

Cheltenham Borough Council Licensing Sub Committee-Alcohol and Gambling

Meeting date: 5 June 2024

Meeting time: 4.00 pm

Meeting venue: Council Chamber - Municipal Offices

Membership:

Councillor Dr David Willingham, Councillor Simon Wheeler, Councillor Dilys Barrell (Reserve) and Councillor Julie Sankey

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Phone: 01242 264 130

Agenda

1 Election of Chair

2 Apologies

3 Declarations of interest

4 Application for a Premises Licence - ADMIRAL, 218 High Street, Cheltenham, GL50 3HF (Pages 5 - 172)

5 BRIEFING NOTES

6 Any other items the Chairman determines to be urgent and which requires a decision

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Licensing Sub - Committee (Alcohol and Gambling) – 5th June 2024

Gambling Act 2005: Determination of Application for a Premises Licence – Adult Gaming Centre

ADMIRAL, 218 High Street, Cheltenham, GL50 3HF

Report of the Licensing Team Leader

1. Introduction

1.1 According to the application made to the authority, this operator plans to operate the above premises as an adult gaming centre (AGC).

1.2 The application has been made under Section 159 of the Gambling Act 2005 (2005 Act) and the application is attached at ANNEX 1.

1.3 AGC premises licences allow the holder of the licence to make gaming machines available for use on the premises.

1.4 Persons operating an AGC must hold a gaming machines general operating licence from the Gambling Commission (the Commission) and must seek a premises licence from the local licensing authority for the premises concerned.

1.5 A business operating under an AGC premises licence is entitled under the Act to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises and any number of category C or D machines.

1.6 The applicant has not specified the hours for trading in their application. However, if the licence is granted section 183 of the Gambling Act 2005 applies a condition to all premises licences that facilities for gambling must not be provided on Christmas day, namely the period of 00.01 hours on 25 December until 00.00 hours on 26 December.

1.7 The applicant has provided supporting documentation to their application as detailed below, and these documents are referenced by the annex numbers provided:-

ANNEX 2 A – Cover letter for application.

ANNEX 2 B – Local Risk Assessment May 2024

ANNEX 2 C – Local Risk Assessment Map

ANNEX 2 D – Social Responsibility Policies and Procedures

ANNEX 2 E – Admiral Professional Development Programme

1.8 The authority must determine the application on the basis of the licensing objectives, namely:-

- **Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,**
- **Ensuring that gambling is conducted in a fair and open way, and**

- **Protecting children and other vulnerable persons from being harmed or exploited by gambling.**

1.9 As provided for by Section 153 of the Gambling Act 2005 (the 2005 Act), in making decisions about premises licences the sub - committee should aim to permit the use of premises for gambling in so far as it thinks it is:-

- In accordance with any relevant code of practice issued by the Commission;
- In accordance with any relevant guidance issued by the Commission;
- Reasonably consistent with the licensing objectives; and
- In accordance with the Authority’s Statement of Licensing Policy.

2. Application

2.1 Application (Ref. 24/00471/ADCAP)

2.2 Applicant: Luxury Leisure.

2.3 Premises: 218 High Street, Cheltenham, GL50 3HF

3. Consultation Process

3.1 The application was advertised in accordance with the Gambling Act 2005 (Premises Licence and Provisional Statement) Regulations 2007 both on the premises and in the local press.

3.2 The 28 day consultation period started from the date the application was received.

3.3 Local residents and businesses could make representations to the Authority within the statutory period.

3.4 The Responsible Authorities were notified of the application and given a copy of the notice of application being made.

3.5 Section 157 of the 2005 Act identifies the bodies that are to be treated as responsible authorities. They are confirmed below:-

- (a) a licensing authority in England and Wales in whose area the premises is wholly or partly situated
- (b) the Gambling Commission
- (c) the chief officer of police or chief constable for the area in which the premises is wholly or partially situated
- (d) the fire and rescue authority for the same area
- (e) in England and Wales, the local planning authority; or in Scotland, the planning authority
- ~~(f) the relevant authority as defined in s.6 of the Police and Fire Reform (Scotland) Act 2012 (opens in new tab)~~
- (g) an authority which has functions in relation to pollution to the environment or harm to human health
- (h) anybody, designated in writing by the licensing authority, as competent to advise about the protection of children from harm
- (i) HM Revenue & Customs

(j) any other person prescribed in regulations by the Secretary of State.

4. Background

4.1 The Licensing Authority must under Section 153(1) of the Act exercise its functions relating to premises licensing with an aim to permit the use of the premises for gambling in so far as it thinks fit and in accordance with the relevant codes of practice, guidance, reasonably consistent with the licensing objectives and in accordance with the Council’s Statement of Principles.

4.2 The Licensing Authority can take into account representations relating to an application for a premises licence from either an interested party (a person living sufficiently close to the premises to be likely to be affected by the authorised activity or has a business interest that may be affected or represents persons in either of these two groups) or a responsible authority.

4.3 Any representations must be relevant and not frivolous or vexatious.

4.4 Section 152 of the 2005 Act provides that a premises licence may not be issued in respect of premises if a premises licence already has effect in relation to the premises, except for a track premises licences. The Explanatory Notes for section 152 state “The general position for premises licensing is that premises may only be subject to one premises licence at a time... The effect of this requirement is to limit the principal activity on the premises to the provision of facilities for a particular type of gambling activity.”

4.5 Regulations made under the 2005 Act impose mandatory and default conditions that promote the licensing objectives. A list of these Mandatory and Default conditions is attached at ANNEX 4 to this report.

4.6 A premises licence issued by the Authority will be subject to the mandatory and default conditions for that licence type. However, paragraph 9.27 of the guidance states that Section 169 of the Act gives licensing authorities: “The ability to exclude from premises licences any default conditions that have been imposed under Section 168;” and “The power to impose conditions on the premises licences that they issue.”

5. Gambling Commission Guidance and Licence Conditions and Codes of Practice (LCCP)

5.1 The Gambling Commission have produced guidance for local authorities in relation to the 2005 Act. The information in this section of the report relates to the relevant points within the Guidance which members may wish to consider.

<https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities>

5.2 However this document is lengthy and produced to assist Licensing Authorities and indirectly all parties to an application to understand this legislation, and assist where it is applicable to a specific licence application.

5.3 To assist all parties it is suggested that the following parts of this guidance would appear most relevant to this application, and this may assist in focusing attention on those parts:-

Parts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 16, 21, 33, 36 and Appendixes A, B, D, F, G, I

5.4 The Committee can, if it feels minded impose conditions on the premises licence.

Paragraph 9.28 of the Guidance states that

“Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission’s codes of practice and this guidance, or their own statement of policy.”

24/00471/ADCAP		
	Page 3 of 9	Last updated 28 May 2024

5.5 The guidance goes further to state that authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions. If the authority does decide that the only way to address a particular concern is through conditions it must be proportionate to the circumstances which they are seeking to address.

5.6 The guidance encourages licensing authorities to ensure that premises licence conditions are relevant to the need to make the proposed building suitable as a gambling facility, directly related to the premises and the type of licence applied for, or fairly and reasonably related to the scale and type of the premises and reasonable in all other respects (see paragraph 9.31 of the guidance).

5.7 Local authorities are also prevented from attaching conditions relating to certain matters.

Paragraph 9.32 of the guidance sets out the relevant sections of the 2005 Act where conditions may not be imposed.

“...The relevant sections are:

- s.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition
- s.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation
- s.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)
- s.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.

5.8 A link is provided below for further background in relation to the consideration of this application. The Licence Conditions and Codes of Practice (LCCP) are important points of reference for licensed operators in running their businesses.

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

5.9 The LCCP details a great deal in terms of responsibilities for operators and is helpful reading in respect of particular concerns or for reassurance in respect of certain concerns.

5.10 The LCCP details the conditions of operator’s licences and personal licences issued by the Gambling Commission.

6. Licensing Statement of Principles

6.1 The Licensing Authority’s Statement of Principles sets out the council’s policy considerations in relation to applications made under the Gambling Act. The Statement re - emphasises the Authority’s position in relation to Section 153 of the Act and sets out the principles and policies that the Authority will adopt when considering and determining Gambling Act applications. It can be found here in full:

https://www.cheltenham.gov.uk/downloads/file/3298/gambling_statement_of_principles

6.2 Section 5 of Part A discusses Local Risk Assessments and should be considered in determining this application. At 5.2 it states:-

Social Responsibility (SR) code 10.1.1 requires licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and to have policies, procedures and control measures to mitigate those risks. In undertaking their risk assessments, they must take into account relevant matters identified in this policy statement.

6.3 It goes on to state at 5.4 and 5.5:-

5.4 This authority will expect the local risk assessment to consider as a minimum:

24/00471/ADCAP		
	Page 4 of 9	Last updated 28 May 2024

5.4.1 the location of services for children such as schools, playgrounds, leisure/community centres and other areas where children will gather;

5.4.2 the demographics of the area in relation to vulnerable groups;

5.4.3 whether the premises is in an area subject to high levels of crime and/or disorder.

5.4.4 how vulnerable people, including people with gambling dependencies are protected.

5.5 This authority will also expected local risk assessments to include, specifically, any relevant information about:

5.5.1 Self exclusion details

5.5.2 Attempts to gamble by under 18s

5.5.3 Outcome(s) of test purchase results

5.5.4 ASB issues on incident logs

5.5.5 Police reports and call outs

5.5.6 Sharing information with nearby agencies e.g. treatment centres

5.5.7 Any protections in place when footfall is the highest

5.5.8 Details of any best practise schemes such as Betwatch or similar

6.4 The statement also notes at 1.1 and 1.2 of Part B:-

1.1 Premises licences will be subject to the requirements set out in the Act and regulations, as well as specific mandatory and default conditions which will be detailed in regulations issued by the Secretary of State. Licensing authorities are able to exclude default conditions and also attach others, where it is believed to be appropriate.

1.2 The authority is aware that in making decisions about premises licences it should aim to permit the use of premises for gambling in so far as it thinks it is: • in accordance with any relevant code of practice issued by the Commission; • in accordance with any relevant guidance issued by the Commission; • reasonably consistent with the licensing objectives, and • in accordance with the Authority's Statement of Licensing Policy

6.5 The statement also discusses the Licensing Objectives at 1.18 – 1.24:-

1.18 Licensing Objectives - Premises licences granted must be reasonably consistent with the licensing objectives. With regard to these objectives, the authority has considered the Commission's guidance and some comments are made below:

1.19 Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime - The authority is aware that the Commission will be taking a leading role in preventing gambling from being a source of crime. The Commission's guidance does however envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. Thus, where an area has known high levels of organised crime, the authority will consider carefully whether gambling premises are suitable to be located there and whether conditions may be suitable such as the provision of door supervisors. The authority is aware of the difference between disorder and nuisance and will consider factors such as whether police assistance was required and how threatening the behaviour was to those who could see it, so as to make that distinction.

