

The Licensing Services
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

SPECIAL DELIVERY

2nd June 2020

RXB/RXB/P55235-519
Doc Ref: 2147361008

r.bradley@popall.co.uk

0115 948 7424

Dear Sirs

Merkur Slots, 58 Station Road, Hayes, UB3 4DF
Bingo Premises Licence

We act for **Cashino Gaming Limited** and have been instructed to submit an application for a Bingo Premises Licence for the above premises.

We therefore enclose:-

1. Application form
2. Notice of Application
3. A copies of the licensing plan of the proposed premises: **SR/HY/02**
4. A copy of plan drawing number **???-PR-05**, for illustrative purposes
5. A copy of local area risk assessment
6. Operational Standards document
7. Cheque in the sum of £3,500
8. Certificate of Service in the name of Nick Arron

Due to the current circumstances, we have we have designated the date for commencement of the consultation period as the **4th April 2020**.

We have arranged for the notice to be displayed on the premises and published within an appropriate local newspaper within 10 working days of **4th June 2020**.

The last date for representations will therefore be the **1st July 2020**.

We confirm we have served notice of the application to the Responsible Authorities as specified in Section 157 of the Gambling Act 2005.

If you have any queries or require anything further, please contact Richard Bradley on the above number so we can discuss the details with you.

We should be grateful if you would acknowledge safe receipt of this letter and the relevant enclosures.

Poppleston Allen

Encs

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: **Cashino Gaming Limited**

7. The applicant's registered or principal address:

Seebeck House

1A Seebeck Place

Milton Keynes

Postcode: **MK5 8FR**

8(a) The number of the applicant's operating licence (as given in the operating licence):
000-003266-N-103444

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: **N/A**

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): **Merkur Slots**

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

58 Station Road

Hayes

Postcode: **UB3 4DF**

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.

Ground floor premises, high street location

14(a) Are the premises situated in more than one licensing authority area? **No**

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:

N/A

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**

[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. **N/A**

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon			
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: **No**

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**

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: **N/A**

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

The Applicant operates a national estate of licensed bingo premises, which include the provision of Bingo Plus and Bingo Express terminals.

The operator has full authority to provide licensed bingo by the provision of an Operating Licence granted by the Gambling Commission. The UK's Gambling Regulator has therefore approved the measures implemented to ensure that effective anti-money laundering procedures are implemented and our policies have been developed to ensure responsible trading in accordance with the gambling legislation, the licensing objectives and the licence conditions and code of practice.

An extract of Cashino Gaming Limited's Operational Standards has been supplied in support of the application. Full details of the Applicant's policies and procedures can be provided upon request.

Part 6 – Declarations and Checklist (Please tick)

We confirm that, to the best of our knowledge, the information contained in this application is true. 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.

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

Checklist:

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

Part 7 – Signatures

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

Signature:

Print Name: Poppleston Allen

Date: 2nd June 2020

Capacity: Solicitors for & on behalf of the applicant

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: _____

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:

Richard Bradley

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

0115 948 7424

24. Postal address for correspondence associated with this application:

**Richard Bradley
Poppleston Allen
37 Stoney Street
The Lace Market
Nottingham**

Postcode: **NG1 1LS**

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:

r.bradley@popall.co.uk

NOTICE OF APPLICATION FOR A PREMISES LICENCE

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

Notice is hereby given that **Cashino Gaming Limited**

of the following address -

**Seebeck House
1A Seebeck Place
Milton Keynes
Postcode MK5 8FR**

the number of whose operating licence is: **000-003266-N-103444**

who applied for an operating licence on: **N/A**

has made an application for a **Bingo Premises Licence**

The application relates to the following premises:

