

LCCP & Social Responsibility Policies & Processes

Version effective from 31st October 2021

Contents

1	Introduction and Overview	Page 3
	<u>Operating Licence Conditions</u>	
2	Personal Licences	Page 7
3	Technical Standards	Page 11
4	Cash and Cash Equivalents	Page 15
5	Fair and Open Practice	Page 19
6	Money Laundering and Terrorist Financing	Page 23
7	Access to Premises	Page 33
8	Information Requirements	Page 37
	<u>Codes of Practice</u>	
9	Combating Problem Gambling	Page 42
10	Access to Gambling by Children and Young Persons (Including Employment of Children and Young Persons)	Page 47
11	Self-exclusion	Page 52
12	Customer Interaction	Page 60
13	Advertising Standards and Marketing	Page 69
14	Complaints and Dispute Resolution	Page 74
15	Assessing Local Risk	Page 79

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.

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
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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

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 customers 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
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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.