1.20 **Ensuring that gambling is conducted in a fair and open way** - The authority has noted that the Commission has stated that it would generally not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way, as this will be addressed via operating and personal licences. There is however, more of a role with regards to tracks which is explained in more detail in the 'tracks' section below.

1.21 **Protecting children and other vulnerable persons from being harmed or exploited by gambling** - The authority has noted the Commission's guidance that states this objective means preventing children from taking part in gambling (as well as the restriction of advertising so that gambling products are not aimed at, or particularly attractive to children). The authority will therefore consider, as suggested in the guidance, whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include supervision of entrance/machines, segregation of areas etc.

1.22 The authority will also make itself aware of the Codes of Practice which the Commission issues as regards this licensing objective.

1.23 As regards the term "vulnerable persons", it is noted that the Commission is not seeking to offer a definition, but states that "it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs".

1.24 The authority will consider this licensing objective on a case by case basis. A list of organisations set up to give help and advice about problem gambling is attached at Appendix D.

6.6 It also provides assistance in respect of the potential attachment of conditions to the grant of a licence from 1.25 – 1.33:-

1.25 Conditions - Any conditions attached to licences will be proportionate and will be:-

- relevant to the need to make the proposed building suitable as a gambling facility;
- directly related to the premises and the type of licence applied for;
- fairly and reasonably related to the scale and type of premises; and
- reasonable in all other respects.

1.26 Decisions upon individual conditions will be made on a case by case basis, although there will be a number of measures The authority will consider utilising should there be a perceived need, such as the use of supervisors, appropriate signage for adult only areas etc. There are specific comments made in this regard under some of the licence types below. The authority will also expect the licence applicant to offer his/her own suggestions as to the way in which the licensing objectives can be met effectively.

1.27 The authority will consider specific measures which may be required for buildings which are subject to multiple premises licences. Such measures may include the supervision of entrances; segregation of gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises in order to pursue the licensing objectives. These matters are in accordance with the Commission's guidance.

1.28 The authority will also ensure that where category C or above machines are on offer in premises to which children are admitted:

- all such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective in preventing access other than through a designated entrance;
- only adults are admitted to the area where these machines are located;
- access to the area where the machines are located is supervised;

- the area where these machines are located is arranged so that it can be observed by the staff of the licence holder; and
- at the entrance to and inside any such areas, there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

1.29 These considerations will apply to premises including buildings where multiple premises licences are applicable.

1.30 The authority is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. As per the Commission's guidance, the authority will consider the impact upon the third licensing objective and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

1.31 It is noted that there are conditions which the authority cannot attach to premises licences which are:

- any condition on the premises licence which makes it impossible to comply with an operating licence condition;
- conditions relating to gaming machine categories, numbers, or method of operation;
- conditions which provide that membership of a club or body be required (the Act specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated); and
- conditions in relation to stakes, fees, winning or prizes.

1.32 Door Supervisors - The Commission advises in its guidance that if a Council is concerned that a premises may attract disorder, or be subject to attempts at unauthorised access (for example by children and young persons), it may require that the entrances to the premises are controlled by a door supervisor and is entitled to impose a premises licence condition to this effect.

1.33 Where it is decided that supervision of entrances/machines is appropriate for particular cases, a consideration of whether these need to be SIA licensed or not will be necessary. It will not be automatically assumed that they need to be licensed, as the statutory requirements for different types of premises vary.

6.7 Section 2 of Part B discusses Adult Gaming Centres specifically:-

2.1 The authority will specifically have regard to the need to protect children and vulnerable persons from harm, or being exploited by gambling and will expect the applicant to satisfy The authority that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises.

2.2 The authority may consider measures to meet the licensing objectives such as:

- Proof of age schemes
- CCTV
- Supervision of entrances/machine areas
- Physical separation of areas
- Location of entry
- Notices/signage
- Specific opening hours

□ Self-exclusion schemes

□ Provision of information leaflets/helpline numbers for organisations such as GamCare.

2.3 This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

7. Responsible Authorities

7.1 No representations were received from any of the statutory responsible authorities.

7.2 Comments were received from the Environmental Health team, which are not deemed as relevant representations in respect of the licensing objectives, but have been passed to the applicant.

7.3 Moreover the Planning Team have advised of the current hours attached to the planning approval for the premises. However, Members should not consider these hours in their decision making, as a venue operator must comply with both any planning restrictions and any licence approval under the Gambling Act 2005, if that is forthcoming.

7.4 The Licensing Authority should consider this application on the merits or otherwise of the application and determine it independently of the planning hours approved.

8. Interested Parties

8.1 Four representations have been received from interested parties. These are attached at ANNEXES 3 A and 3 B of this report. The representation at ANNEX 3 B is accompanied by supporting information at TABs 1 – 10.

9. Options for the sub - committee

9.1 When determining the application the Committee will need to consider the Gambling Act 2005 (including the licensing objectives, the relevant Guidance to Licensing Authorities and the Council's Statement of Principles.

9.2 The sub – committee may:-

a) Grant the application, as per the application with mandatory conditions attached, or

b) Grant the application with mandatory conditions and any conditions the panel believe are necessary to promote the licensing objectives and are proportionate, or

c) Refuse the application.

9.3 Members need to be satisfied that if the application were to be granted there would be no breach of mandatory conditions and the granting of the application would not have a detrimental impact on the licensing objectives.

9.4 If Members are minded to attach conditions they must consider section 6.6 and 6.7 of this report, along with all relevant elements of the Gambling Commission Guidance and LCCP, along with the authority's policy.

10. Public sector equality duty

10.1 The Council in its capacity as Licensing Authority has a duty to have regard to its public sector equality duty under section 149 of the Equality Act 2010. In summary, section 149 provides that a Public Authority must, in the exercise of its functions, have due regard to the need to:-

(a) eliminate discrimination harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and

(c) foster good relations between persons who share a relevant protected characteristics and persons who do not share it.

Section 149 (7) of the Equality Act 2010 defines the relevant protected characteristics as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Background Papers

One Legal - E-mail:

legalservices@onelegal.org.uk

Report Author

Contact officer: Mr Jason Kirkwood
Job title: Team Leader Licensing
E-mail: licensing@cheltenham.gov.uk
Tel no: 01242 262626

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Page 15

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

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

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

Where the application is—

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

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

Part 1 – Type of premises licence applied for

Regional Casino

Large Casino

Small Casino

Bingo

Adult Gaming Centre

Family Entertainment Centre

Betting (Track)

Betting (Other)

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

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

Part 2 – Applicant Details

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

Section A

Individual applicant

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

2. Surname:

Other name(s):

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

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

Postcode:

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

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

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

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

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation:

LUXURY LEISURE

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

7. The applicant's registered or principal address:

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

Postcode: **NE11 0BL**

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

000-001876-N-103087-024

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

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

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

Part 3 – Premises Details

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

ADMIRAL

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

**218 HIGH STREET
CHELTENHAM**

Postcode: **GL50 3HF**

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

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

THE PREMISES ARE LOCATED ON THE GROUND FLOOR OF A THREE STORY BUILDING, WITH NO RESIDENTIAL DWELLINGS ABOVE, IN A HIGH STREET, MIXED USE LOCATION

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

NO *[delete as appropriate]*

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

Part 4 – Times of operation

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

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

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

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

Part 5 – Miscellaneous

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

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

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

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

NO

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

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

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

Part 6 – Declarations and Checklist (Please tick)

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

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

Checklist:

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

Part 7 – Signatures

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

Signature:

[Redacted signature]

Print Name:

[Redacted name]

Date:

27/04/2024

Capacity:

GROUP GENERAL COUNSEL

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

Signature:

Print Name:

Date:

(dd/mm/yyyy)

Capacity:

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

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

Part 8 – Contact Details

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

[Redacted name] – **GROUP GENERAL COUNSEL**

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

[Redacted telephone numbers]

24. Postal address for correspondence associated with this application:

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

Postcode: **NE11 0BL**

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

[Redacted email address]

27th March 2024

Licensing Section
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA

Our Ref: XX/GA05/AGC-New

By e-mail only:-
licensing@cheltenham.gov.uk
cc: jason.kirkwood@cheltenham.gov.uk

Dear Sirs

**Re: Gambling Act 20005 (“the Act”)
Application for an Adult Gaming Centre Premises Licence (‘AGC’) for
Admiral, 218 High Street, Cheltenham, GL50 3HF
Applicant – Luxury Leisure**

I refer to my email of 14 March and my colleague’s emails to and conversations with your team. I confirm that we wish to apply for an AGC premises licence at 218 High Street, Cheltenham, GL50 3HF (the “Premises”).

As you may know, the Premises previously traded as ShoeZone and has been closed since March 2022. We have been granted planning permission to operate the Premises as an AGC. I confirm that Luxury Leisure has the right to occupy the entire building, but the AGC licence will be restricted to the ground floor.

You have confirmed that you are happy to receive this application by e-mail and that on filing, you will provide an online payment link for the application fee of £1,681.

Together with its sister company Talarius, Luxury Leisure is the largest operator of AGCs in the UK. We are long established, having held operating licences since the inception of the Gambling Commission and are now part of the global Novomatic Group of companies. We have a long record of effective and responsible management throughout Great Britain. We are founder members of the industry trade association BACTA, where we are members of the governing committees; I am the past Chairman of the AGC division and am the current Chairman of its Social Responsibility committee.

We have a good relationship with GambleAware, to whom we make substantial annual contributions towards research, education and the treatment of gambling harm and are also supporters of YGAM, (a charity which works to inform educate and safeguard young people against gambling harms) and Betknowmore (a charity which seeks to address gambling related harm in UK communities).

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

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

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

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

- h) We provide a safe system for payment of winnings. The majority of the machines in the Premises will be “ticket in ticket out” (TITO), which is a system that gives tickets on winning, which can be redeemed for cash at the customer’s convenience and time of choosing.
- i) The Premises will have adequate lighting inside and out and the lighting, layout and fitting out will be designed to minimize conflict and opportunities for organized crime and disorder.
- j) Staff will be provided with portable alarm activators, and the Premises will be fitted with a live monitored hold-up alarm system.

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

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

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

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

- f) Staff will be trained in relation to customer interaction and records of customer interactions will be maintained. Our model (and indeed that of AGCs generally) differs from that of betting premises. Our staff constantly patrol the gaming floor, speaking with and observing customers. Observation and interaction are key parts of our bespoke staff training and staff observe customers' patterns of play as part of getting to know and supporting them. They are also trained to recognise customers who may be experiencing difficulties or stress and are able to signpost individuals to external support services as part of such an interaction. I deal further with training generally as a separate item below.
- g) As we do at all of our AGC sites in accordance with our operating licence conditions, we will offer self-exclusion to customers who experience difficulties with gambling. We are members of a multi-operator self-exclusion scheme for AGCs. At the end of any self-exclusion period, the self-exclusion will remain in place for a further 6 months unless the customer takes positive action in order to gamble again and will be given one day to cool off before being allowed to access gambling facilities.
- h) We will install i-beacon technology to operate the GambleWise app for customers who wish to use it to help manage their time spent in the venue. We operate this system throughout our national estate, offering the service to customers free of charge.
- i) We retain the services of a third-party independent test purchasing organisation, Serve Legal, to conduct unannounced test purchases at all of our age restricted sites twice a year and this will apply to the Premises. As you are aware, the results are reported to the relevant local authority and to the Gambling Commission. Our "pass rate" is higher than the industry average and indeed higher than testing for other age restricted products. Any issues are investigated promptly and dealt with.
- j) Appropriate amounts of problem gambling leaflets and posters will be available on the Premises, both within the gaming areas and for collection in more discreet locations, such as the toilet areas.

