

Haven Leisure Limited

Bingo Compliance Manual

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HAVEN LEISURE LIMITED
LETTER OF CORPORATE COMMITMENT

Dear Colleagues,

You will all no doubt be aware that the provision and operation of various gambling facilities in Haven Leisure Limited resorts, parks and hotels is the subject of regulation by the Gambling Act 2005. The Act, along with the related Licence Conditions and Codes of Practice (LCCP) is regulated by the Gambling Commission with the primary objective and intention that operators fully promote with the three Licensing Objectives, namely;

- 1) Preventing gambling from being a **SOURCE OF CRIME OR DISORDER** , being associated with **CRIME OR DISORDER** or **BEING USED TO SUPPORT CRIME**;
- 2) Ensuring that gambling is conducted in a **FAIR** and **OPEN** way;
- 3) **PROTECTING CHILDREN** and other **VULNERABLE PERSONS** from being harmed or exploited by gambling.

Haven Leisure Limited holds a non-remote bingo operating licence permitting them to make facilities available for bingo within their premises. Some premises hold bingo premises licences permitting those premises to make commercial bingo available to customers.

The operating licences also permit any of the parks to provide unlicensed bingo, where the aggregate of stakes or prizes in any seven-day period can exceed £2,000. The unlicensed bingo is provided under Part 12 of the Gambling Act 2005.

We as a company have always committed ourselves as an integral part of our Company ethos, to provide through you all, the best possible levels of care to our owners and guests. We must ensure, when providing gambling to our owners and guests, that we promote the three Licensing Objectives.

These requirements include written policies, dedicated documentation and staff training along with the need for us to provide evidence on occasion to the regulators of our commitment to the process.

We recognise that gambling is enjoyed by the vast majority of those that experience it. Equally, we also recognise that in a small minority of the population gambling can become an addictive behaviour with all the implications that involves for the individual, their family and those around them.

We have always had in place a focus to ensure that we seek to effectively counter the risk posed by gambling. The fact that the need for this is now driven by legislation and a formalised commitment to the licensing objectives, simply reinforces that focus.

With that in mind, Haven Leisure Limited commits to comprehensive training and retraining for team

members and management who are involved in delivering the gambling product. Personal Licence Holders should be reminded that they have an on-going responsibility to comply with the conditions attached to their licences and to ensure they 'cascade' training information down to their team at the front end of that product delivery. Records of all such training are now regularly demanded by the Gambling Commission and management will ensure that such records are maintained and made available to the regulator when regulatory inspections take place.

We cannot impress on you enough that the regulatory environment is demanding and any failures might well cause us reputational embarrassment at the very least and may even place our continuing gambling offering in jeopardy.

We are however confident you will all support the Licensing Objectives and ensure that all training, communication and procedures are implemented in your premises.

Yours Sincerely,

LICENSED BINGO

Haven Leisure Limited holds a Non-Remote Bingo Operating Licence granted by the Gambling Commission.

This allows each park to make facilities available for commercial licensed bingo.

Each premises which has commercial licensed bingo must hold a bingo premises licence granted by the local authority.

To provide licensed bingo we must comply with the Licence Conditions and Codes of Practice attached to the operating licence and the bingo premises licence conditions. Both sets of conditions can be found in the Gambling Act 2005 compliance manual.

Each bingo premises licence must have a personal management licence holder at the premises.

When providing licensed bingo, we can charge a participation fee for each card, provided details of the charge are notified to the customers by a notice displayed at the main point where the bingo tickets are sold. The notice must include the cost in money of each ticket for card payable by an individual to take part, in respect of each ticket or card, the amount that may be charged by way of participation fee and a statement that all or part of the fee may be waived at the discretion of the person charging it.

Under 18s are not permitted to play licensed bingo.

UNLICENSED BINGO

Haven Leisure Limited holds a Non-Remote Operating Licence granted by the Gambling Commission, which permits them to provide unlicensed bingo where the aggregate of stakes or prizes in the seven-day period exceeds £2,000.

Unlicensed bingo is not commercial, and all the money paid in stakes to the players must be paid back to the players in prizes.

Each Haven Park operates as a commercial club for the purposes of the Gambling Act 2005.

Each club is established for the social interaction of guests, the clubs are not established for the purposes of functioning only for a limited period of time and each has at least 25 individual members.

We can charge a daily fee for our guests to play unlicensed bingo. The limits are:-

- In venues which benefit from a club machine permit, the maximum participation fee per person per day is £3.
- In venues which do not benefit from a club machine permit, the maximum participation fee per person per day is £1.
- The players may then purchase books but the only profit which can be made is from the daily fee paid per person per day. Any money staked for books must be returned to the players as prizes.

We must comply with the Licence Conditions and Codes of Practice attached to the operating licence. Details are included in the Gambling Act 2005 compliance manual.

You must have read and understood the Code of Practice for equal chance gaming in clubs and premises with an alcohol licence which is contained in this manual.

With unlicensed bingo, there are no limits on stakes or prizes.

Children are not permitted to participate in unlicensed bingo and must be excluded from the area where the gaming is taking place.

Haven Leisure Limited EXEMPT (UNLICENSED) GAMING

STAFF INSTRUCTIONS

INTRODUCTION

These instructions relate to the provision of bingo in our premises that do not hold a 'Bingo Premises Licence' issued by the Local Authority. Such facilities as we provide in those unlicensed venues must comply with the Gambling Commission's Code of Practice for equal chance gaming in pubs and clubs holding an alcohol licence.

Copies of that Code should be available in the manager's office for the information of managers, staff and customers, should they request to see it for any reason.

OVERVIEW OF COMPLIANCE REQUIREMENTS

The prime responsibility to ensure compliance with the above Code rests with the Designated Premises Supervisor (usually in our case the General Manager or deputy at each venue).

The responsibilities under the Code to some extent mirror the requirements of the LCCP.

