relevant to our licences during induction and also regular refresh training.

3.5.2 PML holders are also required to complete an additional training module specifically on the topic of their responsibilities as personal licence holders. This is delivered by the compliance team.

3.5.3 The Gaming and Service Department are trained to a high standard using all available means including manufacturer support. Contractual agreements with manufacturers or suppliers will in all cases include a level of support.

Section 6 Review

3.6.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

4

Cash and Cash Equivalents & Provision of Credit

Section 4.1 Overview

4.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to Licence conditions 5.1 and 6.1, ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within the GB.

4.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licensed activities. The Companies strive to uphold the Licensing Objectives as set out in the Gambling Act 2005, and with particular relevance to this policy, preventing gambling from becoming a source of crime or disorder, being associated with crime or disorder or being used to support crime. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

4.1.3 Linked Documentation

- a. The prevention of money laundering and combating the financing of terrorism (Guidance for remote and non-remote casinos).
- b. Duties and responsibilities under the Proceeds of Crime Act.
- c. The Money Laundering Regulations.
- d. The companies' processes relating to PDQs.

Section 4.2 Key Terms & Definitions

TITO – Ticket In Ticket Out, this is a system that allows customers to transfer credit between machines and cash out by redeeming at a single point rather than move cash around the premises.

PDQ – Stands for Process Data Quickly. A PDQ machine is also sometimes referred to as a Point of Sale (POS) terminal or card reader, but most commonly as a card machine. It allows businesses to take customer card payments for their goods or services quickly and easily.

ATM – Stands for Automated Teller Machine. These are electronic banking outlets that allow basic banking transactions such as cash withdrawals.

Section 4.3 Policy

4.3.1 The companies recognise and acknowledge their obligations in respect of these conditions of their operating licence.

4.3.2 The companies will put in place processes for effective monitoring of its payment methods.

4.3.3. The companies use cash, certain electronic payments (BACS and CHAPS) and cheques to make and receive commercial payments.

4.3.4 In our venues we accept and pay out in cash. Where we accept debit card payments via a PDQ, they are for the purchase of machine play through a (TITO) ticket only.

4.3.5 Where a debit card is used to purchase machine play or to buy in for gaming at the cash desk, any winnings are directed back to the originating debit card belonging to the customer. Only personal debit cards will be accepted, and not company debit cards.

4.3.6 Cheques, bankers' drafts or digital currencies are not accepted as payment from customers.

4.3.7. We do NOT provide customers with credit in any format.

4.3.8. We do NOT participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

4.3.9 Staff are trained to monitor for and deter any systematic of commercial money lending between customers.

4.3.10 Anyone suspected of systematic or commercial money lending will be banned.

Section 4.4 Key processes

4.4.1 The companies are members of the Bank of England bank note checking scheme.

4.4.2 All of our premises use counterfeit note checking technologies.

4.4.3 Where we use PDQ machines to allow electronic payments, the facility to use credit cards is disabled.

4.4.4 Where we have ATM facilities, they do not accept credit cards.

4.4.5 All transactions are monitored by the cash team for anomalies to our policy. These transactions are escalated to the Financial Controller and Head of Risk and Compliance for investigation.

Section 4.5 Training

4.5.1 All staff receive training relating to the licence conditions and codes of practice relevant to our licences during induction and also regular refresh training.

4.5.2 PML holders are also required to complete an additional training module specifically on the topic of their responsibilities as personal licence holders. This is delivered by the compliance team.

4.5.3 All staff receive training on money laundering and its relevance to their role, including bank note checking and how to operate the PDQ terminal.

Section 4.6 Review

4.6.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

Fair and Open Practice



Section 5.1 Overview

5.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to Licence Condition 7.1 and also the Codes contained under section 4.1 and 4.2, ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

5.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licenced activities. The Companies strive to uphold the Licensing Objectives as set out in The Gambling Act 2005 and with particular relevance to this policy, ensuring gambling is conducted in a fair and open way. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

5.1.3 Linked Documentation

- a. Complaints and Dispute Resolution policy.
- b. Customer interaction policy. Self-exclusion policy.
- c. Self-exclusion policy.

Section 5.2 Key Terms and Definitions

Consumer Rights Act 2015 – Legislation designed to safeguard the rights of consumers and ensure they can see redress if the terms or contract upon which they were provided goods or services were unfair or no transparent.

Section 5.3 Policy

5.3.1 The companies recognise and acknowledge their obligations in respect of the licence condition and codes of practice associated with their operating licence.

5.3.2 The companies have in place policies and processes to ensure that the terms and associated practices on which they offer gambling are fair and transparent.

5.3.3 We offer gambling on terms that are fair within the meaning of the Consumers Right Act 2015.

5.3.4 Notices relating to the terms on which gambling is offered are displayed in our venues and are available for customers to take away. This includes leaflets on how to play the games, any game variants and the house edge.

5.3.5 In our casino premises we display the rules of each type of casino game available, including details of game variants and side bets, a players guide to the house edge and a guide to the rules of equal chance games where they are made available.

5.3.6 In our bingo premises, we display rules about each type of bingo variant available and also rules about prize bingo.

5.3.7 In our casino premises we have procedures in place to ensure the proper supervision of gaming tables, where they are available, by an appropriate member of staff as well as full audio and CCTV records.

Section 5.4 **Key processes**

5.4.1 Notices are displayed in our venues setting out the terms on which gambling is offered.

5.4.2 Leaflets containing the terms on which gambling is offered are available for customers to take away.

5.4.3 The terms on which promotions are offered are contained on our website and made available in our premises on request.

5.4.4 The machines available to play in our premises display the terms and conditions upon which they are operated including, guides on how to play and the average percentage the machine performs to. In our Casino premises this includes electronic gaming terminals as well as slot machines.

Section 5.5 **Training**

5.5.1 Staff receive specific training on induction and regular refresh training including the requirements of these codes.

5.5.2 Staff training is delivered through the Admiral Academy eLearning platform, as well as periodic face to face sessions delivered by the compliance team and managers.

Section 5.6

Review

5.6.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

Money Laundering and Terrorist Financing



Section 6.1

Overview

6.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to Money Laundering and Terrorist Financing, ensuring that they fulfil their legislative and regulatory obligations under the Proceeds of Crime Act 2002 (POCA), the Terrorism Act 2000 (TACT) and the Gambling Commissions Licence Conditions and Codes of Practice (LCCP) in particular in respect of Licence conditions 12.1 and 15.2 as well as code provision 2.1.

The Company also acts in accordance with the following guidance from the Commission: *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding Casino operators; Money laundering and terrorist financing risk within the British gambling industry; The Prevention of Money Laundering and Combating the Financing of Terrorism – Guidance for remote and non-remote casinos*; as well as HM Treasury's, *The Money Laundering and Terrorist Financing Regulations*. We also have regard for HM Treasury's *National Risk Assessment of Money Laundering and Terrorist Financing* and The Gambling Commissions *The money laundering and terrorist financing risks within the British gambling industry*.

The Companies operate land based Adult Gaming Centre's, Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

6.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licensed activities. The Companies strive to uphold the Licensing Objectives as set out in The Gambling Act 2005 and with particular relevance to this policy, to prevent gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

6.1.3 Linked Documentation

- a. Money Laundering Risk Assessment.
- b. Customer Interaction policy.
- c. Combating Problem Gambling policy.
- d. Assessing Local Risk policy.
- e. Access to Premises policy.
- f. Information Requirements policy.
- g. Cash and Cash Equivalents policy.

Section 6.2

Key Terms & Definitions

6.2.1 Money laundering is the process by which the proceeds gained from criminal activity are made to appear to have a legitimate origin.

Proceeds of crime is a term given to the money or assets gained by criminals during the course of their criminal activity. *Money laundering* is where the proceeds of crime are converted into assets (usually cash) which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises and thus support what can be referred to as a *Criminal Lifestyle*.

6.2.2 Some of the common terms used in relation to money laundering and therefore in this and associated documents are defined below.

Criminal Property – Anything derived from criminal conduct.

Criminal Conduct – All conduct which is an offence in GB.

Criminal Lifestyle – Calculation of benefit accrued by a defendant.

Criminal Spend – Is a term commonly used when a criminal uses the proceeds of crime in their daily life, not to disguise its origin but to pay for goods, services or entertainment.

Suspicious Activity – This is difficult to define as it could be manifested in such a broad number of ways, but in the AGC sector in particular but also in casinos, this equates largely to the behaviour of our customers in relation to the environment in which they play and also changes in that behaviour. If a member of staff identifies behaviour which is unusual in that environment or changes in a customer's a behaviour and suspects that it could be a sign of MLTF then this would be suspicious activity in this context. In a casino premises suspicious activity can be more closely tracked and identified through the casino management system whereby mandatory limits or markers can be applied that may indicate a suspicious pattern of play on electronic casino games or machines.

Whether a person holds a suspicion or not is a subjective test. If a person thinks a transaction is suspicious, they are not required to know the exact nature of the criminal offence or that particular funds are definitely those arising from the crime.

Knowledge and Suspicion – In the context of POCA, knowledge means *actual* knowledge. Having knowledge means actually knowing something to be true. There is no requirement for the suspicion to be clear or firmly based on specific facts, but there must exist a degree of satisfaction, not necessarily amounting to belief, but at least extending beyond mere speculation, that an event has occurred or not.

AML – Anti-money laundering, measures to identify and prevent money laundering.

FATF – The Financial Action Task Force (FATF) is the inter-governmental body responsible for setting the international standards for anti-money laundering (AML)

MLRO – Money Laundering Reporting Officer.

Threshold – The point at which customers must be identified by the operator and their identity verified. This is set at €2000 by the 4th AMLD and is interpreted as £1500 sterling in the UK and is further explained below.

‘Threshold approach for tokens’ - In non-remote casinos the threshold for identification and verification is when a customer purchases from or exchanges with the casino tokens for use in gambling with a value of €2000 (£1500) or more.

‘Threshold approach for gaming machines’ - In non-remote casinos the threshold for identification and verification is when a customer pays €2000 (£1500) or more for the use of gaming machines or collects winnings amounting to €2000 (£1500) or more.

CDD – Customer Due Diligence. This a term used to describe the process of completing checks on a customer in order to asses any risk of money laundering or terrorist financing.

EDD – In certain circumstances Casino operators must apply additional due diligence measures.

6.2.3 The FATF issue recommendations and essential measures member countries should implement. The Money Laundering Regulations are the UK’s response to the recommendations and implement them in UK law. The UK legislations, POCA and TACT set out money laundering offences.

6.2.4 Sophisticated money laundering typically has three stages –

Placement – Criminal puts or places their assets/cash into the financial sector.

Layering – Criminal moves their assets/cash around either via accounts or products, institutions or jurisdictions. Potentially numerous times.

Integration – Final stage where criminal decides to move assets/cash back into the mainstream system believing them to be clean.

6.2.5 In the gambling industry, non-remote casinos and AGCs are vulnerable to cash-based methods of money laundering. The risk of money laundering is of simple methods such as the straightforward exchange of stolen cash for ‘clean’ cash using a simple and demonstrable transaction.

Money laundering in the form of criminal spend may have fewer, if any, of the stages associated with classic money laundering and is more difficult to identify.

Section 6.3 Principal Offences

6.3.1 The Proceeds of Crime Act 2002 (POCA) creates a number of offences related to money laundering. Some of the principal offences in the context of gambling are listed below.

- Sec 327 – Concealing criminal property
- Sec 328 – Arrangements to do the above
- Sec 329 – Acquisition, Use and Possession of criminal property
- Sec 330 – Failure to disclose: regulated sector
- Sec 332 – Failure to disclose: other nominated officers
- Sec 342 – Prejudicing an investigation (Tipping Off)

6.3.2 In relation to the Companies' staff there are a number of statutory defences to these offences if they have made an authorised disclosure to a relevant authority such as the nominated officer, the police or HM Customs.

6.3.3 The Terrorism Act 2000 (TACT) establishes a number of offences concerned with engaging in or facilitating terrorism that apply directly to money laundering activity for that purpose.

Section 6.4 Policy

6.4.1 The Companies adopt a risk-based approach to Money Laundering and Terrorist Financing.

6.4.2 The Companies have conducted an assessment of the risks of the businesses we operate being used for money laundering and terrorist financing. The risk assessment is kept under review and updated as appropriate.

6.4.3 The Companies have in place policies and processes to identify the risk of money laundering and measures to mitigate those risks.

6.4.4 In respect of our casino premises, we act in accordance with the Commission's guidance 'The Prevention of Money Laundering and Combating the Financing of Terrorism – Guidance for remote and non-remote casinos'.

Section 6.5 Roles & Responsibilities

6.5.1 The Companies recognise the Gambling Commission as the supervisory authority and will cooperate with them in order for them to meet their regulatory duties.

6.5.2 The Companies nominated officer has oversight for all of the businesses, not only the casino premises. They are responsible for ensuring that there is appropriate and relevant training for staff. This a responsibility shared with the Companies National Learning and Development department.

The nominated officer is also responsible for ensuring there is an appropriate and effective reporting structure for *suspicious activity*, for receiving these reports or 'internal disclosures' and completing Suspicious Activity Reports (SARs) to the National Crime Agency (NCA) where necessary.

The nominated officer has sufficient seniority and autonomy to make decisions independent of operational concerns. They can report directly into the board and the NCA unhindered by interference.

It is the sole responsibility of the nominated officer to make the decision as to whether a disclosure is reported or otherwise. The nominated officer will keep such records as are required concerning the decisions they make. This is referred to as a 'disclosure and decision register'.

6.5.3 All staff have a responsibility to report suspicious activity if they know or suspect it to be money laundering. By making such internal disclosures to the nominated officer the responsibilities of staff are straightforward as the sole responsibility as to whether to report or not to the NCA lies with the nominated officer and all other staff may rely on a statutory defence to the principal money laundering offences.

6.5.4 Anti-Money Laundering as a discipline sits within the Companies Risk and Compliance department. The nominated officer is currently a role fulfilled by the Head of Risk and Compliance.

6.5.5 The Company has a deputy MLRO who can receive internal disclosures and complete SARs to the NCA in the absence of the nominated officer. This is currently the National Security Manager.

Section 6.6 Governance

6.6.1 The nominated officer reports directly to the Companies CEO and board of directors.

6.6.2 When a SAR is completed it is reported to the directors on the same day that the report is submitted.

6.6.3 A detailed analysis of disclosures and SARs is considered as part of the companies' compliance review framework where the company directors are presented with all compliance events data and a full analysis.

6.6.4 Each SAR is a 'key event' as per Licence condition 15.2.1.24 and it is the responsibility of the nominated officer to ensure that the Gambling Commission are notified of the key event by reporting it via the commission's online eService's portal.

Section 6.7 Risk Assessment

6.7.1 In compliance with Licence Condition 12.1.1 the companies have conducted an assessment of the risk of money laundering and terrorist financing associated with our operation. The risk assessment is subject to ongoing review and also reviewed as a minimum every 12 months.

6.7.2 In conducting the assessment, the Company have considered the Commissions guidance on risk assessments for operators, *Money laundering and terrorist financing risk within the British gambling Industry* as well as HM Treasury's *National Risk Assessment of Money Laundering and Terrorist Financing 2017*.

In the Treasury's National Risk Assessment, the risk of both money laundering and terrorist financing in the gambling sector overall was assessed as **low** (13.2. pg76).

The same assessment identified the main risks as: negligent gambling operators allowing money laundering in the sector through poor compliance with the Money Laundering Regulations 2017 and POCA; criminals gaining control of a licensed gambling business and using it as a cover for money laundering; the sector's exposure to criminals' lifestyle spending; criminals using products and services to store and move the proceeds of crime; and cash transactions by anonymous customers.

The Commissions own risk assessment – The money laundering and terrorist financing risks within the British gambling industry – currently assesses the risk for non-remote Casinos as **High**, Bingo non-remote as **Medium**, AGCs as **Medium** and FECs as **Low**.

The implication of these risk assessments considered together is that the Companies operate businesses with High, Medium and Low risk of money laundering and terrorist financing in an overall low risk sector.

6.7.3 For consistency, the companies have opted to use the same methodology adopted by the Gambling Commission and based on the Financial Action Task Force (FATF)

methodology to assess the risks specific to its operation. Specifically, the risk assessment matrix and the definitions of the five ratings.

6.7.4 By assessing the likelihood of the identified risk occurring and also the impact should it occur (combined they are the assessment stage), followed by consideration of the measures to mitigate, an overall risk rating is achieved for each identified risk.

The key stages in our methodology for dealing with the risk of money laundering and terrorist financing are -

Identification – Through KYC, using well trained staff and data systems to identify patterns of play that may indicate money laundering.

Assessment – The Companies have adopted the risk assessment model recommended and used by the FATF.

Management – A range of measures are employed to manage the risk of money laundering across our premises types.

Evaluation – The money laundering and terrorist financing risk matrix employed by the FATF is used to produce risk ratings as part of our overall assessment.

The measures employed to mitigate the risk of money laundering and terrorist financing as well as the controls set out within the Companies' policy and processes are proportionate to the level of risk.

Section 6.8 Key Controls & Processes

AGC/Bingo

6.8.1 In respect of the arcade sector, the primary method of risk identification is staff '*know your customer*' (KYC). Staff are trained and required to be alert to behaviours that may indicate money laundering or terrorist financing (or indeed problem gambling).

6.8.2 We monitor our highest spending customers through this staff KYC to identify those customers and then monitor their behaviour for changes.

6.8.3 There is a process for disclosures to be made to the nominated officer (MLRO). The process is trained to all staff and can be found on the companies' intranet site.

6.8.4 A number of technical controls are also implemented using the companies' bespoke data management system as well as data management systems of products we offer whose data primarily exists on their own network. These technical controls

can identify and flag certain patterns of play that may be indicative of money laundering or terrorist financing.

Casino

6.8.5 The casino management system is a more sophisticated data capture and analysis tool than that used or available in the AGC/bingo sector and allows for real time monitoring of machine and electronic roulette data.

6.8.6 Customer profiles record the establishment of a business relationship with a customer, the monitoring of those relationships and any termination. Customer risk is also assessed, and each customer profile has a risk rating.

6.8.7 Our casino staff receive enhanced training, including on the topic of money laundering and terrorist financing.

6.8.8 Notwithstanding any events identified that need intervention, the data from our casino management system is interrogated daily and reviewed weekly at formal meetings between managers from both operations and the compliance department.

As a minimum, the following are reviewed: -

- All safer gambling conversations (SGC's)
- All interactions
- All customers who have reached the threshold for verification of identity
- All customers subject to CDD
- All customers subject to EDD
- All customers identified as 'high spend customers'

6.8.9 Once a customer reaches the €2000 (£1500) threshold of spend/loss they are required to be identified. In order to identify and verify the identity of a customer we may request an acceptable form of ID or other documents but also use an electronic verification provider. This tool can also provide information on adverse media, sanctions lists and Politically Exposed Persons (PEP) and so provide an initial screening of that customer.