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

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

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

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

Defibrillator

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

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

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

- an application form;
- a drawing referenced CHELT218_003. You will see that the drawing is coloured to show the boundary of the premises marked red and the gaming machine area marked green. We draw your attention to the notes on the drawing;
- a Local Risk Assessment for the site. As you will note, it has been prepared as if we were trading at the Premises;
- Our current G4 certificate;
- Our Social Responsibility Policies and Procedures; and
- A brochure on the Admiral Academy professional development programme.

I confirm that in accordance with The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulations 2007, a notice has been placed at the premises "*in a place at which it can conveniently be read by members of the public from the exterior of the premises*" (Regulation 12 (6) (b) (i)). I have seen reference in the council's guidance note to this notice having to be on blue paper, but that of course applies to applications made under the Licensing Act 2003 and not the Gambling Act 2005. Accordingly, our site notice is on white paper.

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

We will contact you in early course to discuss the application in more detail and to answer any outstanding questions.

In the meantime, please acknowledge receipt of the application and confirm that it is in order, so that we can pay and serve the requisite notices on the Responsible Authorities as soon as possible.

Yours faithfully


Group General Counsel
Novomatic UK
For Luxury Leisure


Enclosures

Adult Gaming Centre Local Risk Assessment

Premises

Premises Name:	Admiral
Premises Address:	218 High Street, Cheltenham
Premises Post Code:	GL50 3HF
Premises Licence Number:	TBC
Category of Premises:	AGC

Company

Operating Company:	Luxury Leisure
Operating Licence Number:	1876

Assessment Writer

Name of Person Writing this Assessment:	xxxxxx
Position within Company or Name of Authorised Agent:	Area Support Manager
Date of this Assessment	01 May 2024
Date that Original Assessment was Written	01 May 2024

Gambling Act 2005 – The Licensing Objectives

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

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

This document seeks to assess the risk to these objectives that our operation may pose and sets out the measures we have put in place to mitigate that risk.

Corporate Social Responsibility

- Luxury Leisure Talarius have attained the prestigious Global Gaming Guidance Group (G4) accreditation. This is only awarded after a rigorous audit of the company's responsible gambling measures. Furthermore, the company have to be reassessed every 2 years in order for it to be maintained.
- Personal Management Licences (PML) are held by those responsible for management functions as required by the Gambling Commission. This includes Area Managers at a local level.
- We hold quarterly compliance meetings where the Chief Executive and Chief Operating Officer review compliance data and processes with the Compliance department and Operations Directors.
- We carry out induction training for all new starters, supported by regular refresher training for all members of staff via our Admiral Academy e-learning system.

Local Authority Statement of Principles

The local authority statement of principles (SOP) in relation to the Gambling Act 2005 has been considered in the completion of this assessment. The SOP recognises the significant requirements of the LCCP placed on operators to promote safer gambling and to prevent harm by supporting customers through implementing mandatory measures such as self-exclusion and signposting to sources of help. It also sets out its expectations with regards Local Risk Assessments which is detailed and has been considered in the completion of this assessment.

Local Area and Site Profile - Overview

The SOP do not offer specific guidance on the geographic extent to be considered when completing this assessment and does / does not contain a local area profile. For the purposes of this risk assessment, we have used a 500-metre radius when considering the local area.

The AGC is located in the town centre on the main high street and sits amongst other high street retailers and local shops. There are a number of high street banks with ATM facilities. Also, there are a number of licensed betting offices in the vicinity of the AGC, but they are not clustered in one part of the town centre, with only two in close proximity to the venue. There are two other AGCs operated by a competitor in the town centre. There are also several premises licensed for the sale and consumption of alcohol within the local area.

There are bus stops outside of the venue and on the opposite side of the street. The mainline train station is not within the 500-metre radius but is a 25 minute walking journey.

Your Circle (Gloucestershire) operates within the area of the AGC which offer support for those suffering from gambling addiction. In addition, there is support operated by Addiction Helpline in Cheltenham; which provide telephone assistance and rehabilitation treatment.

The venue has a single entrance/exit at street level to the front, a double doorway leading into closed lobby area then through glass doors into the gaming area which is rectangular in shape. The meet and greet station is located to the left of the entrance on the upper section of the ground floor, which is accessed by a few steps, giving a clear line of sight and command of the entrance. The Venue will offer machines of category D, C and B3 with stakes ranging from 10p to a maximum £2. The venue does not offer VIP or loyalty schemes.

The venue trades 7 days per week, between the hours of:

Monday – Friday 9am – Midnight

Saturday – Sunday 10am – 10pm

Late evening trading has the addition of an access control system (mag Lock mechanism) which is fitted to the doorway. The venue also has a live monitored hold-up alarm system with remote monitoring which accesses the venue CCTV and can communicate with staff through ceiling mounted mics and speaker. The monitoring station staff can offer verbal assistance over our speaker system or call on emergency services such as the police if required. This system is activated by pressing the PA which each team member is allocated or the fixed PA. A door sensor is also fitted, alarming any time someone enters the venue.

The venues rota is always staffed with a minimum of 2 people including a Manager, Assistant Manager or Supervisor.

Luxury Leisure Talarius contracts with a reputable national security company to supply all venues with licenced security personnel as and when required.

Local Area Profile – Premises Licence (Gaming and Alcohol)

There is an additional Two AGC's, both operated by Be Lucky, approximately 50 metres and 150 metres away from the proposed AGC.

There are several LBO's within the town centre but not clustered together; with Ladbrokes and Betfred being within close proximity to the AGC.

In the immediate vicinity of the AGC are a few public houses/bars; namely Cosy Club (trading Sun-Wed 9am-11pm, Thurs, 9am – midnight, Fri/Sat 9am – 1am), Fight Club (trading Sun-Wed 1130am-midnight, Thurs, 1130am – 1am, Fri/Sat 1130am – 2am), The Alchemist (trading Mon-Wed 12pm-midnight, Thurs, 12pm -1am , Fri 12pm – 2am, Sat 10am – 2am, Sun 11am-11pm) and Smokey Joes Dinner Bar (trading Fri/Sat 1030am – 11pm, Sun 1030am – 3pm – All other days closed).

In addition, within close proximity to the AGC is The Brewery Quarter which houses a number of late-night bars and eateries.

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

Local Area profile - Education Providers and facilities for young people and children

There are 2 nurseries within the 500-metre radius of the AGC; Bright Eyes Day Nursery and Elephant Moon Day Nursery.

There are also 2 schools within the 500-metre radius of the AGC; The Catholic School of St Gregory The Great and Holy Trinity C of E Primary School.

The University of Gloucestershire is 0.7miles from the AGC; and Dunalley Primary School is 0.6miles from the AGC.

There are a number of retail and fast-food establishments that may appeal to children and young people in the vicinity of the AGC. During a site visit as part of the completion of this Local Risk Assessment there was no evidence of young people congregating in the vicinity of the premises.

We operate a strict Think 25 policy for anyone that enters the premise, which is tested twice a year by Serve Legal. Our annual pass rate for all of our estate is over 94% and all test purchase results are communicated to the local authority.

Our external advertising is not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear.

Local Area profile – Financial institution sites

Cheltenham High Street displays a retail/business profile similar to that of many high streets and as such has several high street Banks with free of charge withdraw ATM facilities.

There is also a Pay Day Loan facility within proximity to the AGC offering various services (cash for gold, cheque cashing, advances on pay day) by Money Express, as well as CEX offering buying and selling of electrical items.

Local Area profile - Medical & Support facilities

There is one medical centre within the 500m away offering all NHS services: St Pauls Medical Centre. There is also a family planning clinic within proximity of the AGC; The Milsom Centre.

Gambling Anonymous operates within the area of the AGC which offer support for those suffering from gambling addiction.

In addition, there is support operated by The Drug & Alcohol Recovery Service at Bramley House.

Within close proximity is Cheltenham 1st Stop offering a variety of services with its aim to prevent homelessness ([Caring for Communities and People \(ccp.org.uk\)](#)), plus Cheltenham Open Door – Guest Hub ([Cheltenham Open Door – Welcoming those who need us with food, friendship and support](#))

Local Area profile - Residential

There are lots of residential properties within the vicinity, apartments above retail shops and streets of residential properties as you head outside the 500-metre radius of the AGC.

There are a couple of student accommodation within close proximity of the AGC; Shaftsbury Hall and Sutherland House; however, as you venture outside of our 500-metre radius there are numerous other student accommodation.

Within close proximity is Cheltenham 1st Stop offering a variety of services with its aim to prevent homelessness ([Caring for Communities and People \(ccp.org.uk\)](#)), plus Cheltenham Open Door – Guest Hub ([Cheltenham Open Door – Welcoming those who need us with food, friendship and support](#))

During a site visit as part of the completion of this Local Risk Assessment there was little evidence of homelessness in the vicinity of the venue. It was noted that a local organisation, Cheltenham Night Team, were providing hot drinks to a small group of individuals in the local area that were assumed to be homeless. Luxury Leisure team members are trained and encouraged to log an individual with Street Link who is homeless and seeks to enter the venue.

Local Area profile – Crime

There are no known local problems with crime or anti-social behaviour specifically linked to gambling but the area itself does have relatively high levels of crime. In December 2023 (latest data available) there were 256 reported crimes or incidents of Anti-Social Behaviour within a 1/4 mile radius of the GL50 3HF postcode of the premises. The three biggest crime types were Violent, Shoplifting and ASB. [[UKCrimeStats.com - The Leading Independent Crime Data Platform](#)]

We maintain a log on the premises of all incidents of anti-social behaviour or alleged crimes and report these incidents to the Regional Security Manager for review and further investigation where appropriate. Where available we will join local Betwatch schemes.

Local Area Profile – Vulnerable people

The Gambling Act requires that we seek to safeguard the interests of young and other vulnerable people from being harmed or exploited by gambling. Vulnerable people are not defined by the Act or the LCCP. However, the Gambling Commission's states "it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs".

We are conscious that there are other reasons why someone could be vulnerable. For example, we train staff to be aware of signs that the customer might be suffering from mental illness, recent bereavement, long-term or terminal illness, difficulty communicating, learning disability, substance misuse or addiction and the breakdown of close personal relationships.

Cheltenham has a population of approximately 118,00 [2021 Census] 91.4% of the population are white with the next largest ethnicity being Asian (4.1%). The premises sit in the St Paul's Ward of the Local Authority, which has high levels of deprivation, especially in comparison to the rest of the Local Authority.

