

**Gambling Act 2005**

**Application for Transfer of Adult Gaming Centre**

<b>Applicant</b>	<b>Premises</b>
Genda Europe Limited	Craig Tara Holiday Park Dunure Road Ayr

## GAMBLING ACT 2005

### ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

#### Statement

The Company recognises its responsibility and obligation to mitigate risk to the Licensing Objectives and comply with the Licence Conditions and Codes of Practice (LCCP). Managers and staff receive social responsibility awareness training and compliance with procedures is monitored.

#### Policy and Procedures

##### **Adult Gaming Centre or adult-only gaming area.**

- Any person known to be under 18 years of age or who admits to being under 18 years of age will not be invited to enter into or gamble in any Adult Gaming Centre or adult-only gaming area.
- Any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof of age, will be challenged at the point of entry to an Adult Gaming Centre or adult-only gaming area. If in doubt – we ‘think 25’.
- If a person claims to be 18 or over and we have any doubt about such claim, satisfactory proof of age will be requested and will have to be provided before entry is allowed into an Adult Gaming Centre or adult-only gaming area.
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual’s date of birth; be valid, and legible. It must bear no visible signs of tampering or reproduction. Acceptable forms of identification include those that carry the PASS logo (e.g. Citizencard and Validate); a military identification card; a driving licence (including a provisional licence) with photograph, and a passport..
- Where the person cannot produce proof of age, they will be advised that they will not be permitted to enter until such time as they provide such proof.
- They will be shown, have explained to them, and will be given a ‘proof of age card’ application form or offered an explanation on how to apply for a card.
- Should the person then refuse to leave, they will be advised that the age restriction is a legal requirement.
- If they still will not leave, the Duty Manager will be contacted to take over the situation.
- Where necessary to prevent potential underage gambling, staff are authorised to turn off gaming machines.
- If, despite our control procedures, a person who appears to be under 25 years of age enters the Adult Gaming Centre or adult-only gaming area, or gambles in the Adult Gaming Centre or adult-only gaming area, that person will be asked to provide satisfactory proof of age and where that person is unable to provide such proof of age, they will be advised that they must immediately leave the premises and will be escorted out of the Adult Gaming Centre or adult-only gaming area. Any such occurrence will be recorded as an entry in the appropriate log retained on the premises.

- Other than in respect of Category D gaming machines, any money paid (stake or otherwise) will be returned to confirmed under-18s in an Adult Gaming Centre or adult-only gaming area, and in such locations, under-18s will not be allowed to retain any prize
- Service will be refused in all circumstances in an Adult Gaming Centre or adult-only gaming area where any adult is accompanied by a child or young person.
- Consideration will be given to permanently excluding from our Adult Gaming Centre or adult-only gaming area any adult who, when accompanied by a child or young person, :
  - has attempted to gain entry or, should entry have been gained, if the offence was committed knowingly or recklessly; and/or
  - has attempted to gamble or has gambled or has been complicit in allowing a child or young person to gamble.

In such instances, consideration will be given to reminding such adult customers of their responsibilities in this respect, and of the Company's obligations under its operating licence. Notwithstanding, that adult will be required to stop gambling immediately, will be told to leave the premises and may be told that the matter may be reported to the police or local authorities.

- In instances where a child or young person repeatedly attempts to gain entry to and/or gamble in an Adult Gaming Centre or adult-only gaming area, or where repeated oral warnings have been issued, consideration will be given to reporting the matter immediately to local Site Security and, where appropriate, police or local education welfare department. Information on problem gambling will be made available to such children and young persons.
- The structure and layout of our Adult Gaming Centres and/or adult-only gaming areas will not prevent staff from monitoring and preventing access to gambling by children and young persons and underage gambling. Where it is not possible to ensure that staff have a clear line of sight of the entrance and of gambling products, staff will be required to patrol relevant areas and/or effect required controls through the positioning of staff or use of CCTV.
- The Company will conduct test purchasing at its Adult Gaming Centres and adult-only gaming areas as a means of ensuring that its policies and procedures to prevent underage gambling are effective.
  - Where the Arcade Manager is aware that a test purchase visit has taken place, including test purchase visits by Local Authorities, the Arcade Manager will immediately notify the relevant Area Manager, Regional Manager, and the Compliance Team including notification of the result of that visit, where known.
  - Where the result of a test purchase visit is notified directly to the Compliance Team, they will notify the Director of Operations; relevant Regional Manager, and Area Manager within 24 hours of receipt of the notification. The Area Manager will inform the sites of the result of any test purchase and in the event that the test purchase result is a Fail, the Area Manager will contact the site immediately where possible. The Security Department will effect an investigation.

**Premises other than an Adult Gaming Centre or adult-only gaming area where children or young persons may seek to gamble.**

For example, Licensed Family Entertainment Centres and also unlicensed Family Entertainment Centres.

