

FUTURE LEISURE LIMITED

ADULT GAMING CENTRE COMPLIANCE TRAINING

August 2014
October 2015
January 2018
January 2020

Welcome to your AGC Compliance Training

Explain that the training will be in two parts

- 1) Today – Classroom based training on AGC Compliance
- 2) Tomorrow- Hands on Training
- 3) It will last approximately 2 -3 hours, and will cover all the legal and company policies & procedures you need to meet the objectives of the Gambling Act 2005

There will be individual and group exercises throughout

At the end will be the training sign off and consolidation exercise to check your understanding of everything we have gone through today.

This is a very important training session, please listen and take notes. Your compliance knowledge will be checked by various people inc your NOM, your GM, myself & any Enforcement Officer (Licensing or Gaming)

Contents

- Gaming Act 2005 Licensing Objectives
- Future Leisure Limited Adult Gaming Centre Policies and Procedures
- Adult Gaming Centre Role and Responsibilities
- Gaming Act 2005 Legislation & Codes of Practice
- Social Responsibility Policy

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Read through what we will be covering today

Explain that there are opportunities to ask questions throughout

Licensing Objectives

Gambling Act 2005

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

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Read from slide

Explain we will be covering each one in turn and how each member of staff in their role can meet each objective

We will be referring to these during the course of the training so it would be useful to write them down.

Licensing Objective 1

Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

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Read from slide

Point out:-

Licensees as part of their internal controls and financial accounting systems must have and put into effect policies and procedures concerning the handling of Cash and cash equivalents designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit and to provide assurance that gambling activities are being conducted fairly

Refer the staff to Cash Handling Policies

Duties & Responsibilities under the Proceeds of Crime Act 2002

- Legal duty to report where you know or suspect that a customer is using the proceeds of crime to gamble
- Knowledge & Suspicion
- Future Leisure Limited Anti Money Laundering Reporting Procedures

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Read from slide

Legal Obligation to Report

- ***All gambling operators have a legal obligation to be alert to attempts by customers to gamble money acquired unlawfully, either to obtain 'clean money' in return or simply as a leisure activity.***
- ***They must report any suspicion or knowledge they or their employees have of such attempts to the National Crimes Agency (NCA) via the Nominated Officer***

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Read from slide

Knowledge v Suspicion

Knowledge

- Actually knowing something to be true.
- Must have proof

Suspicion

- Based on some foundation
- Do not need to have evidence

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ASK – WHAT IS THE DIFFERENCE BETWEEN KNOWLEDGE & SUSPICION

Knowledge means actually knowing something to be true. In a criminal court it must be proved that the individual in fact knew that a person was engaged in money laundering.

Suspicion is more subjective and falls short of proof based on firm evidence. Suspicion has been defined by the courts as being mere speculation and based on some foundation.

The test to decide whether you hold a suspicion is a subjective one. If you think a transaction is suspicious, you are not expected to know the exact nature of the criminal offence of that the funds were definitely those arising from the crime. You may notice something unusual or unexpected, and after making enquiries the facts do not seem normal or do not make commercial or financial sense. You do not have to have evidence that the customer is using the proceeds of crime to have suspicion.

Recap from slide

SUSPICIOUS ACTIVITY

- Customer exhibits unusual gambling pattern with an almost guaranteed return or very little financial risk
- Large amounts of money deposited in gaming machines but then cashed or withdrawn after very little game play
- Customer regularly gambles large amounts and appears to find unusual levels of losses acceptable
- Instances of high spends by customers out of the ordinary
- Stakes wagered become unusually high or out of the ordinary
- Being informed that a known drug dealer is gambling large amounts of money
- Knowledge that customers are using 'criminal spend'

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ASK – WHAT CONSTITUTES SUSPICIOUS ACTIVITY IN REGARDS TO MONEY LAUNDERING?

Discuss answers and then show slide

Reporting of Incidents

- Log in Compliance Logs
 - Actual Knowledge
 - Suspicion
- Report to GM & then Nominated Officer using SARS Form
- Nominated Officer must then decide whether or not to report the incident to National Crimes Agency using SARS (Suspicious Activity Reporting System) Form
- Only need to consider making a disclosure if they have actual knowledge or subjective suspicion
- It is an offence to 'tip off' suspicion of possible Money Laundering. NO TIPPING OFF.

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Read from slide

Refer to AGC Manual – Policy for refusal of service - (those identified to be money laundering or money laundered in past)

Nominated officer – Actual person to be announced but will be the point of call for all reporting of knowledge & suspicious activities in regards to money laundering.

Unusual patterns of gambling, including gambling involving particularly large amounts of money should receive attention, but unusual patterns of behaviour should not necessarily lead to knowledge or suspicion of money laundering, or the submission of a SOCA.

Nominated Officer or Managers assigned Anti Money Laundering Duties should assess all of the circumstances. In cases where it is feasible it may be helpful to ask customers discreetly for more information such as why they have a large cash amount to spend.

All instances are to be noted doesn't matter how many its all compliance and helps us show the Gambling Commission we are fully trained and aware.