We have clear guidelines in place for monitoring customer behaviour and interacting with customers who have been identified as being vulnerable or may be suffering from gambling related harm. This has been underpinned by additional external training, provided in collaboration with BetKnowMore and YGAM, for all venue staff on these subjects between January and March 2023.

Luxury Leisure team members are trained and encouraged to log an individual with Street Link who is homeless and seeks to enter the venue.

During a site visit there was no evidence of street drinking, drug taking or other anti-social behaviour in the vicinity of the venue.

Luxury Leisure is proud that all our AGCs are members of the Walk Safe initiative, ensuring a safe space is given should a member of the public need assistance. All our team members are trained to deal with such situations, and all our venues display the Walk Safe logo within their window; as well as the AGC appearing on the Walk Safe App.

Risk Identification	LO	Level of Risk	Impact	Risk Management	Reviewed
Children entering site unnoticed.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - All staff are trained in social responsibility policies as part of their induction and are provided with regular refresher training. - Layout of premises considered in staff numbers and deployment. Breaks and shift changes are planned to take account of school closing times to ensure there is always supervision of the gaming area. Breaks and shift changes ensure there is always supervision of the gaming area. - Staff deployed to specific zones for which they have responsibility. - Machine layout takes into consideration lines of site to the entrance. - Clear 'Over 18' signage is displayed, visible from outside and also in the entrance to the arcade. - There is a lobby area beyond the doorway from the street ensuring that those who enter cannot simply inadvertently walk in without passing through a further door and past clear Over 18 signage. - The meet and great station is positioned to give line of sight to the entrance. - CCTV cameras positioned to cover all parts of the premises but specifically the entrance and secluded parts of the premises. - The company operate a 'Think 25' policy in which all staff are trained at induction and they receive regular refresh training. - Staff log all attempts to enter by young persons on the appropriate log. - Posters and displays of acceptable identification on site for staff. - The company use independent test purchasing operations. All venues are tested at least twice in a rolling 12-month period. 	May 2024
Children enter site with adult.	C	Low	Severe to business. Moderate to child.		May 2024
Children enter site and play before being noticed.	C	Low	Severe to business. Severe to child.		May 2024
Children enter site and play where age is misjudged.	C	Low	Severe to business. Severe to child.		May 2024
Age verification is not sought.	C	Low	Severe to business. Severe to child.		May 2024
Children knowingly allowed to play.	C	Low	Severe to business. Severe to child.		May 2024

				<ul style="list-style-type: none"> - Stringent disciplinary procedures for failures identified through age verification testing, where staff negligence is identified or where staff allow children into a venue. - Social Responsibility returns data reviewed through submissions from Area Managers to National Compliance Manager. - All social responsibility returns data subject to a quarterly compliance review. 	
Young person wearing face covering is not challenged for verification of age.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - Staff have been trained to ask a customer to lower a face covering if necessary, this has the effect of allowing staff to adjudge the apparent age of all customers and if necessary challenge for verification by the presentation of ID. 	May 2024
Child sexual exploitation (CSE) - Sexual abuse where a child or young person is forced or manipulated into inappropriate sexual activities, often in exchange for alcohol, drugs, gifts or attention. Although children and young persons are not permitted into AGC premises, it is possible that a customer could target or be targeted by nearby children or young persons as they enter or leave our venue.	C	Low	Severe to business. Severe to child or young person.	<ul style="list-style-type: none"> - Our staff are trained to look for the signs of CSE using a CSE training module on our Admiral Academy training platform. 	May 2024
Those considered to be vulnerable, having access to gambling	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - Staff are trained to identify vulnerable customers as defined in the local area and site profile. 	May 2024

				<ul style="list-style-type: none"> - Staff are trained to interact with customers who they have identified as being potentially vulnerable and monitor their play. - Staff are trained to refuse entry and service to anyone who they feel is under the influence of alcohol or drugs - Staff are trained to identify customers who play more than they want to and interact if a customer displays these behaviours. 	
Those made vulnerable through abuse of drugs and/or alcohol having access to gambling.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - The venue is installed with iBeacon technology able to work with the 'Gamblewise' app which is free for our customers to download and use to assist them manage their time spent gambling. - Gamcare details are prominently displayed on all gaming cabinets, along with price of play. Game rules and payout details are also displayed either on the cabinet or within the game menu. - Staff are trained and encouraged to log an individual with Street Link who is homeless and seeks to enter the venue. 	May 2024
Those who may be considered vulnerable through gambling more than they want to, 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	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - A responsible Gambling message is displayed at all positions where gaming is possible through posters, leaflets and stickers on machines. - Responsible Gambling Poster or leaflet holder adjacent to ATM or PDQ Machine. - Poster/Leaflet designs incorporate QR codes for GAMCARE, Gambleaware contact information. - Responsible Gambling information stickers on all machines. - Compliance Audit function performed by Area Manager and also through regional field auditors and security managers. - Luxury Leisure Talarius have attained the Global Gaming Guidance Group (G4) accreditation for our responsible gambling measures. 	May 2024
Failure to provide information to players on responsible gambling.	C	Low	Severe to business Severe to customer		May 2024
Failure to provide information in a suitable format.	C	Low	Severe to business. Severe to customer.		May 2024

Failure to recognise signs of problem gambling.	C	Low	Severe to business Severe to customer	<ul style="list-style-type: none"> - Additional aspects to training incorporating guidance on identifying problem gambling, procedure for interaction and sources of help. - Clear policy to detail the procedure for interaction and level of staff that can 'intervene'. 	May 2024
Failure to interact with customer displaying signs of problem gambling.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - 'Stay in control leaflets' with QR codes to GAMCARE and Gambleaware. - All recorded SR data subject to a quarterly compliance review by senior management. 	May 2024
Failure to sign-post customer to help and support.	C	Low	Severe to business. Severe to customer.		May 2024
Failure to properly administer self-exclusion.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - Staff training incorporates policy and procedure for self-exclusion. - Since April 2016 Luxury Leisure/Talarius have operated one or both of the AGC national multi-operator self-exclusion schemes (MOSES), offered through BACTA and IHL. 	May 2024
Failure to impose exclusion in locality and in same types of establishments.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - Tablet devices are provided at all sites to take an image of customers wishing to self-exclude so that the exclusion can be effectively enforced. - The location of the site in relation to the customer's home address and any regular routes to work for example will be considered if the customer requests a wider exclusion. 	May 2024
Customer breaches of self-exclusion.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - All SR returns data subject to a quarterly compliance review. - All staff trained to regularly check the MOSES gallery relating to their venue to ensure information shared from other local operators relating to self-excluded customers is monitored. 	May 2024
Customer breaches self-exclusion by using another to gamble on their behalf.	C	Unknown	Moderate to business. Severe to customer.	<ul style="list-style-type: none"> - Staff have been trained to ask a customer to lower a face covering if necessary This has the effect of allowing staff to adjudge the apparent age of all customers and if necessary challenge for verification by the presentation of ID and also to identify if a customer attempting to enter is self-excluded. 	May 2024

<p>Money Laundering (Dye stained notes and Criminal spend).</p>	<p>A</p>	<p>Low</p>	<p>Low – Severe</p>	<ul style="list-style-type: none"> - The company have a Money Laundering Reporting Officer (MLRO). - Staff training at induction and refresh training. - Luxury Leisure/Talarius have a corporate AML Risk Assessment and policies and procedures relating to AML. - £1000 limit on automated transactions using TITO. Any greater amounts require the intervention of a staff member. - Technical parameters on note acceptors designed to reject poor quality notes. (Often notes obtained by way of robbery are perished). - Manufacturer activity alerts from machines on independent networks (primarily SG and Storm). - TITO tickets not transferable between sites. - Slim change machines set up so that notes cannot be changed 'up'. - Comprehensive CCTV coverage in all sites. - Partnerships with local police where appropriate to identify and discourage criminal spend. 	<p>May 2024</p>
<p>Commission of criminal offences to fund problem gambling</p>	<p>A</p>	<p>Low</p>	<p>Low – Severe</p>	<ul style="list-style-type: none"> - Stringent policy and procedures in place to identify and intervene with customers who may be vulnerable to harm through problem gambling. See above under Information to players, Customer Interaction and Self-Exclusion. 	<p>May 2024</p>
<p>Anti-social behaviour associated with late night operation</p>	<p>A</p>	<p>Low</p>	<p>Low – Severe</p>	<ul style="list-style-type: none"> - Access control measures either through door supervision or physical controls, utilised at night where appropriate or This site does not operate late at night. - Policy of non-players refused entry or asked to leave. - Refreshments offered only to players and known customers. 	<p>May 2024</p>
<p>Poor security increasing vulnerability to robbery or theft.</p>	<p>A</p>	<p>Low</p>	<p>Low – Severe</p>	<ul style="list-style-type: none"> - A 'live-monitored' hold-up alarm system is used so that monitoring station staff can communicate with and support shop staff through CCTV and two-way audio using mics and speakers mounted in the ceiling. 	<p>May 2024</p>

				<ul style="list-style-type: none"> - All staff have personal attack 'hold-up' alarms and there are some strategically placed static alarms also. - The premises are fitted with an intruder alarm which can also be live monitored from the monitoring station, meaning alarm activations are verified, using sight and sound, by the monitoring station thus reducing the number of false alarms to police. - Extensive CCTV coverage with recording of approx. 30 days of footage. - Strict key storage procedure. - Time lock and/or time delay safes utilised. - Drop safe used for banking. - Staff personal floats limited to £100. - Toughened glass for window front. - TITO facility enables customers to come and go without carrying cash. 	
Advertising Standards and Marketing	A	Low	Low – Moderate	<ul style="list-style-type: none"> - All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). We ensure that our marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008), including 'free bet' offers, do not amount to or involve misleading actions or misleading omissions within the meaning of those regulations. We adopt the general principles that our advertising is: <ul style="list-style-type: none"> - legal, decent, honest and truthful - Prepared with a sense of responsibility to consumers and to society - Respectful to the principles of fair competition generally accepted in business - Not intended to bring advertising into disrepute. <p>Specifically we ensure that:</p>	May 2024

				<ul style="list-style-type: none"> - Advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise - Advertisements and promotions are socially responsible and do not encourage excessive gambling - Care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable - Advertising is not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear. No medium is used to advertise gambling if more than 20% of its audience is under 18 years old - Persons shown gambling are not, nor do they appear to be, under 25 years of age - There is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer - Advertising and promotional material carries a reference for the need to keep gambling under control - It is never suggested or implied that gambling is a means of getting out of financial difficulty. - Advertising and marketing material should not appear on any primary web page/screen or micro-site that provides advice or information on responsible gambling. - Marketing decisions are controlled by the central marketing department and a system is in place for local managers to apply for marketing initiatives that are approved by the Head of Marketing to ensure they are legal, honest and compliant with the Gambling Act/License Conditions & Codes of Practice. 	
Failure to display Terms and Conditions	B	Low	Low – Moderate	<ul style="list-style-type: none"> - Terms and Conditions displayed prominently within the premises. 	May 2024
Failure to deal with customers making	B	Low	Low – Moderate	<ul style="list-style-type: none"> - Machines only acquired from licensed suppliers. - Additional machine compliance checks completed by a technician when installing new machines. 	May 2024