An overview of the Code compliance requirements are as follows:

1. This gaming is known as 'exempt gaming' and may be carried out without a gambling licence or permit. In our case, such gaming will only involve bingo, which is equal chance gaming, as permitted by the Code;
2. You cannot play this in a venue or part of a venue where a Bingo Premises Licence is in force;
3. The stakes / charges / participation fees we apply are identified in the Exempt Gaming Rules, which will be tailored to accommodate the games you offer in your venue;
4. Those Exempt Gaming Rules must be displayed at or near the point of sale of bingo tickets;
5. Remember all stake moneys must be returned to players by way of prizes. We can however charge a participation fee of either £1 or £3, dependent upon whether or not your premises hold a Club Machine Permit;
6. Customers can only be charged one participation fee per day;
7. Staff must ensure that a full audit trail record of all monies received, retained and applied to prizes be maintained for all gaming made available under the Exempt / Unlicensed Code;
8. If in any continuous seven day period the total stakes or prizes exceed £2,000, this is not a concern provided Haven Leisure Limited continue to hold an Operating Licence, and comply with the requirements of the Licence Conditions and Codes of Practice (LCCP) and the Bingo Technical Standards;

9. This type of gaming is expected to be 'low level', and the DPS is expected to take all reasonable steps to ensure that this remains the case;
10. The DPS should ensure that all gaming carried out in premises is located where it can be properly supervised by staff whose role is to supervise it;
11. The DPS should put into effect procedures designed to prevent under age gambling. In essence, this is a 'Think 25' situation which requires checking the name of potentially under age players (Note: remember document for forms of acceptable ID / age confirmation);
12. The gambling Commission Code suggests holding the gaming in premises or parts of the premises restricted to adults. This may not be possible in some of our venues, but this is nevertheless acceptable provided we rigorously ensure the 'Think 25' principle is applied;
13. Signs reinforcing to customers that the playing of bingo by persons under 18 is not permitted should be prominently displayed at the entrance to the premises, and inside the venue where the gaming is taking place;
14. Procedures should be in place for dealing with cases where an underage person repeatedly attempts to gamble;
15. The DPS should take reasonable steps to ensure that all employees fully understand their responsibilities under this Code;
16. All payment in respect of gaming covered by this Code must be made in cash (including participation fees), prior to the commencement of the games;
17. Credit may not be offered in any circumstances;
18. All equipment used in gaming should be supplied by Haven Leisure Limited, be secured when not in use, replaced when damaged and no player should be permitted to supply / use their own equipment in any circumstances;
19. The DPS should ensure a pleasant atmosphere, and deny participation to customers who cheat or collude, are threatening, damage equipment or create a disturbance.

GAMBLING ACT 2005

Haven Leisure Limited

PRINCIPAL CONCEPTS

Statement

Haven Leisure Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

Licensing Objectives

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

Licensing

Haven Leisure Limited holds a non-remote bingo operating licences permitting them to make facilities available for bingo within their premises. Some premises then hold bingo premises licences permitting those premises to make commercial bingo available to customers.

The operating licences also permit any of the parks, hotels or resorts to provide unlicensed bingo, where the aggregate of stakes or prizes in any seven day period can exceed £2,000. The unlicensed bingo is provided under Part 12 of the Gambling Act 2005.

Policy and Procedures

- We pay an annual contribution to the Responsible Gambling Trust towards the prevention and treatment of problem gambling, public education on the risks of gambling and how to gamble safely and the identification of and treatment of problem gamblers.
- We operate an on-going training program for key team members to ensure awareness and compliance of our social responsibility and other statutory requirements. Individual written policies and procedures are in place and adhered to in respect of:
 - (a) Access to Gambling by Children and Young Persons
 - (b) Access to Premises
 - (c) Advertising Standards and Marketing
 - (d) Customer Interaction
 - (e) Employment of Children and Young Persons

- (f) Fair and Open Practice and Dispute Resolution
- (g) Information on how to Gamble Responsibly and Help for Problem Gamblers
- (h) Money Laundering, Cash Handling and Suspicious Transactions
- (i) Self-Exclusion

- Team members are trained on all of the policies and procedures above on their induction to Haven Leisure Limited and then again on an annual basis as an update and refresher.
 - Senior management have procedures in place to ensure that interim policy and procedure changes are made, implemented and trained in, as and when they are required.
 - If you have any training requirements or help understanding our regulatory obligations you should talk to one of the managers.
 - Understanding of the policies and procedures is checked using a quiz for all team members.
 - Documented evidence of the training is recorded and retained.
- We operate our business with integrity, due care and diligence with necessary systems in place to combat crime and disorder. Written policies and procedures are in place concerning the handling of cash and cash equivalents (e.g. cheques) designed to minimise the risk of crime, such as money laundering and the avoidance of illicit credit.
 - Haven Leisure Limited understands its responsibility to take all reasonable steps to ensure that all team members involved in the provision of facilities for bingo and gaming machines are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become difficult to control.
 - All team members receive induction and refresher training on where they can obtain help if they think they, their friends or their family may have problems controlling their gambling.
 - Conflicts of interest between Haven Leisure Limited and our customers are managed transparently and fairly.
 - Gaming machines will only be sourced from operators licensed by the Gambling Commission to supply machines and will comply with the Gambling Commission's technical standards, exhibit the applicable stakes and prizes levels and the chances of winning. The rules of each game are either available to customers in writing or communicated by team members.
 - Gaming machines will be positioned to allow open lines of sight so they can be monitored by team and/or CCTV.
 - Gaming machines are only ancillary to the provision of substantive facilities for non-remote bingo. Few gaming machines are provided in the bingo premises, and bingo is provided daily for limited periods in the evening.
 - We do not provide credit in connection with gambling nor participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.
 - We seek to prevent systematic or organised money lending between customers on the premises, and team are trained to be alert to such practice and to report any instances of substantial money lending to the Duty Manager if they become aware of them.

- There are a number of personal management licence holders throughout the business. Personal management licence holders are reminded of their responsibilities to take all reasonable steps to ensure that the way in which they carry out their responsibilities in relation to licensed activities does not place the holder of the operating or any relevant premises licence in breach of their licence conditions. They are also reminded they must keep themselves informed of developments in gambling legislation, codes of practice and any Gambling Commission guidance relevant to their role.
- We hold bingo premises licences for a number of our premises which permit commercial bingo and all team members providing bingo in bingo licensed premises must understand the conditions attached to those premises licence on the provision of bingo from those parks, resorts and hotels.
- Where reference is made to vulnerable people, or problem gamblers, this includes those under the influence of drugs or alcohol, or with a mental disability, or with potential or actual problems with addiction to gambling, or those who are not capable of making informed decisions on their gambling.
- All bingo equipment will comply with the Gambling Commission's Specifications on Bingo Equipment.
- All security and entertainment team members must complete a Disclosure Barring Service check.
- Licensees must not offer or permit to be played prize gaming games that appear on any list of games prohibited by the Gambling Commission.
- We will not provide lotteries, sweepstakes or raffles in our venues, without first obtaining advice from Poppleston Allen.