6.8.10 Customer due diligence (CDD) is applied in the following circumstances: -

- Where ML/TF is suspected
- Where there is doubt about the veracity or adequacy of documents or information previously obtained for the purpose of identification or verification
- Where there is any transaction that amounts to €2000 (or a sterling equivalent, set at £1500)
- Where we become aware of a change in a customer's circumstances relevant to the risk assessment

Customer due diligence is aided by the use of an electronic verification provider.

6.8.11 Enhanced due diligence is applied in accordance with the Gambling Commission's guidance, *The prevention of money laundering and combating the*

financing of terrorism, Guidance for remote and non-remote casinos. EDD is applied at the following thresholds: any single transaction of over £1,500; any cumulative transactions in a single identifiable session of play of over £5,000 or in a 24-hour period; or any rolling annual transactions of over £15,000.

6.8.12 Records are maintained of all CDD and EDD.

6.8.13 In respect of our relationships with business partners, all of the individuals or companies we have commercial business relationships with are screened using the electronic screening tool.

6.8.14 The nominated officer maintains an internal 'disclosure and decision register' to record internal disclosures made and the outcome.

Section 6.9 Training & Education

6.9.1 Staff receive specific training on induction and regular refresh training including on the requirements of the relevant licence condition and codes.

6.9.2 Staff training on induction is delivered through the Admiral Academy eLearning platform, as well as face to face training with an experienced member of staff or manager using a series of workbooks. Refresh training modules are completed via the Admiral Academy and there are periodic face to face sessions delivered by the compliance team and managers.

6.9.3 Training relating to MLTF is included in the SR core modules completed by all staff. There is also a refresh training module that all staff are required to complete.

9.4 Casino staff are trained in the topics prescribed in the money laundering regulations.

Section 6.10 Review

6.10.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

Access to Premises



Section 7.1 Overview

7.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to Licence condition 14.1.1 and Code provision 1.1 ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

7.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licensed activities. The Companies strive to uphold the Licensing Objectives as set out in the Gambling Act 2005, and with particular relevance to this policy, that gambling is conducted in a fair and open way. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

7.1.3 Linked Documentation

Materials used for training on the companies Admiral Academy for the proper training of staff in this licence obligation as well as elements of the companies *Security Manual* relating to the identification of visitors and allowing access to secure parts of the premises such as a venue office. This policy also forms part of the companies wider social responsibility policy and procedures document.

Section 7.2 Key Terms & Definitions

Enforcement officers – Can be employees of the Gambling Commission designated as enforcement officers or could also be persons appointed by the Commission as enforcement officers for the purposes of the Gambling Act 2005.

Authorised persons – There are a number of other persons who are authorised by the 2005 Act to access our premises and these include a constable, an inspector appointed under the Health and Safety at Work etc Act 1974 and an inspector appointed under the Fire Precautions Act 1971 but most commonly, an officer of the local licensing authority.

Compliance – A constable, enforcement officer or authorised person may access our premises for the purpose of assessing compliance and/or assessing whether an offence is being committed by virtue of the Act.

Section 7.3 Policy

7.3.1 The companies recognise and acknowledge their obligations in respect of this condition of their operating licence.

7.3.2 Our staff will at all times cooperate and facilitate constables, enforcement officers and authorised persons in the proper performance of their compliance functions, including the right of entry to the premises.

7.3.3 We will assist a constable, enforcement officer or authorised person by answering any question, providing any record requested (in copy) and allowing inspection of any part of the premises or any machine on the premises.

7.3.4 The companies seek to always operate in a way that does not put the licensing objectives at risk.

7.3.5 We work with The Commission in an open and cooperative way.

Section 7.4 Key processes

7.4.1 Effective staff training is fundamental to ensuring that compliance visits are handled in accordance with the conditions of our licence and therefore lawfully.

7.4.2 In terms of overall compliance, it is imperative that the companies have in place, effective policies and processes to ensure compliance with its legal and regulatory obligations.

7.4.3 There is an internal notification process when a visit by a constable, enforcement officer or authorised person is commenced to ensure the proper supervision of that visit and therefore our compliance with the requirements.

Section 7.5 Training

7.5.1 Staff receive specific training on induction and regular refresh training including the requirements of this licence condition.

7.5.2 Staff training is delivered through the Admiral Academy eLearning platform, as well as periodic face to face sessions delivered by the compliance team and managers.

Section 7.6

Review

7.6.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

Information Requirements



Section 8.1 Overview

8.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to all of the Licence conditions under section 15 and the codes of practice under 8, ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within the GB.

8.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licensed activities. The Companies strive to uphold the Licensing Objectives as set out in the Gambling Act 2005, all three having relevance to this particular policy. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

8.1.3 Linked Documentation

- a. Key events and LCCP notifications reports on the Gambling Commissions eServices portal.
- b. AML disclosure and decision register held by the Head of Risk and Compliance.
- c. The key events register held by the Head of Risk and Compliance.
- d. The companies' policy on complaints and dispute resolution.
- e. Documentation and records relating to the companies' compliance review framework and regulatory returns process.
- f. This policy also forms part of the companies wider social responsibility policy and procedures document.
- g. Regulatory Returns.

Section 8.2 Key Terms & Definitions

Reporting suspicion of offences – The companies must report anything which may relate to a commission of an offence under the Gambling Act 2005 or a breach of a licence condition or a social responsibility code provision.

Reporting key events – A key event is an event that could have significant impact on the nature or structure of a licensee's business including those specified under the following headings: operator status; relevant persons and positions; financial events; legal or regulatory proceedings or reports; and gambling facilities.

Other reportable events – These include the outcome of a dispute that was referred to alternative dispute resolution (ADR), any outcome adverse to the licensee in any proceedings taken against them in relation to a gambling transaction and also some events relating to group companies who are not licensed by the Gambling Commission advertising remote gambling in certain jurisdictions.

General and regulatory returns – On request licensees must provide the Commission with information they may require in relation to the use made of facilities provided in accordance with the licence, including in particular information about the numbers of people making use of the facility, the range of gambling activity and the licensees policy's in relation to safer gambling. In any event within 28 days of the end of each quarter if submitting quarterly returns or within 42 days of the end of each annual period if submitting annual returns.

Section 8.3 Policy

8.3.1 The companies recognise and acknowledge their obligations in respect of this condition of their operating licence and the applicable codes of practice.

8.3.2 The companies seek to always operate in a way that does not put the licensing objectives at risk.

8.3.3 We work with The Commission in an open and cooperative way.

8.3.4 The companies will put in place procedures for effective monitoring and reporting of relevant events.

8.3.5 Qualifying events will be reported within 5 working days of the company becoming aware of the events occurrence.

8.3.6 The companies will report qualifying events relating to disputes resolved by ADR, any adverse outcomes from proceedings taken against them in relation to a gambling transaction and any instances of advertising as described in condition 15.2.2 (1.c).

8.3.7 The companies will submit such information as the commission require when it is requested.

8.3.8 For AGC premises, a Regulatory Return will be submitted within 42 days of the end of each annual period. (It is of note that the companies collect, analyse and review the returns data on a quarterly basis through its compliance review framework but submits its Regulatory Return to the commission annually).

8.3.9 For Casino premises a Regulatory Return is completed quarterly and submitted within 28 days of the end of the period.

We will report other matters which may have a material impact on our business or affect compliance and respond to the Commissions requests in a manner or at a time that they may from time to time specify.

8.3.10 The companies will ensure that there are at least two individuals who can access the Commissions eServices portal in order to submit reports to comply with the information requirements and Regulatory Returns.

Section 8.4 Key processes

8.4.1 A disclosure and decision register is maintained in relation to Money Laundering and Terrorist Financing (MLTF) in order to monitor and record the completion of Suspicious Activity Reports (SARs).

8.4.2 A key event register is maintained to monitor and record all events that are considered as qualifying as a reportable event.

8.4.3 The companies use a 'compliance review framework' which involves the collection, analysis and review of a broad range of compliance data, including but not limited to information that the Commission may require.

8.4.4 The compliance review framework is founded on quarterly reviews whereby senior figures from all support departments as well as operations review and are held accountable by board members.

Section 8.5 Training

8.5.1 All staff receive training relating to the licence conditions and codes of practice relevant to our licences during induction and also regular refresh training.

8.5.2 PML holders are also required to complete an additional training module specifically on the topic of their responsibilities as personal licence holders. This is delivered by the compliance team.

Section 8.6 Review

8.6.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

Codes of Practice



Combating Problem Gambling

(Information on How to Gamble
Responsibly and Help for Problem
Gamblers)



Section 9.1

Overview

9.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to the Codes of Practice under 3.1, 3.3, and 7.1 ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP). The company's procedures relating to combating problem gambling through providing information on how to gamble responsibly, signposts to sources of help for problem gamblers as well as the gambling management tools we offer are designed to be in keeping with the regulator's guidance.

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

9.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licenced activities. The Companies strive to uphold the Licensing Objectives as set out in The Gambling Act 2005 and with particular relevance to this policy, ensuring gambling is conducted in a fair and open way and also protecting children and the vulnerable being harmed or exploited from gambling. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

9.1.3 Linked Documentation

- a. Customer Interaction policy.
- b. Self-exclusion policy.

Section 9.2

Key Terms and Definitions

Problem Gambling – Problem gambling' means gambling to a degree that compromises, disrupts or damages family, personal or recreational pursuits. (The Gambling Commission Statistics and research release 'Problem gambling vs gambling-related harms).

Gambling-Related Harms – Gambling-related harms are the adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society. These harms impact on people's resources, relationships and health. (The Gambling Commission Statistics and research release 'Problem gambling vs gambling-related harms).

GamCare – A charity that provides information, advice and support for anyone affected by gambling harms. They operate the National Gambling Helpline.

BeGambleAware – Provides information, advice and directs people to support in order to keep people safe from gambling harms. It is administered and funded by **GambleAware**, an independent charity who commission research to promote prevention and treatment services relating to gambling harms.

Gamblewise - This is an 'app' based gambling management tool that uses iBeacon technology to allow customers to manage their gambling behaviour via an app on their mobile device. Users can manage their time and spend using the facilities on the app and even elect not to attend on selected days or times. The beacon detects the presence of the device and reminds both the user and the venue staff of the users' restrictions. It is provided to our customers free of charge.

Section 9.3 Policy

9.3.1 The companies recognise and acknowledge their obligations in respect of the applicable codes of practice associated with their operating licence.

9.3.2 The companies have in place policies and processes to promote safer gambling.

9.3.3 We make an annual financial contribution to those approved by the Gambling Commission who deliver or support research into the prevention and treatment of gambling related harms, harm prevention approaches and the treatment of those harmed by gambling.

9.3.4 Information on how to gamble responsibly and how to access information and help in respect of responsible gambling is made readily available in our venues, on our marketing materials and website.

9.3.5 In our premise's, information is available in all areas where gambling facilities are provided and where applicable is adjacent to ATMs. In addition, in our casino premises it is provided on reception and at the cash desk.

9.3.6 Information is provided using posters, machine stickers and digital messaging as appropriate to the size and layout of the premises and through the use of leaflets and QR codes is available in a format that can be taken away, discreetly if necessary.

9.3.7 Responsible gambling information is available in our venues in a wide range of foreign languages.

9.3.8 We provide information about the gambling management tools we offer. (This is also covered in our customer interaction policy but also here for completeness).

9.3.9 We train and inform our staff of advice on socially responsible gambling and provide a service for them where they can seek confidential advice about problem gambling should they suffer from gambling related harms.

9.3.10 The companies will help and support staff who are suffering from gambling related harms. All employees have access to a Health Assured scheme which is paid for by the company. They can obtain a range of advice on specific topics including gambling related harms.

9.3.11 We will ensure that our processes relating to customer interaction, information about safer gambling for our customers, the gambling management tools we offer, and our self-exclusion processes provide a substantive framework for player protection.

Section 9.4	Key processes
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9.4.1 The company makes responsible gambling information readily available through ‘Stay In Control’ leaflets and posters as well as through advertising GamCare and BeGambleAware on digital screens, marketing materials and machine stickers.

9.4.2 Staff and their families are prohibited from playing in our venues. This is formalised in the terms and conditions of employment of all staff.

9.4.3 The companies provide a health service for all employees which includes confidential help and advice for gambling related problems.

9.4.4 In all of our premises we use the following methods and advise to provide our customers with appropriate tools to manage their gambling.

- To visit less often.
- To shorten their periods of play.
- To take a ‘time out’ from visiting our premises.
- To play a lesser category of slot machine.
- Utilise the Gamblewise app to manage their time and location with regards to gambling.
- Machine limit setting.
- Self-exclusion (see section 12).

Gamblewise is a gambling management tool that we offer to our customers for free. It is operated through an app available for customers to download onto their mobile device and use to manage their time spent gambling. They can set themselves limits as to where and when they wish to gamble. The settings in the app and the location of the phone will then be used to remind them of their chosen limits and encourage them to plan and reflect on their time spent gambling in our venues.

The Gamblewise system will also notify staff via a manager’s app on the venue tablet if someone enters a venue at a time when they have previously chosen not to. This will then instigate an interaction. Customers will not be asked to leave the venue but will be reminded by staff that they have set a limit on the app that they are not adhering to and advised to reflect on this before commencing play. These interactions are

recorded as appropriate to the premises type and accompanied by signposts to sources of help through staff providing a 'Stay in Control' leaflet or pointing out where information relating to sources of help is available in the venue.

Section 9.5 Training

9.5.1 Staff receive specific training on induction and regular refresh training including the requirements of these codes.

9.5.2 Staff training is delivered through the Admiral Academy eLearning platform, as well as periodic face to face sessions delivered by the compliance team and managers.

Section 9.6 Review

9.6.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

Access to Gambling by Children and Young Persons

(Including Employment of Children and
Young Persons)

Section 10.1 Overview

10.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to the Codes contained under 3.2 and 3.6, ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

10.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licenced activities. The Companies strive to uphold the Licensing Objectives as set out in The Gambling Act 2005 and with particular relevance to this policy, protecting children and the vulnerable from being harmed or exploited from gambling. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

10.1.3 Linked Documentation

- a. Fair and Open Practice policy.
- b. Assessing Local Risk policy.

Section 10.2 Key Terms and Definitions

Child – A person under the age of 16 years old.

Young person – A person who is 16 or 17 years old.

Adult gaming area – An area within a Family Entertainment Centre (FEC) premises, entry to which is restricted by age to those over 18 years old because of the gambling activity available in that area.

Test Purchase – Often also referred to as Age Verification (AV) testing, this term is used to refer to the process employed by an independent external body we instruct to test the implementation of our age verification processes.

Section 10.3 Policy

10.3.1 The companies recognise and acknowledge their obligations in respect of these codes of practice relating to children and young persons.

10.3.2 The companies have in place policies and processes designed to prevent underage gambling and monitor the effectiveness of these.

10.3.3 Our procedures include, for AGCs, FECs with adult gaming areas, and bingo, those for checking the age of those apparently underage, removing those who appear underage and who cannot produce a suitable form of identification to verify their age and taking action when there are repeated attempts by young persons to enter. In order to achieve this, we operate a 'Think 25' Policy at all of our venues so that anyone who appears to be under the age of 25 is challenged to verify their age by producing identification.

10.3.4 At our casino premises we designate a supervisor for each entrance. The role of the supervisor includes, verifying a customer's age with an acceptable form of identification should they appear to be under 25, refusing entry to those who cannot upon request verify their age and taking steps should someone repeatedly attempt to enter who has been refused entry or is clearly underage.

The supervisor is responsible for compliance with the applicable codes relating to access.

10.3.5. In all of our premises our policies and processes take account of the structure and layout of the premises.

10.3.6 In our casino and AGC premises, we do not deliberately provide facilities for gambling in such a way as to appeal to children or young persons.

10.3.7 We refuse service in our Casinos, bingo, FEC adult gaming areas and AGCs where an adult is accompanied by a child or young person and they are required to leave the premises. We do not allow adults to play in our premises where they have left a child or young person outside of the premises to wait for them.

10.3.8 The Company will consider a permanent ban from the premises of an adult who on more than one occasion or who knowingly or recklessly brings a child into our premises.

10.3.9 We only accept identification that contains a photograph and from which the individual can be identified, states the date of birth, is valid and is legible and shows no evidence of tampering or being counterfeit.

10.3.10 The only acceptable forms of identification are those carrying a PASS logo such as a Citizencard, a military identification card, a driver's licence photocard, passport or European national identity card.

10.3.11 We employ independent test purchasing operations for age verification processes in all of our age restricted premises.

10.3.12 It is a matter of gross misconduct to allow entry to our AGCs, Adult Gaming Area(s), bingo or casino premises (knowingly or otherwise) to a person who appears to be under 25 and who cannot provide satisfactory proof of age, which may lead to dismissal. This includes test purchase visitors.

10.3.13 It is a matter of gross misconduct for a member of staff to knowingly allow entry by any person who is under the age of 18 years to our AGCs, Adult Gaming Area(s), bingo or casino premises, which may lead to dismissal. This includes children in the company of an adult such as babies in prams or buggies etc.

10.3.14 All staff are expected to uphold the licensing objectives and in doing so it is expected that, regardless of their role or whether they are off duty, if a staff member is on one of our premises they take appropriate action to prevent children or young persons from entering the premises and gambling.

10.3.15 We do not employ anyone under the age of 18 years old in any capacity in any of our premises.

Section 10.4 Key processes

10.4.1 We display clear and prominent signage at all of our premises where entry is restricted by age.

10.4.2 The companies operate a 'Think 25' policy, so that anyone who appears to be under 25 is required to verify their age.

10.4.3 All attempts to enter our premises where a person is asked to verify their age by presenting identification are recorded on a log.

10.4.4 We employ an independent company to conduct test purchasing operations in our AGC premises and participate in the scheme offered by the BGC in our casino premises, in order to provide reasonable assurance that our policies and procedures to prevent underage gambling are effective, in particular Think 25.

Failed test purchase visits are reported to the local licensing authority and also the Gambling Commission and the venue retested within a month of the failed test date.

All premises are tested at least twice in a rolling 12-month period and some venues such as adult gaming areas within an FEC or premises in a traditional 'seaside' location are tested more often and particularly in the lead up to school holiday periods.

Test visits are conducted in the evening and at night where we operate later opening times.

10.4.5 The Companies take a firm stance on failed AV test purchase visits and so the process is underpinned by a robust investigatory process and stringent disciplinary framework.

10.4.6 Where it is appropriate and necessary to do so the Companies invest in technology to help in its efforts to prevent underage gambling, such as the deployment of a notification system that uses CCTV cameras and video analytics to inform staff when someone has moved into an adult gaming area from an FEC.

10.4.7 Staff conducting interviews for employees must see proof of age before an interview can commence in order to ensure the Companies do not employ anyone under the age of 18 years old. Furthermore, a new employee cannot start until their right to work and age have been confirmed and proof uploaded onto the Companies HR system.