All instances need to be recorded in logs

- 1) KNOWLEDGE OF CRIME**
- 2) SUSPICION OF CRIME**

Nominated Officer will decide what needs to be reported further using the SARS Money Laundering Form

Nominated Officer

- The main role of the Nominated Officer is:
 - Receive internal SARS Forms
 - Decide whether disclosures should be reported to National Crimes Agency
 - If appropriate make external reports to National Crimes Agency
 - Ensure that appropriate consent is applied for as necessary
- All communication to the Nominated Officer will be documented and filed for review at Operations Meetings
- Will ensure that we meet obligations under the Proceeds Of Crime Act 2002 and the Terrorism Act 2000
- Will also liaise with National Crimes Agency or local law enforcement agencies on whether to proceed with a transaction or what information may be disclosed to customers or third parties

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Read from slide

Our Nominated Officer in regards to Money Laundering is Gavin Tresidder at Head Office.

His email address is gt@betrgb.com and phone number is 0208 997 1110

Licensing Objective 2

Ensuring that Gambling is conducted
in a fair and open way

Read from slide

Fair & Open Gambling

- Licensees must provide evidence to show that their terms and conditions are not unfair
- Terms and conditions must be available and reasonable
- Rules about Adult Gaming Centres must be made available

- Any changes or variation of rules must be made available
- Customers must be notified of changes to these terms
- Complaints & Disputes Policy & Procedure must be in place and displayed and available to all customers

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READ FROM SLIDE

Licensees must satisfy themselves that the terms on which gambling are offered are not unfair under the Unfair Terms and Consumer Contract Regulations 1999 and where applicable, make the reasonable test under the Unfair Contract Terms Act 1977.

ASK – WHERE SHOULD THE TERMS AND CONDITIONS BE DISPLAYED?

- Display clearly
- Machines each have charge to play (ctp) signage
- General Terms & Conditions need to be laminated and put on a notice board for display

Show a copy of the General Terms & Conditions

Make yourself familiar with each game and machine so that you are fully prepared for any questions the customer may have.

Complaints and Disputes

- Written procedures for handling customer Complaints and Disputes resolution must be in place
- Information must be accessible to customers regards ADR approved entities used by the operator
- Contact arrangements for referral to the ADR approved entity must be provided to customers
- Dispute resolution must be offered free of charge
- Records to be kept for a minimum of 12 months
- All complaints to be logged in Complaints Log
- A copy and outcome of each dispute by the ADR entity must be submitted to the Commission

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ASK – WHERE WOULD A CUSTOMER FIND THE DETAILS FOR PUTTING IN A COMPLAINT?

Staff should also be aware of what they have to do so they can explain

Refer to AGC Manual – Complaint & Disputes Procedure

Read through and discuss with staff

Independent Third Party - Independent ADR and others are available

Show Complaints form and explain Complaints Log

Licensing Objective 3

Protecting children and other vulnerable persons from being harmed or exploited by Gambling

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Read from slide

Policies & Procedures

Future Leisure Limited have policies and procedures in place to protect children & vulnerable people and their effectiveness must be monitored

- Age Verification
- Refusing Entry & Action
- Dealing with Adults
- Employment of Children & Young Persons
- Combating Problem Gambling
- Staff Awareness
 - Information
 - Interaction
 - Self Exclusion

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Read from slide

In this section we will cover the above and how you can achieve this particular licensing objective

Age Verification

- Acceptable ID if current with photograph
 - Passport
 - Photographic Driving Licence
 - PASS logo
- If suspected underage, proof of ID must be asked for
- Challenge 25 Policy
- Record on Challenge 25 log
- Refusal of Entry if no suitable ID or under 18

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ASK – HOW CAN WE PREVENT UNDERAGE GAMBLING ON THE PREMISES ?

Read from slide

Therefore firstly we must check identification

ASK – CAN ANYONE GIVE AN EXAMPLE OF AN ACCEPTABLE FORM OF ID?

-Photographic Driving Licence

-Passport

-Pass Logo documentation

Future Leisure operates a Challenge 25 policy. Must produce ID as soon as it comes to your attention that they wish to access gambling facilities.

Record all ID checks on U25 Log

ASK – WHAT WOULD YOU DO IF THE PERSON COULD NOT PRESENT A SUITABLE FORM OF ID?

-Refuse entry

-Ask them to return with a suitable form of ID

-Record on suspicious Log

-Inform GM

Refer to AGC Manual – Age Verification Policy and read through with all staff

Also discuss the Policy for refusal of service in regards to not being able to produce suitable ID

Refusing Entry & Action

- Refusal of entry to anyone under 18
- Refusal of entry to anyone who cannot show a suitable form of photographic ID
- Refusal of entry to any self excluded persons
- Refusal of entry to adults accompanied by under 18's
- Refusal of entry to all barred persons
- Procedures in place for a young person repeatedly attempting to gamble
- ***Refund the Stake but not the Prize***

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ASK – WHAT CIRCUMSTANCES WOULD YOU REFUSE SERVICE?