Premise address:

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Date:

Name:

Position:

Signature:

TO BE RETAINED ON THE PREMISES

GAMBLING ACT 2005

Haven Leisure Limited

ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

Statement

Haven Leisure Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

Policy and Procedures

Haven Leisure Limited acknowledges its obligation to ensure that its team members prevent children and young persons from accessing gambling facilities. All of our premises have entrances that are manned by our team members or licensed contractors throughout operational hours. Escape exits (fire doors) are kept closed throughout operational hours. Nobody can enter the premises via these doors nor are they allowed to exit via these routes except in cases of emergency.

Haven Leisure Limited operates 'open plan' premises that are manned by team members and management throughout operational hours. Gambling, including gambling on machines, is not hidden away in private areas. All areas are well lit and the majority are covered by CCTV.

Haven Leisure Limited operates the 'Think 25' policy

- Under-18s are only allowed access to or to play on Category D gaming machines and are not permitted to gamble on Category B or Category C gaming machines. Under-18s are not allowed to participate in bingo. There are permitted in the bingo premises. Signs to reflect these limitations on under-18s gambling will be displayed throughout the premises, at points of entry to adult only areas, and on gaming machines.
- Category B machines will only be positioned in a designated supervised adult only area and separated by a barrier to prevent children obtaining access.
- Adults have entertainment passes. These passes are required to play at the bingo venues.
- Any person who appears to be under 25 years of age and who has not previously provided satisfactory proof to the contrary, must be challenged at the point of entry to adult only areas, when buying bingo tickets or whilst playing bingo.
- If they claim to be 18 or over, satisfactory proof of age must be requested and provided before entry is allowed.
- Acceptable identification should:-
 - Contain a clear photograph.
 - Show the persons date of birth.
 - Be valid i.e. in date.
 - Be legible and have no signs of tampering or reproduction.
- Acceptable forms of identification are:-

- Passport
 - Photo Driving Licence
 - Any ID which contains the PASS logo Hologram such as Citizen Card, Validate and the Governments own Connexions Card
 - Military ID card
- Where the person cannot produce one of the above, they should be politely advised that they will not be permitted to enter until such time as they provide proof.
 - Should the person then refuse to leave, they should be advised that the age restriction is a legal requirement and if broken the police will be notified.
 - If they still will not leave or repeated attempts at entry are made the Duty Manager must be called to take over the situation.
 - Think 25 Interaction Record
 - Each time a customer is asked for identification it is logged via the Smart Hub software on the Bingo Compliance tablet.
 - This must show the following details:-
 - The date of the interaction
 - The customer's name
 - The type of ID produced
 - The customer's date of birth and age shown on the ID
 - Whether entry was allowed or refused
 - If the customer can verify their age by the production of suitable ID, they may be permitted entry to play.
 - If the customer cannot verify their age by the production of suitable ID, they must be refused play and entry. The team must then log the 'refused' status via the Smart Hub software on the Bingo Compliance tablet.
 - Once the customer's age has been verified the 'ID Shown' section should be completed on the membership system.
 - In cases where an adult member attempts to facilitate, encourage or endorse the entry of a young person to the club, entry will be refused to the young person until they can produce valid ID as per the Think 25 Policy. The adult will receive an oral warning from the Duty Manager and if this re-occurs then the matter will be reported to the Gambling Commission and where appropriate the Police. Where it is likely that a customer's young or otherwise vulnerable children will be left unattended on or adjacent to the premises, you should consider reminding customers of their parental responsibilities.
 - In all cases the Duty Manager will complete an Incident Report via the Smart Hub software on the Bingo Compliance tablet.
 - Should team members become aware that an underage person has used gambling facilities despite the above controls being in place, the Duty Manager will return any stake or fee to that person as soon as is reasonably practical. At the same time, any outstanding prizes or winnings for that person will not be paid.

- In all cases the Duty Manager will complete an Incident Report via the Smart Hub software on the Bingo Compliance tablet.
- Any disagreements as to the amount gambled and due for return to the player etc. will be fully identified on the incident form as will a detailed description of what has taken place.
- In the event of the disputed stakes being related to the playing of a gaming machine by the underage player, wherever possible the electronic record of machine play will be audited as to amounts involved in conjunction with an examination of any available and relevant CCTV footage.
- It will be the Duty Manager's responsibility to ensure that the legal requirements of this area of the legislation are fully discharged and that the incident is documented in full as dictated above.

Team Members are trained as part of their induction process and in refresher training in the understanding of, and the strict adherence to this policy. The training covers all relevant prohibitions against inviting children or young persons to gamble or enter our premises. Team members are required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

Premise address:

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Date:

Name:

Position:

Signature:

TO BE RETAINED ON THE PREMISES

GAMBLING ACT 2005

Haven Leisure Limited

ACCESS TO PREMISES

Statement

Haven Leisure Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

Policy and Procedures

Haven Leisure Limited acknowledges its obligation to ensure that team members co-operate with the Gambling Commission's Enforcement Officers, the Police and the Authorised Officers of the Local Authority in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises contained under Part 15 (S.303 to S.326) of the Gambling Act 2005 (refer to page 2 of this document) and that:

- Haven Leisure Limited must provide the Gambling Commission, Police or Local Authority with any information that they suspect may relate to the commission of an offence under the Gambling Act 2005, including an offence resulting from a breach of an operating or premises licence condition or a code of practice provision having the effect of a licence condition. Changes in key circumstances must be reported within five working days of their occurrence in accordance with the terms set out in the operating licence conditions.
- Haven Leisure Limited must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as:
 - (i) the numbers of people making use of the facilities and the frequency of such use;
 - (ii) the range of gambling activities provided by the licensee and the number of team employed in connection with them;
 - (iii) the licensee's policies in relation to, and experience of, problem gambling; and
 - (iv) a record of customer complaints and disputes, including disputes referred to alternative dispute resolution
- Haven Leisure Limited must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time (quarterly), and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977 and complies with the Consumer Rights Act 2015.
- The Duty Manager must be informed immediately an Enforcement Officer, the Police or Authorised Person (such as a licensing authority officer) properly identifies himself on the premises, and will attend to the Officer without undue delay.
- Team members will co-operate at all times with Enforcement Officers, the Police and Authorised Officers in the proper performance of their compliance functions. The manager will ask the visiting officer for a written report of the inspection.