Section 10.5 Training

10.5.1 Staff receive specific training on induction and regular refresh training including on the requirements of this code.

10.5.2 Staff training on induction is delivered through the Admiral Academy eLearning platform, as well as face to face training with an experienced member of staff or manager using a series of workbooks. Refresh training modules are completed via on the Admiral Academy and there are periodic face to face sessions delivered by the compliance team and managers.

10.5.3 Core SR modules and refresher modules include the legal requirement to return stake and not pay prizes to underage customers.

10.5.4 All staff complete an eLearning module on Child Sexual Exploitation (CSE).

Section 10.6 Review

10.6.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

Self-Exclusion



Section 11.1 Overview

11.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to the applicable Codes of Practice under 3.5 ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

11.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licenced activities. The Companies strive to uphold the Licensing Objectives as set out in The Gambling Act 2005 and with particular relevance to this policy, to protecting children and the vulnerable being harmed or exploited from gambling. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

11.1.3 Linked Documentation

- a. Data protection policy.
- b. Customer interaction policy.
- c. User guides relating to the self-exclusion systems in each of the AGC, Bingo and Casino sectors.

Section 11.2 Key Terms & Definitions

Self-exclusion – A customer-led arrangement whereby they ask a gambling provider to exclude them from using the facilities they provide for gambling for a period of time, usually between 6 and 12 months.

Multi Operator Self-Exclusion Scheme (MOSES) – Operators within a sector of gambling contribute to and support schemes that provide customers with the ability to self-exclude from facilities for gambling provided by other licensed operators in the local area.

Self-Enrolment National Self-Exclusion (SENSE) – Non-remote casino operators all participate in the national self-exclusion scheme administered by the Betting and Gaming Council, which excludes customers from all casinos in Great Britain for a minimum of six months.

Section 11.3 Policy

11.3.1 The companies recognise and acknowledge their obligations in respect of the codes of practice relating to self-exclusion.

11.3.2 The companies have in place policies and processes to promote safer gambling and provide tools, including self-exclusion, to allow our customers to manage their gambling but self-exclusion should be seen as last resort. It is our position that it is entirely more desirable that customers do not reach the position where they are suffering from gambling related harms so that the only option is to stop altogether. We do not take this position from a commercial perspective but from a social responsibility perspective. Our customer interaction processes allied with the gambling management tools we offer are designed to arrest any descent towards behaviour that causes harms.

11.3.3 We take reasonable steps to prevent those who have self-excluded from participating in gambling.

11.3.4 We take all reasonable steps to prevent marketing materials being sent to self-excluded customers and also to remove their details from any marketing databases used by group companies.

11.3.5 When self-excluding, a customer is required to show suitable identification and provide a photograph of sufficient quality that it can be used to identify them should they try and re-enter. If a customer will not provide such a photograph they cannot self-exclude.

They must also provide a signature acknowledging the terms of the agreement between the customer and the companies.

All customers who self-exclude are recorded on a company register as well as the national databases for the AGC MOSES schemes and SENSE in relation to casinos.

11.3.6 Our staff are trained in self-exclusion and in particular they understand that any self-excluded customer found in our premises must be removed.

11.3.7 All customers who self-exclude can do so without entering our premises, are spoken to discreetly and in private where they wish and are signposted to sources of help at that point as well as having previously been so during any interaction that may have preceded the self-exclusion.

11.3.8 Customers who self-exclude are offered the opportunity to also exclude from other premises operated by the companies in the customers local area and are encouraged to exclude from other types of gambling. They are provided with a helpful information leaflet explaining how they can do this.

11.3.9 All of the self-exclusion agreements we make with our customers are for a minimum of 6 months and for no more than 12 months at a time. They can be extended by one or more period of 6 months at a time.

11.3.10 A customer who wishes to self-exclude immediately can do so. However, if they wish to speak with a more senior and experienced member of staff about their gambling, they can arrange a meeting with the Area Manager or consult other sources of help first (such as discuss with problem gambling groups) and complete the self-exclusion at a later time.

11.3.11 When a self-exclusion agreement period ends it is automatically extended for 6 months if the customer does not take positive action to return to gambling.

If a self-excluded customer takes positive action to return to gambling within the 6-month period after the expiry of the exclusion, then we enforce a cooling off period of at least 24 hours. Although there is no requirement to do so we also enforce a 24-hour cooling off period for every customer that returns to gambling even if they return beyond the 6 months at the end of the exclusion period. Clearly this is subject to us being able to identify them as returning from a self-exclusion.

11.3.12 In order to identify someone who breaches their self-exclusion Staff are required to check the MOSES or SENSE (as appropriate to the premises) system gallery of current self-excluded customers at least once per week and the duty manager is required to check the gallery at the start of every shift.

11.3.13 When a customer self-excludes, we will permanently suppress their details on our marketing database as soon as practicable and in any event within two days of completing the self-exclusion agreement.

11.3.14 We offer customers with whom we enter into a self-exclusion agreement, the opportunity to exclude from facilities for the same type of gambling offered in the locality by other operators through participating in Multi Operator Self-Exclusion Schemes (MOSES) available to the sectors in which we operate.

11.3.15 Where a customer self-excludes on three or more separate occasions, they will automatically be banned from our venues for life (or a minimum period of 10 years).

Section 11.4 Key processes

11.4.1 When a customer requests that we prevent them from gambling using the facilities we provide, the customer and the duty manager (the most senior person on duty is in effect the duty manager and is the appointed person for this purpose) will formally document the request by completing a self-exclusion request form. (This can be a paper form but also by entering the customer details directly into the MOSES system as applicable).

11.4.2 The companies participate in the MOSES systems appropriate to the premises they operate, the BACTA scheme for AGCs, the Bingo Association SMART exclusion in their Bingo premises and the SENSE (Self enrolment national self-exclusion scheme) system in their casino premises.

11.4.3 When a customer requests to self-exclude there must always be an accompanying customer interaction record. (Please see the Customer Interaction Policy and associated training and guidance). A customer interaction relating to a request by the customer to self-exclude or on the basis of concerns held by members of staff monitoring a customer, should always include discussion of the available gambling management tools and the duty manager providing the customer with information on how to find sources of help and support.

11.4.4 Once it is established between the customer and the staff member conducting the interaction that self-exclusion is the best option for the customer to manage their gambling behaviour, the terms and conditions applicable to the scheme must be explained clearly. A copy of the terms and conditions will be signed by the excluder as acknowledgement of understanding.

11.4.5 A customer can self-exclude immediately, subject to verifying their identity, allowing staff to photograph their face and agreeing to it being shared on the appropriate MOSES system so that the exclusion can be enforced by staff at relevant premises.

Photo identification and a signature of the customer are required for self-exclusion agreements except where an alternative means of identification is at least as effective. Photographs should be taken using the tablet device wherever possible. The image of the person should be of the shoulders upwards to include a clear picture of the face with a plain background where possible.

If a customer becomes abusive or is aggressive, regardless of their distress, our staff reserve the right to ask them to complete the self-exclusion process at a later time. This does not have to be at one of our premises but allows for the duty manager to consider the risks and plan accordingly.

11.4.6 If the customer is not known to staff in any way or there is any doubt about the identity of someone requesting to self-exclude, suitable photographic identification is required before the self-exclusion can be processed.

11.4.7 In addition to the record the self-exclusion on the applicable MOSES system, it is also recorded in either the customer interaction and self-exclusion file in AGCs and Bingo premises or on the customers profile on the casino management system.

11.4.8 Customers may not revoke a self-exclusion during the exclusion period. They will be refused entry to our venues and prevented from gambling by our staff. Members of staff are trained to be alert to self-excluded customers attempting to breach

agreements and also to beware of the possibility that they may enlist another person to gamble on their behalf.

11.4.9 Where the customer requests to self-exclude from other premises operated by The Companies outside of the local area, we will try to facilitate this request, but it is subject to the limits of the applicable system. The duty manager must contact the Compliance team to establish what extended area of exclusion can be set for the customer in the particular circumstances. On the SENSE system, national self-exclusions are entered automatically.

11.4.10 Customer data relating to self-exclusion is handled in line with The Companies Data Protection Policy. Records held on the applicable MOSES system remain on the database for the duration of the self-exclusion period plus an additional 6 months unless extended at the request of the customer. After that period the data is automatically deleted by the system.

11.4.11 The names of customers who have self-excluded along with the dates of the exclusion period and the primary venue they excluded from are retained on a central record in the compliance department for up to 10 years so that a customer's behaviour over a longer period can be monitored, especially in relation to multiple self-exclusions.

11.4.12 Where a customer is excluded by the Companies in their own interest because of concerns over the harms they may be suffering because of their gambling behaviour, the data is retained for a period of 10 years. The most common example of this is where a customer is self-excluded on 3 separate occasions, it is our policy to ban them from our premises for life. In order to enforce this then we must retain their personal data. (See part 6 below).

Section 11.5 Return to gambling

11.5.1 A customer must take positive action in order to return to gambling after the end of a self-exclusion period.

11.5.2 If the customer takes positive action within 6 months of the end of the period then they must serve a 24 hour 'cooling off' period.

If the customer returns after the end of the 6 month period we still enforce a cooling off period if we are able to identify that the customer has returned from a self-exclusion. This is usually as a result of the staff recognising the returning customer or if the customer makes it known to staff that they are returning after a period of self-exclusion.

11.5.3 A 'return to gambling' meeting is held with the venue (or duty) manager so that they can a) check that they have considered their decision and the implications of a return, and b) to explain and implement the 'cooling off' period.

11.5.4 In addition we discuss with the customer, using the gambling management tools available, to stage their return and avoid a resumption of harmful play.

11.5.5 This is recorded in the customer interaction and self-exclusion file for AGCs and bingo premises or the customer profile on the casino management system. If the customer interaction and self-exclusion file for that customer has been archived, then a new interaction is logged. The applicable MOSES system is also updated if the return is within the 6 months of the expiration of the exclusion and therefore still on the system.

Section 11.6 Company imposed exclusions

11.6.1 There are occasions, although rare, when it is clear that a customer's gambling behaviour is harmful and either they don't recognise it or don't wish to deal with it. One such circumstance is when a customer repeats a cycle of gambling then self-exclusion.

11.6.2 The companies can and will impose bans on these customers to permanently exclude them in their own best interests. For example, once a customer self-excludes for the third time it is our position that this is an indication that they cannot control their gambling sufficiently and so in the best interests of the customer we ban them from gambling in any of our premises for life (minimum period of 10 years).

11.6.3 These imposed exclusions are not catered for on the sector MOSES systems and so are managed by an internal process.

Section 11.7 Cross sector exclusions

11.7.1 The requirement of SR code 3.5.6 is only that licensees, in respect of those with whom they have a self-exclusion agreement, must offer the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies only. This means that there are sector specific MOSES schemes that do not cater for cross sector self-exclusions.

11.7.2 If a customer self-excludes from an AGC or bingo premises and there are casino premises operated by the companies in the locality we will automatically ensure that they are also excluded from those casinos.

11.7.3 If a customer self-excludes from a casino premises then we will not automatically exclude them from AGC and Bingo premises so that they may opt to play a lesser category of machine as a means of managing their gambling behaviour. This is discussed and agreed with the customer.

11.7.4 All customers who self-exclude are given an information leaflet containing details of how they can exclude from other gambling sectors to the one they have entered into the agreement with.

Section 11.8 Training

11.8.1 Staff receive specific training on induction and regular refresh training including the requirements of these codes.

11.8.2 Staff training is delivered through the Admiral Academy eLearning platform, as well as periodic face to face sessions delivered by the compliance team and managers.

Section 11.9 Review

11.9.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

Customer Interaction



Section 12.1 Overview

12.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to the Codes of Practice under 3.3 and 3.4, ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP). Also, the Gambling Commission formal guidance note relating to code 3.4.1 provides a framework, through outlining its expectations of operators, so that they may fulfil their obligations with regards to customer interactions. The company's procedures relating to customer interactions are designed to be in keeping with the regulator's guidance.

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

12.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licensed activities. The Companies strive to uphold the Licensing Objectives as set out in The Gambling Act 2005 and with particular relevance to this policy, ensuring gambling is conducted in a fair and open way and also protecting children and vulnerable people from being harmed or exploited by gambling. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

12.1.3 Linked Documentation

- a. The company's overall social responsibility policies and procedures document.
- b. Customer Interaction: formal guidance for premises-based operators. (Formal guidance under 3.4.1)
- c. Self-exclusion policy.
- d. Casino operating procedures
- e. MLTF policy.
- f. MLTF risk assessment.

Section 12.2 Key Terms and Definitions

Gamblewise – This is an 'app' based gambling management tool that uses iBeacon technology to allow customers to manage their gambling behaviour via an app on their mobile device. Users can manage their time and spend using the facilities on the app and even elect not to attend on elected days or times. The beacon detects the presence of the device and reminds both the user and the venue staff of the users' restrictions. It is provided to our customers free of charge.

Vulnerable people - The Gambling Act requires that we safeguard the interests of vulnerable people as well as young people from being harmed by gambling. Vulnerable people are not defined by the Act or the LCCP but the Commission says the following in its guidance for local authorities,

The Commission does not seek to define 'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.

The companies' position on this is to adopt a broad definition of vulnerability. For example, someone could be considered to be vulnerable for the following reasons:

- Suffered a recent bereavement
- Mental health problems
- Long-term or terminal illness
- Dementia or brain injury
- Difficulty in communicating, for example reading or speaking on the phone
- Learning disability
- Relationship breakdown
- Addiction

This list is **not** exhaustive, and there are many other reasons why someone could be considered to be vulnerable. Vulnerability may also be temporary.

Section 12.3	Policy
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12.3.1 The companies recognise and acknowledge their obligations in respect of the applicable codes of practice associated with their operating licence.

12.3.2 The companies will put into place systems for effective customer interaction so as to minimize the risk of customers experiencing harms associated with gambling.

12.3.3 We will implement the guidance set out in the Commissions formal guidance on customer interaction for premises-based operators so that we will **Identify** customers who are at risk, **Interact** with them to reduce the risk of suffering harms and **Evaluate** the outcome.

12.3.4 We will use the latest technologies to assist us identify and record our interactions.

12.3.5 We will monitor a range of appropriate indicators in order to identify customers who may be experiencing harms.

12.3.6 We offer a range of gambling management tools to our customers. (This is also covered in our combating problem gambling policy but also here for completeness).

12.3.7 We will ensure that our processes relating to customer interaction, information about safer gambling for our customers, the gambling management tools we offer, and our self-exclusion processes provide a substantive framework for player protection.

Section 12.4	Key processes
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12.4.1 In all of our venues, whether AGC, Bingo or Casino, we adopt the guidance from the Commission and implement a framework to Identify, Interact and Evaluate. The main difference in the processes that follow from this are based on the amount of information we know about the customer.

12.4.2 Identify

In our AGC and Bingo premises, where no membership or customer details (other than verification of age where it is not clear) are required by the operator in order to play, the primary indicator likely to alert staff to customers potentially suffering or at risk from suffering gambling related harm, is their behaviour and changes in it. This can be used with observations about the amount of, or changes in the amount of time they spend gambling. Such observations may also be used by staff in conjunction with knowledge of the machine category being played or any anecdotal information known to staff about the habits or background of a customer, in order to inform a judgement about whether they should interact with that customer.

If a member of staff has concerns that a customer's behaviour may indicate problems related to their gambling, the venue manager is to be informed at the earliest available

opportunity. Indicative behaviour may include, but is not limited to, signs of distress, agitation, aggression, intense mood swings, hysteria or remorse. All staff are trained to recognise such behavioural indicators, and which may further manifest themselves in the following ways:

- Chasing losses
- Paranoia that games are fixed
- Complaining of money difficulties
- Arguing with staff over losses or repeatedly asking for promotions
- Rude or aggressive behaviour
- Frequently spends all the money they have brought with them
- Tries to borrow money from staff or customers
- Repeated trips to ATMs either in the venue or externally
- Repeated requests to withdraw cash via the venue PDQ
- Assaults on staff
- Damage to machines or other property

As a minimum such behaviours should be recorded as observations in an interaction log and the most senior person on duty informed.

We do not and cannot currently monitor a customer's spend through our data management system used in our AGCs and Bingo premises, primarily because the data is anonymous because it is not associated with a customer through any electronic or automated means.

In our Casino premises, although membership is not required, many of our customers are signed up to a loyalty scheme which identifies their play to our casino management system. This system allows us to tag and more effectively monitor play than in an AGC for example and therefore more indicators are available to our staff such as spend as well as frequency and length of play. This information will be used to automatically flag when agreed triggers are met, and to mark customers' profiles as 'Action on Entry' to initiate an interaction on their next visit.

Our Casino staff are trained to observe and recognise the same behavioural indicators listed above and to interact with customers as appropriate. They also have access to additional data which can be used in conjunction with these observations to inform decisions about customer interactions. This data can be in relation to a player's level of spend for example and also information about how a player deals with limit setting.

12.4.3 Interact

An effective interaction has three parts. Observation, Action and Outcome. An initial interaction could well be the Observation of behaviour. For instance, a member of staff identifies a change in the behaviour of a customer, either throughout their period of play or over time if they are a more regular customer.

AGC/Bingo

Having made this **Observation**, they then make a first entry on the Customer Interaction Log.

If the behaviour continues then a second entry may be required to record that the change in behaviour was more than fleeting. In an AGC or Bingo premises a 'Customer Interaction & Self Exclusion file' is then opened and the initial entry copied across before the second observation is recorded thus creating a single record for this customer.

Venue managers (and duty managers of any rank) are designated persons for the purpose of customer interaction, and it is their responsibility for making the decision as to whether there should be contact with the customer to prompt them to think about their gambling (**Action**) such as speaking with the customer. If there is any doubt, then an area manager or a member of staff from the compliance department should be consulted on the telephone.

In an AGC or Bingo premises an **Outcome** should be recorded on the 'Customer Interaction & Self Exclusion file'.

Casino

In a Casino, having made an initial **Observation**, this is recorded on the customer profile on the casino management system.

If the behaviour continues then a second entry on the customer profile may be required to record that the change in behaviour was more than fleeting.

The duty PML holder or supervisor on the premises, are designated persons for the purpose of customer interaction, and it is their responsibility for making the decision as to whether there should be an **Action** such as speaking with the customer.

Notwithstanding any initial urgent action taken to deal with the customer's behaviour by any member of staff, the venue manager (or most senior member of staff on duty - AGC) or the duty PML holder or supervisor (Casino) is required to record what has or is to happen next as an **Outcome** of this interaction. This could range from continuing to observe the customer's behaviour to speaking to them about gambling management tools such as 'Gamblewise' to signposting them to sources of help. It is essential that details of any conversations are recorded on the customer profile, including advice given and actions agreed by the customer.

In a casino premises there is a breakout area for customers to take a break and reflect or they can serve as a quiet and discreet area for interactions by staff.

In a casino an **Outcome** should be recorded in the customer profile on the casino management system.