- Those unable to produce required ID
- Those who knowingly and recklessly allow children and vulnerable people to use the over 18s area
- Those who are on the self exclusion register and have not yet been removed or carried out their 6 month exclusion
- Those who are on the banned register and have not yet been removed
- Those identified to be money laundering or have in the past

Recap first two points from slide

We also need to have procedures in place to prevent entry by under 18's

ASK – WHAT COULD WE DO IF AN UNDER 18 REPEATEDLY ATTEMPTS TO GAMBLE?

- Ask them to leave the premises
- Incur an instant ban
- GM to be informed and then record on Ban Register and report to Line Manager
- File away in lockable cabinet

YOU MUST REFUND THE STAKE BUT NOT THE PRIZE

Refer to AGC Manual – Refusing Entry & Action & Refusal of Service

Read through and discuss with staff

Dealing with Adults

- Procedures must be in place to deal with an occasion where an adult knowingly or recklessly attempts to permit a child or young person to gamble
- Need to remind customers of their parental responsibilities

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ASK – WHAT COULD WE DO IF AN ADULT KNOWINGLY OR RECKLESSLY ALLOWS A CHILD OR YOUNG PERSON TO GAMBLE?

- Service must be refused in any circumstance where any adult is accompanied by a child or young person
- Ban for 6 months & GM record on Ban Log in Red File send to NOM and file away in a lockable cabinet
- Ask them to leave the premises
- Child is to have their stake removed but not the prize

Emphasise the need to log all interaction – showing your social responsibility in regards to problem gaming

Refer to AGC Manual – Dealing with Adults that knowingly or recklessly allow a child or vulnerable person to gamble & Refusal of Service

Read through and discuss with staff

Employment of Children & Young Persons

Licensees who employ children and young persons should be aware that it is an offence:-

(a) to employ them to provide facilities for playing gaming machines

(b) for their contract of employment to require them or permit them to perform functions in respect of the gaming machines.

(c) To employ a child to perform any function on the premises where gambling facilities are being provided.

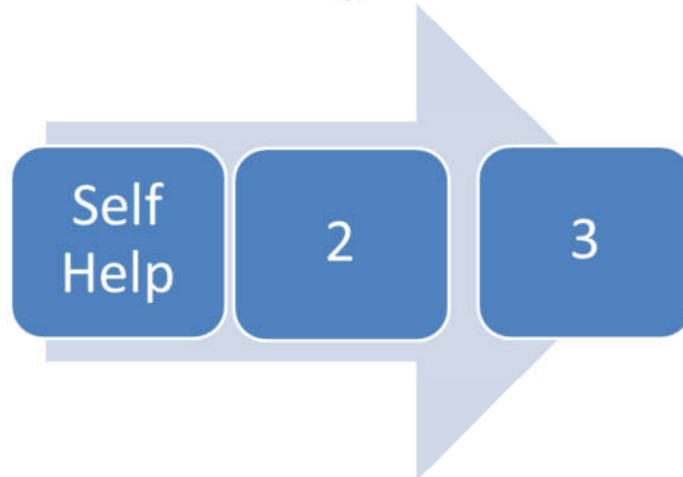
All staff should be aware of the above.

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Read from slide and discuss

Combating Problem Gambling

Three Stage Process



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As a company we have a social and moral responsibility to protect our customers from being exploited or harmed by gaming.

It's easier to think of this as a three stage process

Read from slide

ASK – FROM WHERE COULD CUSTOMERS SEEK ADVICE?

Customers seek advice themselves from ourselves or external companies

- 1) Gam Care leaflets need to be readily available both in the machine area and also in a discreet area where the customer can pick it up without drawing attention to themselves
- 2) Information must cover any measures provided by us to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend.
- 3) The information must be directed to all customers whether or not we also make available material which is directed specifically at customers who may be problem gamblers. For gambling premises, information must be available in all areas where gambling facilities are provided and are adjacent to ATMs where these are not located in a gambling area.
- 4) As a minimum information must be displayed promptly on posters appropriate to the size and layout of the premises and contained in leaflets that may be taken away.

Problem Gambling Organisations

- GamCare
 - www.gamcare.org.uk
 - 0808 8020 133
- Gamblers Anonymous
 - www.gamblersanonymous.org.uk
 - 0207 384 3040
- GamAnonUK (for relatives of gamblers)
 - www.gamanon.org.uk
 - 08700 50 88 80

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Read from slide and explain that these are a few organisations that are available to all people regardless of their gambling problem.