Team members are trained as part of their induction process and in refresher training in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

Rights of Entry

Rights of entry to premises by the Gambling Commission's Enforcement Officers, the Police or an Authorised Officer of the Local Authority are contained in Part 15 of the Gambling Act 2005 which deals with inspection.

- **Suspected Offence**
A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed.
- **Inspection of Gambling**
A constable, enforcement officer or authorised person may enter premises if they reasonable suspect that unlawful facilities for gambling (other than private and non commercial gaming) or better may be being provided, may be about to be provided or have been provided.
- **Inspection of Operating Licence Condition Compliance**
A constable or enforcement officer may enter premises that they reasonably believe to be used by the holder of an operating licence in connection with licensable activities, to determine whether the licensed activities are being carried out in accordance with the conditions of the operating licence.
- **Licensed Premises**
A constable, enforcement officer or authorised person may enter a premises where an application for a premises licence has been made to assess the likely effects of activity carried on under a premises licence
- **Alcohol Licensed Premises**
A constable, enforcement officer or authorised person may enter a premises in respect of which an on-premises alcohol licence has effect for the purposes of determining whether the gaming is lawful and ascertaining the number and category of gaming machines being made available for use.
- A constable or enforcement officer may require the holder of an operating licence to produce, within a specified period, a copy of the authorisation (Section 316).
- The constable, enforcement office or authorised person can inspect any part of the premises, any machine or anything on the premises, question any person, require access to written or electronic records and remove or retain anything he reasonably believes constitutes or contains evidence of committing an offence or beach of terms and conditions.
- The power of inspection must be exercised only at a reasonable time.
- The enforcement officer or authorised person must provide evidence of his identity and authority.
- A constable, enforcement officer or authorised person may use reasonable force to enter premises.
- It is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

You should be aware that there are other rights of entry for the police or authorised officers outside of the Gambling Act 2005. If you would like any further information, please speak to your manager.

Reporting 'Key Events'

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission of the occurrence of key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence.

Some key events apply to Personal Licence Holders. Personal Licence Holders are responsible for and must notify the Gambling Commission of the occurrence of any key events within ten working days after the Licensee becomes aware of the event's occurrence. Personal Licence Holders should refer to Section 3 of the Licence Conditions and Codes of Practice for details of relevant key events.

Licensees must as soon as reasonably practicable provide the Gambling Commission with any information that they know relates to or suspects may relate to the commission of an offence under the Gambling Act 2005, including any breaches of the Licence Conditions and Codes of Practice.

LCCP Notifications - other reportable events

Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable of the occurrence of any of the following events:

- a. any material change in the licensee's arrangements for the protection of customer funds in accordance with licence condition 4 (protection of customer funds) (where applicable).
 - b. any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
 - c. their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised, or their becoming aware of a sustained or meaningful generation of 3% or 10% of group Gross Gambling Yield being exceeded by the group in that jurisdiction.
 - d. any actual or potential breaches by the licensee of the requirements imposed by or under Parts 7 or 8 of the Proceeds of Crime Act 2002, or Part III of the Terrorism Act 2000, or any UK law by which those statutes are amended or superseded.
2. The licensee must notify the Commission, as soon as reasonably practicable, if it knows or has reasonable cause to suspect that a person who has gambled with it has died by suicide, whether or not such suicide is known or suspected to be associated with gambling. Such notification must include the person's name and date of birth, and a summary of their gambling activity, if that information is available to the licensee.

Premise address:

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Date:
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Name:

Position:
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Signature:

TO BE RETAINED ON THE PREMISES

GAMBLING ACT 2005
Haven Leisure Limited
ADVERTISING AND MARKETING POLICY

Statement

Haven Leisure Limited recognises that advertising gambling in the UK should be socially responsible and as a consequence Haven Leisure Limited will use advertising and marketing techniques with particular caution, in line with the Licence Conditions and Codes of Practice, the Licensing Objectives and in accordance with the Committee of Advertising Practice (CAP), the Broadcast Committee of Advertising Practice (BCAP), the Gambling Industry Code for Socially Responsible Advertising and any other relevant guidelines.

Introduction

All advertising and marketing must comply with the advertising codes of practice issued by the Gambling Commission, the Committee of Advertising Practice (CAP), the Broadcast Committee of Advertising Practice (BCAP) and any other relevant guidance as applicable.

Any rewards or incentives must comply with the Licence Conditions and Codes of Practice requirements and team members must heed the restrictions and circumstances where complementary drinks might be made available to customers.

Haven Leisure Limited will not advertise in any way intended to stimulate the interest of persons under the age of 18 years, either in content, location or timing of advertising.

Haven Leisure Limited will not market bingo to persons under the age of 18 years.

Team members will not make unsolicited offers of free alcoholic drinks for consumption by customers at a time when they are gambling.

Customer information on gaming machines and bingo rules will be displayed as required and bingo will be played in accordance with those rules. This information will be easily understandable. The bingo rules will be displayed at all premises, including rules about the variation of bingo available and any rules about prize gaming. The terms by which gambling is offered will be provided to customers in plain and intelligible language.

Any material changes to our terms and conditions will be notified to customers by way of a notice at reception or at the entrance to the bingo venue displayed before the changes come into effect.

Policy and Procedures

- Any proposed advertising must be seen and approved by Head Office and any issues or concerns as to its content etc. will follow and comply with the policy identified in the narrative of this section.