Staff should not tolerate any form of abusive or anti-social behaviour during an interaction with a customer. This policy and associated procedures are consistent with and implemented with due regard to the company's duty in respect of the health and safety of members of staff.

12.4.4 Evaluate

By maintaining individual logs for customers in our AGC and Bingo premises and customer profiles in our Casino premises, we are able to monitor behaviour and the effectiveness of our controls over time.

Each log is specific to the customer, meaning that all future interactions at a venue relating to that customer are stored in a single record allowing us to understand the impact of an interaction. This is further underpinned by the company's compliance review framework whereby all compliance data, including interactions are reviewed by board members and stakeholders from the senior management team.

The data from our casino management system is interrogated daily and reviewed weekly at formal meetings between managers from both operations and the compliance department. As a minimum, the following are reviewed: -

- All interactions
- All customers who have reached the threshold for verification of identity
- All customers subject to CDD
- All customers subject to EDD
- All customers identified as 'high spend customers'

Section 12.5 High Spend Customers

AGC/Bingo

12.5.1 In our AGC and Bingo premises we identify our top spending customers using the knowledge of our venue staff. Each venue then produces a list of either their top 5, 10 or 20 highest spending customers according to the model below.

Small venue – with average weekly income of under £10k = Top 5

Medium venue – with average weekly income of under £20k = Top 10

Large venue – with average weekly income of over £20k = Top 20

12.5.2 In order to monitor these customers there is an arbitrary reporting model whereby the venue manager reports any changes in the behaviour of those customers each week. In order to identify changes in behaviour, and therefore a potential indication of gambling related harm, we must first benchmark the customers behaviour. We achieve this by asking the following questions about each of the customers in the list.

What is their typical stake?

How long is their typical session?

How many visits per week?

Other known factors about the customer?

Each customer on this 'High Spend Log' is then given a pseudonym, as their true identity may not be known to us.

12.5.3 The customer is then monitored through a process whereby the venue manager comments on each customer on the 'High Spend Log' once per week, noting any changes in behaviour and adding any commentary as required.

12.5.4 Any changes in behaviour are then evaluated by the venue manager to determine if and what kind of interaction is required. If necessary, the venue manager can consult with their operational seniors or members of the compliance department.

Casino

12.5.5 In our casino premises, although membership is not required, our staff encourage everyone entering the premises to register as a member of the rewards scheme, collecting basic information and verifying ID at that point. If a customer declines to give personal information they are still reminded of the threshold requirement. The casino management system also allows us to tag players and create customer profiles in circumstances where they decline personal information.

12.5.6 We consider a high spend customer in a casino premises as a customer who conducts any single transaction of over £10,000; any cumulative transactions in a single identifiable session of play of over £10,000; or any monthly cumulative transactions of over £50,000.

These customer profiles are monitored and reviewed at the weekly casino compliance meetings. Interactions with these customers are recorded on their profile.

Section 12.6 Gambling Management Tools

12.6.1 In all of our premises we use the following methods and advice to provide our customers with appropriate tools to manage their gambling.

- To visit less often.
- To shorten their periods of play.
- To take a 'time out' from visiting our premises.
- To play a lesser category of slot machine.
- Utilise the Gamblewise app to manage their time and location with regards to gambling.
- Machine limit setting.
- Self-exclusion (see section 12).

12.6.2 Gamblewise is a gambling management tool that we offer to our customers for free. It is operated through an app available for customers to download onto their mobile device and use to manage their time spent gambling. They can set themselves limits as to where and when they wish to gamble. The settings in the app and the location of the phone will then be used to remind them of their chosen limits and encourage them to plan and reflect on their time spent gambling in our venues.

The Gamblewise system will also notify staff via a manager's app on the venue tablet if someone enters a venue at a time when they have previously chosen not to. This will then instigate an interaction. Customers will not be asked to leave the venue but will be reminded by staff that they have set a limit on the app that they are not adhering to and advised to reflect on this before commencing play. These interactions are recorded as appropriate to the premises type and accompanied by signposts to

sources of help through staff providing a 'Stay in Control' leaflet or pointing out where information relating to sources of help is available in the venue.

Section 12.7 Training

12.7.1 Staff receive specific training on induction and regular refresh training including the requirements of these codes.

12.7.2 Staff training is delivered through the Admiral Academy eLearning platform, as well as periodic face to face sessions delivered by the compliance team and managers.

Section 12.8 Review

12.8.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

Advertising Standards and Marketing



Section 13.1 Overview

13.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to Licence condition 16.1 and the codes of practice at 5.1, ensuring that they fulfil their regulatory obligations under the Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's, Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

13.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licensed activities. The Companies strive to uphold the Licensing Objectives as set out in the Gambling Act 2005, and with particular relevance to this policy, the protection of children and the vulnerable being harmed or exploited from gambling. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

13.1.3 Linked Documentation

- a. UK Advertising Codes: the CAP code, including Direct and Promotional Marketing; and the BCAP code.
- b. Gambling industry code for socially responsible gambling.
- c. Company data protection policies, records of data processing activity and records of customer consents.

Section 13.2 Key Terms & Definitions

The Committee of Advertising Practice (CAP) – Adverts in the UK are regulated through a system of both self-regulation and co-regulation. Through CAP, members of the advertising industry advise and guide as well as inform the Advertising Codes (The CAP Code).

The Broadcast Committee of Advertising Practice (BCAP) – This is a part of CAP and advises on and informs the UK Code of Broadcast Advertising. (The BCAP Code).

The Advertising Standards Authority (ASA) – ASA (the sister organisation of CAP) is the UK's independent regulator of advertising across all media. They have a contract with the communications regulator OFCOM to regulate day to day TV and radio advertising (co-regulation).

Section 13.3 Policy

13.3.1 The companies recognise and acknowledge their obligations in respect of these conditions of their operating licence.

13.3.2 All advertising and marketing by the Companies is done so in a socially responsible manner and complies with the UK Advertising Codes issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) and administered by the Advertising Standards Authority (ASA).

13.3.3. The companies ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content and take all reasonable steps to ensure that third parties with whom we contract do not do so either.

13.3.4 The companies have in place procedures for effective monitoring of its advertising and marketing.

13.3.5 We ensure that our advertising and marketing is not appealing to children or young persons.

13.3.6 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.

13.3.7 The companies ensure that advertising contains nothing that is likely to lead people to adopt styles of gambling that are harmful, and that advertisements and promotions are socially responsible and do not encourage excessive gambling

13.3.8 We do not place advertising and marketing material on any primary web page/screen or micro-site that provides advice or information on responsible gambling

13.3.9 We ensure that people shown gambling in our advertising materials do not appear to be, and are not, under the age of 25 years old and all adverts carry appropriate messaging about responsible gambling and sources of help such as 'BeGambleAware'.

13.3.10 Any incentive or reward scheme is transparent and operated in a way designed so that neither the receipt nor the value or amount of the benefit is:

- a. dependent on or calculated by reference to the length of time for or the frequency with which the customer gambles or has at any time gambled; or
- b. dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency.

If the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases. Incentives and rewards are proportional to the type and level of the customer's gambling.

13.3.11 Where we serve alcoholic drinks for consumption on the premises they are never offered for free on terms which links the availability of such drinks to whether, or when, the customer begins, or continues to gamble. We do not make unsolicited offers of free alcoholic drinks for immediate consumption when a customer is participating in gambling activity.

13.3.12 In casinos, discounted refreshments, including alcoholic drinks for consumption on the premises, are only offered as part of a loyalty scheme and are conditional on membership of that scheme and not on whether, or when, the customer begins, or continues, to gamble.

Section 13.4 Key processes

13.4.1 The companies' marketing department utilise CAPs Copy Advice team.

13.4.2 Agencies used by the marketing department also adhere to the processes governing their activity such as Clearcast for broadcast advertising.

13.4.3 The Admiral marketing hub provides guidance for operational staff on marketing processes.

13.4.4 There are internal systems in place to ensure that advertising and marketing campaigns must be authorised through the marketing department to ensure compliance with the advertising codes and the LCCP.

13.4.5 A record is kept of authorities and sign off given by the Head of Marketing which are saved to internal files.

Section 13.5 Governance

13.5.1 Compliance in respect of advertising standards and marketing is reviewed as part of the companies' compliance review framework.

13.5.2 The Head of Marketing is a PML holder and reports directly into the companies' board members through monthly board reports and quarterly compliance reviews.

Section 13.6 Training

13.6.1 All staff receive training relating to the licence conditions and codes of practice relevant to our licences during induction and also regular refresh training.

13.6.2 PML holders are also required to complete an additional training module specifically on the topic of their responsibilities as personal licence holders. This is delivered by the compliance team.

13.6.3 Venue managers and above receive training in respect of the Advertising Codes.

Section 13.7 Review

13.7.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

Complaints and Dispute Resolution



Section 14.1 Overview

14.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to the Codes contained under 6.1, ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

14.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licenced activities. The Companies strive to uphold the Licensing Objectives as set out in The Gambling Act 2005 and with particular relevance to this policy, ensuring gambling is conducted in a fair and open way. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

14.1.3 Linked Documentation

- a. Fair and Open Practice policy.
- b. Customer interaction policy.
- c. Self-exclusion policy.
- d. Information Requirements policy.

Section 14.2 Key Terms and Definitions

Complaint – A complaint is defined as 'an expression of dissatisfaction, whether spoken or written, about any aspect of the way the licensee conducts their licensed activities. For example, a complaint:

- About the outcome of a gambling transaction
- About the way a gambling transaction has been managed
- That concerns the way the licence holder carries out its business in relation to the three licensing objectives

Customers may also complain about commercial matters, such as the quality of our facilities but these are not overseen by the Gambling Commission nor governed by the LCCP.

Dispute – 'Disputes' for the purposes of SR code provision 6.1.1 are those complaints that are about the customer's gambling transaction (including management of the

transaction) and have not been resolved at the first stage of the operator's complaints procedure. Disputes may include, for example, those linked to the application of bonus offers or to other terms and conditions, account management, or the ability to access funds and winnings.

Alternative Dispute Resolution (ADR) entity – a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015; and whose name appears on the list of providers that meet the Gambling Commission's additional standards found in *Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers*.

The approved ADR entity the Companies refer complainants to relating to their AGC and bingo premises is BACTA.

The approved ADR entity the Companies refer complainants to relating to their casino premises, is IBAS.

Section 14.3 Policy

14.3.1 The companies recognise and acknowledge their obligations in respect of this code of practice associated with their operating licence.

14.3.2 The companies have in place policies and processes for accepting and handling customer complaints and disputes in a timely, fair and transparent manner.

14.3.3 In our premises we make available information on our complaints policy and procedures. This is also available on our website and complaints can be made via the website.

14.3.4 We undertake to investigate and resolve complaints or refer to ADR within 15 working days but in any event within 8 weeks of receiving the complaint and where the customer has cooperated with the complaints process in a timely manner.

14.3.5 We maintain records of complaints, disputes and ADR outcomes and supply them to the Commission when requested in accordance with this code and also the licence conditions relating to information requirements.

14.3.6 The Companies will not accept a complaint from a customer who is abusive or violent. They will be offered the information leaflet on the complaints procedure and asked to leave. They can then make their complaint in writing, through email or via the website.

Section 14.4 Key processes

14.4.1 The Companies have a two stage complaints procedure.

Stage 1 (3 Parts)

Part 1 (Venue Manager VM) – The VM receives and investigates the complaint. If they are able to resolve the complaint at this stage, it goes no further but is recorded in the complaints log. (Complaints received by phone or email at head office or via the complaints form on the website are passed to the operational team to implement the same escalation procedure).

Part 2 (Area Manager AM) – If the VM is unable to resolve the complaint or the matters require a more in-depth investigation. The complaint is passed to the AM.

Part 3 (Regional Operations Manager ROM) – If the AM is unable to resolve the complaint, it is passed to the ROM. The outcome after part 3 will be the company's final position with regards to the complaint.

Stage 2

If at this stage the complaint is not resolved to the satisfaction of both parties, and it is within the scope of the ADR entity then the complainant is informed of their right to refer it to ADR directed towards the ADR entity whose full contact details are included on the complaints form.

14.4.2 The ADR will investigate the complaint and decide on an outcome within 60 days.

14.4.3 Data in relation to complaints is reviewed as part of the Companies compliance review framework.

Section 14.5 Training

14.5.1 Staff receive specific training on induction and regular refresh training including the requirements of this code.

14.5.2 Staff training is delivered through the Admiral Academy eLearning platform, as well as periodic face to face sessions delivered by the compliance team and managers.

Section 14.6

Review

14.6.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

Assessing Local Risk



Section 15.1 Overview

15.1.1 Scope of the policy

This policy sets out the framework for the Companies' governance of all matters relating to the Codes contained under 10.1, ensuring that they fulfil their regulatory obligations under the Gambling Commissions Licence Conditions and Codes of Practice (LCCP).

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs), Bingo premises and non-remote Casinos in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

15.1.2 Policy Statement

The Companies intend that they should always be compliant with all relevant laws and regulation governing their licenced activities. The Companies strive to uphold the Licensing Objectives as set out in The Gambling Act 2005 and with particular relevance to this policy, ensuring gambling is conducted in a fair and open way and also protecting children and the vulnerable being harmed or exploited from gambling. The measures set out in this policy and all associated documents are the plans by which it is intended that this compliance is achieved.

15.1.3 Linked Documentation

- a. Fair and Open Practice policy.
- b. Customer interaction policy.
- c. Self-exclusion policy.
- d. Information Requirements policy.
- e. Local Risk Assessment form.
- f. Risk maps.

Section 15.2 Key Terms and Definitions

Local Risk Assessment – A process to identify, assess and manage risk in accordance with the requirements of the codes of practice. The document used to record this is often referred to as an LRA.

Mapping Tool & Risk Maps – The Companies use a bespoke, open-source tool that assists with the identification of locations within the locality of our premises that may present a risk to the licensing objectives. The tool produces risk maps that accompany the local risk assessment.

Statement of policy/principles (under the Gambling Act 2005) – Local authorities are required to produce a statement of licensing policy (sometimes called a statement

of principles) relating to gambling. They must be considered in the assessment of local risk.

Section 15.3 Policy

15.3.1 The companies recognise and acknowledge their obligations in respect of this code of practice associated with their operating licence.

15.3.2 The companies have in place policies and processes for the assessment of local risk to the licensing objectives at each of their FEC, bingo, AGC and casino premises.

15.3.3 The local risk assessments are conducted by an Area Manager so that they are dealt with by someone with local knowledge but also a level of seniority.

15.3.4. We will use technologies, where available and as appropriate, to assist in the identification of local risks.

15.3.5 The local authority statement of policy is considered when conducting an assessment.

15.3.6 The local risk assessments are reviewed at least annually or in the event of significant changes at our premises or significant changes in the local circumstances.

15.3.7 A local risk assessment is reviewed if the Companies apply for a variation to their licence or a new risk assessment is completed if an application is made for a new licence.

15.3.8 We will implement processes to ensure that a local risk assessment document can be shared on request.

Section 15.4 Key processes

15.4.1 The risk assessment documents are stored at each venue along with its local risk map and the local authority's statement of policy.

15.4.2 A copy of all local risk assessments are stored digitally on a central 'Compliance' drive.

15.4.3 The companies have commissioned the development of a bespoke open-source tool that assists the assessment process by identifying places that may pose a risk to the licensing objectives because they are locations where vulnerable people might congregate for example.

15.4.4 Local risk assessments are completed by a local manager, usually the Area Manager, with assistance and support from the Compliance department.

15.4.5 A Venue Manager is required to notify the Area Manager and the Compliance department immediately if any significant changes occur in the locality to allow for the risk assessment to be updated.

Section 15.5 Training

15.5.1 Staff receive specific training on induction and regular refresh training including the requirements of this code.

15.5.2 Staff training is delivered through the Admiral Academy eLearning platform, as well as periodic face to face sessions delivered by the compliance team and managers.

15.5.3 Specific training on the requirements relating to local risk assessments is provided.

Section 15.6 Review

15.6.1 This policy is subject to ongoing review to ensure it remains appropriate, up to date and fit for purpose, based on regulatory updates and guidance, industry feedback and internal experience and learnings. It is reviewed as part of the compliance review framework at the quarterly meetings or as a minimum it is reviewed annually.

Access

Effective date	
Accessible to	
Location	

Approvals

Name	Signature	Title	Date	Version
Tom Allison		CEO		
Paul Hyman		COO		
Mark Thompson		Head of Risk & Compliance		

Version

Date	Summary of changes	Author
September 2021	New document	Mark Thompson



APPLICATION PROCESS



1.

Colleague meets the eligibility criteria and completes an application form, approved by manager



2.

Submissions made by the deadline (dates to be communicated)



3.

Admiral Professional Development Panel to review applications, ensuring consistency and fairness



4.

Course start dates confirmed for successful applicants



ADMIRAL PROFESSIONAL DEVELOPMENT PROGRAMME



ADMIRAL

WHAT IS THE ADMIRAL PROFESSIONAL DEVELOPMENT PROGRAMME?

The Admiral Professional Development Programme provides career progression by investing in the development of colleagues. Luxury Leisure Talarius are working with an external training provider to deliver nationally recognised training programmes. These training programmes are available to support both colleagues starting their Admiral career and colleagues looking to further develop in their current role.

LEADERSHIP CAREER DEVELOPMENT PATHWAY

UPPER MANAGEMENT TIER 2

LEVEL 5 OPERATIONAL LEADERSHIP & MANAGEMENT

For colleagues who manage teams and projects in line with organisation's operational strategy.

24 months*

- English and Maths

MIDDLE MANAGEMENT TIER 1

LEVEL 4 LEADERSHIP & MANAGEMENT – MANAGER

For colleagues who are responsible for managing teams within a retail environment to deliver organisation targets.

18 months*

- Practical and engaging work based projects
- Digital learning sessions

FUTURE LEADER/FIRST LINE MANAGER

LEVEL 3 LEADERSHIP & MANAGEMENT – TEAM LEADER / SUPERVISOR

For colleagues who manage teams and projects to meet the organisation's goals.

15 – 18 months*

- Monthly sessions
- Group workshops & 1:1 assessments

*Approximately

PROGRAMMES AVAILABLE

LEVEL 3

LEADERSHIP & MANAGEMENT – TEAM LEADER / SUPERVISOR

Throughout this programme colleagues will demonstrate knowledge, skills and behaviours in supporting, managing and developing team members, managing projects, planning and monitoring workloads and resources, delivering operational plans, resolving problems, and building relationships.

Suitable for colleagues who are first line managers or in a supervisory role e.g. Team Manager, Venue Manager and Supervisor.

For further detail please visit - <https://www.instituteforapprenticeships.org/apprenticeship-standards/team-leader-supervisor/>

LEVEL 4

LEADERSHIP & MANAGEMENT – MANAGER

Throughout this programme colleagues will demonstrate knowledge, skills and behaviours in delivering sales targets and a positive experience to customers that will encourage repeat custom and loyalty to the brand / business. Colleagues will demonstrate skill in leading and developing a team to achieve business objectives.