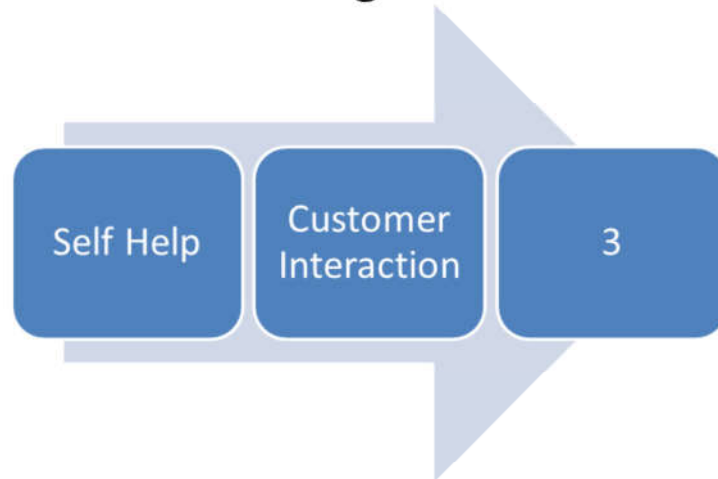
The list is not exhaustive

Gam Care also offers counselling support:

- 1) To help stop or reduce the frequency of problem gambling*
- 2) To help develop ways of coping with problem gambling behaviour*
- 3) To help understand some of the underlying reasons why gambling has become a problem*
- 4) To help address related issues that are causing harm or damage*
- 5) To help develop a productive and healthy life without problem gambling*

Combating Problem Gambling

Three Stage Process



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-ASK – HOW COULD YOU INTERACT WITH THE CUSTOMER TO COMBAT PROBLEM GAMBLING?

- Ask if they want to take a break for something to eat or drink
- Suggest they walk round to the nearest bank rather than just the ATM
- Encourage them to leave the area and reflect about what they are / intend to do

-Record all of this in the Customer interaction log as it proves due diligence and adherence to the Objectives.

- *Show examples of Customer Interaction from the sample Customer Interaction log*

Signs of Problem Gambling

- Finding it hard to manage or stop their gambling
- Having arguments with friends or family about money or gambling
- Always thinking or talking about gambling
- Gambling until all money is gone
- Borrowing money or selling possessions to gamble
- Not paying bills to pay for gambling
- Needing to gamble with large amounts of money for a longer time to get some feeling of excitement or buzz
- Neglecting work, family, personal needs, household responsibilities because of gambling
- Lying about their gambling or hiding it
- Losing interest in usual activities or hobbies

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PAIRS EXERCISE

WHAT SIGNS COULD A PERSON DISPLAY THAT MIGHT INDICATE THEY HAVE A GAMBLING PROBLEM?

Discuss as a group and then read from slide for further answers

Refer to AGC Manual – Types of behaviour relating to Problem Gambling that will be logged and reported

Read through and discuss with staff

Indicative Behaviour

- Feeling anxious, worried, guilty, depressed, stressed or irritable
- Being aggressive, damaging equipment
- Hysteria or remorse
- Spending more money & time on gambling than they can afford or increased gambling habits (length of time, amounts)
- Chasing losses or gambling to get out of financial trouble
- Running out to ATMs to take out more cash

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Customer Interactions

- Monitor the individual and make observations of their behaviour
- Decide whether an interaction is required
- Ask open questions
- Suggest talking in a private place
- Provide information as to how an individual can seek help
- Explain the Self-Exclusion process
- LCCP 3.4.1
- All customer interaction must be logged

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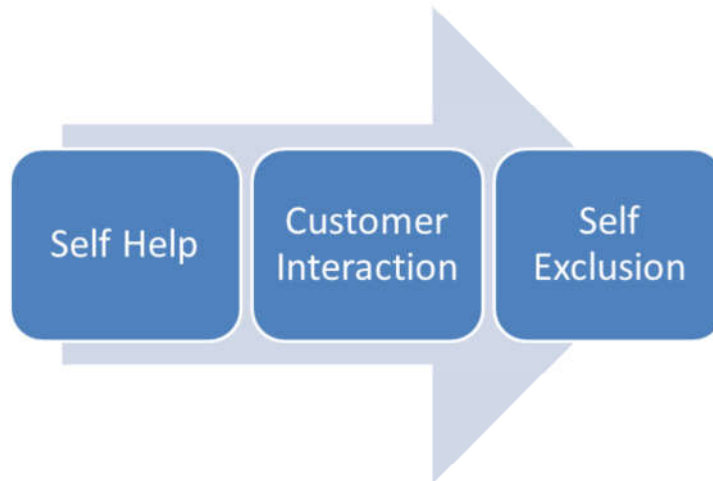
Outcomes of a Customer Interaction

- The Customer may decide to think about their gambling habits
- The Customer may accept a leaflet on problem gambling
- The Customer may self refer to an organisation such as GamCare
- The Customer may self-exclude
- Management might decide that the Customer, if they are not willing to self-exclude, must be barred from the premises

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Combating Problem Gambling

Three Stage Process



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There must be procedures for self exclusion.

Anyone who is involved in direct customer service must be aware of the self exclusions system in place and be able to direct that individual to an immediate point of contact with whom to complete that process.