- Any significant conditions that apply to marketing incentives or reward schemes must be transparently and prominently provided to customers. Significant conditions will be provided at the point of sale for any promotion and on any advertising for that marketing incentive unless in the case of advertising material this is not possible due to limited space.
- Any incentive or reward scheme or other arrangement under which customers may receive money, goods, services or any other advantage Haven Leisure Limited offers, will be made available strictly in accordance with the Licence Conditions and Codes of Practice marketing code. Haven Leisure Limited will only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of the gambling offered.
- In the event that an incentive or reward is offered to a customer designated 'high value', 'VIP' or equivalent it must be offered in manner which is consistent with the licensing objectives.
- Haven Leisure Limited does not currently have any 'VIP' or 'high value' bingo customers. Before a customer is designated 'high value' or equivalent we will ensure that the customer's spending is affordable and sustainable and assess whether there is evidence of gambling related harm of heightened risk linked to vulnerability. Once a customer is designated 'high value' or equivalent ongoing checks on affordability must be carried out at regular intervals.
- Unless expressly permitted by law customers will not be contacted with direct electronic marketing without their informed and specific consent. Whenever a customer is contacted they will be provided with the opportunity to withdraw their consent.
- Haven Leisure Limited are responsible for the actions of third parties with whom we contract for the provision of any gambling-related marketing. Haven Leisure Limited will ensure that any contract with third parties providing gambling-related marketing services complies with the Licence Conditions and Codes of Practice requirements.
- Haven Leisure Limited ensure that there is no digital advertisements on websites providing unauthorised access to copyright content.
- All Personal Management Licence Holders will ensure they have an in depth knowledge of this section, the Licence Conditions and Codes of Practice (remember failure to comply with a social responsibility code provision is a criminal offence) and ensure that it features regularly in any 'in house' refresher training.
- All instances of issuing free alcoholic drinks to customers must be authorised by the General Manager only.
- Self Excluded customers must be removed from any marketing databases within two days of receiving the completed Self Exclusion notification, but we will take all reasonable steps to prevent details being knowingly sent as soon as practicable
- Any proposed digital advertising will not provide unauthorised access to copyrighted content, and reasonable steps will be taken to ensure that third parties with whom the business contracts, in relation to promoting bingo, do not place digital advertisements on websites providing unauthorised access to copyrighted content.

Premise address:

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.....
.....

Date:
.....

Name:

Position:
.....

Signature:

TO BE RETAINED ON THE PREMISES

GAMBLING ACT 2005

Haven Leisure Limited

CUSTOMER INTERACTION POLICY

Statement

Haven Leisure Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Monitoring of procedures is on-going and subject to compliance inspection.

Policy and Procedures

Haven Leisure Limited operates 'open plan' premises that are manned by team members and management throughout operational hours. Gambling, including gambling on machines, is not hidden away in private areas. All areas are well lit and the majority are covered by CCTV.

Haven Leisure Limited operates a 3 stage Policy for Customer Interactions. The 3 stages are:-

- a) **Identifying Problem Gamblers** – All team and management should be aware of and alert to the signs of problem gambling and know when it is appropriate to take action.
- b) **Interaction with the Customer** – If a team member or management identifies a potential problem gambler then the Duty Manager will perform the Customer Interaction. Under no circumstances will a team member attempt to initiate an interaction. All cases of suspected problem gambling must be reported to the Duty Manager.
- c) **Recording and Evaluating the Details of the Interaction** – All Customer Interactions that are performed by a Duty Manager must be reported to senior management via an Incident Report and also recorded in the Customer Interaction Log. Records of Incident Reports and the Customer Interaction Log will be available to staff to aid decision making in future interactions.

Identifying Problem Gamblers

Team members and Management should be alert to the characteristics or signs of problem gambling, including:

- Customer informs an employee that they feel their gambling spend is out of control.
- Family and friends inform team/management about people that they are concerned about.
- Unacceptable behaviour towards team members, other customers, machines or company property.
- Crying, mood swings, irritability, restlessness, not caring about their appearance, even personal hygiene.
- Demonstrating signs of distress, agitation or aggression.
- Approaching team members or other customers for a loan.
- Significant periods of time engaged in gambling activity, particularly on gaming machines.
- Repeated use of ATM's.
- Obvious money difficulties and debts.
- Concealing or lying about their gambling behaviour.
- Frequently spending all the money they have brought with them. It should be noted however that

some customers may have brought in a pre-determined amount to limit their spending.

- Seeing gambling as a way to 'make money'.
- Paranoid belief that their gambling losses are as a result of the game being 'fixed'.
- Chasing losses.
- A big win..

Team members and Management should also take into account all other relevant information when deciding to perform an interaction. This includes taking into account non-obvious signs of, or overt behaviour associated with, problem gambling, such as time or money spent on gambling, visit frequency and length of stay.

Haven does not have "high value" of "VIP" bingo customers.

Interaction with the Customer

- Where a team member is approached by a customer who believes that they have a gambling problem, the team member must be supportive and sympathetic and direct the customer initially to the 'Helping you stay in Control' notices and leaflets that are provided in all arcades and toilets. Additionally they should let the customer know that the Duty Manager has more information that will assist the customer with their queries or concerns. Tell the customer that you will let the Duty Manager know that the customer was interested in the information.
- In cases where a suspected problem gambler has been reported to or been observed by the Duty Manager, a Customer Interaction will be initiated. This includes where the customer demonstrates signs of agitation, distress, intimidation, aggression or other such behaviour. Where possible this interaction will be conducted discreetly and in private. The Duty Manager will discuss their concerns about the customer's well-being and will provide either materials produced by Bourne Leisure Limited or details of the most appropriate provider of help or guidance for the customer's needs.
- In addition to providing support contact details of the sources of help, the Duty Manager should discuss the possibility of Self Exclusion (See Self Exclusion Policy for more details) with any customer who admits to having lost control of their gambling or who are exhibiting symptoms of distress.
- In serious cases it may be necessary to stop the customer gambling by asking them to leave the premises. This should be conducted at a time when it is safe to do so. The purpose of this is to allow the customer to 'cool off'. It may be appropriate to refuse service and / or bar the customer from the premises.
- The Duty Manager may act on 3rd party information (such as family member or friends) after ascertaining the truth of the facts.
- With the customer's consent, the Duty Manager may act on information provided, including information from any treatment agency or service, or pass on information to these services.