Suitable for second line managers responsible for multiple teams or departments e.g. Area Managers, Department Managers and future Area/Department Managers.

For further detail please visit - <https://www.instituteforapprenticeships.org/apprenticeship-standards/retail-manager/>

LEVEL 5

OPERATIONS MANAGER

Throughout this programme colleagues will demonstrate knowledge, skills and behaviours in creating and delivering operational plans, managing projects, leading and managing teams, managing change, financial and resource management, talent management, coaching and mentoring.

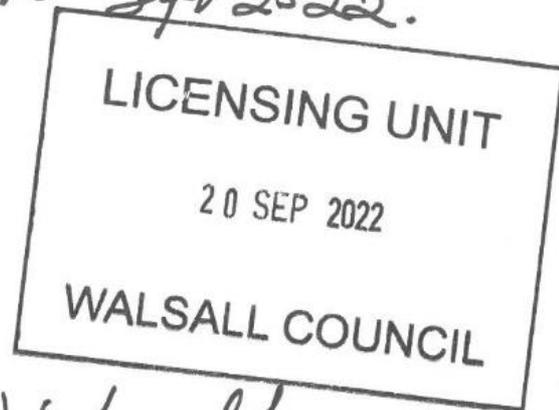
Suitable for colleagues who manage large operational teams, departments or projects e.g. Regional Operations Managers and future Regional Operational Managers.

For further detail please visit - <https://www.instituteforapprenticeships.org/apprenticeship-standards/operations-departmental-manager/>

Speak to your line manager or contact learninganddevelopment@luxury-leisure.co.uk for more information.

Licensing Department
 Walsall Council
 Darvall St
 Walsall.
 WS1 1TP

16th Sept 2022.



Admiral 9-11 Parket Walsall

Dear Sir

We operate from Shu Box Directly
 opposite this Address -

We have seen nothing but trouble
 when Luda had a bingo with slot
 machines at this place -

Now we are going to have to endure
 a similar business open 24 hours through
 the night

Please Turn this application Down!

We Believe that this Admiral Shop
 will encourage crime and disorder
 just like the Luda did before.

Please get the Licence committee
 to Refuse this application

Regards

Marie Bains

LICENSING DEPT
WALSALL COUNCIL
CIVIC CENTRE
DAEWALL STREET
WALSALL
WS1 1TP

15/09/22

Dear Sir/Madam

I am the owner of CHARLIE BROWNS'
CLOTHES SHOP, WALSALL (PARK STREET).

I am writing to object to the Gaming licence
Application made by Luxureyherisure for
Nº 9-11 Park Street, Walsall. This is for an
Adult Gaming Centre.

This application will only increase the problems in
the town centre. It will make gambling, become
a source for crime and disorder!. Walsall is
already dangerous town to trade from. We have
previously experienced people hanging around outside,
meeting up and then coming in our business to
steal, to fund their habit.

These premises are to be open 24hrs a day.

This type of thing next to our retail shops is
unforgivable and will be a continuous problem for the
town centre police. We are local traders who
will be directly affected by this application.

As your licence committee to turn this down on the
reason of, source of crime and disorder.

yours Faithfully

HAMMI BENNING - Hammi

GAMBLING DEPT
WALSALL COUNCIL
17-9-22

LICENSING UNIT

20 SEP 2022

WALSALL COUNCIL

DEAR SIR

I AM A SHOP KEEPER IN PARK STREET
WALSALL ARCADE SHOP 5.

I WAS SO PLEASED WHEN LUDA
CLOSED DOWN 9-11 PARK STREET.

PETTY CRIME DROPEO OVER NIGHT. NOW
ADMIRAL HAVE APPIED FOR EVEN MORE
GAMBLING AT THIS ADRESS TO RUN
24 HOURS THROUGH THE NIGHT. WE
PAY RENT AND RATES IN THIS TOWN
AND ARE STRUGGLING NOW, IF WE SEE
THIS REOPEN AND CRIME GOES BACK
UP WE WILL PROBABLY HAVE TO
CLOSE.

I HAVE ASKED AROUND AND YOU CAN
REFUSE THIS LICENCE ON THE VALID
REASON OF CRIME AND DISORDER.

~~RE~~

PLEASE DO SO.

ADAM, NEWSAGENTS

From: Sanjeev Kumar
Sent: 13 September 2022 20:39
To: Licensing
Subject: Admiral Gaming 9-11 Park Street Walsall

CAUTION: STOP and THINK - This email originated from outside of the council. If it looks suspicious it probably is and you should NEVER enter your council username and password into an external link or open attachments.

RE: Admiral 9-11 Park Street Walsall

Dear Sir/Madam

As Vice Chairman, i represent the walsall market traders association.

After a meeting of the of the traders association, we have decided to lodge a formal objection to the AGC Licence application at these premises.

We strongly believe that our close business interests will be adversely affected by this application.

These premises have actually had a similar use in the past and I can speak from personal experience when i say that it was a magnet for crime and disorder.

One of Walsall's licencing objectives is to prevent gambling becoming a source of crime and disorder!

Walsall is the second most dangerous major town in the West Midlands, overall crime is 18% higher than the average West Midlands town. "Rate for drugs and crime".

This shop when it was LUDA, caused nothing but trouble for the shop keepers and market traders in the town. Addicts were hanging around looking to steal to feed their habit.

To allow Admiral to have a gaming licence at these premises and to open it 24 hours a day is pure madness.

Plases see sense and send this to the licencing committee who i am sure will understand that this will be detrimental to all the other businesses in Park Street and will refuse this application.

Yours Faithfully

Codes of practice**Licensing authority discretion (s.153 of the Act)**

- 1.23** Licensing authorities have a broad discretion to regulate local provision of gambling and the Act gives wide-ranging powers to do so. Those include the power:
- to issue a statement of licensing policy, setting expectations about how gambling will be regulated in a particular area
 - to grant, refuse and attach conditions to premises licences
 - to review premises licences and attach conditions or revoke them as a result.
- 1.24** In exercising its functions under the Act, s.153 states that the licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it:
- a. in accordance with any relevant code of practice under s.24
 - b. in accordance with any relevant guidance issued by the Commission under s.25
 - c. reasonably consistent with the licensing objectives (subject to a. and b. above), and
 - d. in accordance with the licensing authority's statement of licensing policy (statement of policy) (subject to a. to c. above).
- 1.25** The 'aim to permit' framework provides wide scope for licensing authorities to impose conditions on a premises licence, reject, review or revoke premises licences where there is a potential conflict with the relevant codes of practice, relevant Guidance issued by the Commission, the licensing objectives or the licensing authorities own statement of policy.
- 1.26** Licence conditions are one method by which it is possible to mitigate risks associated with particular premises. The imposition of licence conditions might be prompted by local risk to the licensing objectives, for example the proximity of gambling premises to a school.
- 1.27** However, licensing authorities may first wish to have proactive engagement with local operators to encourage them to effectively mitigate risks to the licensing objectives. Such engagement can facilitate an open and constructive partnership which, in turn, can improve compliance and reduce regulatory costs.
- 1.28** To reflect the breadth of licensing authority discretion, licensing authorities are entitled to request such information from operators as they may require in order to make effective licensing decisions. The Act requires that an application must be accompanied by a minimum level of information (detailed in Part 7 of this Guidance). In the Commission's view, however, this does not preclude reasonable requests from licensing authorities for additional information to satisfy themselves that their licensing decision is reasonably consistent with the licensing objectives and the Commission's codes. That information may include, for example, a suitable business plan or the operator's own assessment of risk to the licensing objectives locally.

Part 5: Principles to be applied by licensing authorities

Licensing objectives

- 5.1** In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:
- 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.
- 5.2** It is expected that the licensing authority will have set out their approach to regulation in their statement of policy, having taken into account local circumstances. This is dealt with in more detail at Part 6.

Objective 1 : Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

- 5.3** Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6.
- 5.4** A licensing authority will need to consider questions raised by the location of gambling premises when:
- formulating its statement of licensing policy
 - receiving relevant representations to an application
 - dealing with applications as a responsible authority in its own right
 - considering applications before it.
- 5.5** In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.
- 5.6** Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.
- 5.7** Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003 / Licensing (Scotland) Act 2005, in which context they have wider powers to also take into account measures to prevent nuisance.

- 5.8** In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in Part 9 of this Guidance.
- 5.9** There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. Further information can often be found on the website of industry trade associations⁵.
- 5.10** Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

⁵ For example, The Safe Bet Alliance's Voluntary Code of Safety and Security National Standards for Bookmakers

Other considerations

- 5.31** Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 5.32** In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.
- 5.33** Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in Part 9.
- 5.34** Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

⁹ *Template: Compliance and Enforcement Policy*, Better Regulation Delivery Office. This template policy was developed by the Local Better Regulation Office, with local authorities, to assist local authorities in developing a policy that is in line with the requirements of the Regulators' Compliance Code, or to review their existing policy. It is available on the BRDO website at <http://www.bis.gov.uk/brdo/resources/risk-based-regulation/compliance-policy>

¹⁰ *Age restricted products and services framework / updated April 2014* sets out an agreed set of shared responsibilities and reasonable expectations for young people, their parents and carers, businesses, employees and regulators with regards to access to age restricted products and services. The document forms the foundations of the *Age restricted products and services: a code of practice for regulatory delivery / updated April 2014*

- 9.28** Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this Guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 9.29** Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.
- 9.30** Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.
- 9.31** Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:
- relevant to the need to make the proposed building suitable as a gambling facility
 - directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
 - fairly and reasonably related to the scale and type of premises
 - reasonable in all other respects.

Other powers

- 36.44** Licensing authorities may want to consider whether their officers have powers under other relevant legislation, such as the Licensing Act 2003 or Local Government Act 1972. For example, s.87, s.88 and s.89 of the Licensing Act 2003 give licensing authorities the ability to review club premises certificates, including suspending and withdrawing certificates, and s.90 allows licensing authorities to withdraw certificates where it appears to the licensing authority that the club does not satisfy the conditions for being a qualifying club.
- 36.45** There are various local authority and police powers to manage issues such as street drinking and anti-social behaviour, and licensing authorities should look to these powers in the first instance as being more appropriate remedies than the Act.
- 36.46** Whilst of limited use due to the absence of a central database and the ability to share information with other authorities, licensing authorities may wish to consider the use of police cautions as a deterrent.

Case law, templates and case studies

- 36.47** Supplementary enforcement and compliance materials are available on the Commission's website including case law, sample conditions, letter templates and examples of circumstances in which LAs have made effective use of their powers under the Act.

Gambling Commission September 2015

Keeping gambling fair and safe for all

For further information or to register your interest in the Commission please visit our website at: www.gamblingcommission.gov.uk. Copies of this document are available in alternative formats on request.

Gambling Commission • Victoria Square House • Victoria Square • Birmingham B2 4BP
T 0121 230 6666 • F 0121 230 6720 • E info@gamblingcommission.gov.uk

GUI 15/01

The Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007

Schedule 3, Regulation 12,

Mandatory Conditions attaching to Adult Gaming Centre Premises Licences

1. A notice stating that no person under the age of 18 years is permitted to enter the premises shall be displayed in a prominent place at every entrance to the premises.
2. No customer shall be able to access the premises directly from any other premises in respect of which a licence issued under Part 8 of the Act, or a permit issued under Schedule 10, 12 or 13 to the Act, has effect.
3. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling at any gaming machine in order to do so.
4.
 - 1) No alcohol shall be permitted to be consumed on the premises at any time during which facilities for gambling are being provided on the premises.
 - 2) A notice stating the condition in sub-paragraph (1) shall be displayed in a prominent place at every entrance to the premises.

Additional Information from Applicant

Adult Gaming Centre Local Risk Assessment

Premises

Premises Name:	Admiral Walsall
Premises Address:	7-11 Park Street, Walsall
Premises Post Code:	WS1 1LY
Premises Licence Number:	TBC On Application
Category of Premises:	AGC

Company

Operating Company:	Luxury Leisure
Operating Licence Number:	1876

Assessment Writer

Name of Person Writing this Assessment:	Will Powell
Position within Company or Name of Authorised Agent:	Area Manager
Date of this Assessment	March 2023
Date that Original Assessment was Written	August 2022

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.

This document seeks to assess the risk to these objectives that our operation may pose and where necessary what measures we have put in place to mitigate that risk.

Independent Accreditation

Luxury Leisure Talarius have attained the prestigious Global Gaming Guidance Group (G4) accreditation. This is only awarded after a rigorous audit of the company's responsible gambling measures. Furthermore, the company have to be reassessed every 2 years in order for it to be maintained.

Local Area and Site Profile

The local authority gambling policy 2019 in relation to the Gambling Act 2005 has been considered in the completion of this assessment. The statement does not offer specific guidance on the geographic extent to be considered when completing this assessment and contains a local area profile.

The SOP recognises the significant requirements of the LCCP placed on operators to promote safer gambling and to prevent harm by supporting customers through implementing mandatory measures such as self-exclusion and signposting to sources of help. It also sets out its expectations with regards Local Risk Assessments which is detailed and has been considered in the completion of this assessment.

The AGC is an adult only venue located on the main high street in Walsall and sits amongst other national high street retailers as well as some local shops. There are high street banks nearby which have ATM facilities. There are four licensed betting offices on or around the high street, with two being in the immediate vicinity. There is one AGC and one bingo premises operated by competitors and LLT in the town. There are a number of premises licensed for the sale and consumption of alcohol within the 500-metre radius used in the compilation of this assessment but only one in the immediate vicinity of the premises. No alcohol will be supplied on the premises.

There are no known incidents of crime and disorder associated with the premises licensed as an AGC. To further discourage any crime, disorder, antisocial behaviour, or public nuisance the premises are fitted with 14 internal and 2 external CCTV cameras covering the under passage. The CCTV can be accessed by local council and police authorities to support any local investigations when requested. The premises will be illuminated night and day all internal areas, entrance lobby, window and external lighting.

In December 2022, there were 162 reported crimes or incidents of Anti-Social Behaviour within a quarter mile radius of the premises. The three biggest crime types were Violent 48, Shoplifting 27, and Public Order 25.

Our regulatory return data in our existing venue in Walsall town centre locations does not reflect any specific problems associated with consumer complaints, the need to call police for assistance or attempts by vulnerable or children and young persons to enter the premises.

The rota for the Venue always includes a minimum of two fully trained staff on every shift to include a Duty Manager, Assistant Manager or Venue Manager.

There are 12 staff employed to work at the venue.

Luxury Leisure Talarius contracts with a reputable national security company to supply all venues with licenced security personnel as and when required.

A 'live-monitored' hold-up alarm system is used so that monitoring station staff can communicate with and support shop staff through CCTV and two-way audio using mics and speakers mounted in the ceiling.

All staff have personal attack 'hold-up' alarms and there are some strategically placed static alarms also.

There are three schools for children of secondary school age nearby, Emmanuel School, The Ladder School and Blue Coat Academy, and two junior schools in the area, Blue Coat C of E and Emmanuel School, as well as several nursery schools.

There are 3 churches within a 500m radius of the venue - St. Pauls Church, The Potters House Christian Centre, and Walsall Community Church. There are no other places of worship within the immediate vicinity.

The main town bus stop is within 200m of the venue at the bottom of the street which is delivery access only. The mainline train station is within the 300 metre radius and is a 5-minute walk from the premises.

There are 3 centres nearby called CGL – The Beacon, T3 Young Person's Substance Abuse and Seasons Rehabilitation Centre operating within 500m of the vicinity of the AGC. The centres all offer support for those suffering from drug and substance misuse. There is also accommodation nearby for people with poor mental health, at JNHG which is 500m from the venue.

The venue has a single entrance/exit at street level to the front, a double doorway leading directly into the gaming area which is rectangular in shape. The meet and greet station is located prominently towards the front of the store giving a clear line of sight and command of the entrance. The Venue will offer machines of category D, C and B3 with stakes ranging from 10p to a maximum £2. The venue does not offer VIP or loyalty schemes.

The venue trades 7 days per week 24 hours per day. Night trading has the additional support of an access control system (mag Lock mechanism) which is fitted to the doorway.

As a business we are aware of vulnerable people, those who sleep rough or are homeless can present a unique challenge and that there are instances of rough sleeping in the area. We will be actively working with local support agencies and police to identify and support or report individuals who fall within this category.

We operate a strict policy across all of our venues to exclude those who we are aware or suspect of being vulnerable, begging, sleeping rough or being homeless and anyone staff suspect is under the influence of drugs/alcohol or known to us as drug or alcohol misuser. We do not in practice have issues with such individuals trying to access our venues but we will also be monitoring our external shop front and use CCTV and extensive lighting. We will take appropriate steps to move on individuals or wet down areas and report illegal activities to the police.

Our venue colleagues are trained in all aspects of Social Responsibility on Induction and through refresher courses on our own online academy, these topics include Think 25, Customer Interaction, Self-Exclusion, Responsible Gambling.

The Gambling Act requires that we safeguard the interests of vulnerable people as well as the young from being harmed by gambling. Vulnerable people are not defined by the Act or the LCCP however both the Gambling Commission and Local Authority state "it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs".

Furthermore, the Local Authority consider that a range of people could fall into a category of vulnerability including:

- People affected by substance misuse
- People with learning disabilities
- People with mental illness
- People on low income
- People who may be in debt

When completing this Local Risk Assessment, we take the above definitions into account and in addition, we believe the term must be interpreted in its widest everyday meaning.

For example, someone could be vulnerable in the following ways:

1. Suffered a recent bereavement
2. Mental health problems
3. Long-term or terminal illness
4. Dementia or brain injury
5. Difficulty in communicating, for example reading or speaking on the phone
6. Learning disability
7. Relationship breakdown
8. Addiction
9. People who gamble more than they want to and/or beyond their means
10. Homelessness

This list is not exhaustive, and we are conscious that there are other reasons why someone could be vulnerable. For example, we train staff to be aware of those suffering from mental illness, recently bereaved, suffering from long-term or terminal illness, difficulty communicating, learning disability, substance misuse or addiction, breakdown of close personal relationship.

Walsall is listed as an area of high poverty within the West Midlands, comparable with West Bromwich where Luxury Leisure Talarius also operate.