**Merkur Slots
58 Station Road
Hayes
UB3 4DF**

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

**The Licensing Services
London Borough of Hillingdon
High Street
Uxbridge
UB8 1UW**

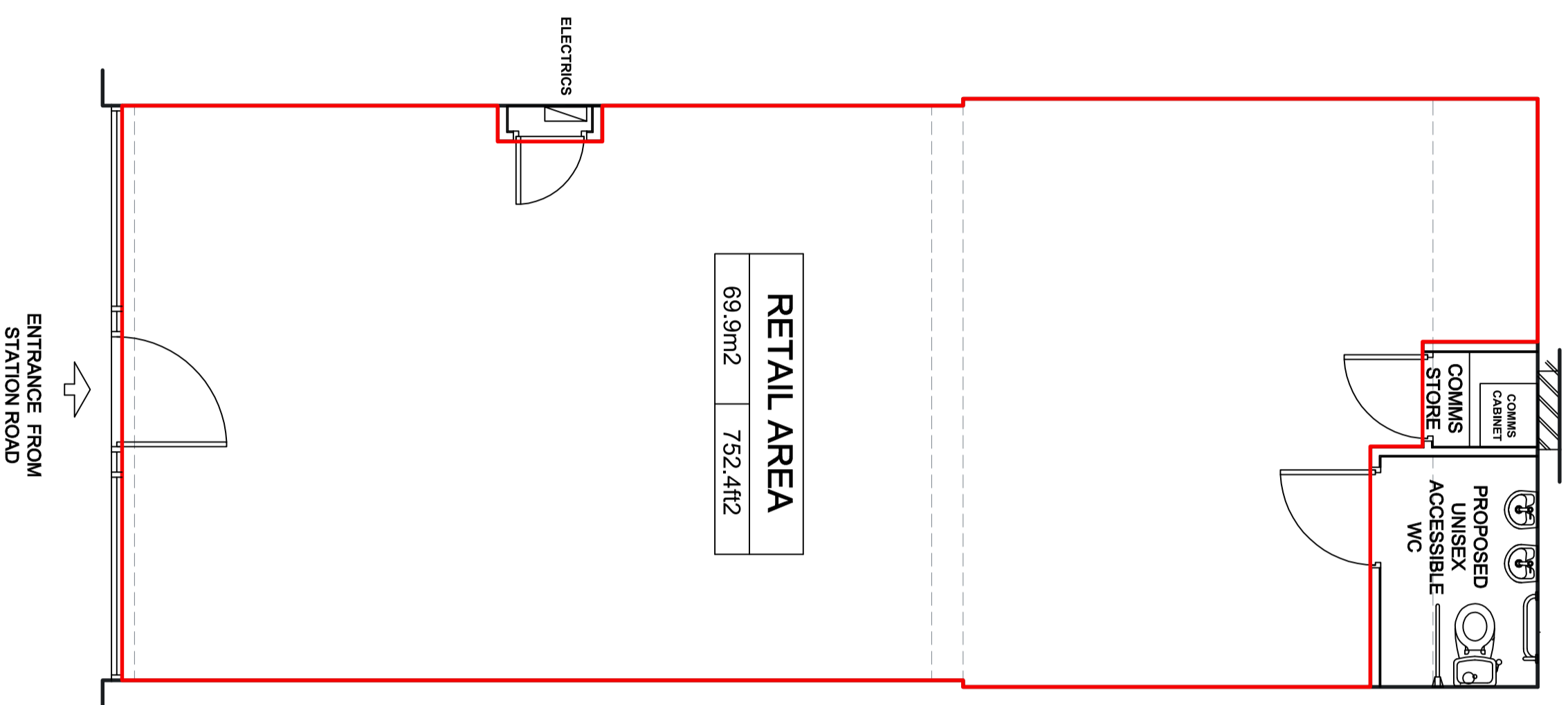
Website: **www.hillingdon.gov.uk**

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

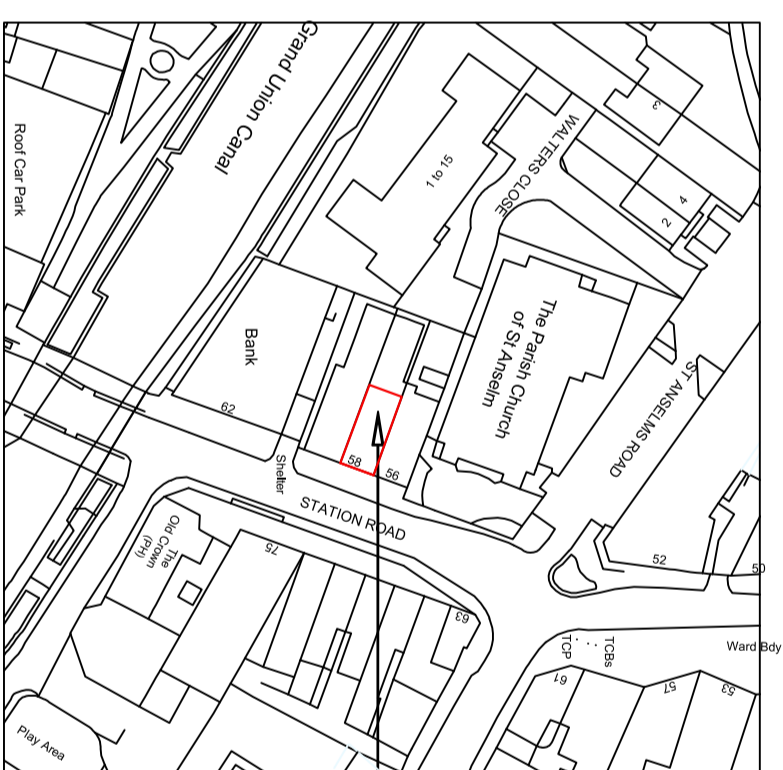
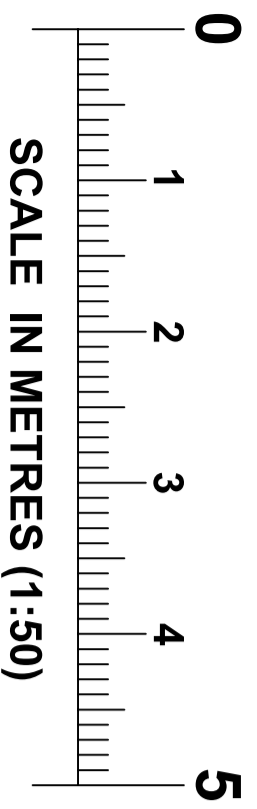
The following person connected with the applicant is able to give further information about the application:

**Richard Bradley
0115 948 7424
Popleston Allen
37 Stoney Street
The Lace Market
Nottingham
NG1 1LS**

Any representations under section 161 of the Gambling Act 2005 must be made no later than the following date: 1st July 2020



Ground Floor Plan 1:50

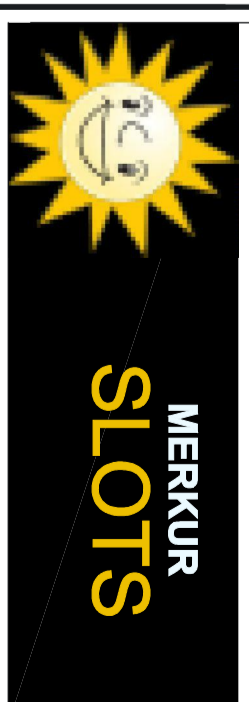


Indicates site in application at:
58 STATION ROAD,
HAYES,
UB3 4DF

Location Plan 1:1250

GAMBLING ACT 2005 LICENSING PLAN

Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only, and **does not** form part of the premises licence