Recording the Details of Customer Interactions

- In all cases where a team member or management has been approached by a customer who has concerns about their gambling or has requested information on responsible gambling, this will be reported to the Duty Manager. This interaction will be logged in the Customer Interaction Log with as many details as are available.
- In all cases where the Duty Manager performs a Customer Interaction, this will be reported to senior management via an Incident Report and will also be logged in the Customer Interaction Log.
- All Duty Managers will be trained by their relevant Manager and given advice on how best to perform Customer Interactions. In addition, all Duty Managers have telephone access to their General Manager or a Senior Manager during all operating hours so that they can seek help and advice when considering a Customer Interaction.
- In cases where an interaction has been considered but ruled out, these will also be recorded in the Customer Interaction Log including reasons why the interaction was ruled out. Where the interaction takes place at the later date, this should be recorded.

Evaluating the Details of Interactions

- Records of Incident Reports and the Customer Interaction Log will be available to staff to aid decision making in future interactions.
- Havenn Leisure Limited aims to understand and improve on the effectiveness and impact of customer interactions by evaluating previous experience. Staff are trained to review previous interactions to look at the relevant triggers that led to an interaction, the form of interaction undertaken and any effect on behaviour.

Team Members and management are trained as part of their induction process and in refresher training in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

Premise address:

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Date:

Name:

Position:

Signature:

TO BE RETAINED ON THE PREMISES

GAMBLING ACT 2005

Haven Leisure Limited

EMPLOYMENT OF CHILDREN AND YOUNG PERSONS POLICY

Statement

Haven Leisure Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Monitoring of procedures is on-going and subject to compliance inspection.

Policy and Procedures

- Haven Leisure Limited Policy is not to employ children or young persons under the age of 18 in any role relating to the provision of bingo.
- All job applicants are required to complete an application form which includes a section for their date of birth. The date of birth must be scrutinised by all managers before inviting all applicants to an interview.
- All successful candidates have their date of birth checked as part of the 'Right to Work in the UK' checking process before commencing employment.

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Date:
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Name:

Position:
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Signature:

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GAMBLING ACT 2005
Haven Leisure Limited
COMPLAINTS AND DISPUTES POLICY

Statement

Haven Leisure Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Monitoring of procedures is on-going and subject to compliance inspection.

Policy and Procedures

The operator is committed to providing a high quality, accessible and responsive service to customers and the local community. Dissatisfied customers may communicate a complaint to us either verbally or in writing. All complaints are taken seriously, investigated thoroughly and handled in a confidential manner. A copy of this written procedure for dealing with complaint is supplied to the complainant at the earliest opportunity together with the name and status of the person to contact regarding the handling of the complaint. Information about complaints must be available on the gambling premises or website. Information about the complaints procedure is also set out in the terms and conditions.

An accurate summary of the contractual terms on which gambling is offered, set out in plain and intelligible language is available to customers on request, with customers being notified of changes to terms before they come into effect.

Customers should provide us with a comprehensive description and nature of the complaint (whether it is an original complaint or a follow up to a reply they were not satisfied with), their name, postal address and a contact telephone number.

A 'complaint' means a complaint about any aspect of the Company's conduct of the licensed activities.

A 'dispute' is any complaint which:

- a) Is not resolved at the second stage of the complaints procedure (see below); and
- b) Is related to the outcome of the complainant's gambling transaction.

Disputes which are not resolved to the customer's satisfaction internally at the second stage of the complaints procedure will be referred to an independent arbitrator within eight weeks from the complaint being received.

- Customers will then be given a further opportunity of submitting their own version of events.
- The dispute is investigated in full by the independent arbitrator
- Both parties are notified in writing of the proposed outcome of the investigation.
- This procedure may, but need not, provide for the independent arbitrator's proposed resolution of the dispute to be binding on both parties.

The operator is obliged to keep a record of all complaints and disputes, other than those considered to be trivial or not relevant to the licensing objectives, including all disputes referred for arbitrations that are not resolved at the first stage of the complaints procedure. The operator has a requirement to submit reports of the outcome of disputes, referred to the independent arbitrator, to the Gambling Commission at intervals determined by the Commission either by the independent arbitrator or by the operator. The licensee must arrange for any outcome adverse to the licensee in any proceedings taken against the licensee by a customer in relation to gambling to be notified to the Gambling Commission as a key event.

Complaint and Dispute Procedure

Haven Leisure Limited allow customers to raise complaints for at least six months from the date of the incident. Any complaints received must be acknowledged by staff within three working days.

All staff are to report complaints which relate to gambling to the Head of the Department responsible for the gambling. In most instances this will be either the Entertainment Manager or the Complex Manager.

Any complaints received by Customer Services at Head Office or by Customer Services at the individual resorts, hotels or parks must be referred to the Manager responsible for the gambling, normally the Entertainment Manager or the Complex Manager.

STAGE 1

- 1.1 The Entertainment Manager or Complex Manager to engage with the customer making the complainant
- 1.2 Complete the customer complaint and dispute form
- 1.3 Provide the customer with a copy of the completed complaint and dispute form
- 1.4 Update the customer complaint and dispute log
- 1.5 Provide the customer with our complaint and dispute resolution policy and a copy of this procedure

STAGE 2

- 2.1 If a complaint is not resolved to the satisfaction of the customer, the complaint will then be referred to the General Manager of the Park.

STAGE 3

- 3.1 If the General Manager does not resolve the complaint to the satisfaction of the customer, it should be referred to Head Office and to third party arbitration. This must take place no later than eight weeks from the date the complaint is received.
- 3.2 Haven Leisure Group currently use the services of IBAS for independent third party arbitration of

disputes.

Premise address:

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Date:
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Name:

Position:
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Signature:

TO BE RETAINED ON THE PREMISES

GAMBLING ACT 2005

Haven Leisure Limited

CUSTOMER INFORMATION AND HELP FOR PROBLEM GAMBLERS POLICY

Statement

Haven Leisure Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Monitoring of procedures is on-going and subject to compliance inspection.