Risk Identification	LO	Level of Risk	Impact	Risk Management	Reviewed
Children entering site unnoticed.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - Layout of premises considered in staff numbers and deployment. Breaks and shift changes are planned to take account of school closing times to ensure there is always supervision of the gaming area. Breaks and shift changes ensure there is always supervision of the gaming area. 	March 2023
Children enter site with adult.	C	Low	Severe to business. Moderate to child.	<ul style="list-style-type: none"> - Two members of staff will be rostered on at all times. - Staff deployed to specific zones for which they have responsibility. - Machine layout takes into consideration lines of site to the entrance. - Clear 'Over 18' signage is displayed, visible from outside and also in the entrance to the arcade. 	March 2023
Children enter site and play before being noticed.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - There is a lobby area beyond the doorway from the street ensuring that those who enter cannot simply inadvertently walk in without passing through a further door and past clear Over 18 signage. 	March 2023
Children enter site and play where age is misjudged.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - Venue Welcome Board contains Challenge 25 notice showing acceptable ID - UK Photo driving licence, Passport and Proof of age cards bearing the "Pass" hologram symbol. - The meet and great station is positioned to give line of sight to the entrance. 	March 2023
Age verification is not sought.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - CCTV cameras positioned to cover all parts of the premises but specifically the entrance and secluded parts of the premises. - All staff are trained in social responsibility as part of their induction and are provided with regular refresher training. 	March 2023
Children knowingly allowed to play.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - Posters and displays of acceptable identification on site for staff. - The company operate a 'Think 25' policy in which all staff are trained at induction and they receive regular refresh training. 	March 2023

				<ul style="list-style-type: none"> - Staff log all attempts to enter by young persons on the appropriate log. - The company use independent test purchasing operations to test adherence to the Think 25 policy. All venues are tested at least twice in a rolling 12-month period. - Stringent disciplinary procedures for failures identified through age verification testing. - Social Responsibility returns data reviewed through submissions from Area Managers to National Compliance Manager. - All social responsibility returns data subject to a quarterly compliance review. 	
Young person wearing face covering is not challenged for verification of age.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - Staff have been trained to ask a customer to lower a face covering if necessary, this has the effect of allowing staff to adjudge the apparent age of all customers and if necessary challenge for verification by the presentation of ID. 	March 2023
Those considered to be vulnerable, having access to gambling	C	Low	Severe to business, severe to customer	<ul style="list-style-type: none"> - Staff are trained to identify vulnerable customers as outlined on page 4 and 5 above. - Staff are trained to interact with customers who they have identified as being vulnerable and monitor their play. 	March 2023
Those made vulnerable through abuse of drugs and/or alcohol having access to gambling	C	Low	Severe to business, severe to customer	<ul style="list-style-type: none"> - Staff are trained to refuse entry and service to anyone who has been observed begging outside the venue or local area or we are aware is homeless. - Staff are trained to refuse entry and service to anyone who they feel is under the influence of alcohol or drugs 	March 2023
Those who may be considered vulnerable through abuse of drugs and/or alcohol having access to gambling.	C	Low	Severe to business, severe to customer	<ul style="list-style-type: none"> - Staff are trained to identify customers whose play is out of control and interact if a customer displays these behaviours. - The venue is installed with iBeacon technology able to work with the 'Gamblewise' app which is free for our customers to download and use to assist them manage their time spent gambling. - All interactions are logged and staff are trained to review logs daily to familiarise themselves with any customer 	March 2023

				<p>who is regularly interacted with so they can continue to monitor and follow up previous interactions.</p> <ul style="list-style-type: none"> - Where customer gambling continues to be out of control, we may make the decision to perform a company exclusion. This essentially bans them from the premises for their own protection. 	
<p>Child sexual exploitation (CSE) - Sexual abuse where a child or young person is forced or manipulated into inappropriate sexual activities, often in exchange for alcohol, drugs, gifts or attention. Although children and young persons are not permitted into AGC premises, it is possible that a customer could target or be targeted by nearby children or young persons as they enter or leave our venue.</p>	C	Low	<p>Severe to business. Severe to child or young person.</p>	<ul style="list-style-type: none"> - Our staff are trained to look for the signs of CSE using a CSE training module on our Admiral Academy training platform. 	March 2023
<p>Failure to provide information to players on responsible gambling.</p>	C	Low	<p>Severe to business Severe to customer</p>	<ul style="list-style-type: none"> - A responsible Gambling message is displayed at all positions where gaming is possible through posters, leaflets and stickers on machines. - Poster/Leaflet designs to incorporate QR codes for GAMCARE, Gambleaware contact information. - Responsible Gambling information stickers on all machines. 	March 2023
<p>Failure to provide information in a suitable format.</p>	C	Low	<p>Severe to business. Severe to customer.</p>	<ul style="list-style-type: none"> - Compliance Audit function performed by Area Manager and also through regional field auditors and security managers. 	March 2023

				<ul style="list-style-type: none"> - Luxury Leisure Talarius have attained the Global Gaming Guidance Group (G4) accreditation for our responsible gambling measures. 	
Failure to recognise signs of problem gambling.	C	Low	Severe to business Severe to customer	<ul style="list-style-type: none"> - Additional aspects to training incorporating guidance on identifying problem gambling, procedure for interaction and sources of help. - Clear policy to detail the procedure for interaction and level of staff that can 'intervene'. 	March 2023
Failure to interact with customer displaying signs of problem gambling.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - 'Stay in control leaflets' with QR codes directing customers to GAMCARE and Gambleaware. 	March 2023
Failure to sign-post customer to help and support.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - All recorded SR data subject to a quarterly compliance review by senior management. 	March 2023
Failure to properly administer self-exclusion.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - Staff training incorporates policy and procedure for self-exclusion. 	March 2023
Failure to impose exclusion in locality and in same types of establishments.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - Since May 2016 Luxury Leisure/Talarius have operated one or both of the AGC national multi-operator self-exclusion schemes (MOSES), offered through BACTA Portal and IHL. - Staff have been trained to ask a customer to lower a face covering if necessary This has the effect of allowing staff to adjudge the apparent age of all customers and if necessary challenge for verification by the presentation of ID and also to identify if a customer attempting to enter is self-excluded. 	March 2023
Customer breaches of self-exclusion.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - Tablet devices are provided at all sites to take an image of customers wishing to self-exclude so that the exclusion can be effectively enforced. 	March 2023
Customer breaches self-exclusion by using another to gamble on their behalf.	C	Unknown	Moderate to business. Severe to customer.	<ul style="list-style-type: none"> - The location of the site in relation to the customer's home address and any regular routes to work for example will be considered if the customer requests a wider exclusion. - All SR returns data subject to a quarterly compliance review. 	March 2023

				<ul style="list-style-type: none"> - All staff trained to regularly check the Bacta Portal gallery relating to their venue to ensure information shared from other local operators relating to self-excluded customers is monitored. 	
Money Laundering (Dye stained notes and Criminal spend).	A	Low	Low – Severe	<ul style="list-style-type: none"> - The company have a Money Laundering Reporting Officer (MLRO). - Staff training at induction and refresh training. - Luxury Leisure/Talarius have a corporate AML Risk Assessment and policies and procedures relating to AML. - £1000 limit on automated transactions using TITO. Any greater amounts require the intervention of a staff member. - Technical parameters on note acceptors designed to reject poor quality notes. (Often notes obtained by way of robbery are perished). - Manufacturer activity alerts from machines on independent networks (primarily SG and Storm). - TITO tickets not transferable between sites. - Slim change machines set up so that notes cannot be changed 'up'. - Comprehensive CCTV coverage in all sites. - Partnerships with local police where appropriate to identify and discourage criminal spend. 	March 2023
Commission of criminal offences to fund problem gambling	A	Low	Low – Severe	<ul style="list-style-type: none"> - Stringent policy and procedures in place to identify and intervene with customers who may be vulnerable to harm through problem gambling. See above under Information to players, Customer Interaction and Self-Exclusion. 	March 2023
Anti-social behaviour associated with late night operation	A	Low	Low – Severe	<ul style="list-style-type: none"> - Access control measures either through door supervision or physical controls, utilised at night where appropriate. - Policy of non-players refused entry or asked to leave. - Refreshments offered only to players and known customers. - Venue is connected to a remote monitoring station which staff can communicate with if support is required. 	March 2023

				Monitoring centre has two-way communication and can communicate directly with customers through ceiling mounted mics and speakers if required.	
Poor security increasing vulnerability to robbery or theft.	A	Low	Low – Severe	<ul style="list-style-type: none"> - A 'live-monitored' hold-up alarm system is used so that monitoring station staff can communicate with and support shop staff through CCTV and two way audio using mics and speakers mounted in the ceiling. - All staff have personal attack 'hold-up' alarms and there are some strategically placed static alarms also. - The premises are fitted with an intruder alarm which can also be live monitored from the monitoring station, meaning alarm activations are verified, using sight and sound, by the monitoring station thus reducing the number of false alarms to police. - Extensive CCTV coverage with recording 31 days with date and time stamp. - Strict key storage procedure. - Time lock and/or time delay safes utilised. - Drop safe used for banking. - Staff personal floats limited to £100. - Door Supervisor employed where appropriate - Toughened glass for window front. 	March 2023
The premises being subject to the misuse of drugs including use of, possession of or drug dealing	A	Low	Low – Severe	<ul style="list-style-type: none"> - Signage in place at entrance that we have a zero tolerance policy in relation to the misuse of drugs on the premises. - Any person identified or suspected of being in possession of unlawful drugs will be removed from the premises - Where individuals are suspected of being involved in drug dealing but no evidence is available, best efforts will be made to identify the individual and intelligence will be passed to the police - Any drugs recovered will be logged and stored in compliance with local police policy 	March 2023

<p>Advertising Standards and Marketing</p>	<p>A</p>	<p>Low</p>	<p>Low – Moderate</p>	<ul style="list-style-type: none"> - All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). We 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: <ul style="list-style-type: none"> - legal, decent, honest and truthful - Prepared with a sense of responsibility to consumers and to society - Respectful to the principles of fair competition generally accepted in business - Not intended to bring advertising into disrepute. <p>Specifically we ensure that:</p> <ul style="list-style-type: none"> - 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 payout ratio that applies to the gambling on offer - Advertising and promotional material carries a reference for the need to keep gambling under control 	<p>March 2023</p>
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				<ul style="list-style-type: none"> - 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. - Marketing decisions are controlled by the central marketing department and a system is in place for local managers to apply for marketing initiatives that are approved by the Head of Marketing to ensure they are legal, honest and compliant with the Gambling Act/License Conditions & Codes of Practice. - 	
Failure to display Terms and Conditions	B	Low	Low – Moderate	<ul style="list-style-type: none"> - Terms and Conditions displayed prominently within the premises. 	March 2023
Failure to deal with customers making complaints about the outcome of gambling	B	Low	Low – Moderate	<ul style="list-style-type: none"> - Machines only acquired from licensed suppliers. - Additional machine compliance checks completed by a technician when installing new machines. - Machine maintenance carried out by qualified technician. - Clear service complaint protocol to deal with machine or game performance related customer complaints. - Customer complaints policy and procedure. - Complaints policy and procedure are available for customers to take away in each site. - Complaint forms available at each site. - Luxury Leisure head office complaints telephone line. - Novomatic UK group complaints channel. - Registered with an ADR entity – BACTA. 	March 2023
Insufficiently trained or inexperienced staff	A/ B/ C	Low	Low - severe	<ul style="list-style-type: none"> - All staff are trained in on the three licensing objectives as part of their induction and are provided with refresher training every 6 months throughout their employment. - All training is recorded on our Admiral Academy training system that is accessible within the venue. - All training is centrally monitored to ensure completion - All staff are trained on the specific local risks to the licensing objectives that have been identified for these 	

				<p>premises as part of the staff induction training programme.</p> <ul style="list-style-type: none">- All social responsibility returns data subject to a quarterly compliance review. Any non-compliance with our policies and procedures is identified and corrected.	
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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.

Independent Observations Report

MARK HALTON - MJH LICENSING CONSULTANTS LTD

ADMIRAL 9-11 PARK STREET WALSALL WS1 1LY.

Introduction

I have been instructed to conduct impartial external observations on the site situated at 9-11 Park Street Walsall WS1 1LY.

I am aware that a premises licence has been applied for by Luxury Leisure to permit the venue to be used as an Adult Gaming Centre (AGC) under the Gambling Act 2005 (as opposed to any planning permission) for 24 hours, 7 days a week.

The premises was previously a Bingo premises named Luda which was part of the Rank organisation. It is now closed and not trading.

Within my review I have considered the Licensing objectives under the Gambling Act 2005.

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

I have further viewed the Licensing Authority's Gambling Statement of Principles.

I conducted my observations at various times throughout the day and night on the following dates: Thursday 23rd February 2023, Friday 24th February 2023 & Saturday 25th

OBSERVATIONAL REPORT: Admiral 9-11 Park Street Walsall WS1 1LY.
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February 2023. I selected the following timings so I could observe the effect a proposed venue could have on the local area concentrating on criminality, anti-social behavior, youths, children, and other vulnerable persons.

Thurs 23/02/23	5pm – 7pm	8pm – 10pm	12am – 1am
Fri 24/03/23	3pm – 6pm	10pm – 2am	
Sat 25/03/23	11pm – 3am		

OBSERVATIONS

PARK STREET AREA, WALSALL: Thursday 23rd February 2023. 5pm to 7pm, 8pm to 10pm & m/night to 1am.

1. On all the visits, the weather was dry. During the night observations, the areas were well lit with street lighting. I had clear and unobstructed views throughout the day and night.
2. I observed the general local environment including checking footfall, and for signs of criminality, anti-social behavior, begging, and vulnerable and persons at risk.
3. Park Street runs north to south. The area I observed is from the Gallery Square at the top of Park Street to the High Street and the immediate area leading off this half mile section of Park Street in which the applicant's proposed venue lies.
4. Park Street is a pedestrianised street and falls within the St. Mathews ward. On my observation between 5pm and 7pm the street was busy. On my observation from 8pm to 10pm, it was not. The shops are closed including McDonalds (closed 7pm) and The Red Lion pub which was open earlier in the day closed at 6pm. There were few people in the street late. There is no parking in the street itself but there are car parks in the immediate area. I did notice that later at night there were a minimal number of taxis in Park Street.
5. The area includes a barber shop, a pub, cafes, fast-food restaurant, 3 betting shops, retail shops with two shopping arcades. There are two adult gaming centre premises in the area being Playland Amusements on the junction of Bradford Street and Digbeth and Admiral in Bradford Street, both are open 24 hours through the week. They are approx. 40 yards apart. The application venue is approx. 40 yards north at 9-11 Park Street.
6. I could see the area has a diverse community and people were seen visiting the shops and services. There was a big drop in the number of persons in the area between my

OBSERVATIONAL REPORT: Admiral 9-11 Park Street Walsall WS1 1LY.
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first and second/third observations that day. There is residential accommodation both new and old that lead off the streets of Park Street and the Waterfront but I did not see any residential property in Park Street itself, Digbeth or the High Street.

7. The new accommodation is mainly flats around the quay area.
8. I visited the proposed Admiral AGC at 9-11 Park street and noticed that it has displayed its application under the Gambling Act 2005 prominently and centrally on the entrance door.
9. I did not see groups of youths or unattended children throughout the observations that day.
10. I saw no persons begging or sleeping in the street throughout the day's observations.
11. Immediately next to the applicant's premises is a clothing store, a gift shop, a jeweler, and an optician. There are 4 market stalls south of the venue in the middle of Park Street. Across the street is a card shop, a jeweler, and a bank. All operate daytime hours and are closed later in the evening.
12. There are not many restaurants in Park Street, It is made up of retail premises.
13. There is steady pedestrian traffic through the day which eases to almost nothing post 10pm.
14. I am aware that Playland benefits from relatively recently granted 24/7 permissions, including a Gambling Act AGC premises licence. Admiral AGC premi on Bradford street (the operators of which are making the application for 9-10 Park Street) also opens for 24 hours a dat. Both were still open when I finished observations at 1am. I saw no crime & disorder, no anti-social behavior, no street sleeping, no begging, no

groups of youths or unaccompanied children, (indeed no children were seen from 9pm onwards). There are no other betting or gambling establishments within the area.

15. The shop fronts of the bookmakers have been obscured, although the glass doors give a view into the venues. There is a small sign on the door of Playland notifying that persons under 18 are not allowed entry. On the frontage of Admiral are large separate signs stating no persons under 18 allowed, no alcohol allowed inside, a Challenge 25 policy applies and the management refusal right.

16. At 12.35am. There was no noise audible from outside either Playland or Admiral.

17. I entered both venues through my observations before 6pm and then post 10pm. Customers were sitting at machines. All were reasonably smart in appearance; the age range was between 20yrs and 60yrs of age, and both venues had male and female customers. There were two members of staff in each. Both venues were clean, with no signs of drunkenness or drugs, and the customers well behaved. I felt very comfortable and did not see any issues.

18. Upon entry at Admiral I saw displayed the rules of the house, CCTV signage, challenge 25 notice and fire evacuation sign. No alcohol is sold. Further, no alcohol is allowed in the venue and there is a zero tolerance to drugs. Entry is refused for either.

19. The maximum stake for machine games (and on some machines only) is £2.

20. Between 10pm and 1am there was hardly anyone around and Park Street was very quiet. There were no obviously homeless people, nor people begging. No one appeared to be vulnerable, and I saw no anti-social behavior. It was not busy. I walked the length of Park Street eight times and the surrounding streets on numerous occasions and again saw no homeless people, nor any crimes or anti-social behavior.

21. I saw no graffiti in Park Street and no unaccompanied children.

22. The Red Lion pub appeared to be well managed. It was not busy. I saw no security presence at any of the premises.
23. There are no real restaurant venues apart from those I would describe as fast food. Customers seemed to be well behaved. All the venues apart from Playland and Admiral were closed or closing on my later visits.
24. During my entire visit on the 23rd of February, I saw no evidence of any crime and disorder, anti-social behavior, street drinking, begging, no groups of youths or groups of unaccompanied children.
25. I felt very safe throughout my observations. I saw nothing intimidating. No youths were hanging around the AGC or betting shops. The betting shops were closed on my later visits both nights. During the day I saw no gangs gathering outside them apart from persons smoking and then re-entering.

PARK STREET AREA, WALSALL: FRIDAY 24th FEBRUARY 2023 3pm to 6pm & 10pm to 2am.

26. At 3pm the next day 24 February, I returned to observe Park Street. The street was busy with shoppers and attending the market stalls. At 3.25pm I saw 1 person begging for money in Gallery Square. At 3.55pm he was gone.
27. At 3.35pm I entered Admiral AGC in Bradford Street, where there were 3 customers aged between 35 and 50. There were 2 members of staff. It was quiet and I saw no issues.
28. I returned at 10pm and the street was empty apart from a handful of people using the street as a walk through.

29. The Red Lion pub was busy from 10pm and Karaoke could be heard from the street. There was no one standing outside. The pub closed at midnight. McDonalds closed at 7pm.
30. I saw no persons enter from the pub into either AGC which were still open through my observations. Customers walked out the pub at closing time walking home or into waiting taxis.
31. I walked the length of Park Street, Digbeth and Bradford Street, eight times between 10pm and 2am I saw no crime, no anti-social behavior, no nuisance. It was quiet, and there was hardly anyone about.

PARK STREET AREA, WALSALL: SATURDAY 25th FEBRUARY 2023 11pm to 3am.