Address
58 STATION ROAD
HAYES
UB3 4DF

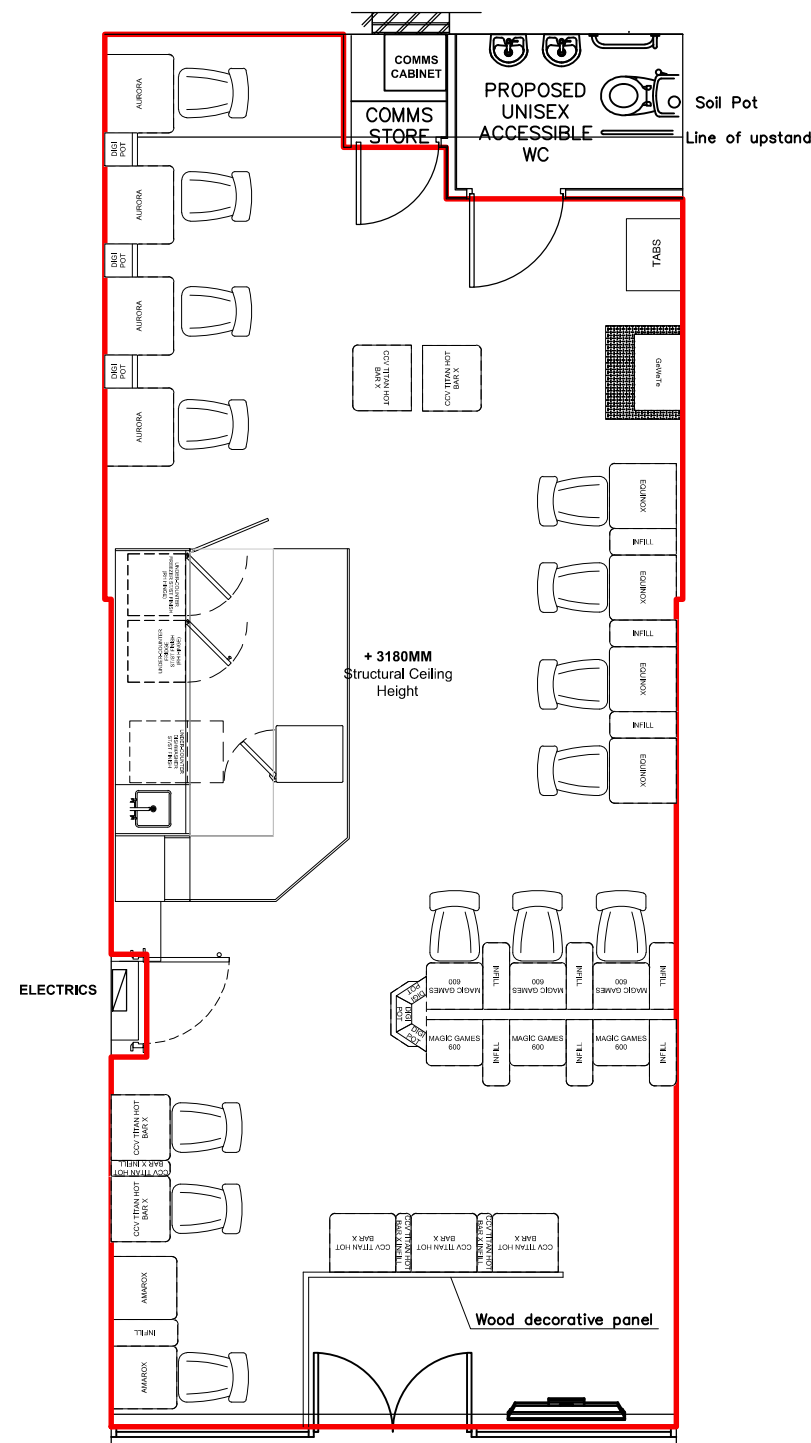
Title
LICENCE PLAN

Drawn	Date	Scale
JAM	13/12/2019	1:50 @ A1
Customer Area	69.9m ²	
Drawing Number	SR/HY/02	Revision

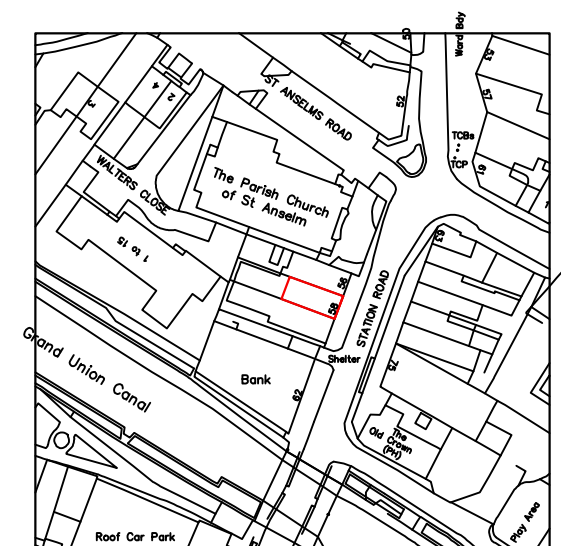
Mickewins Ltd
301 Alvechurch Road, Birmingham, B31 4UB Tel: 0121 453 4745
Licence Plan