Policy and Procedures

- Haven Leisure Limited pays an annual contribution to the Responsible Gambling Trust towards the prevention and treatment of problem gambling, public education on the risks of gambling and how to gamble safely, and the identification of and treatment of problem gamblers.
- Haven Leisure Limited has a Customer Interaction Policy which seeks to identify potential problem gamblers and provide them with help and assistance to gamble responsibly.
- Haven Leisure Limited provides information in the form of a leaflet entitled “Let’s Keep It Fun’ which includes:-
 - Information on responsible gambling
 - Examples of behaviour that may indicate problem gambling
 - Information on our policies and procedures to assist problem gamblers
 - Information on Self Exclusion
 - A Self Exclusion Form
 - Advice on Self Exclusion from other gambling premises and activities
 - Advice on how to take control of problem gambling
 - Practical steps on how to monitor and control your gambling
 - Contact details for organisation that can provide further help, advice and support
- These information leaflets must be prominently displayed in all bingo venues, machine arcades, in all toilets and near all ATM’s. The leaflets must also be readily accessible in locations which enable the customer to obtain it discreetly. Consideration should be given to the size and layout of the premises and it may be appropriate for information to be displayed on posters, screens or other facilities.
- Haven Leisure Limited has a Self Exclusion Policy which clearly sets out the procedures that are to be followed by Management to assist customers that wish to self exclude themselves from our premises to help control their gambling.

Premise address:

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Date:
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Name:

Position:
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Signature:

TO BE RETAINED ON THE PREMISES

GAMBLING ACT 2005

Haven Leisure Limited

ANTI-MONEY LAUNDERING AND CASH RELATED MATTERS

Statement

Haven Leisure Limited recognises its responsibility and obligation to promote with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. As part of Haven Leisure Limited's procedures for compliance with the requirements in respect of the prevention and detection of Money Laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, Haven Leisure Limited has taken into account the Commission's advice on the Proceeds of Crime Act 2002, the Licence Conditions and Codes of Practice and any further Guidance issued by the Gambling Commission, including "Duties and responsibilities under the Proceeds of Crime Act 2002 – advice for operators (excluding casino operators)."

Team members will receive training on the Anti-Money Laundering policy and monitoring of procedures is an ongoing subject of compliance inspection.

1) Money Lending

Haven Leisure Limited will use reasonable endeavors to identify and prevent substantial systematic and/or organised money lending between customers in its gambling areas. Managers or team members will immediately report to duty managers any instances of substantial money lending of which they become aware. Duty managers will report any such instances to the Money Laundering Officer..

2) Provision of Credit

Haven Leisure Limited does not provide credit in connection with gambling or participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

3) Money Laundering and Suspicious Transactions Introduction

This policy is necessary in order to comply with the Money Laundering Regulations 2003, which requires processes to be put in place to avoid the possibility of money laundering. This policy applies to all employees.

Obligations in respect of money laundering are imposed by the Proceeds of Crime Act 2002, the Terrorism Act 2000 and the Money Laundering Regulations 2003. This legislation broadens the definition of money laundering and increases the range of activities caught by the statutory control framework. As a result of this legislation Haven Leisure Limited is required to establish procedures to prevent the use of its services and resources for money laundering.

Haven Leisure Limited has undertaken a detailed risk assessment of the Money Laundering and terrorist financing risks to the business.

Policy and Procedures

Haven Leisure Limited is committed to ensuring that all necessary safeguards are in place with regards to the receipt of money by Haven Leisure Limited in order to avoid Haven Leisure Limited being used to launder money that may originate from the proceeds of crime.

Haven Leisure Limited has appointed a designated Money Laundering Officer (MLO), Jane Bentall

Relevant team members will be trained on the requirements of the Regulations, and told of the need to report any suspicious cash payments in the gambling areas of over £1000 or any series of suspicious transactions amounting to £1000 or any other suspicious money received by Bourne Leisure Limited to the MLO.

Money Laundering Definition

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises and includes any criminal spend that is of any monies illegally obtained.

This definition of money laundering means that potentially any employee could contravene the Regulations if they become aware of or suspect the existence of criminal property or money laundering and continue to be involved in a matter which relates to that property without reporting their concerns.

Money Laundering Examples

Examples of money laundering include the following:

- Exchange of bank notes for other bank notes
- Exchange of bank notes (especially large bank notes) for coins which are not used or which are largely not used to play machines, especially regular/ frequent instances of such exchanges, whether such exchanges are effected at cash desks, note change machines, note acceptors or any other exchange facility
- Stained or unusual bank notes
- Purchase of high value prizes which could be onward sold

Team members are trained to look out for transactions which may amount to Money Laundering. Wherever possible, team members will refuse to effect such transactions and/or any other transactions that they suspect may represent money laundering and will report all/any such transactions using the disclosure procedure below.

Disclosure Procedure

- Where you know or suspect that money laundering activity is taking/has taken place the disclosure must be notified to **Simon Palethorpe**, the designated MLO, as soon as possible. Due to the importance of this issue, notification should normally take place immediately by telephone or, where that is not possible, by email.
- The MLO should be contacted without delay.
- No discussions should take place with colleagues as confidentiality is paramount and you need to ensure you do not alert the person who you have concerns about.
- You will be informed if the MLO makes a disclosure report to the relevant authorities. In this case, no transactions must be completed until clearance has been given by the authorities, or seven days have elapsed since the disclosure was made to them.
- The MLO shall maintain a file of all notifications received detailing the method of verification used to identify the person.

Cash Handling Policy

The Gambling Act 2005 and Licence Conditions and Codes of Practice require licensees as part of their internal controls and financial accounting systems, to have and put into effect policies and procedures concerning the handling of cash and cash equivalents (i.e. bankers drafts, cheques and debit cards), 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.

Team Instructions

As far as these instructions are concerned, **Cash Handling** requirements fall broadly into two areas, monies relating to gaming machines and other monies related to our provision of facilities for the playing of bingo.