GM to deal with where possible

Refer to AGC Manual – Policy in respect of Problem Gambling

Read through and discuss with staff

Self Exclusion Policy

- Self exclusion procedures must require positive action
- It is solely the customer's choice to self exclude
- Prior to excluding ,there should be sufficient information available
- Encourage the customer to self exclude at other gambling locations
- Exclusion for a minimum period of six months up to maximum period of 12 months
- Self exclusion remains in place until the agreed period of time expires
- If not renewed and such a person wishes return to gaming there is a one day (24 hour)cooling off period before approval of return
- Records must be retained of all self exclusions in a safe location
- No marketing material must be sent to anyone who is self excluded
- Logged in self exclusion log and Commission regulatory returns

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Read from slide

Emphasise that anyone who has Self excluded must be removed from marketing databases and info placed on membership details. Flag that person . Place details on the self exclusion register.

Show staff a copy of our self exclusion letter.

Customer accounts of any individual who has entered a self exclusion agreement must be closed and customer money returned. Procedures must be in place to stop excluded individuals from gaining access to gambling.

A customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without an cooling off period. However, if the customer wishes to consider the self exclusion further the customer may return at a later date to enter into it.

IF SOMEONE WHO HAS SELF EXCLUDED ENTERS THE PREMISES WHILST SELF EXCLUDED YOU MUST REFUSE ENTRY , RECORD AND YOU MUST REFUND THE STAKE BY THE SELF EXCLUDED BUT NOT THE PRIZE

Refer to AGC Manual –Policy for Refusal of Service & Policy for Self Exclusion

Read through both and discuss with staff

Staff Awareness

- Advice on socially responsible gaming
- Where to obtain confidential advice should your gaming get out of control - Compliance Officer
- Cannot play any Gaming Machines in any Future Leisure Limited Adult Gaming Centre which is against Company Policy
- Deemed as Gross Misconduct and discipline enquiries will follow

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ASK – HOW COULD YOU ACCESS INFORMATION RELATING TO SOCIALLY RESPONSIBLE GAMING?

Gam Care Leaflet
Social Responsibility Policy
AGC Manual

No staff to play Machines in any venues. Will be deemed as gross misconduct
Refer to AGC Manual – Staff Playing or participating in gambling

Read through and discuss with staff

Compliance Officer

- Will work as an independent body
 - a point of contact for staff whistle blowing
 - feedback
 - queries that require a confidential reporting nature,
- Will then address these issues and inform the Operations Director (Gavin Tresidder) of issues and outcomes
- All feedback and queries dealt with by the compliance officer will also be discussed at the Operations Meetings.
- Confidential Helpline Notice details email and mobile number for staff.
- A log of such calls and actions will be kept and referred to the Operations Compliance Committee' and if necessary will be available for outside scrutiny by the GC or reported in the returns.

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As a company it is crucial that we are compliant with the legislation, hence why we are training today.

We have to have our own Internal Compliance Officer and this is Anna Zietkiewicz, supported by Ken Duncan who has previously worked for the Gambling Commission

Read from slide

ASK – WHY IS IT IMPORTANT FOR THERE TO BE AN INDEPENDENT BODY WITHIN OUR ORGANISATION IN REGARDS TO GAMBLING LEGISLATION?

You may need to report something e.g. illegal gambling by another member of staff and not know what to do

