

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