32. Park Street was extremely quiet. Apart from the 2 AGC venues there was only the Red Lion pub open, and this closed at 1am. As the night before, people walked away in both directions from Park Street; a few entered waiting taxi's and there was no interaction between those persons leaving the pub and either AGC venues.
33. Again, I visited each AGC venue and there was no more than 5 persons in each at any time. The customers were well behaved and aged between 20 and 60. I saw no issues, no gangs, no children, no crime & disorder, no anti-social behavior, no persons congregating and heard no noise. Park Street is probably the quietest street I have carried out observations upon.
34. During my entire visit to the area, I personally saw no evidence of any crime and disorder, anti-social behavior, street drinking, begging for money, no groups of youths or unaccompanied children at all.
35. I felt safe throughout all the observations.

**ADMIRAL 26 QUEEN STREET, WOLVERHAMPTON SITE VISIT: FRIDAY 24th
FEBRUARY 2023. Midday to 1pm.**

36. I understand from the applicant that the current Admiral venue in Walsall has operated for many years and while the policies and procedures are uniform across the Admiral estate it was suggested that I visit a nearby Admiral venue in Wolverhampton which is more akin in fit out to the proposed venue which is the subject of this application, as the fit out is new.

37. I attended the Admiral premises situated at 26 Queen Street Wolverhampton WV1 3JW at midday. It is operated by the applicant for the Admiral AGC in Park Street Walsall. Upon entry I saw displayed the rules of the house, CCTV signage, challenge 25 notice and fire evacuation sign.

38. The premises were extremely clean, well illuminated and the 2 staff were very smart in company uniform of blue and black.

39. There were three customers inside, who were a mixed age group between 25 and 50, 2 male and 1 female.

40. When I observed the Admiral in Walsall I did so unobstructively. In Wolverhampton I met Martin Scott, a regional operations manager. As a result of my conversation and observations, I ascertained and observed the following. Much is reflected at the existing venue in Walsall :

- The venue is open 24 hours a day. The entrance is locked at 10pm and can only be opened from inside by a member of staff pressing a maglock button.
- CCTV covers the whole licensed area. There are thirteen cameras of extreme quality in image. The image can be downloaded. Very comprehensive.

- Staff, as I witnessed, are very personable, polite, circulate and interact with customers who in the main appeared to be regulars and locals. Staff work 6 or 8 hour shifts within the 24-hour system.
- Midday there were three customers within venue. I saw no issues.
- Training is by e-learning modules and in-venue training. Of particular interest to me is that training on social responsibility far outweighs customer service (which is comprehensive). There are six-month refresher courses on the constantly updated teaching modules. If a member of staff fails to complete training the system shows a flag to a manager, the training package cannot be continued until the last is passed. This ensures compliance but also allows management to constantly ensure that staff are aware of responsibilities, ensuring quality of service and of staff. I understand that this applies across all staff and I found it to be very impressive.
- Again, no alcohol is sold. Further, no alcohol is allowed in the venue and there is a zero tolerance to drugs. Entry is refused for either.
- The maximum stake on some machines only is £2.
- The majority of machines operated Ticket in Ticket Out (TITO) system. Cash can be paid in, but winnings are paid on ticket. This allows customers to withdraw their winnings when they want to.
- Lighting is high level without impacting on the outside of the venue area. Machines are positioned ensuring clean lines of sight within.
- All staff carry portable alarms in form of wristband on the person. Once operated, the alarm company is immediately notified. There is further to this an

announcement tannoy system that is automated this can be used to ask persons to leave if necessary.

- No children are allowed in the venue. It is Adult only.
- ID requested is as per Home Office Guidelines: driving licence, passport, PASS hologram, military ID (always checked thorough as some military ID can be under 18).
- All staff are trained in Think 25 (“If you look under 25, prove you are 18”). There is signage throughout the venue.
- Test purchase (TP) operations are conducted by independent company unannounced, four times a year. If a TP is failed, all staff are retrained and investigation by the Area manager is launched.
- The company operates the recommended self-exclusion policy, whereby a customer can request that they are self-excluded for up to 6 months. The company goes beyond with plus 6 months. Therefore, on a case-by-case basis, self-exclusion can last for 12 months.
- There is gambling addiction literature in the form of signage and leaflets throughout the venue. It can also be found in the toilet areas in case of persons would like to request help but are embarrassed to do so.
- Timers can be issued to customers on request. This aids self-regulation and is combined with staff supervision and awareness.
- Many measures are encompassed within the Gamblewise tool used at the venue. This is an app encompassing measures that, among other steps, allow customers

to set a budget limit and set the time spent on visits. This puts controls and awareness in the hands of the customers, with the assistance of staff.

- We spoke about the cash office. Details are not contained within this report, but I am fully satisfied that security is not an issue.

QUEEN STREET, WOLVERHAMPTON: FRIDAY 24th FEBRUARY 2023 11.30am to midday and 1 pm to 1.30pm.

41. Queen Street has retail premises either side like Park Street. It is a well-kept street within Wolverhampton and runs off the main shopping area. The road was not busy with vehicles and but had a good number of pedestrians using the street as a walk through from the nearby train station. I witnessed no anti-social behavior within the area.

42. As stated, there were three customers. There were two smartly dressed staff. There were no issues, no drunkenness, and the customers were well behaved with an age range from 25 to 50. The premises were clean, and the atmosphere relaxed It was all very comfortable. I felt very safe.

43. I found Admiral to be a clean, safe, friendly, and alcohol-free venue.

SUMMARY FINDINGS

During the visit to 9-11 Park Street and its surrounding area I saw no evidence of crime and disorder or anti-social behavior, no gangs of youths and no unaccompanied children apart from the daytime accompanied by parents. I saw one person begging during my observations. I witnessed no street drinking on Park Street.

I am aware that at the end of January a man was attacked on the high street near Asda and sadly died. However, I did not witness any fights or violent behavior in the locality.

In addition to visiting the existing Admiral AGC on Bradford Street in Walsall, I also visited Admiral AGC at 26 Queen Street in Wolverhampton, WV1 3JW, operated by the same company making this application. It was clean, extremely smart inside, well illuminated, well operated with polite courteous staff. It had a clean smart frontage. There, I saw no evidence of crime and disorder or anti-social behavior, no street drinking, no youths, no litter, or drugs. The same applies to the Admiral in Bradford Street Walsall.

Management and staff in both venues are professional, polite, and attentive. The venues are well run and clearly the defined systems in place help to ensure that the licensing objectives are adhered to. They ensure that measures are taken and in place so as not to attract children, youths, or vulnerable persons.

Most of the customers I saw at all the AGC venues I visited were clearly over 25. In my view, young persons or children would not be attracted to them. The insides are not like a seaside amusement arcade. Admiral is a quiet, low key lounge style environment. The most customers I saw at any one time was five and usually a lot less. There was no noise audible from the Admiral AGC venues in Bradford Street (unlike the pub in Park Street) or Queen Street in Wolverhampton.

My first hand experience of the surrounding area in Park Street is that it was non problematic. While I accept that, contrary to my personal findings, that might be different on occasions, I have seen the good practice, policies, strategies, training, and overall

assessments of risk reduction put in place by the applicant operator within the venues in Wolverhampton and Walsall. I have also witnessed Admiral venues in other national locations and there is a consistent approach.

The applicant has well run premises and the measures it takes to reduce the risk of crime and disorder and protecting vulnerable persons from being taken advantage of, are above and beyond those that I believe are strictly needed. Please see bullet points above re my site visit to Wolverhampton.

From observations, I see no reason why residential properties will be affected by this new venue - not least because there are none nearby. I note here are no residential objections to this application.

During my observation I saw no crime and disorder or anti-social behavior in the area relating to the application venue. I saw no harm or danger to children or young persons at the gambling establishments – there were no children or young persons in them. I saw no evidence of harm or encouragement to vulnerable persons by the gambling establishments.

From what I have seen, the AGC applied for, would not attract children or youths, and the policies and procedures which Admiral would have in place, would prevent drunken persons, or persons at risk from entering or remaining. The previous occupants at the site operated with a bingo licence, allowing alcohol. This is a very different style of operation and operator - Luxury Leisure and Talarius Ltd have been accredited by the Global Gambling Guidance Group for Responsible Gambling, the first land-based operator to have gained the accreditation. I have witnessed that this is a good company working with an AGC licence that does not allow alcohol or drugs within. As can be seen within this report, the applicant has numerous policies in place to adhere to the licensing objectives. I do not envisage any problems relating to crime or disorder that arising with with this operator in this area. The existing AGC premises I have seen in the vicinity do not cause any issues or problems, and I do not see why this should be any different. I have also

seen that the Playland AGC venue was issued its 24hr licence in June of last year and on the basis of my observations that is perfectly understandable.

I note that neither the police nor local authority has made any objection in their role as responsible authorities. On the basis of my observations, I agree with that approach. I have not seen any evidence that the licensing objectives under the Gambling Act would be harmed by the AGC which is the subject of this application, There are however copious amounts of evidence in the way the applicant runs its venues to show how they not only comply with the licensing objectives, but install strong operating and due diligence procedures in the venues and in the staff employed.

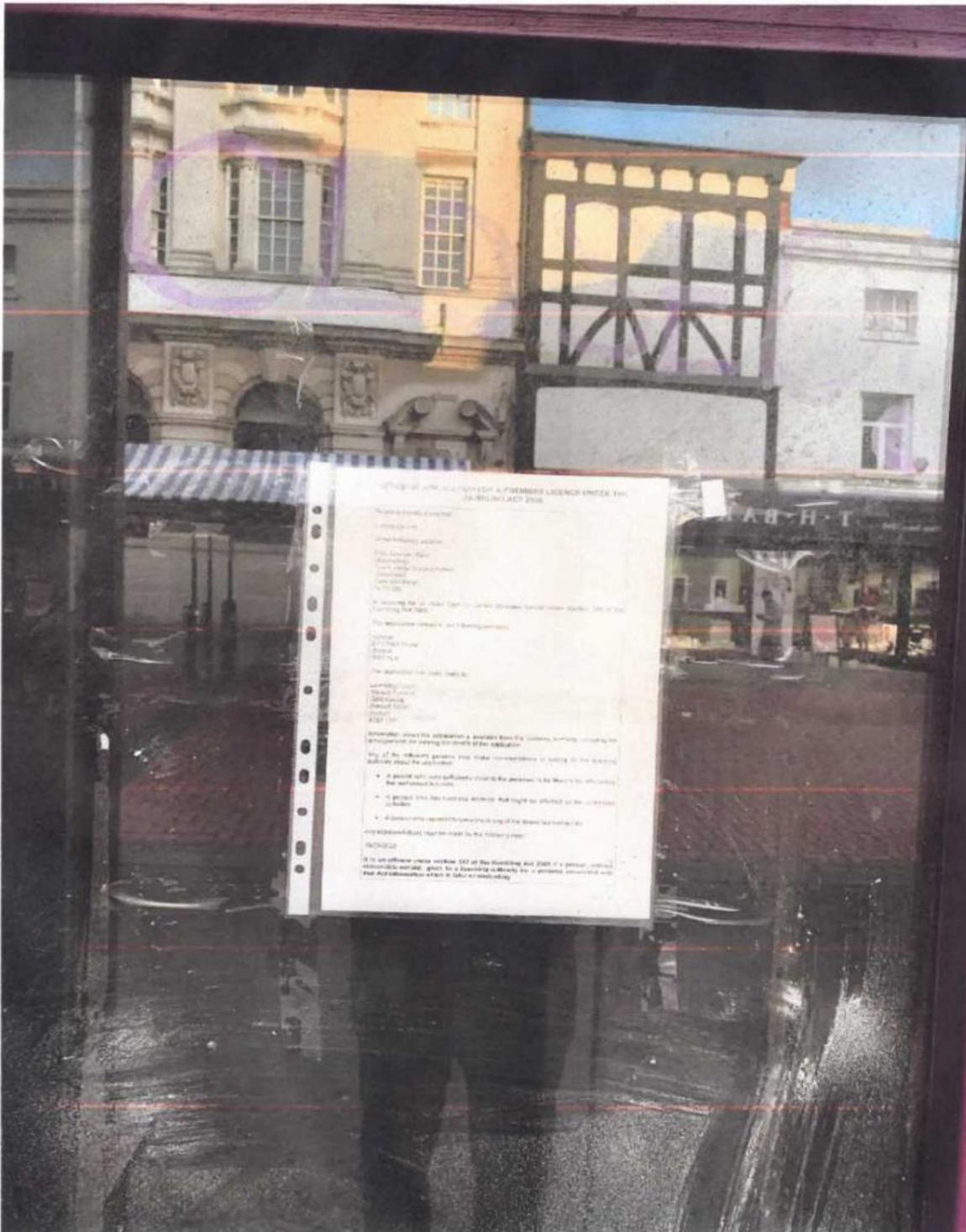
All matters relevant in the report on which my expert evidence is given has been included in this report. I believe the facts I state in this report are honest and true and that the opinions I have expressed are correct to the best of my judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

IMAGES

1. Application Site 9-11 Park Street.



2. Notice of Application.



OBSERVATIONAL REPORT: Admiral 9-11 Park Street Walsall WS1 1LY.
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3. Admiral front entrance Bradford Street 4.50pm (40yds from proposed site).



4. Park Street venue front (site on left), retail shops & market. 12.10pm.



5. Bradford Street. Admiral (existing venue) & Playland 40 yards from proposed site. 12.10pm.



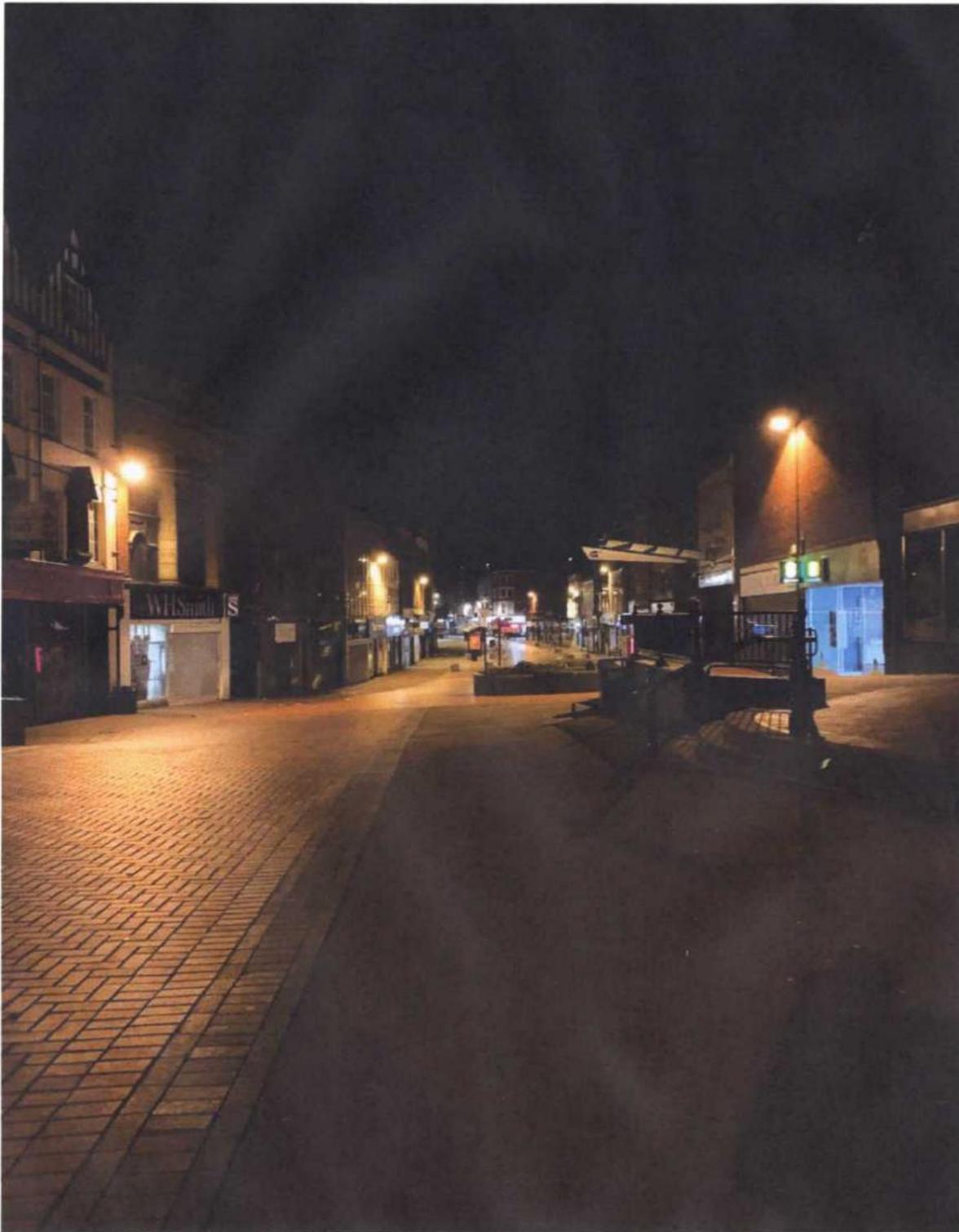
6. Bradford Street, Admiral. 10.15pm.



7. Park Street proposed site front 10.50pm.



8. Length of Park Street 00.40am.



9. Bradford Street Admiral & Playland. 00.40am.



10. Admiral Queen Street Wolverhampton.



11. Queen Street Wolverhampton. Bingo/AGC premises & Bookmaker 100 yards from Admiral.



OBSERVATIONAL REPORT: Admiral 9-11 Park Street Walsall WS1 1LY.
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12. Length of Queen Street.



13. Staff. Personal alarm, think 25 and name badge.



OBSERVATIONAL REPORT: Admiral 9-11 Park Street Walsall WS1 1LY.
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Admiral Systems in place. Witnessed by myself previously.