FOR ILLUSTRATION
PURPOSES ONLY

RETAIL AREA	
69.9m ²	752.4ft ²



Ground Floor Plan 1:50



Location Plan 1:1250

REVISIONS	FIT OUT TYPE FUTURE VENUE	REFERENCE DRAWINGS	
	PROJECT MERKUR SLOTS 58 Station Road Hayes UB3 4DF	SCALE 1:50	DRAWN BY
	DESCRIPTION PROPOSED MACHINE PLAN	DATE 12/05/2020	
		DRAWING No. ???-PR-05	REVISION



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LOCAL GAMBLING RISK ASSESSMENT

Premises Name:	HAYES				
Premises Address:	Merkur Slots, 58 Station Rd, Hayes, UB3 4DF				
Operator Premises Code:	902	Area Manager:		Area:	Area
Category of gambling premises licence:	Bingo	Staff Guard System: Y/N	Yes	24 hours opening:	Yes
Premises Licence Number:	0				
Local Authority details:	London Borough of Hillingdon				
Name of person completing assessment:	Garry Talman	Position within Company:	Compliance Manager		
Date original Assessment completed:	08/01/2020				
Date of Assessment Review:					
Reason for Assessment Review:	New Premise Application				

REQUIREMENT TO COMPLY – social responsibility code provision 10.1.1 - with effect from 6th April 2016

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

This risk assessment must be completed based upon the local risks to the licensing objectives posed **when applying for a new gambling premises licence and when applying for a variation of a premises licence.**

Licensees must review and update their local risk assessment when internal/external changes take place in each of their premises which may affect the mitigation of local risk, taking into account significant changes to local area circumstances, including those identified in a licensing authority's statement of licensing policy. Some authorities have included details of their local area profiles, which you can refer to for further information.

Ordinary code provision 10.1.2

Licensees are required to 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 AREA PROFILE

Useful websites:

<https://www.hillingdon.gov.uk>

<http://www.ukcrimestats.com>

<http://www.gov.uk/government/collections/crime-statistics>

<https://www.findmyschool.co.uk>

<https://checkmypostcode.uk>

<https://postcodearea.co.uk>

<https://www.google.com/maps>

<https://www.police.gov>

Premises Design and Gambling Operation

Hillingdon councils requirements for Bingo Premises in Part 5.35 to 5.41 of the Statement of Gambling Policy will be fully covered in this venue.

The venue will be fitted with a HD CCTV system that is clearly advertised to customers with screens visible by employees when working in the service area. Floor layout will enable supervision of entrances and machines from the central service area. The premises and employees will be protected by an employee Guard security system and intruder alarms will be installed.

Premises Logs - Information pertaining to the Licence Conditions and Codes of Practice will be recorded electronically using the IHL SmartTablet with the data evaluated centrally via the back office.

The proposed venue will operate under a Bingo License, with a range of category B3, C and D machines and proprietary bingo equipment.

Premises frontage will be of a style which obscures the interior with appropriate advertising inline with Licence Conditions and Codes of Practice.

External windows will have digital marketing screens which will display safer gambling messages, Think 25, Bingo Played Here, opening times and promotional activity.

Local Risk

The venue is situated at the top end of the main shopping street of Station Road and within Hayes Town Centre. Hayes and Harlington stations are nearby.

To the left of the premises is a Restaurant and Barclays bank, to the right a hairdressing salon.

Further along Station Road are all the mainstream retail outlets and locally owned shops. All of the mainstream bookmakers are in the town centre with William Hill being the closest and there is one other adult gaming centre, Admiral Casino on Station Road.

West London YMCA is located approx. 2 minute walk from the venue on the same side of the road. There is a bus stop opposite the venue. H&T Pawnbrokers is approx. 200yds away.

There are two public houses in close proximity to the venue; The Old Crown directly opposite the bank and Captain Morgans in Clayton Rd, with one more located in Coldharbour Lane.