<p>complaints about the outcome of gambling</p>				<ul style="list-style-type: none"> - Machine maintenance carried out by qualified technician. - Clear service complaint protocol to deal with machine or game performance related customer complaints. - Customer complaints policy and procedure. - Complaints policy and procedure displayed prominently in each site. - Complaint forms available at each site. - Luxury Leisure head office complaints telephone line. - Novomatic UK group complaints channel. - Registered with an ADR entity – BACTA. 	
<p>Insufficiently trained or inexperienced staff</p>	<p>A/ B/ C</p>	<p>Low</p>	<p>Low - severe</p>	<ul style="list-style-type: none"> - All staff are trained in on the three licensing objectives as part of their induction and are provided with refresher training every 6 months throughout their employment. - All training is recorded on our Admiral Academy training system that is accessible within the venue. - All training is centrally monitored to ensure completion - All staff are trained on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme. - All social responsibility returns data subject to a quarterly compliance review. Any non-compliance with our policies and procedures is identified and corrected. - All staff receive Conflict Management Training - All staff undertake drug and alcohol awareness training which includes homeless and street drinking 	<p>May 2024</p>

Requirement to Comply

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

Effective as at 6 April 2016

Social responsibility code provision 10.1.1

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

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

Ordinary code provision 10.1.2

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

Local Risk Assessment Venue Colleague Sign Off Sheet

All venue colleagues must sign below to validate they have read and understood the LRA

Signature	Print Name	Signature	Print Name

This page is intentionally left blank

 Banks

Name: Nationwide Building Society
Address: 225, 227 High Street, Cheltenham

Name: Barclays Bank
Address: 128 High Street, Cheltenham

Name: HSBC Cheltenham
Address: 2 The Promenade, Cheltenham

Name: Halifax
Address: 8 Winchcombe Street, Gloucestershire

Name: Cheltenham Post Office
Address: 192-194 High Street, Cheltenham

Name: Santander
Address: 176-186 High Street, Cheltenham

Name: TSB Bank
Address: 153 High Street, Cheltenham

Name: Lloyds Bank
Address: 130 High Street, Gloucestershire

Name: Handelsbanken Cheltenham
Address: First Floor, Regent House, 65 Rodney Road, Cheltenham

Name: Coventry Building Society Cheltenham
Address: 20 Promenade, Cheltenham

Name: Tesco Bank ATM
Address: Tesco Express, High Street, GLOUCESTERSHIRE

 Betting shops

Name: Ladbrokes (custom)
Address: 11, 19 Winchcombe St , undefined, GL52 2LZ

Name: Ladbrokes
Address: 256 High St, Cheltenham

Name: Paddy Power
Address: 122 High St, Cheltenham

Name: Betfred - Cheltenham (High Street)
Address: 228 High St, Cheltenham

Name: Betfred
Address: 85 High St, Cheltenham

Casino/AGC

Name: Be Lucky (custom)
Address: 260-264 High St , undefined, GL503HF

Name: Admiral (custom)
Address: 218 High Street, undefined, GL50 3HF

Name: Be Lucky (custom)
Address: 82-84 High St, undefined, GL50 1EG

Doctors Surgery

Name: The Milsom Centre (custom)
Address: 8 Milsom St , undefined, GL50 4BA

Name: Dr T J A Winniffrith - Dr Hollands & Partners
Address: Cheltenham Tutorial College, Cheltenham

Name: Willis N
Address: Cheltenham Medical Eye Centre, 11 Regent Street, Cheltenham

Name: Riddle F
Address: Cheltenham Medical Eye Centre, 11 Regent Street, Cheltenham

Name: Patel Dr H
Address: Cheltenham Medical Eye Centre, 11 Regent Street, Cheltenham

Name: Mr. Aamir Khan MBBS FRCOG Obstetrician & Gynaecologist
Address: 16, Ormond Terrace, Regent Street, Cheltenham

Name: Simon
Address: 5, 5 Saint Paul's Road, Cheltenham

Drug and Alcohol Treatment facilities

Hostels

Nurseries

Name: Hickory Dickorys Day Nursery Ltd
Address: 19 Cambray Pl, Cheltenham

Name: The Catholic School Of St Gregory The Great
Address: St James' Square, Cheltenham

Pawn Shops

Name: CeX (custom)

Address: 23 Pittville St , undefined, GL52 2LN

Name: Money Express

Address: 324-326 High St, Cheltenham

Name: David Edwards

Address: 61 High St, Cheltenham

Name: CeX

Address: 23 Pittville St, Cheltenham

Name: Promenade Antiques and Jewellers

Address: 18-20 Promenade, Cheltenham

Name: Mann Jewellers

Address: 198 High St, Cheltenham

Name: Goldsmiths

Address: 78 Promenade, Cheltenham

Name: Frederick Allen Jewellers

Address: 24 Winchcombe St, Cheltenham

Name: Bakers Fine Jewellery

Address: 15 Montpellier Walk, Cheltenham

Name: Ernest Jones

Address: Unit 10, Regent Arcade, Cheltenham

Name: Strand Jewellers Cheltenham

Address: 1 Grosvenor Terrace, Cheltenham

Name: Crystals

Address: Regent St, Cheltenham

Name: Beards

Address: 70 Promenade, Cheltenham

Name: HOOPER BOLTON

Address: 6 Promenade, Cheltenham

Payday Loan Shops

Name: Money Express (custom)

Address: 324-326 High St , undefined, GL50 3JF

Name: Central Union Partners Ltd

Address: Ormond Terrace, Regent St, Cheltenham

Name: The Mortgage Branch

Place of worship

Name: Spiritualist Church (custom)

Address: 19 Bennington St, undefined, GL50 4ED

Name: Cheltenham Synagogue

Address: Synagogue Lane, Cheltenham

Name: Cheltenham Minster, St Mary's

Address: 44 Clarence Street, Cheltenham

Name: Trinity Cheltenham

Address: 100-102 Winchcombe Street, Cheltenham

Name: St Gregory the Great RC Church

Address: 10 Saint James' Square, Cheltenham

Name: St Matthew's Church

Address: 44 Clarence Street, Cheltenham

Name: Godfirst Church Cheltenham - The Chapel

Address: The Chapel, Knapp Road, Cheltenham

Name: Cheltenham Friends' Meeting House - Religious Society of Friends (Quakers)

Address: Warwick Place, Cheltenham

Name: St George's church

Address: Dunalley Street, Cheltenham

Name: Bayshill Unitarian Church

Address: Royal Well Lane, Cheltenham

Name: Cambray Baptist Church

Address: Cambray Baptist Church, Cambray Place, Cheltenham

Name: Gloucestershire Chinese Christian Church 格洛斯特郡華人基督教會

Address: 1 Cambray Place, Cheltenham

Pubs and Bars

Name: The Shamrock (custom)

Address: 386-388 High St , GL50 3JD

Name: Yates - Cheltenham

Address: Promenade House, Cheltenham

Name: Coco

Address: 14 Regent Street, Cheltenham

Name: Simply Mobile Bar Hire
Address: 12 Royal Crescent, Cheltenham

Name: Cosy Club
Address: The Brewery Quarter, High Street, Cheltenham

Name: 2 PIGS
Address: Church Street, Cheltenham

Name: Hollywood Bowl Cheltenham
Address: The Brewery Quarter, Henrietta Street, Cheltenham

Name: Turtle Bay Cheltenham
Address: Corner of Pittville &, Albion Street, Cheltenham

Name: The Clarence Social
Address: 1 Clarence Parade, Cheltenham

Name: Brewhouse & Kitchen - Cheltenham
Address: The Brewery Quarter, Henrietta Street, Cheltenham

Name: The Old Courthouse
Address: County Court Road, Cheltenham

Name: KIBOU Japanese Restaurant & Bar - Cheltenham
Address: Unit 36, Regent Arcade, Regent Street, Cheltenham

Name: BarberNBar
Address: 51 Winchcombe Street, Cheltenham

Name: The Tavern
Address: 5 Royal Well Place, Cheltenham

Name: Grill 49
Address: 49 Rodney Road, Cheltenham

Name: MooMoo Clubrooms Cheltenham
Address: 1 Regent Street, Cheltenham

Name: Copa of Cheltenham
Address: 66 Regent Street, Cheltenham

Name: The Bank House - JD Wetherspoon
Address: 15-21 Clarence Street, Cheltenham

Name: Whittle Taps
Address: 1 Regent Street, Cheltenham

Name: Revolution Cheltenham
Address: Clarence Parade, Cheltenham

Page 51

Name: Tailors Eating House
Address: 4 Cambray Place, Cheltenham

Name: Thirteen Degrees
Address: 13 Saint George's Road, Cheltenham

Name: The Feathered Fish
Address: 104-106 Winchcombe Street, Cheltenham

Name: The Frog & Fiddle, Cheltenham
Address: 313-315 High Street, Cheltenham

Name: The Bayshill Inn
Address: 85 Saint George's Place, Cheltenham

Name: Popworld - Cheltenham
Address: 2A Regent Street, Cheltenham

Name: The Bottle of Sauce
Address: Ambrose Street, Cheltenham

Name: Albion House
Address: 7 North Street, Cheltenham

Name: Smokey Joe's Diner, Bar and Venue
Address: 16 Bennington Street, Cheltenham

Name: Flight Club Cheltenham
Address: Unit 11 & 12, The Brewery Quarter, Henrietta Street, Cheltenham

Name: St. Georges Vaults
Address: 53 Saint George's Place, Cheltenham

Name: The Alchemist Cheltenham
Address: The Brewery Quarter, Henrietta Street, Cheltenham

Name: BrewDog Cheltenham
Address: Unit 3, The Brewery Quarter, Henrietta Street, Cheltenham

Name: Croft & Jones Trading Co
Address: 1 Clarence Parade, Cheltenham

Name: Hub Box Cheltenham
Address: Unit 7A, The Brewery Quarter, Saint Margaret's Road, Cheltenham

Name: United Services Social Club
Address: Nibley House, 7 North Place, Cheltenham

Name: The Botanist Bar & Restaurant Cheltenham
Address: Unit 6, The Brewery Quarter, Cheltenham

Name: BAO + BBQ
Address: 3 Regent Street, Cheltenham

Name: Memsahib's Lounge
Address: 47 - 49 Promenade, Cheltenham

Name: Storyteller Bar & Private Venue Hire
Address: 11 North Place, Cheltenham

Name: Rouge
Address: 6 Regent Street, Cheltenham

Name: The Cotswold Inn, Cheltenham.
Address: 17 Portland Street, Cheltenham

Name: The Grape Escape Wine Bar & Merchant
Address: 15 Regent Street, Cheltenham

Name: Domaine 16 French Restaurant
Address: 16 Regent Street, Cheltenham

Name: Revival Cafe Bar & Grill, Restaurant
Address: 5-7 Winchcombe Street, Cheltenham