Email Compliance officer discreetly on – anna@ftrgroup.co.uk

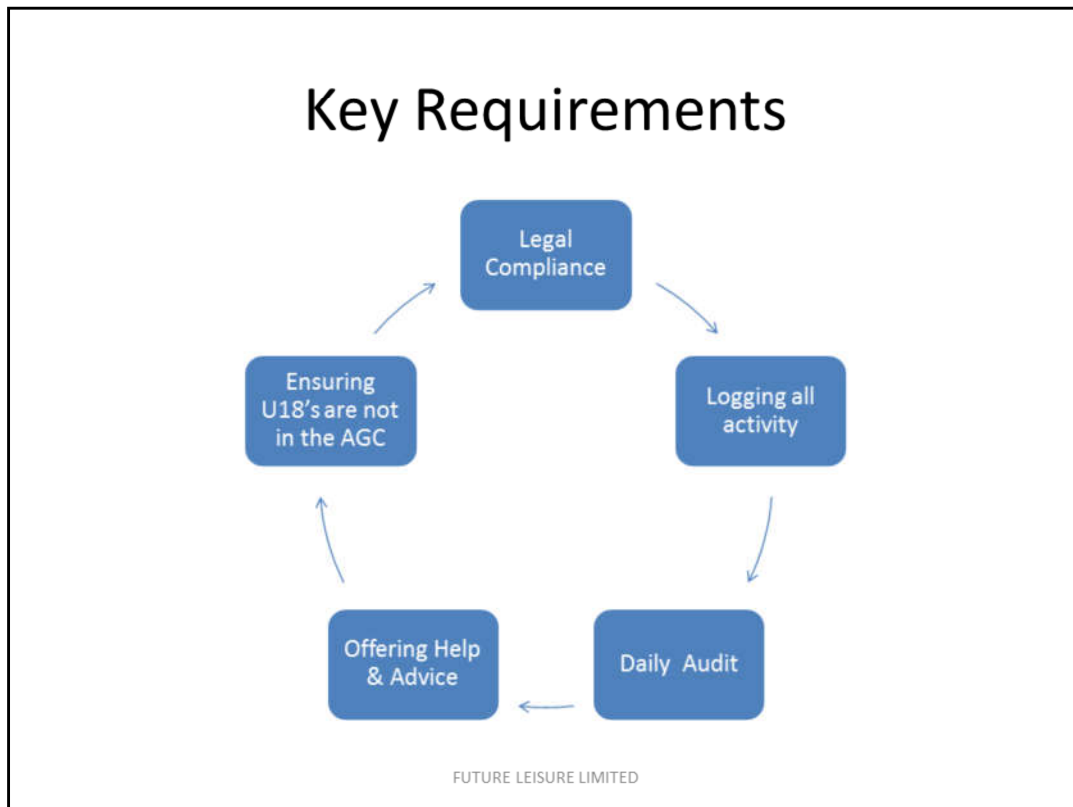
Hotline Number – 07824 566 702

Role & Responsibilities

PAIRS EXERCISE

List as many requirements as you can of what your role entails on a day to day basis

Discuss as a group and ensure the key ones on the next slide are mentioned



1. Legal compliance I.e. meeting the Licensing Objectives
2. Reporting all instances in Prevention of Crime, Customer interaction and Challenge 25 Logs. Recording Ban & Self Exclusion incidents as well
3. Audit at start of your shift
4. Offering advice and help to customers in regards to fair and open gambling & preventing problem gambling
5. Ensuring Under 18's are kept out of the premises

Show slide

Remind staff that shop floor Assistants must be in uniform at all times

Must be in licensed area or close vicinity

Gaming Commission / Customers must be able to identify who is working in the licensed Area.

Maybe useful to take a quick break now before you start the Legislation / Codes of Practice section

Licence Conditions & Codes of Practice

Gambling Act 2005

Contents

- Mandatory Conditions on Premises Licence
- Default Conditions
- Primary Gambling Activity
- Access to Premises
- Personal Licence Holders
- Informing the Commission (Suspicious Offences / Key Events)
- Codes of Practice
- Marketing

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Read from slide and explain we will be covering each section in detail

Mandatory Conditions on Premises Licence

- Summary must be displayed.
- Operating licence must be displayed
- Layout of the premises should be in accordance to plan.
- No ALCOHOL

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This has all been done in advance in the preparation.

Note where the licence is displayed, it must be kept there at all times.

ASK – WHAT NOTICES NEED TO BE DISPLAYED?

Premises Licence
Operating Licence
Plan of premises
Public & Employers Liability Certificate
Terms & Conditions
Disputes Notice
No U18's notice
Gamcare leaflets etc

AGC Mandatory Conditions

- Children under 18 years of age are not allowed in the AGC
 - Supervision at all times.
 - Able to be observed.
 - Definition of supervision.
- Notice displayed at all entrances to Adult Gaming Centres–
No under 18's Allowed on these Premises
- Rules must be available (Terms and Conditions document)
- ATM location.
- No Alcohol

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Referring to 3rd Licensing Objective 'Protecting children and other vulnerable people from being harmed or exploited by Gambling'

ASK – HOW WOULD YOU FIND OUT INFORMATION ABOUT THE MACHINE?

Press the help button

Explain their job role, ensuring U18's do not enter the premises. Must always be someone supervising the shop floor.

A notice stating that no person under the age of 18 years is permitted on the premises shall be displayed in a prominent place at every entrance to the premises. Make sure that the No Under 18's signage is clearly displayed at all times.

ASK – WHY DO THE CHARGES NEED TO BE DISPLAYED?

Fair and Open so the customer knows what it costs – Licensing Objective 2

ASK – WHY MUST THE RULES BE AVAILABLE?

Fair and Open

Laminated copy of the General Terms & Conditions document needs placing on a notice board in the area as well

ATM location –

ASK – WHY SHOULD THE ATM NOT BE NEAR MACHINES MACHINE AREA?

MANDATORY - Customer wishing to use an ATM must cease gambling to do so

Default Conditions

- No default condition in place at this time

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Access to Premises

- Licensees must have policies to ensure that their staff cooperate with the Commission's Compliance and Enforcement Officers.
- Council Enforcement Officers
- Police Officers
- No ID no Entry
- Rules of Reporting

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As with any legislation e.g. Health & Safety / Food Hygiene / Licensing – Enforcement Officers have a right to enter the premises to check compliance with the Law and investigate whether an offence is being created.

They need to make sure the Licensing Objectives are being followed.

ASK – WHAT DO WE NEED TO DO WHEN WE HAVE A VISIT?

- Verify who they actually are – sign in with contractors log book
- Show them our due diligence and training
- Back of House – audit trails / incidents / manuals
- Front of House – reference file
- Staff training documents
- Let the GM know (who should then inform NOM)
- Log as an incident report
- Any reports / recommendations given should be logged on incident report and then shown to line manager

Failure to complete an incident report (GM) and notify your Line Manager may result in disciplinary action

DETAIL THE REPORTING CHAIN FOR VISITS

STAFF – GM/PML – NOM / COMPLIANCE MANAGER – ANNA ZIETKIEWICZ

Emphasise that one mistake in one venue could affect all venues.