Haven Leisure has well established audit trail requirements and financial accounting systems which require little review or revision but in view of the requirements outlined above, our policies which potentially impact on the Gambling Act 2005 and related Licence Conditions and Codes of Practice and other legislation are identified below:

- i. The receipt of stake money from players will be properly accounted for in all circumstances.
- ii. Any promotional activity which impacts on the level of stake monies received will be properly identified and vouchers and the like which can be used to facilitate free machine games thereby reducing cash income will be stored securely, issued only by management, and be properly accounted for.
- iii. It is not a regular occurrence for us to consider or agree to ex gratia payments to customers but if such an unusual circumstance should arise, it will be authorised by the manager involved in the event, and such authorisation and payment will be documented in full by that manager and witnessed by at least one other team member.
- iv. Any 'ticket' payments resulting from a customer's success as a consequence of playing of gaming machines will be electronically recorded and verified from the 'summary ticket' at the end of the trading day.
- v. Any major variations/shortages identified in machine performance will be identified to the premises management and it will be their responsibility to ensure the event is properly investigated and the outcome(s) fully documented.
- vi. Records of machine percentage returns to players will be monitored to ensure that the return is in line with the percentage advertised on the machine and any shortfall outside what can normally be anticipated on normal machine usage will be documented and investigated by management.
- vii. ALL machine emptying will be monitored by the duty manager and at least one other team member.

Premise address:

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Date:
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Name:

Position:
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Signature:

TO BE RETAINED ON THE PREMISES

GAMBLING ACT 2005

Haven Leisure Limited

SELF-EXCLUSION

Statement

Haven Leisure Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Monitoring of procedures is on-going and subject to compliance inspection.

Policy and Procedures

Whilst most customers are able to enjoy and control their gambling, this business recognises its duty of care to those who cannot. Accordingly we provide a multi-operator Self Exclusion facility for those clients to request their exclusion for a fixed period of time.

Customers that Request Self Exclusion

- If a customer asks a team member about Self Exclusion, they will be referred to the Duty Manager.
- The Duty Manager will take the customer to an office or somewhere suitable to discuss Self Exclusion in private.
- During the discussion, if the customer requests that they be refused entry to our premises, the Duty Manager will discuss the implications of Self Exclusion with the customer.
- If the customer wishes to proceed with Self Exclusion then the Duty Manager will complete the Self Exclusion Request Form on the Smart Hub software via the Bingo Tablet.
- During the Self Exclusion process the Duty Manager should offer the customer information in the form of the 'Let's Keep It Fun' leaflet which contains information and advice on how to get help with problem gambling.
- The Duty Manager should ensure that the customer fully understands the Terms and Conditions relating to the Self Exclusion and the Data Protection permission represented in the form, before the customer's signature is obtained.
- The Self Exclusion form when completed and signed, will serve to immediately exclude the customer from gambling in all UK clubs that are registered members of the Bingo Association.
- Haven Leisure Limited is a participant in the Bingo Association Multi-Operator Self Exclusion Scheme. Through this scheme customers who enter into a Self Exclusion agreement with Haven Leisure Limited will have the ability to self-exclude from premises operating the same kind of gambling in the locality offered by any other operating licence holder.
- When requesting to be Self Excluded, the customer is asked to assist us in applying the exclusion by providing us with an up-to-date photograph showing a good likeness. Alternatively, the Duty Manager will take a photograph of the customer (either from a camera phone or from our CCTV system) for inclusion in the Self Exclusion documents. An up to date signature must also be obtained.
- The Duty Manager will authorise the customer's exclusion for a minimum period of six months and no more than 12 months, and instruct team members not to permit the customer entry during this period. The period of Self Exclusion can be extended for one or more further periods of at least 6 months.
- It must be made clear to the customer that they may not revoke the Self Exclusion during the agreed period and that if found either in the gambling area or attempting to gamble they will be removed.

- A copy of the Self Exclusion Request form is given to the customer and a copy retained on site for the duration of the exclusion. An entry is also recorded on a Self Exclusion log retained on the premises. The Self Exclusion log must record as a minimum the customer's name, address, other details, and any membership or account details.
- Those Self Excluded are removed from any marketing databases held by this Company within two days of receiving the completed Self Exclusion notification, but we will take all reasonable steps to prevent details being knowingly sent as soon as practicable.
- Customers are not required to attend the premises to Self Exclude. Where an application is made by phone, email, or letter, the Self Exclusion Form must still be completed by the Duty Manager.
- All records relating to a Self Exclusion agreement must be retained for at least the length of the Self Exclusion plus 6 months.

Breach of Self Exclusion

- Haven Leisure Limited operates 'open plan' premises that are manned by team members and management throughout operational hours. Gambling, including gambling on machines, is not hidden away in private areas. All areas are well lit and the majority are covered by CCTV.
- If a customer enters the premises (whether they take part in gambling or not), while their Self Exclusion is active, they will be 'in breach of their Self Exclusion' and should be discreetly asked to leave immediately. All stake money should be refunded and any winnings not already paid out should be retained.
- All team members and management will be notified of the identity of the individual that has attempted to breach their Self Exclusion.
- The incident should be recorded on the Bingo Association Breach of Self Exclusion Report.
- In all cases of breach of Self Exclusion, an Incident Report should also be completed and sent to senior management.
- A letter should be sent to the member reminding them of their responsibilities under their Self Exclusion agreement and the earliest date that they can return to the premises.
- All cases of Self Exclusion breach will be reported to the Gambling Commission.

Reinstatement

- At the end of the period of Self Exclusion chosen by the customer, the Self Exclusion remains in place for a further 6 months, unless the customer requests to be reinstated.
- Reinstatement following Self Exclusion can only be made at the request of the customer, either by phone, in writing or in person and cannot be considered within the period of Self Exclusion.
- Where a customer chooses not to extend the Self Exclusion and makes a positive request to begin gambling again, the customer must be given a 24 hour 'cooling off' period before being allowed access to the gambling facilities.
- When a customer is ready to return to the premises you must complete a Reinstatement Form.
- All cases of reinstatement following a period of self-exclusion must only be dealt with by the General Manager.
- A copy of the reinstatement form (signed by the customer) must be given to the customer and a copy filed in the Gambling Compliance Folder.
- Following the expiry of the Self Exclusion period, no marketing material should be sent to the customer unless and until they have asked for or agreed to accept such material.

Management and Staff Training

Management and Team members are trained as part of their induction process and in refresher training in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

Premise address:

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Date:
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Name:

Position:
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Signature:

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