Name: After Hours
Address: 18 Regent Street, Cheltenham

Name: Holee Cow
Address: 49 Winchcombe Street, Cheltenham

Name: Ginger & Garlic
Address: 334 High Street, Cheltenham

Name: Four Cats Bar & Bottle Shop
Address: Unit 2, The Studios, Royal Well Place, Cheltenham

Name: Stacks Events
Address: 85 Saint George's Place, Cheltenham

Name: The Railway
Address: Railway Inn, New Street, Cheltenham

Name: TIVOLI Cinemas - Cheltenham
Address: Regent Arcade, Regent Street, Cheltenham

Name: Roxy Lanes Cheltenham High Street
Address: 103 High Street, Cheltenham

Name: Imperial Haus
Address: 1A Imperial Square, Cheltenham

School

Name: Inlingua
Address: 1 Royal Well Road, Cheltenham

Name: The Catholic School Of St Gregory The Great
Address: Saint James' Square, Cheltenham

Name: Belong Learning CIC
Address: 3 Royal Crescent, Cheltenham

Name: Hickory Dickorys Day Nursery Ltd
Address: 19 Cambray Place, Cheltenham

Name: Schools
Address: Cheltenham

Transport nodes

Name: Clarence Street
Address: United Kingdom

Name: Boots Corner (NE-bound)
Address: United Kingdom

Name: Pittville Street
Address: United Kingdom

Name: Royal Well Bus Station
Address: United Kingdom

Name: High Street (Stop 11)
Address: United Kingdom

Name: High Street (Stop 12)
Address: United Kingdom

Name: High Street
Address: United Kingdom

Name: Clarence Street (Stop 9)

Address: United Kingdom

Name: Clarence Street (Stop 8)

Address: United Kingdom

Name: Clarence Street (Stop 7)

Address: United Kingdom

Name: Primark (Stop 18a)

Address: United Kingdom

Name: Primark (Stop 18b)

Address: United Kingdom

Name: Clarence Street arrival (Stop 30)

Address: United Kingdom

Name: Boots Corner

Address: United Kingdom

Name: Boots Corner

Address: United Kingdom

Name: Clarence Parade arrival

Address: United Kingdom

Name: Pittville Street (Stop 14a)

Address: United Kingdom

Name: Pittville Street (Stop 16)

Address: United Kingdom

Name: Pittville Street (Stop 14)

Address: United Kingdom

Name: Pittville Street (Stop 15)

Address: United Kingdom

Name: Pittville Street (Stop 17)

Address: United Kingdom

Name: Pittville Street

Address: United Kingdom

Name: Ambrose Street

Address: United Kingdom

Name: Royal well cheltenham spa A

Address: United Kingdom

Name: Promenade (Stop 5)
Address: United Kingdom

Name: St James's House
Address: United Kingdom

Name: Royal Well
Address: United Kingdom

Name: Royal Well Bus Station (Bay B)
Address: United Kingdom

Name: Royal Well Bus Station (Bay C)
Address: United Kingdom

Name: Holy Trinity Church
Address: United Kingdom

Name: Royal Well Bus Station (Bay D)
Address: United Kingdom

Name: John Lewis
Address: United Kingdom

Name: Holy Trinity Church
Address: United Kingdom

Name: Promenade
Address: United Kingdom

Name: St James's House
Address: United Kingdom

Name: St James's House
Address: United Kingdom

Name: Fairview Road
Address: United Kingdom

Name: John Lewis
Address: United Kingdom

Name: Promenade (Stop 4)
Address: United Kingdom

Name: Holy Trinity Church
Address: United Kingdom

Name: Promenade (Stop 3)
Address: United Kingdom

Name: Promenade (Stop 2)
Address: United Kingdom

Name: Royal Well Lane (Stop 25)
Address: United Kingdom

Name: Promenade (Stop 1)
Address: United Kingdom

Name: Chapel Walk Set Down Only
Address: United Kingdom

Name: Restaurant at Regency House Hotel
Address: 50 Clarence Square, Cheltenham

Name: Grove Street
Address: United Kingdom

Name: Gloucestershire County Association For The Blind
Address: 81 Albion Street, Cheltenham

Name: Grove Street
Address: United Kingdom

Name: Grove Street
Address: United Kingdom

 Other

LCCP & Social Responsibility Policies & Processes

V03.24

Contents

1	Introduction and Overview	Page 3
	<u>Operating Licence Conditions</u>	
2	Personal Licenses	Page 7
3	Technical Standards	Page 12
4	Cash and Cash Equivalents	Page 16
5	Fair and Open Practice	Page 20
6	Money Laundering and Terrorist Financing	Page 23
7	Access to Premises	Page 32
8	Information Requirements	Page 36
	<u>Codes of Practice</u>	
9	Combating Problem Gambling	Page 41
10	Access to Gambling by Children and Young Persons (Including Employment of Children and Young Persons)	Page 46
11	Self-exclusion	Page 52
12	Customer Interaction	Page 60
13	Advertising Standards and Marketing	Page 67
14	Complaints and Dispute Resolution	Page 72
15	Assessing Local Risk	Page 77

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 in Great Britain (GB) under the Admiral brand: Admiral Slots.

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



2

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) and Bingo premises 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 bingo licences only, oversight of the day to day management of a single set of premises.

Section 2.3 Policy

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
- Risk and Compliance Director
- Finance Director
- Head of Marketing
- National IT & Systems Development Manager
- National Technical Services Manager
- Regional Operations Directors
- Regional Operations Managers
- Area Managers
- Bingo Premises Managers

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

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

Section 2.4 Key processes

2.4.1 PML 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.

3

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) and Bingo premises 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.
- c. The Commissions specification for bingo 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 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.

3.3.9 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.

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

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

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

Section 3.4 Key processes

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

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

Section 3.5 Training

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

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

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

Section 6 Review

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

4

Cash and Cash Equivalents & Provision of Credit

Section 4.1 Overview

4.1.1 Scope of the policy

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

The Companies operate land based Adult Gaming Centre's (AGCs), Family Entertainment Centre's (FECs) and Bingo premises 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.

5

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) and Bingo premises 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 bingo premises, we display rules about each type of bingo variant available and also rules about prize bingo.

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.

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.

6

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:

- UKGC Duties and responsibilities under the Proceeds of Crime Act 2002 - Advice for operators (excluding Casino operators)
- UKGC Money laundering and terrorist financing risk within the British gambling industry
- HM Treasury's The Money Laundering and Terrorist Financing Regulations.
- HM Treasury's National Risk Assessment of Money Laundering and Terrorist Financing.
- UKGC Guidance on emerging risks
- UKGC Annual enforcement report
- UKGC Public register of regulatory actions

The Companies operate land based Adult Gaming Centre's, Family Entertainment Centre's (FECs) and Bingo premises 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 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.

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.

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 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, 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.

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. 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 have deputies (National Compliance Manager and AML Compliance Manager) who can receive internal disclosures and complete SARs to the NCA in the absence of the nominated officer.

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 AMLTF is an agenda section at Quarterly Compliance Review meetings. These take place every three months (January, April, July, October) and are attended in full by:

- Chief Executive Officer
- Chief Operating Officer
- Group General Counsel
- All Retail Operations Directors (or Regional Operations Manager in their absence)
- Risk and Compliance Director
- National Compliance Manager
- All Compliance Managers
- All other members of the Compliance team

Set agenda points at these meetings relating to AMLTF are:

- Internal Disclosures
- Suspicious Activity Reports
- Any changes in the AML risk environment

6.6.4 Each SAR is a ‘key event’ as per Licence condition 15.2.1.15 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.

6.6.5 Any potential or actual breach of POCA by the licensee is an “other reportable event” as per Licence condition 15.2.2.1(d). It is the responsibility of the nominated officer to ensure that the Gambling Commission are notified of any other reportable 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 following guidance documents:

- UKGC Duties and responsibilities under the Proceeds of Crime Act 2002 - Advice for operators (excluding Casino operators)
- UKGC Money laundering and terrorist financing risk within the British gambling industry
- HM Treasury's' The Money Laundering and Terrorist Financing Regulations.
- HM Treasury's National Risk Assessment of Money Laundering and Terrorist Financing.
- UKGC Guidance on emerging risks
- UKGC Annual enforcement report
- UKGC Public register of regulatory actions

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 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 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 premise's 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.

6.8.5 Customer due diligence (CDD) is applied in accordance with our CDD policy.

6.8.6 Enhanced due diligence (EDD) is applied in accordance with our EDD policy.

6.8.7 Records are maintained of all CDD and EDD.

6.8.8 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.

6.8.9 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.

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

7

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) and Bingo premises 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
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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.



8

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) and Bingo premises 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).

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



9

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) and Bingo premises in Great Britain (GB) only and this policy confines itself to that jurisdiction and all of the relevant legislation and regulation that govern such activity within GB.

9.1.2 Policy Statement

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

9.1.3 Linked Documentation

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

Section 9.2 Key Terms and Definitions

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

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

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

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

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

Section 9.3 Policy

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

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

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

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

9.3.5 In our premise’s, information is available in all areas where gambling facilities are provided and where applicable is adjacent to ATMs.

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

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.

10

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 section 3 and in particular 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) and Bingo premises 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 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, 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.

Vulnerable person – This definition has no clear boundary as someone's vulnerability can be caused by any number of conditions or influences. As a starting point we recognise and completely accept what the Gambling Commission has provided in its guidance to Licensing Authorities which states,

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 reasons including the following:

- 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
- Substance misuse and or/addiction
- Homelessness

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

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

10.3.5 In our premises we do not deliberately provide facilities for gambling in such a way as to appeal to children or young persons.

10.3.6 We refuse service in our 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.

10.3.7 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.

10.3.8 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.

10.3.9 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.

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

10.3.11 It is a matter of gross misconduct to allow entry to our AGCs, Adult Gaming Area(s) or bingo 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.

10.3.12 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) or bingo premises, which may lead to dismissal. This includes children in the company of an adult such as babies in prams or buggies etc.

10.3.13 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.

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

10.3.15 We try to deny entry and/or service to those who appear to be intoxicated (through any means).

10.3.16 We try to deny entry and/or service to those who either appear to be homeless or who staff believe to be homeless regardless of their appearance. The companies'

note that those who appear to be homeless are not always and that those who are in fact homeless cannot be identified as being so from their appearance alone.

Section 10.4 Key processes

10.4.1 We conduct a risk assessment of the local risk to the licensing objectives posed by our operation in a particular location. This includes identifying and mitigating local risks such as the presence of a large homeless community for example.

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

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

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

10.4.5 We employ an independent company to conduct test purchasing operations in our AGC and Bingo 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.

10.4.6 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.

10.4.7 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.

10.4.8 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).

10.5.5 The company offers staff training on homelessness.

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.

11

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) and Bingo premises 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 and Bingo 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.

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.

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 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).