CCTV, Think 25, Social Responsibility



Maglock entry button



Staying control literature, ATM

(Replicated at exit, toilets, inside venue)



OBSERVATIONAL REPORT: Admiral 9-11 Park Street Walsall WS1 1LY.
Page 28 of 29

Signed Mark Halton

Mark Halton

Dated 9th MARCH 2023

MJH LICENSING CONSULTANTS

'Specialists in risk reduction, training, compliance, observations and investigations for the licensed trade'

Mark Halton | Licence Consultant | 07900 806 864 | mjh.licensing@gmail.com

WALSALL COUNCIL LICENSING SUB-COMMITTEE

29th MARCH 2023

IN THE MATTER OF ADMIRAL, 9-11 PARK STREET, WALSALL, WS1 1LY

WITNESS STATEMENT OF JAMES STURGESS

I, **JAMES IAN STURGESS**, of Fifth Avenue Plaza, Queensway, Team Valley Trading Estate, Gateshead, NE11 0BL will say as follows:-

1. I am a Regional Operations Director for the applicant company, Luxury Leisure, and its sister companies Talarius Ltd and RAL Ltd, which together operate low stake Adult Gaming Centres ("AGCs"), Family Entertainment Centres ("FECs") and Bingo licensed venues across Great Britain (the Business) and are part of the global Novomatic group of companies (which have the requisite operating and premises licences in order to trade).
2. I have held this position since 2017. I initially commenced my employment with Luxury Leisure in 2003, as an Area Manager. I was promoted to the role of Regional Operations Manager in 2001, a role which I held until being promoted to my current position. I am responsible for day-to-day operations within my region and for over [800] employees. I have held a Personal Management Licence, granted by the Gambling Commission, since the current regime was implemented in 2007.
3. I am responsible for 84 sites, (including our existing AGC venue at Admiral, 2A-3A Bradford Street in Walsall and a further number in the West midlands area) including and 1 bingo licensed venue, all based in the midlands and north of the country. If this application is successful, the venue at 9-11 Park street, Walsall, will form part of my operational responsibilities.
4. I report to The Chief Operating Officer of the Business. Directly reporting to me are 2 Regional Operations Managers and reporting directly to them, are 12 Area Managers. The Business employs approximately 3000 people and with over 250 venues we are the largest operator of AGCs in the country. We are also one of the oldest and have a long tradition of industry engagement to help drive up and maintain

standards, especially in matters of Social Responsibility and we seek to drive and adopt best practice where we can.

5. Bacta is the trade association for the amusements industry and we are founding members. Ms Speed, our Group General Counsel is a former Chair of the AGC division and the current Chairman of its Social Responsibility committee and she and others in our business sit on bacta's governing body. In this role, we consider and look at issues affecting the sector and how the sector can address and deal with them. Through bacta we have been involved in developing policies and strategies in relation to matters of Social Responsibility, including safer gambling and the protection of children and other vulnerable people from gambling harm. It is something the Business takes very seriously.
6. I have seen Ms Speed's letter of 23rd August 2022, submitting this application and confirm it accurately reflects our measures, policies and practices.
7. Our AGCs are low stake, adult only venues. Our emphasis is on providing fun in a safe, clean, friendly and social environment. The majority of our customers across the country are regulars and visit us for the social engagement with people they know, over a coffee, as much to play games. Our customer base is roughly split between men and women 60-40% and the average age is about 45-50. We are careful to ensure that our premises are not attractive to the underage, but also have the appropriate safeguards in place to ensure that they do not frequent our premises.
8. Part of my role involves ensuring that our policies and procedures within our sites are suitable and that they are delivered appropriately through training of our employees. Through this we can be confident that our premises do and will operate fully in line with the requirements under any premises licence, the LCCP (and other guidance issued by the Gambling Commission), the relevant legislation and also in accordance our own policies and procedures. It is a highly regulated business: no alcohol is ever supplied in our AGCs and we operate a "think 25" policy with twice yearly unannounced age verification tests carried out by an independent third party company at every venue. Our "pass rate" of circa 93% is the highest in the industry and higher than tests for many other age restricted products. We have a 100% pass rate for age verification tests at our existing Walsall AGC venue in the last 3 years.

9. I believe that we are the best operator in the sector. This is reflected by the fact that we have never had enforcement action taken in relation to any premises licence or had any premises licence reviewed.
10. We have operated at our current AGC for many years. We do not experience particular issues of anti-social behaviour at that venue, nor indeed at our venues generally - whether, inside, or through groups of people congregating outside. We do not have, and never had, FOBTs which caused so many reported issues in bookmakers.
11. I am however aware of concerns that have been raised in response to his application, to the effect that our proposed venue will be "source of crime and disorder" or "encourage crime and disorder". There has been no suggestion that our existing AGC in Walsall has done either of these things and I note that the police have confirmed that they have no objection to this current application.
12. We produce a detailed Local Risk Assessment (LRA) for each of our venues and these are updated regularly. I refer to the LRA filed with our application. Given that the application was filed in August we have reviewed and updated that document.
13. All of our venues (including our current Walsall AGC and the application site should we be granted a premises licence) are manned by trained staff, who circulate the shop floor and interact with customers. They are trained to recognise signs of problem gambling and potential vulnerabilities.
14. In terms of use of the venue, should a licence be granted, then typically 5 to 7 customers use our premises at any one time and the maximum is likely to be between 12 to 14. A large number of our customers are regulars, who know our staff.
15. Some customers prefer to visit us later in the day and night- largely those who work shifts, or later hours such as those in hospitality, taxi drivers, health workers, to name a few. This includes our Bradford Street venue where we operate 24/7 – as indeed does Playland AGC.
16. We take care in selecting potential AGC venues and the premises which are the subject of this application are no different. To focus on just a few attributes, the premises will:

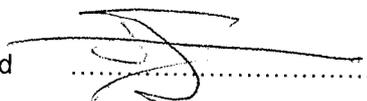
- Have a modest frontage;
 - Be fitted out to a high standard with gaming machines spaciouly laid out;
 - Have a customer area of some *60 square metres*;
 - Have good lines of sight throughout the customer area;
 - Provide complimentary refreshments to customers who are playing;
 - Have toilet facilities – only available to customers; and
 - Be well lit, clean and secure.
17. The move from our existing venue will allow us to improve the facilities to both customers and staff. It is our intention to close our existing venue if we are successful in our licence and planning applications, once we have opened and transferred our custom to the new AGC.
18. One of the ways in which we ensure that the Business can maintain a proper focus on regulatory and compliance matters (including the adequacy and implementation of our policies and procedures) is through ensuring that our “field-based” management team is constantly visiting our premises on a regular basis. This not only includes our Area Managers but our Regional Managers and me and our two other Regional Directors. Our CEO and COO also frequently visit and inspect our sites.
19. Our Risk and Compliance Director, Mark Thompson, and his team also regularly visit sites and are on hand if there are any issues with which a venue needs assistance. In my experience within the industry, the extent of this hands-on focus is a highly unusual approach, but it is also essential for us as a business. It means that anything of a regulatory or compliance nature that happens at a site will be picked up and passed up the chain all the way to board level virtually as soon it occurs. I believe this is one of the reasons why our sites operate so well. It is part of our proactive culture of ensuring we get things right.
20. A further key element to operating a safe, compliant and successful business is the training we provide to our valued employees. We believe in investing in our employees as they are a key part of the Business and are essential to us operating to the high standards we achieve. The training we provide is extensive and goes beyond the critical matters of compliance and social responsibility. We want our employees to have the tools and skills they need to perform in their roles and to be confident in doing so. Our training is delivered and refreshed via an online portal.

21. Together with Blackpool and Fylde College, we have created a bespoke Professional Development training opportunity for staff, called the Admiral Academy. Successful applicants to the Academy can embark on training courses that lead to qualifications ranging from GSCE level to undergraduate equivalent. We are very proud to offer this to our employees and I am delighted that are more than 75 employees undertaking further personal and professional development as part of the current cycle. Again, I think this is a good example of how we invest in the Business and our employees and try to implement and promote best practice. We were particularly delighted that in each of 2021 and 2022 one of our managers was selected as "Apprentice of the Year" by the college; and in 2022 another manager was awarded "Rising Star"- all from all apprentices across all sectors. In addition, the term "Academy" is also used to describe our more general eLearning training programme to all employees.
22. As Ms Speed mentions on page 4 of her letter to the licensing authority of 23rd August 2022, if successful in our application, we will install a defibrillator for public use. This is our policy for all new openings and is also being rolled out to existing sites.

Statement of Truth

The contents of this witness statement are true to the best of my knowledge and belief.

Signed


.....
James Dan Sturgess

Dated

9/3/2023.
.....

WALSALL COUNCIL LICENSING SUB-COMMITTEE

29th MARCH 2023

IN THE MATTER OF ADMIRAL, 9-11 PARK STREET, WALSALL, WS1 1LY

WITNESS STATEMENT OF MARK THOMPSON

I, **MARK IAN THOMPSON**, of Fifth Avenue Plaza, Queensway, Team Valley Trading Estate, Gateshead, NE11 0BL will say as follows:-

1. I am the Risk and Compliance Director for the applicant company Luxury Leisure and its sister companies Talarius Ltd and RAL Ltd, which together operate Adult Gaming Centres ("AGCs"), Family Entertainment Centres ("FECs") and Bingo licensed venues (the Business). They are part of the global Novomatic group of companies and have the requisite operating and premises licences in order to trade.
2. I joined the Business in October 2014 as Head of Security and Compliance and was appointed to my current role on the 1st of January 2022. I oversee a team of 17 in total, focussing on security and regulatory compliance, reporting directly to the CEO, although I work closely with the COO, the Regional Directors and Group General Counsel on certain issues where required. My team comprises of 5 compliance staff made up of a national manager, a Data Protection Officer, a Safer Gambling Manager, a Customer Care Manager and an administrator, all of whom report to me. In addition, I have a further team of 12 security staff who also provide a field audit function. This covers a range of operational processes, including cash handling and security measures but also compliance processes. The team also provide an investigative function for the Business, reactively investigating reports or suspicions of dishonesty and wrongdoing. I am also the appointed Money Laundering Reporting Officer for the Business.
3. Prior to taking up my role, I was a Police Officer, serving in the Metropolitan Police Service for almost 15 years. I served mostly as a Detective, attaining the rank of Detective Sergeant by the time that I left the service. I worked in both volume and specialist crime, having at different times responsibility for investigating serious acquisitive crimes such as robbery and burglary, as well as domestic violence and hate crime, and I also spent 4 years investigating homicide.

4. I refer to the letter dated 23rd August 2022 from Elizabeth Speed, Group General Counsel for Novomatic UK, under which this application for an AGC premises licence was submitted. I confirm that the contents are accurate. To assist, I expand on a few points below.
5. The Business is the largest operator of AGCs in Great Britain, with acknowledged very high standards of operation and probity. I have held a Personal Management Licence issued by the Gambling Commission since I entered the industry in 2014.
6. Those of our employees who occupy the specified management offices hold PML's issued by the Gambling Commission in accordance with the licence condition 1.2.1 of the Licence Conditions and Codes of Practice issued by the Commission. We were also one of the first major operators to be asked by the Commission to complete and file Annual Assurance Statements. This is an ongoing comprehensive review of the effectiveness of a business's governance and risk management arrangements in facilitating positive consumer protection and addressing gambling-related harm and crime prevention measures.
7. This detailed tool helps to ensure that the board are actively involved in setting the strategy in relation to compliance with the LCCP as well as promoting safer gambling and in completing that statement demonstrate their accountability. Each filed Statement is thoroughly considered by the Gambling Commission.
8. We take training of staff very seriously. All staff must, during their induction training, complete two core modules on Social Responsibility (SR). This is delivered as eLearning through the Admiral Academy which is a virtual platform to deliver our training. This training is in addition to the training development which James Sturgess also describes in his statement. The first SR module introduces the student to the licensing objectives and contains sections on Access to Gambling by Children and Young Persons, Customer Interaction, signposts to sources of help and self-exclusion. The second module contains sections on complaints and dispute resolution, Access to Premises (the Commission's enforcement officers), Money Laundering and Terrorist Financing, employment of children and young persons, advertising standards, incidents that require police assistance and the requirement to provide the commission with annual returns. This sets out the regulatory landscape in which we operate and their responsibilities to uphold the licensing objectives. A number of refresh modules on individual topics such as self-exclusion and customer

interaction, from within these core training modules are then completed by staff at least biannually. These include subjects such as Anti Money-Laundering and Terrorist Financing, customer interaction and age verification. We continue to review and augment the training we provide on matters of compliance and social responsibility. For example, in the last 2 years we added a module on Child Sexual Exploitation. We do not permit any children or young persons (whether alone or with adults) in our AGC venues, but we nonetheless provide this training to staff to ensure they maintain the highest levels of awareness of the issues which might arise. We try to provide our employees with the appropriate training to allow them to properly perform their role and ensure they play their role in enabling the Business to meet its wider obligations and responsibilities as a gambling sector operator which takes its responsibilities very seriously.

9. I believe that we were amongst the first operators of venues in our sector, (if not the first), to move to a Think 25 age verification policy and that is our policy in every one of our (age restricted) venues. That is one of the core elements of staff training as borne out by our very high pass rates in the independent age verification test purchasing that is carried out at least twice a year in each venue. In reality, in our experience our AGCs are not attractive to children or young persons and we do not have an issue with them trying to gain access. Despite this and as I have set out above, we still have the appropriate safeguards in place.
10. As Ms Speed mentions at the top of page 2 of her letter of 23rd August 2022, we have been audited and certified by G4 for Responsible Gambling practices and recertified as part of an ongoing cycle.
11. As part of our aim to lead the sector on social responsibly matters, we have introduced the Gamblewise app which works within each venue, providing customers with another tool to support them to manage their gambling behaviours so that they do not become problematic and lead to associated harms. This app allows customers to set themselves limits on the times and locations they want to play and using iBeacon technology, alerts them should they attend a location or visit a venue at a time or date when they have elected not to. The system also alerts staff who are trained to then conduct an interaction with the customer to remind them of the self-imposed limits and to discuss with them their gambling behaviour. This is provided entirely free of charge to the consumer.

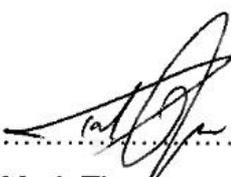
12. We also operate a strict self-exclusion policy which allows customers to be excluded from our venues and others in the locality. Indeed, my team are on the key industry users' group for this system, to ensure that it continues to develop and supports players in the best possible way.
13. Concern has been expressed about our proposed venue attracting anti social behaviour and more. As the Local Risk Assessment prepared for the venue shows, we have detailed procedures and training in place to combat any such risk. We are certainly not complacent, but in practice our venues are not magnets for ASB in any event. There is no alcohol; and we have stringent policies to refuse and remove those who are drunk, under the influence of drugs or vulnerable in other ways, such as homelessness. Non-players are not allowed to loiter in our venues and so they are not attractive places for those who might cause ASB to congregate. This is achieved through clear policies about entry and acceptable behaviour, staff training (not least that on conflict management), effective security installations such as the 'live monitored' hold-up alarm systems and measures to control access such as mag lock style mechanisms and door supervision. We have traded our existing AGC in Walsall on Bradford street for many years and we have not experienced the issues mentioned in the objections even though our existing venue is only about a one minute walk away from the application site. For example, I can see in our returns to the Gambling Commission for last year, we had no reported calls for police assistance and in the reports I receive from my security staff, our venue does not feature.
14. All of our stores are fitted with extensive CCTV for coverage and are equipped with the latest HD cameras and digital recording equipment that ensure we retain a minimum of 30 days' footage. The CCTV can be viewed and reviewed remotely by key managers and security staff and in the event of an alarm activation is monitored live at the alarm monitoring station.
15. We install and use 'live monitored' hold-up alarm systems in our venues. They use technologies that allow the monitoring station to view a venue where the alarm has been activated via a live CCTV stream and to communicate with the venue staff through two-way audio. Monitoring station interventions often de-escalate incidents but if there is an emergency, then the call is made to the Police or other emergency service. This has the impact of removing the risk of false activations and the demand on local police resource as well as enabling live monitoring of any event by trained staff who can intervene via the ceiling mounted speakers to assist staff by deterring

potential offenders and de-escalating confrontational situations. Our venues are also fitted with an intruder alarm system and this is monitored.

16. Each of our stores utilises a three system of 'day safe', time-lock safe and deposit safe to reduce the risk of cash loss in the event of a robbery or burglary.
17. We employ third party cash in transit (CIT) services from a nationally recognised professional and experienced CIT service provider, who service all of our stores with cash collection and coin delivery.
18. As Risk and Compliance Director I convene a quarterly meeting of the Business's Compliance Committee. It is attended by a team including the Business's CEO, COO, our three Regional Operations Directors, Ms Speed, the Head of Marketing, Gaming & Service Director, National Compliance manager and Regional Operations managers. During that day-long meeting we analyse our social responsibility data from each venue, including the numbers of customer interactions, self-exclusions, age verification results and developments and regulatory changes. It is all part of a very focussed approach.
19. The applicant, together with its sister company Talarius Ltd are widely acknowledged to be an excellent operator. It has very high standards and does not suffer bad behaviour – nor does it attract it. And that includes at its current Walsall AGC. I cannot see any justification under the Gambling Act 2005 why the application should not be granted.

Statement of Truth

The contents of this witness statement are true to the best of my knowledge and belief.

Signed .....
Mark Thompson

Dated 8th March 2023.....

Subject: FW: [External]: Gambling Act 2005 - New Adult Gaming Centre (AGC) Premises Licence Application for Admiral, 9-11 Park Street, Walsall, WS1 1LY

From: Tracey Rose
Sent: Friday, September 2, 2022 12:29 PM
To: Elizabeth Speed <espeed@novomatic.co.uk>
Subject: FW: [External]: Gambling Act 2005 - New Adult Gaming Centre (AGC) Premises Licence Application for Admiral, 9-11 Park Street, Walsall, WS1 1LY

FYI

From: Walsall Licensing <H_WALSALL_LICENSING@westmidlands.police.uk>
Sent: 02 September 2022 11:00
To: Tracey Rose <Tracey.Rose@Luxury-Leisure.co.uk>
Cc: Licensing <Licensing@walsall.gov.uk>
Subject: RE: [External]: Gambling Act 2005 - New Adult Gaming Centre (AGC) Premises Licence Application for Admiral, 9-11 Park Street, Walsall, WS1 1LY

Good morning

After assessing this request West Midlands Police have no representation's to make relating to this application.

Kind regards

Jennifer

Jennifer Mellor
Walsall Licensing and Regulatory Services Officer
Walsall Partnership Team
Walsall Police
Civic Centre, Walsall

Tel: 101 ext 8896324

Mobile: 07826 956933

Email: jennifer.mellor@westmidlands.police.uk

Sign-up for neighbourhood policing alerts at www.wmnow.co.uk

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From: Tracey Rose <Tracey.Rose@Luxury-Leisure.co.uk>
Sent: 24 August 2022 10:59

To: Walsall Licensing <H_WALSALL_LICENSING@westmidlands.police.uk>

Subject: [External]: Gambling Act 2005 - New Adult Gaming Centre (AGC) Premises Licence Application for Admiral, 9-11 Park Street, Walsall, WS1 1LY

Importance: High

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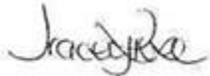
Dear Sirs

**The Gambling Act 2005
New Adult Gaming Centre (AGC) Premises Licence Application for
Admiral, 9-11 Park Street, Walsall, WS1 1LY
Applicant – Luxury Leisure**

The attached documentation is being sent to you as a Responsible Authority under the Gambling Act 2005.

Kindly confirm safe receipt.

Yours faithfully



Tracey Rose
Senior Legal & Licence Compliance Administrator
LUXURY LEISURE, TALARIUS LTD & RAL LTD
NOVOMATIC GROUP
Fifth Avenue Plaza
Team Valley Trading Estate
Gateshead
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Mobile: +44 (0) 7778 499933

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Company Number: 02448035

Hours: Monday to Thursday – 8am to 4.30pm

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