- If members of staff have concerns that school age children or young persons are using the premises within school hours (meaning that they are suspected truants), the Duty Manager must be informed at the earliest available opportunity.
- The suspected truant should be challenged about the circumstances of their visit.
- Should the suspected truant offer proof of age, this should contain a photograph from which the individual can be identified, state the individual's date of birth, be valid and legible. It should bear no visible signs of tampering or reproduction. Acceptable forms of identification include those that carry the PASS logo (ie Citizencard and Validate), a military identification card; a driving licence (including provisional licence) with photograph and a passport.
- Where the suspected truant cannot produce proof of age, they will be invited to leave and advised that they will not be permitted to enter until such time as they provide such proof.
- If they still will not leave, the Duty Manager will be contacted to take over the situation.
- Any attempts by suspected truants to access the premises will be brought to the attention of the Duty Manager immediately and recorded as an entry on a log retained on the premises. Details of the entry to include date, time, identity of the individual if known – or a detailed description if unknown – the member of staff dealing with the action taken and the outcome. The log entry must be countersigned by the Duty Manager.
- Stakes will be returned to suspected truants attempting to gamble on Category D gaming machines and suspected truants will not be allowed to retain any prize obtained from such gambling
- Managers and staff are trained as part of their induction process in the understanding of, and the strict adherence to all aspects of this policy and accompanying logs. Appropriate refresher training will be provided to relevant staff to ensure that knowledge is updated and current, and to maintain staff competency and Company performance. Managers and staff are required to sign training records for induction training and refresher training and keep a copy for future reference. Originals are retained on employee's personnel files.

# **Staff Code of Conduct**

Version 1.0

November 2024

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## Version History

Date	Version	Change comment	Approved by
05/11/2024	1.0	Initial creation	

## Document Changes & Approvals

This document forms part of the overall control documentation that describes core standards and processes relating to Genda Europe Limited's operation. All these documents are reviewed annually, or whenever there is a need for a change: a number of review forums are used for this activity.

## Genda Europe Limited's Senior Management Team

The Genda Europe Limited Senior Management Team are responsible for the revision and approval of all significant policies.

## Context and Overview

### Introduction

Genda Europe Limited has an expectation for the behaviour of all employees and contractors that undertake Genda Europe Limited business duties.

The policy has been created to ensure a safe, respectful, and professional working environment, and to promote the highest ethical standards in the workplace. All employees are expected to comply with this policy.

This policy should be read alongside other key policies, including the company's data protection and internet use policies.

### Why this policy exists

Genda Europe Limited seeks to promote the highest ethical standards in the workplace. Professionalism, appropriate and respectful behaviour not only benefits the business, it also serves to benefit the company staff, its customers, suppliers, agents and clients.

This code of conduct policy intends to:

- Promote the ethical and professional standards of Genda Europe Limited and its employees, volunteers, and contractors;
- Provide guidance on how individuals should present themselves whilst carrying out their business duties;

### Policy scope

This policy applies to all staff and contractors at Genda Europe Limited. It applies no matter where the individual is carrying out their normal business duties: Either in-office, travelling for business, working remotely, or situated at another appropriate location.

## Code Of Conduct

### Professionalism and Business Conduct

- a) All employees and contractors must conduct themselves in a professional manner at all times and comply with the company's policies, procedures, and guidelines.
- b) Employees should maintain a positive attitude, be respectful of others, and refrain from engaging in any behaviour that could be considered disrespectful, discriminatory, or harassing.
- c) Employees should also maintain a high level of honesty and integrity in all their business dealings and avoid any conflicts of interest. If in any doubt regarding what may constitute a conflict of interest, employees should consult with their line manager.

## Confidentiality

- a) Employees must maintain the confidentiality of all proprietary and confidential information of the company, including customer information, business strategies, and trade secrets.
- b) Employees should not disclose confidential information to anyone outside the company, including family and friends, without prior authorization from the Senior Management team.
- c) Employees should also be mindful of the security of sensitive information and take appropriate steps to safeguard it.

Consult with the Information Security policy documentation set, available alongside this code of conduct document for further details.

## Safer Gambling

- a) Employees and contractors of Genda Europe Limited are expected to support Safer Gambling practices and comply with all relevant laws and regulations.
- b) Employees and contractors should not encourage excessive gambling, nor should they market gambling products to vulnerable or underage individuals at any time.
- c) Any employee who suspects that a customer may have a gambling problem should immediately report it to the Senior Management Team.

## Conflict Resolution

- a) The company encourages all employees to resolve any conflicts or disputes in a professional and constructive manner.
- b) Employees should report any incidents of harassment, discrimination, or other inappropriate behaviour to their line manager or HR representative.
- c) The company will take appropriate action to investigate and resolve any complaints in a timely and confidential manner.

## Compliance with Laws and Regulations

- a) All employees must comply with all applicable laws, regulations, and industry standards, including those relating to gambling, data protection, and anti-bribery.
- b) All employees, notably, those in specified management roles having completed the Gambling Commission's Annex a declaration process, should be aware of and keep up to date regarding their obligations under the Gambling Act and other applicable laws and regulations. Any suspected breaches must be reported immediately to a line manager or HR representative.
- c) All new employees are subject to appropriate reference checks at commencement of employment. Disciplinary procedures are attached to each new employee's contract of employment.

## Compliance with Operational Procedures

- a) All staff receive appropriate training for compliance with operational policies and procedures and contractual obligations ensure that any failures are subject to disciplinary procedure, including but not limited to dismissal in the case of gross misconduct.
- b) Staff activity is supervised and is subject to monitoring as appropriately required.

## Conclusion

This Staff Code of Conduct Policy is not exhaustive and does not limit the company's rights to take disciplinary action against any employee who breaches these standards or engages in any other inappropriate behaviour.