They must report all visits on the Incident Report system so that this can be tracked and used to aid our compliance training.

*We also have to report all visits to the Gaming Commission. Visits have taken about 3 hours so far
Refer to AGC Manual – Ensure staff co-operate with Gambling Commissions Enforcement Officers
Read through policy and discuss with staff*

Personal Licence Holders

- Must ensure they do not place the holder of the Operating Licence in breach of Operating Licence conditions.
- Must keep themselves informed of developments in Gambling Legislation, Codes of Practice and Commission Guidance relevant to their role.
- Must notify the Commission of the occurrence of a 'key event'. (Those which will have a significant impact on the licence holder or the business)
- PML Key Events include: disciplinary sanctions against them, their resignation, their disqualification, a Court judgement against them, change in name or address
- Company Key Events include: - entering administration, change in company name or key personnel
- Future Machines Limited will operate as a Small Scale Operation(SSO) under the provisions of the Small Scale-Operators Regulations 2006 which does not require Personal Licence Holders

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READ FROM SLIDE

ASK – HOW CAN YOU KEEP YOURSELVES INFORMED OF DEVELOPMENTS IN GAMBLING LEGISLATION?

Key information will be passed down from Head Office, but it is also useful to go onto the Gambling Commission's website and personally keep up to date with the information. Premises must be signed up for GC E-Bulletins

<http://www.gamblingcommission.gov.uk/>

ASK – GIVE AN EXAMPLE OF A KEY EVENT

Read out examples from slide

Refer GM to their Personal Management Licence Holders Responsibilities & Requirements Declaration

Reporting 'Key Events'

- Gambling Commission must be notified as soon as is reasonably practicable
- Must be within 5 working days of becoming aware of the occurrence

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READ FROM SLIDE

ASK – WHAT IS A KEY EVENT?

A 'key event' is an event that could have a significant impact on the nature or structure of the Licensee's business.

Examples include:-

- 1.If the Company is wound up or placed into administration,
- 2.If the Licensee is required to have their accounts audited,
- 3.Any unplanned change of the auditor,
4. Departure from the Licensee's business of any occupying a qualifying position,
- 5.Any breach of a covenant given to a bank or other lender,
6. Any default in making repayment of the whole or any part of a loan on its due date, any Court judgements remaining unpaid 14 days after the date of the judgement
7. The commencement of any material litigation against the Licensee,
- 8.The imposition of disciplinary sanction including dismissal against the holder of Personal Licence or person of qualifying position for gross misconduct or disciplinary proceedings.

Informing the Commission

- We need to be open and honest with the Gambling Commission
- Provide them with any information that we know relates to or suspect relates to of an offence under the Act
- Reporting suspicion of offences
 - Money Laundering
 - Allowing an Under 18 to Gamble
- Reporting Key Events

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ASK – GIVE AN EXAMPLE OF AN OFFENCE UNDER THE GAMBLING ACT?

- ALLOWING AN UNDER 18 TO PLAY MACHINES
- MONEY LAUNDERING

Must report this to the GM who then in turn report to NOM / Nominated Officer and then report to Gambling Commission.

If it is a criminal matter the Police must also be informed

We need to make sure we are monitoring any suspicious offences and prevent them from occurring.

We MUST record them on the Prevention of Crime log reports

We also have a Regulatory Returns Crib Sheet, which must be completed monthly by each club in order that we have the relevant information in relation to each log category should we need it for regular or annual returns.

Refer to AGC Manual – Reporting Suspicion of Offences

Read through and discuss with staff

Codes of Practice

- Compliance with these is a condition of Operating licences therefore any breach of them by an operator may lead to the Commission to review the operator's licence with a view to suspension or other punishment.
- These are all documented in the Adult Gaming Centre Policies and Procedures Manual
- Section 116 of Gambling Act

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This is all held in the AGC Manual and we have already discussed most of these during the training.

They also help us adhere to the three Licensing Objectives

Marketing

- All rewards or incentives schemes are to have clear Terms and Conditions
- No rewards or incentives can be dependent on the length of time or frequency someone chooses to gamble
- If a cash match scheme is offered both the spend and reward must be consistent
- If travel or accommodation is offered, it should not be directly related to the level of the customers prospective gambling
- Incentive/rewards schemes should only be offered proportionate to type and level of customers gambling
- All advertising to be undertaken in a socially responsible manner
 - No targeting Under 18's
 - Gamble aware logos on all advertising material

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READ FROM SLIDE

Any rewarding has adhere to the Rules and Regulations.

E.G.

We cannot say that someone would have to play for an hour every day for a week to claim a prize (It goes against the licensing objectives and social responsibility policy)

We have to be consistent:-

We couldn't give £5 worth of tokens for a £5 spend and £5 worth of tokens for a £10 spend, it would have to be £5 and £10 worth.

Social Responsibility Policy

- Promotion of socially responsible gaming
- Prevention and monitoring of under age gambling
- Preventing Credit being given in connection with gambling
- Providing information for responsible gaming and help for problem gamblers
- Customer Interaction and signs of problem gambling
- Implementation of self exclusion procedures and refusal of service to all who are self excluded
- Fair and Open provisions

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Everything we have covered today relates back to our Social Responsibility Policy.