Local Academies are (Lake Farm) which is 0.9km from the venue with other secondary schools being further away, Botwell House Catholic Primary School is approx. 4 minutes walk. Within a one mile radius the total number of schools are: 2 Secondary School Inc. further education (16 to 18 yr. olds); 7 Primary Schools.

The Hayes and Harlington locality population is 106,692 residents of which 25.2% are under the age of 16. Ethnic make up is 40.3% White British, 38.9% Asian/ Asian British and the remaining from other ethnic backgrounds. 70.1% of working age residents are economically active compared to 69.9% for England. 54.2% of residents own their own property. (Hillingdon Ward Profile 2017)

Local Crime Analysis (police.uk)

We have reviewed the Police.UK hot-spot mapping for the area and we are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local police over reducing our involvement in any incident.

The crime rate in this area is classed as normal compared to similar areas, however, it is lower than the average for the Metropolitan Police force area. Metropolitan Police average 98.65 - Hillingdon average 85.49.

Assessment of premises incident records (Past 12 Months)

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

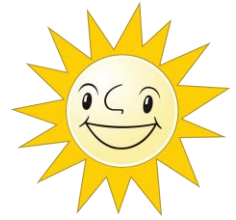
CD - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

FO - Ensuring that gambling is conducted in a fair and open way.

CV - Protecting children and other vulnerable people from being harmed or exploited by gambling.

LO	Local Risk Detail	Degree of Risk (Severity vs Likelihood)	Control Measures	Updated
CD	Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.	Moderate	Systems: employees trained on the requirements to comply with the Money Laundering Regulations and the Company AML Policy. Customer Interaction used to identifying potential suspects, behaviour, spend patterns and the use of change machines.	Jan-20
			Designs: Open design with vision across the venue floor.	
			Physical: IHL Smart Tablet to record incidents with emails direct to the AMLO tablet. Shared security alerts and photos of suspects with operators nationally. CCTV systems available for additional monitoring of activity. MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.	
CD	Poor security control measures which may increase vulnerability to crime	Low	Systems: Security Alert system allows the sharing of information on criminal activity across all venues and relevant employees. Key management policy in place. Regular checks on Emergency exits and equipment. Extensive monitoring of employees and customer activity from Audit Department.	Jan-20
			Designs: Open design with vision across the venue floor	
			Physical: Staffguard security system. HD CCTV system installed with remote viewing available. Time lock safe installed. Monitored Intruder alarm system installed. Machine data monitoring in MARS.	
CD	To identify aggressive customers to prevent crime and disorder (will be dependent on customers who frequent premises)	Low	Systems: employee training on how to deal with aggressive customers and situations which may also require police assistance.	Jan-20
			Designs: Open design with vision across the venue floor.	
			Physical: Smart Incident app on the IHL Tablet used to record all incidents Inc. crime reference number, supporting emails and back office report monitoring. Security Group email in operation Inc. BACTA alerts.	
CD	Awareness of local crime issues in the local area	Low	Systems: Annual LARA review, policies and procedures for communication of change in local issues. Reference to http://www.police.uk , http://www.ukcrimestats.com , http://www.gov.uk/government/collections/crime-statistics .	Jan-20
			Designs:	
			Physical: Membership of local Town Radio schemes where available. Security group email alerts.	
CD	Failure to protect employee and customers from harm during the hours of late night opening	Low	Systems: Lone working and night working procedures in place. Use of locked Door policy. Full time Support Night Manager available throughout the night.	Jan-20
			Designs:	
			Physical: Night Time contact number, HD CCTV system, Staffguard Security System.	
FO	Failure to prevent customers complaints and disputes regarding gambling within our premises.	Low	Systems: Management and monitoring of reported faults via MARS. Machines maintained by trained persons. Machine standards audited on regular basis. Gaming rules prominently displayed at entrance to each venue. Employees have full understanding of machine gaming rules. Machine Standards Policy in place.	Jan-20
			Designs: Stakes, prize levels and % pay-outs are clearly displayed on all machines.	
			Physical: Gambling machines comply with technical standards and are acquired from licensed suppliers only.	