11.3.16 If a self-excluded customer manages to gamble on our premises in breach of their self-exclusion, and we subsequently become aware of the breach, the circumstances will be investigated and appropriate action taken.

11.3.17 A customer who breaches their self-exclusion does **not** have a right to refund of losses or stakes.

11.3.18 A customer can request self-exclusion via the website or by contacting Head Office direct.

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 IHL Smarthub scheme for AGCs, the Bingo Association SMART exclusion in their Bingo 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.

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. Suitable ID for this purpose would include photo ID or a bank card in the customer's name. However, if no ID is provided the self-exclusion should still 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.

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.

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 Breach of self-exclusion

11.5.1 Venue staff must review the self-exclusion gallery at the start of every shift to familiarise themselves with new self-exclusions and review existing customers who are self-excluded.

11.5.2 If a member of staff recognises a self-excluded customer has entered the premises they must approach the customer as soon as practicable, confirm they are self-excluded and escort them off the premises.

11.5.3 If a customer has successfully gambled prior to recognition any outstanding credit should be collected and the cash amount given to the customer. However, the customer is not entitled to return of any losses. Similarly, we are not entitled to any winnings returned to us.

11.5.4 All breaches of self-exclusion must be recorded on the relevant SE scheme as a breach. Where a customer repeatedly attempts to breach their self-exclusion agreement advice should be sought from the relevant Area Manager and Compliance department on how to deal with this customer.

11.5.5 Any customer who attempts to breach their self-exclusion agreement should be given a 'stay in control' leaflet and encouraged to make contact with begambleaware.

Section 11.6 Return to gambling

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

11.6.2 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.

11.6.3 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.

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

11.6.5 The return to gambling conversation should be recorded alongside the self-exclusion on the relevant SE scheme portal.

11.6.6 Regular, discrete interactions should be held with customers who are returning from a period of self-exclusion to monitor their activity.

Section 11.7 Company imposed exclusions

11.7.1 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.

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).

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

Section 11.8 Cross sector exclusions

11.8.1 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.

11.8.2 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 11.9 Training

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

11.9.2 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 11.10 Review

11.10.1 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.

12

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) and Bingo premises 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. MLTF policy.
- e. 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 person – This definition has no clear boundary as someone’s vulnerability can be caused by any number of conditions or influences. As a starting point we recognise and completely accept what the Gambling Commission has provided in its guidance to Licensing Authorities which states,

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 reasons including the following:

- 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
- Substance misuse and/or addiction
- Homelessness

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.

12.3.8 We deny entry and/or service to those who appear to be intoxicated (through any means).

12.3.9 We try to deny entry and/or service to those who either appear to be homeless or who staff believe to be homeless regardless of their appearance. The companies' note that those who appear to be homeless are not always and that those who are in fact homeless cannot be identified as being so from their appearance alone.

Section 12.4 **Key processes**

12.4.1 In all of our venues, whether AGC or Bingo 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 identifies that a customer's behaviour may indicate that their gambling has become problematic and could be causing harm, they must inform the most senior member of staff on duty and record their observation.

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 an ATMs
- Repeated requests to withdraw cash via the venue PDQ
- Playing more than one machine simultaneously
- 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.

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.

Having made this **Observation**, they then make a first entry on the Customer Interaction Log. If the behaviour continues or the first occasion warranted **Action** then the Venue Manager or Duty Manager must be informed.

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 Log'.

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 we are able to monitor behaviour and the effectiveness of our controls over time.

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.

Section 12.5

Gambling Management Tools

12.5.1 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).

12.5.2 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 12.6	Training
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12.6.1 Staff receive specific training on induction and regular refresh training including the requirements of these codes.

12.6.2 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.

12.6.3 The company offers staff training on homelessness.

Section 12.7	Review
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12.7.1 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.



13

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) and Bingo premises 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 All advertising and marketing activity, defined as the purchasing or display of media via third party vendors on our behalf (including, but not limited to printed, digital visuals or audio-based collateral) must be sanctioned by the Marketing Department and signed off by the Marketing Director (or other designated member of the company Executive). This is to ensure that the companies have in place procedures for effective monitoring of its advertising and marketing and the necessary steps for compliance can be met.

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. Any and all collateral produced to support such offers must have originated via, or been sourced via procurement channels outlined by the Marketing Department. These are outlined on the company intranet pages.

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.

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.

14

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) and Bingo premises 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 Pegasus ADR Service.

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.

14.3.7 Any complaint that is related to the processing of a debit card transaction will be escalated to a Regional Operations Manager as an exception to the standard complaints process. E.g., Incorrect funds have been debited from a card or funds have not been returned to a card correctly.

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) and Bingo premises 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 and AGC 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.

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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

Page 137



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



PROGRAMMES AVAILABLE



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/>



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/>



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.

ANNEX 3 A

Interested Parties

No. 1

Attached to the report as ANNEX 3 B

No. 2

From:

Sent: Friday, April 5, 2024 11:34 AM

To: Licensing (CBC) <Licensing@cheltenham.gov.uk>

Subject: 24/00471/ADCAP

Dear Licensing,

Please find below an email from Alex Chalk Conservative Parliamentary Candidate in regard to application 24/00471/ADCAP.

I would be very grateful if you may be able to confirm receipt.

Thank you.

Best wishes,

Dear Licensing Team

Ref: 24/00471/ADCAP – Licence application for an Adult Gaming Centre at 218 High Street, Cheltenham, GL50 3HF

I am writing to object to the above application.

As local residents have been clear when contacting me on this issue, there are significant concerns about the possibility of an increase in Anti-Social Behaviour as a result of an adult gaming centre at this location. Studies (Analysing the effect of betting shops on crime in England (bournemouth.ac.uk)) have previously shown that there is a correlation between gambling and ASB, and I am conscious of the effect this may have on other established businesses in the vicinity.

Equally, I remain concerned that licensing of gambling at this location could have a significant impact on adjacent businesses, and could discourage more Cheltenham residents from visiting the town centre.

218 High Street is a prominent and visible location in the town, in a high footfall area nearby other local venues for retail and entertainment. Children will inevitably walk past the premises, and congregate near to it, during its operational hours. Such a venue would also be highly visible to those who are vulnerable or susceptible to gambling addiction.

Thank you for your consideration.

Best wishes,
Alex Chalk KC Conservative Parliamentary Candidate

No. 3

From:
Sent: Tue, 23 Apr 2024 09:39:35 +0000

Our comment is as follows:

"We, as managing agents of The Brewery Quarter and the residential apartments above it, are deeply concerned about the application for a gambling license at 218 High St Cheltenham, immediately opposite our premises. We believe that such an establishment poses a significant threat to the well-being of our community and the fulfilment of the licensing objectives; particularly regarding the protection of children and other vulnerable persons from harm or exploitation by gambling, as well as preventing gambling from being a source of crime and disorder.

Crime & Disorder:

First and foremost, the proximity of the application premises to areas associated with crime raises serious concerns. The High St has unfortunately been plagued by increasing instances of theft, violence, and antisocial behaviour, as evidenced by recent crime statistics and reports from local enforcement. Moreover, photographs taken in the vicinity of 218 High St Cheltenham clearly illustrate the presence of graffiti, litter, and other signs of neglect that contribute to a sense of disorder in the area. There have been millions invested in the Minster area (Minster Exchange) along with further planned investment into the area that will raise the profile beyond the current applied-for usage.

If the application were to be approved, we fear that it would only exacerbate these existing problems and deter further investment, potentially leading to an escalation in criminal activity and a decline in the overall safety and security of our nearby community.

Children, Young People & the Vulnerable:

Equally troubling is the potential impact of the proposed gambling establishment on children, young people, and vulnerable persons in the area. The High Street is a thoroughfare frequently traversed by children due to the presence of nearby schools and student accommodations. Additionally, there are facilities in close proximity that cater to vulnerable individuals, including Cheltenham 1st Stop, and numerous homeless shelters within a minute or two's walk.

The presence of another gambling establishment in proximity to these vulnerable populations is deeply concerning, as it could expose them to exploitation and harm. Moreover, the lack of adequate safeguards or measures to protect these individuals further compounds the risk posed by the proposed establishment. In conclusion, we urge you to carefully consider the implications of granting a gambling license at 218 High St Cheltenham. The evidence presented clearly demonstrates the potential for such an establishment to undermine the

licensing objectives, jeopardize the safety of our community, and exploit vulnerable individuals. We respectfully request that you deny the application to safeguard the well-being of our neighbourhood. "

I look forward to your response.

Many thanks

Marketing and Communications Manager
The Brewery Quarter - Martin Commercial Properties Limited

No. 4

Customer Details

Name:

Email:

Address:

Comments Details

Commenter Type: Other

Stance: Customer objects to the Licensing Application

Reasons for comment:

Comments: 08/04/2024 2:23 PM The high street would not benefit from an additional premises that would overall drain money from residents.

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All correspondence should be sent to our Leeds office

Licensing Section
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA

Our ref [REDACTED]

Your ref

19 April 2024

Dear Sirs,

Application for a Premises Licence under the Gambling Act 2005
Admiral, Admiral -218 High Street, Cheltenham, GL50 3HF
Operator: Luxury Leisure

We represent St Matthew's & The Minster ("**The Minster**") of 44 Clarence St, Cheltenham GL50 3PL to object to the above application for an Adult Gaming Centre ("**AGC**") at this location.

The Minster satisfy the test under the Gambling Act 2005 of being an interested party as having a business interest that would be affected by the authorised activities should a premises licence be granted at the above address.

Background

218 High Street (the application site) and the churchyard for the Minster are directly linked via an alley way running down the side of 218 into the churchyard (Please see Tabs 1-5). In terms of proximity, it is estimated that from the door of 218, to the actual churchyard, it is only a 10-meter walk. As a church, The Minster welcome families and small children every day, to visit and to services, as well as holding events in the churchyard.

Cheltenham Minster is Cheltenham's only surviving medieval building, dating back to the mid-11th century. It is a hugely important heritage site. The surviving medieval masonry and windows are a particular highlight. The churchyard is highly significant, containing Grade II listed walls, gate piers and railings, lamp posts and memorials. The church and churchyard have been subject to criminal damage and anti-social behaviour. This has caused lasting damage to the church and heritage assets within the churchyard.

In the past, the churchyard has been a focal point for vulnerable persons, where drug use and alcohol abuse have been rife. This has improved since the redevelopment of the churchyard but it is still an issue. A handbag was recently stolen from someone during a church service before Christmas last year.

As a result, the local community and partners have worked to create Gloucestershire's first Heritage Watch scheme for the area, under the name of Operation Minster. Heritage Watch aims to highlight the historical context of the area, raise awareness locally and encourage the reporting of heritage crimes. The project has seen investment in better lighting, better seating and better general conditions to try to deter further issues, some £229,000 was received from the ERDF (European Regional Development Fund) has been invested, with contributions from St Matthew's & The Minster and other interested parties. Please see Tab 6.