Read from slide

ASK – HOW DO WE PROMOTE SOCIALLY RESPONSIBLE GAMING?

Identifying problem gamblers / challenge 25 policy / refusal of entry to u18, self excluded, barred / Help & advice for those with a gambling problem / self exclusion / staff training / customer interaction & challenge 21 logs / reality checks & timers

ASK – HOW DO WE PREVENT & MONITOR UNDER AGE GAMBLING?

Challenge 25 at all times & record in log
Suitable forms of ID
Supervise the area
Refusal of entry to over 18s
Taking action ie barred for unlawful attempts to area
Legal requirement to return stake but not prize to an U18
Stake to be returned but not prize

MENTION – YOU MAY NOT GIVE CREDIT IN CONNECTION WITH GAMBLING, OR PARTICIPATE IN, ARRANGE OR KNOWINGLY FACILITATE THE GIVING OF CREDIT IN CONNECTION WITH GAMBLING

ASK – WHAT INFORMATION IS AVAILABLE FOR RESPONSIBLE GAMING & HELP FOR PROBLEM GAMBLERS?

GamCare Leaflets & Posters
Phone numbers & web address of 3 organisations
Staff fully trained in signs and how to offer help / interaction & self exclusion

ASK – HOW WOULD YOU RECOGNISE IF SOMEONE HAD A GAMBLING PROBLEM?

Agitated / spending long periods at machines / asking to borrow money / tired & anxious / refer back to slide

ASK – WHAT IS THE PROCEDURE FOR SELF EXCLUSION?

First offer help and interact with customer / direct to GM and explain the self exclusion procedure. Six months minimum (no cooling off period) cannot come on premises whilst self excluded / marketing informed / membership details

ASK – HOW DO WE MAKE SURE OUR GAMBLING IS FAIR AND OPEN?

Charges to Play and percentages clearly displayed on machines
General Terms & Conditions document
Complaints & Disputes procedure displayed & readily available

Refer to AGC Management & Regulations Manual – Social Responsibility Policy

Social Responsibility Policy

- Marketing and advertising of Gambling
- Written procedures for complaints and disputes
- Protection of gambling staff and where to seek confidential advice
- To ensure that machines supplied comply with and are tested in accordance with the relevant Gaming Machine Technical Standards issued by the Gambling Commission
- To ensure that machines supplied to/by Future Leisure Limited display all required information

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ASK – HOW DO WE PROMOTE SOCIAL RESPONSIBLE GAMBLING THROUGH MARKETING & ADVERTISING?

Gam Care logos / not sent to self excluded / that the benefit is not dependant on the customer gambling for a pre determined length of time /not altered or increased if qualifying activity or spend is reached within a shorter time / value of benefit does not increase at a rate no greater than at which the amount spent increases / travel or accommodation is not directly related to the level of customers prospective gambling

ASK – WHAT ARE THE WRITTEN PROCEDURES FOR COMPLAINTS & DISPUTES?

Write to Anna Zietkiwicz @ Head Office / then escalate to Gavin Tresidder / if still not resolved goes to IPBA (third party)

Must give customer a copy of the procedure when asked

ASK – WHERE CAN YOU SEEK CONFIDENTIAL ADVICE IN REGARDS TO A GAMBLING PROBLEM?

Gam Care etc

Internal Compliance Officer – Anna Zietkiewicz

ASK – WHAT INFORMATION NEEDS TO BE DISPLAYED ON OUR MACHINES?

NOM's & GT liaise with the machine suppliers to ensure all machines comply with the Gaming Machine Technical Standards Ensure they mention – category of machine, that the correct machines are sited in accordance with relevant authorisations i.e. Over 18's area, rules, charges, likelihood of winning, information about where to seek help for problem gaming.

Future Leisure displays Gamcare / Gamble Aware stickers on all its machines

Refer to AGC Manual – Social Responsibility Policy

Aims

By the end of the Adult Gaming Centre compliance training you will be able to:-

- Understand and explain the 3 Licensing Objectives in relation to the Gambling Act
- Detail the policies and procedures in place for Future Leisure Limited commitment to Adult Gaming Centre Compliance
- Describe your role and responsibilities to ensure the 3 Licensing Objectives are met
- Ensure that legislation and codes of practice are in place and adhered to daily

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Recap from the above slide

Earlier we mentioned the aims of today's AGC Compliance Training

ASK – What are the 3 licensing objectives?

ASK- How can we prevent gambling from being used as a source of crime?

ASK – How can we ensure gambling is fair and open?

ASK – How can we protect children & other vulnerable people from gambling?

ASK – Can you detail 2 policies & procedures in place for Future Leisure's commitment to AGC Compliance?

ASK – What do you need to do on a daily basis?

ASK – What are your responsibilities?

Hand out AGC Consolidation Test to each staff member and get them to complete

Sign off Staff Compliance sheet for each staff member and get them to countersign