FO	Failure to resolve customers complaints and disputes regarding our gambling premises.	Low	Systems: Complaints management policy in place for written and telephoned complaints. Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Employees encouraged to use positive discretion to resolve customer issues in venue.	Jan-20
			Designs:	
			Physical: Code of Practice and Complaints and Disputes policy displayed at venue entrance. Complaints and Disputes policy leaflets available within the venue.	
CV	Ensuring Under 18's do not have access to licensed premises	Low	Systems: Proof of Age scheme in place with application forms available in the venue. 3rd party company - Check Policy employed for underage verification testing. Persons who are unable to provide proof of age are refused entry.	
			Designs: Think 25 policy and posters are displayed at entrance and within the premises, Think 25 badges form part of employee uniform. Entrance door signage and machines display 'No Under 18's'. Marketing and Promotions complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice.	
			Physical: Age verification app on the IHL tablet used to record all Age verification challenges. All entrances and venue floor are monitored by employees.	
CV	To identify signs associated with problem gambling and people who may be at risk of gambling related harm	Moderate	Systems: employees trained on customer interaction and how to identify and interact with players who exhibit signs of developing problem gambling, identifying players whose behaviour changes.	Jan-20
			Designs:	
			Physical: Playright App available in venues to assists players with managing their gambling. IHL tablet used to record all incidents of customer interaction with email alerts to Compliance Manager who has access to back office for additional monitoring.	
CV	Failure to provide information to customers on responsible gambling	Low	Systems: Employees are provided with the training to enable them to provide guidance on safer and responsible gambling.	Jan-20
			Designs: Stay in Control posters and leaflets promoted at venue entrance, within the venue and in washroom areas.	
			Physical: Socially Responsible messaging is implemented on B3 and digital Cat C machines. All machines display Gamble Responsibly stickers with helpline contact details.	
ALL	Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews	Low	Systems: Essentials of Compliance and Safe Guarding Vulnerable People Induction training and 6 monthly refresher training for all employees. This training includes administering the self exclusion process and interacting with players. Central monitoring of all exclusions, breeches, reinstated customers and customer interactions by Compliance Manager.	Jan-20
			Designs: Tablet available for use of all employees.	
			Physical: Self exclusions logged on IHL Tablet Smart App. Information is shared across all operators. Members of Bingo Association Multi-operator Self Exclusion scheme.	
ALL	Training & Social Responsibility		Systems: Essentials of Compliance, Safeguarding and lone working trained on Inductions and refreshed 6 monthly for all employees. Compliance Manager attendance at Manager Meetings for refresher and update training. Review of all logs on IHL back office to identify and promptly target venues where changes are exhibiting.	Jan-20
			Designs: On-line training platform and two regional training centres.	
			Physical: Compliance and Social Responsibility Folder with all policies and procedures available to all employees. Venue Mangers review logs monthly. Area Managers Bi monthly and Compliance Audits twice yearly.	



THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

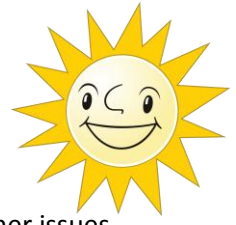
- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

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

- Cashino Gaming Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Cashino Gaming Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Cashino Gaming Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Cashino Gaming Limited premises operate digital CCTV and customer areas are supervised.
- Cashino Gaming operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- The employees in Cashino Gaming premises are required to carry a portable alarm which is provided by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Cashino Gaming Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Cashino Gaming employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Cashino Gaming operate a robust late night working policy, which is fully supported by a full-time Night Manager.
- Cashino Gaming do not operate a single-manning policy between 8pm and 6am, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

Objective 2 - Ensuring that gambling is conducted in a fair and open way.

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.



Cashino Gaming Limited

Operational Standards

- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers attend our National Training Centre for a thorough induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during the course of their employment to ensure that potential issues can be addressed at the earliest opportunity.

Objective 3 - Protecting children and other vulnerable persons from being harmed or exploited by gambling

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and Check Policy are our third-party independent partner for compliance testing.
- All licensed premise employees receive induction and six-monthly refresher training during the course of their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Playright is installed in all licensed premises - this is a self-help App available to customers to enable them to manage spend and play time.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.
- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, education and treatment of problem gambling.

All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.