

## Adult Gaming Centre Local Risk Assessment

### Premises

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

### Company

Operating Company:	Luxury Leisure
Operating Licence Number:	1876

### Assessment Writer

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

## **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 1<sup>st</sup> 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 1<sup>st</sup> 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"> <li>- All staff are trained in social responsibility policies as part of their induction and are provided with regular refresher training.</li> <li>- 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.</li> <li>- Staff deployed to specific zones for which they have responsibility.</li> <li>- Machine layout takes into consideration lines of site to the entrance.</li> <li>- Clear 'Over 18' signage is displayed, visible from outside and also in the entrance to the arcade.</li> <li>- 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.</li> <li>- The meet and great station is positioned to give line of sight to the entrance.</li> <li>- CCTV cameras positioned to cover all parts of the premises but specifically the entrance and secluded parts of the premises.</li> <li>- The company operate a 'Think 25' policy in which all staff are trained at induction and they receive regular refresh training.</li> <li>- Staff log all attempts to enter by young persons on the appropriate log.</li> <li>- Posters and displays of acceptable identification on site for staff.</li> <li>- The company use independent test purchasing operations. All venues are tested at least twice in a rolling 12-month period.</li> </ul>	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"> <li>- Stringent disciplinary procedures for failures identified through age verification testing, where staff negligence is identified or where staff allow children into a venue.</li> <li>- Social Responsibility returns data reviewed through submissions from Area Managers to National Compliance Manager.</li> <li>- All social responsibility returns data subject to a quarterly compliance review.</li> </ul>	
<b>Young person wearing face covering is not challenged for verification of age.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to child.</b>	<ul style="list-style-type: none"> <li>- 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.</li> </ul>	<b>May 2024</b>
<b>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.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to child or young person.</b>	<ul style="list-style-type: none"> <li>- Our staff are trained to look for the signs of CSE using a CSE training module on our Admiral Academy training platform.</li> </ul>	<b>May 2024</b>
<b>Those considered to be vulnerable, having access to gambling</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- Staff are trained to identify vulnerable customers as defined in the local area and site profile.</li> </ul>	<b>May 2024</b>

				<ul style="list-style-type: none"> <li>- Staff are trained to interact with customers who they have identified as being potentially vulnerable and monitor their play.</li> <li>- Staff are trained to refuse entry and service to anyone who they feel is under the influence of alcohol or drugs</li> <li>- Staff are trained to identify customers who play more than they want to and interact if a customer displays these behaviours.</li> </ul>	
<b>Those made vulnerable through abuse of drugs and/or alcohol having access to gambling.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>		<b>May 2024</b>
<b>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</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- 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.</li> <li>- 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.</li> <li>- Staff are trained and encouraged to log an individual with Street Link who is homeless and seeks to enter the venue.</li> </ul>	<b>May 2024</b>
<b>Failure to provide information to players on responsible gambling.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business Severe to customer</b>	<ul style="list-style-type: none"> <li>- A responsible Gambling message is displayed at all positions where gaming is possible through posters, leaflets and stickers on machines.</li> <li>- Responsible Gambling Poster or leaflet holder adjacent to ATM or PDQ Machine.</li> <li>- Poster/Leaflet designs incorporate QR codes for GAMCARE, Gambleaware contact information.</li> </ul>	<b>May 2024</b>
<b>Failure to provide information in a suitable format.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- Responsible Gambling information stickers on all machines.</li> <li>- Compliance Audit function performed by Area Manager and also through regional field auditors and security managers.</li> <li>- Luxury Leisure Talarius have attained the Global Gaming Guidance Group (G4) accreditation for our responsible gambling measures.</li> </ul>	<b>May 2024</b>

<b>Failure to recognise signs of problem gambling.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business Severe to customer</b>	<ul style="list-style-type: none"> <li>- Additional aspects to training incorporating guidance on identifying problem gambling, procedure for interaction and sources of help.</li> <li>- Clear policy to detail the procedure for interaction and level of staff that can 'intervene'.</li> </ul>	<b>May 2024</b>
<b>Failure to interact with customer displaying signs of problem gambling.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- 'Stay in control leaflets' with QR codes to GAMCARE and Gambleaware.</li> <li>- All recorded SR data subject to a quarterly compliance review by senior management.</li> </ul>	<b>May 2024</b>
<b>Failure to sign-post customer to help and support.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>		<b>May 2024</b>
<b>Failure to properly administer self-exclusion.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- Staff training incorporates policy and procedure for self-exclusion.</li> <li>- 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.</li> </ul>	<b>May 2024</b>
<b>Failure to impose exclusion in locality and in same types of establishments.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- 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.</li> <li>- 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.</li> </ul>	<b>May 2024</b>
<b>Customer breaches of self-exclusion.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- All SR returns data subject to a quarterly compliance review.</li> <li>- 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.</li> </ul>	<b>May 2024</b>
<b>Customer breaches self-exclusion by using another to gamble on their behalf.</b>	<b>C</b>	<b>Unknown</b>	<b>Moderate to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- 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.</li> </ul>	<b>May 2024</b>

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

				<ul style="list-style-type: none"> <li>- All staff have personal attack 'hold-up' alarms and there are some strategically placed static alarms also.</li> <li>- 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.</li> <li>- Extensive CCTV coverage with recording of approx. 30 days of footage.</li> <li>- Strict key storage procedure.</li> <li>- Time lock and/or time delay safes utilised.</li> <li>- Drop safe used for banking.</li> <li>- Staff personal floats limited to £100.</li> <li>- Toughened glass for window front.</li> <li>- TITO facility enables customers to come and go without carrying cash.</li> </ul>	
<b>Advertising Standards and Marketing</b>	<b>A</b>	<b>Low</b>	<b>Low – Moderate</b>	<ul style="list-style-type: none"> <li>- 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"> <li>- legal, decent, honest and truthful</li> <li>- Prepared with a sense of responsibility to consumers and to society</li> <li>- Respectful to the principles of fair competition generally accepted in business</li> <li>- Not intended to bring advertising into disrepute.</li> </ul> </li> </ul> <p>Specifically we ensure that:</p>	<b>May 2024</b>

				<ul style="list-style-type: none"> <li>- Advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise</li> <li>- Advertisements and promotions are socially responsible and do not encourage excessive gambling</li> <li>- Care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable</li> <li>- 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</li> <li>- Persons shown gambling are not, nor do they appear to be, under 25 years of age</li> <li>- 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</li> <li>- Advertising and promotional material carries a reference for the need to keep gambling under control</li> <li>- It is never suggested or implied that gambling is a means of getting out of financial difficulty.</li> <li>- Advertising and marketing material should not appear on any primary web page/screen or micro-site that provides advice or information on responsible gambling.</li> <li>- 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 &amp; Codes of Practice.</li> </ul>	
<b>Failure to display Terms and Conditions</b>	<b>B</b>	<b>Low</b>	<b>Low – Moderate</b>	<ul style="list-style-type: none"> <li>- Terms and Conditions displayed prominently within the premises.</li> </ul>	<b>May 2024</b>
<b>Failure to deal with customers making</b>	<b>B</b>	<b>Low</b>	<b>Low – Moderate</b>	<ul style="list-style-type: none"> <li>- Machines only acquired from licensed suppliers.</li> <li>- Additional machine compliance checks completed by a technician when installing new machines.</li> </ul>	<b>May 2024</b>

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