Gambling Act 2005

This representation is made on the basis that the applicant will not be able to support the Gambling Act 2005 licensing objectives of:

- Preventing gambling being a source of crime and disorder, being associated with crime or disorder or being used to support crime.
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The Minster would be directly affected by the licensed activities, just as other local businesses and local residents will be affected by the behaviour of the AGC customers. It is clear to The Minster that the risk to the licensing objectives in the local area will increase should the AGC premises licence be granted, particularly given the issues associated with crime and disorder in the area and the attraction of fast food restaurants to young children.

Crime and Disorder near the application Premises

In terms of crime and disorder, this part of the High Street is associated with not only anti-social behaviour, but also crime and disorder. This is evidenced in the news articles summarised below, as well as crime statistics for the Town Centre.

The Minster Gardens are already a haven for Crime and Disorder and anti-social behaviour. A teenager being beaten and robbed in December 2022 in the Churchyard directly behind the application premises (Please See Tab 7). There was also the stolen hand bag incident mentioned previously. In particular mention should also be made of the armed robbery that took place in Cheltenham at a betting shop in January 2023 (Please see Tab 8), highlighting the link in Cheltenham to gambling and Crime and Disorder.

Children and Vulnerable Persons

There is considerable footfall of children and vulnerable people who circulate around the area of the application premises, and this operation would pose real and considerable risks to their well-being. The application site is in very close proximity to a number of fast food restaurants, including McDonalds, Burger King, and Taco Bell, which are very attractive to children. There are also fashion brands such as Urban Outfitters, directly opposite, again which attracts children (Please see Tab 9 showing the location of key premises).

We are aware that a BetFred betting shop is situated three doors up from the proposed application premises. Should this premises licence be granted, it will allow those gamblers the offer of more higher stake, higher prize, gaming machines to play, which is of real concern in relation to gambling addiction and those that are vulnerable. Especially given the midnight hours that have been applied for, when the betting shop closes at 2200hrs (Please see Tab 10).

We are aware that the YMCA offers supported accommodation at 6 Vittoria Walk, Cheltenham GL50 1TP, for the most vulnerable members of society. This being just half a mile away from the application premises. A further gambling premises operating on the High Street will only make available more gaming machines to these vulnerable persons.

Local Residents

Cheltenham is small borough, and with the density of the residential population, there are very few areas within its boundaries that could be described as solely commercial or shopping areas. It is with this in mind that The Minster is concerned that the hours of operation (until midnight) will have a detrimental effect on the local residents.

The noise and commotion of customers coming in and out at all hours of the day will have a real effect on residents' sleep and quality of life.

Protecting Children and other Vulnerable Persons

As per Part B, paragraph 2.1 of the Cambridge Borough Council, Statement of Principles, and specific to Adult Gaming Centres, the licensing authority is aware in relation to this particular type of premises (AGC), that they must have specific regard to *“the need to protect children and vulnerable persons from harm, or being exploited by gambling will expect the applicant to satisfy The authority that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises.”*

Again, we have not yet seen the applicant's supporting documents, but this 'need to protect' is the key thrust of this representation.

Previous Application Refused

We are aware that this operator had a premises licence application refused by the Westminster City Council Licensing Sub-Committee for an AGC application at 1A Bedford Street, London, WC2E 9HH.

The Local Area Risk Assessment for this application has yet to be seen, and so at this stage no comment can be made in relation to whether it comprehensively deals with the issues that have been raised in this representation. This was of particular importance as the Westminster City Council Licensing Sub-Committee stated that the evidence (in that case) specific to the risk assessment for that application did not give the Sub-Committee confidence that the risk to children and other vulnerable persons, considering the location of the premises, had been addressed adequately. The penultimate paragraph stated that: *“the Sub-Committee did not have confidence that the risk to children and other vulnerable persons from being harmed or exploited by gambling had been suitably mitigated, given the written and oral evidence and the compelling evidence presented by the objectors to the application.”*

The application was subsequently granted on Appeal.

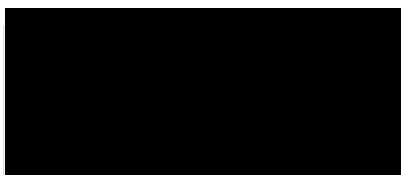
Grounds to Refuse

In accordance with section 153 of the Gambling Act, we are aware that the licensing authority should aim to permit the use of premises for gambling, and so far as it thinks it is able to in accordance with the licensing authority's statement of licensing policy. As you will note, a number of issues have been raised whereby the applicant will not accord with the authority's Gambling Policy, and so this would give grounds for the licensing authority to refuse the application should it choose to.

We, therefore, request at this stage, that the application be refused.

If all correspondence in this matter could be addressed to Chris [REDACTED] at our Leeds office, or via email at [REDACTED]

Yours faithfully



Woods Whur

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Minster Exchange (MX)

Minster Gardens

As part of the Minster Exchange (MX) scheme, the closed churchyard of Cheltenham Minster – the town’s oldest building – has benefitted from renovation and restoration works.

Now known as Minster Gardens, the project has received £229,000 of funding from the England European Regional Development Fund (ERDF).



European Union

**European Regional
Development Fund**



HM Government

The investment has helped rejuvenate this historical conservation area and cultural core of the town centre. What was a dark and unwelcoming space has benefitted from a number of improvements, including the creation of more social space, additional paths and lighting across the gardens, and a range of seating so that everyone can enjoy the grounds of the Grade I Minster. Also included is an additional path with a seating area that links to the entrance of the new Minster Exchange (MX) building, which is in the final stages of construction, next to the gardens behind the Children’s Library.



As part of the project, urgent and necessary work on a number of historically significant memorials has been carried out, including the churchyard's cross base (a scheduled ancient monument) and the Grade II Listed gate piers that mark the entrances to the Gardens. Numerous listed headstones and table tombs have also received conservation work, one of the best examples of which can be found nestling in the corner of the gardens, next to Cheltenham House. The Grade II listed ornate overthrow with integral light at the entrance to Famous alleyway has been brought back to its original glory, whilst several of the listed dragon and onion lamp posts have also received conservation attention. Many locals are aware of the brass markers set within Processional Way and the project ensured that these were carefully lifted, cleaned and replaced exactly where they were found.

The mature lime trees that characterise the gardens have had their crowns lifted to allow more light to infiltrate the space and encourage 'natural surveillance' from the surrounding buildings, opening up the views across this beautiful area. Due to their poor condition, two trees required replacing and in their place two new cork oaks (*Quercus suber*) have been planted to diversify the species on site and to provide better resilience to climate change.

A dusk survey for bats identified common pipistrelle bats visiting the churchyard and roosting opportunities for local bats has been incorporated into the site through the installation of bat boxes. Existing lights has been modified and new lighting designed sensitively to create low-level lighting and minimise potential impacts on bats. Several bird boxes have also been introduced to encourage nesting birds.

The Gardens have also benefitted from an extensive planting scheme, with hundreds of bulbs having been planted, along with a variety of annual and perennial plants. A flowering meadow has been established on the west side of the Gardens, with a blend of ornamental, annual and perennial species, specifically selected to supply pollen bearing flowers to benefit bees, butterflies and other pollinating insects for the longest period possible, from spring through to early autumn. The gabion-backed benches give small animals and insects the opportunity to take refuge and hibernate in winter and once fully established, the planting scheme will boost existing habitats and thus increase wildlife and biodiversity, whilst conserving the history of the site.



The Cheltenham Civic Society has helped establish a volunteer working group for the Minster Gardens.



Gloucestershire County Council assisted the scheme by funding upgrades to existing paths and lighting.

[What is the MX?](#)

Minster Gardens

[The MX and Minster Gardens project FAQs](#)

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Teen attacked and robbed in Cheltenham churchyard

🕒 17 December 2022



| [Police are appealing for witnesses to the assault](#)

A teenager has been attacked and robbed of youths in a churchyard.

He walked into St Mary's Churchyard in Cheltenham at about 19:00 GMT on Thursday and was punched in the face and knocked to the ground police said.

The group of youths continued to kick and punch him, and one of them hit him with a wooden stick and another had a bladed item, police added.

The victim's money and bank card were stolen and he was treated for a broken nose and cuts to his face in hospital.

Gloucestershire Police said there were a number of people in the churchyard at the time of the assault, and the group ran off in the direction of Clarence Street.

An appeal has been made for anybody with relevant information to contact police.

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Men armed with 'large batons' wearing balaclavas rob bookmakers in Cheltenham

They threatened staff and stole hundreds of pounds in cash

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📷 **Police appeal for witnesses of armed robbery in Cheltenham**

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Two men armed with large batons and possibly a knife robbed a bookmakers on Bath Road yesterday night (12 January). They threatened staff and stole hundreds of pounds in cash then made off on foot down Bath Road in the direction of Cheltenham College.

Police in Cheltenham are now appealing for witnesses of the armed robbery to come forward. Officers were called with a report that masked men entered the betting shop at around 7.35pm.

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It was reported that two men, described as being white and wearing balaclavas, entered the shop. The men are reported to have had large batons and possibly a knife.

Read more: [Cotswold pub Golden Heart safe as three properties to be demolished for A417 superhighway](#)

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The suspects are described as wearing dark clothing and one of the men wore white socks. Police are asking anyone who was in the area at the time and saw the incident, or the men acting suspiciously, to come forward.

Anyone with information is asked to contact police by completing the following form and quoting incident number 435 of 12 January:

<https://www.gloucestershire.police.uk/tua/tell-us-about/cor/tell-us-about-existing-case-report/>

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SATURDAY	8:00am	10:00pm
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- ACCESS CONTROL** Controlled access to all areas
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SELF EXCLUDE
IF YOU HAVE MORE THAN ONE ACCOUNT IN YOUR AREA
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For any enquiries contact us on
0800 032 0678

217

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21?

NOTED - DRINK RESPONSIBLY PLEASE STAY SAFE

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ANNEX 4

Mandatory and Default Conditions

Gambling Act 2005

This ANNEX provides the mandatory conditions that are applied to Gambling Act 2005 an AGC Premise Licence and the default conditions which applicants can apply to be excluded (there are none for an AGC).

Adult Gaming Centre Premises

Mandatory Conditions

1. The summary of the terms and conditions of the premises licence issued under section 164(1)(c) of the 2005 Act shall be displayed in a prominent place within the premises.
2. The layout of the premises shall be maintained in accordance with the plan.
3. The premises shall not be used for— a) the sale of tickets in a private lottery or customer lottery, or b) the sale of tickets in any other lottery in respect of which the sale of tickets on the premises is otherwise prohibited.
4. A notice stating that no person under the age of 18 years is permitted to enter the premises shall be displayed in a prominent place at every entrance to the premises.
5. No customer shall be able to access the premises directly from any other premises in respect of which a licence issued under Part 8 of the Act, or a permit issued under Schedule 10, 12 or 13 to the Act, has effect.
6. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling at any gaming machine in order to do so.
- 7.1 No alcohol shall be permitted to be consumed on the premises at any time during which facilities for gambling are being provided on the premises.
- 7.2 A notice stating the condition in sub-paragraph (7.1) shall be displayed in a prominent place at every entrance to the premises.

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