

## **APPLICANT'S RESPONSE TO THE REPRESENTATIONS**

Golden Slots (Southern) Limited is a small business owned and managed by Harpreet Chattha. He started working for the previous owner at the beginning of 2019 and purchased the Company in 2022. The Company which has been trading since 2014 is licensed by the Gambling Commission to offer gambling facilities, including low stake gaming machines in Adult Gaming Centre (AGC). It has licensed Premises in Bletchley, Harringay, Cricklewood and Northampton. The Company conducts a legitimate business, contributing to the local and national economy, it employs local people, pays business rates, and pays taxes in many forms.

The following gaming machines can be made available in AGCs:-

- Category B3 maximum stake £2 maximum prize £500
- Category C – maximum stake £1, maximum prize £100
- Category D – maximum stake 10p maximum prize £5

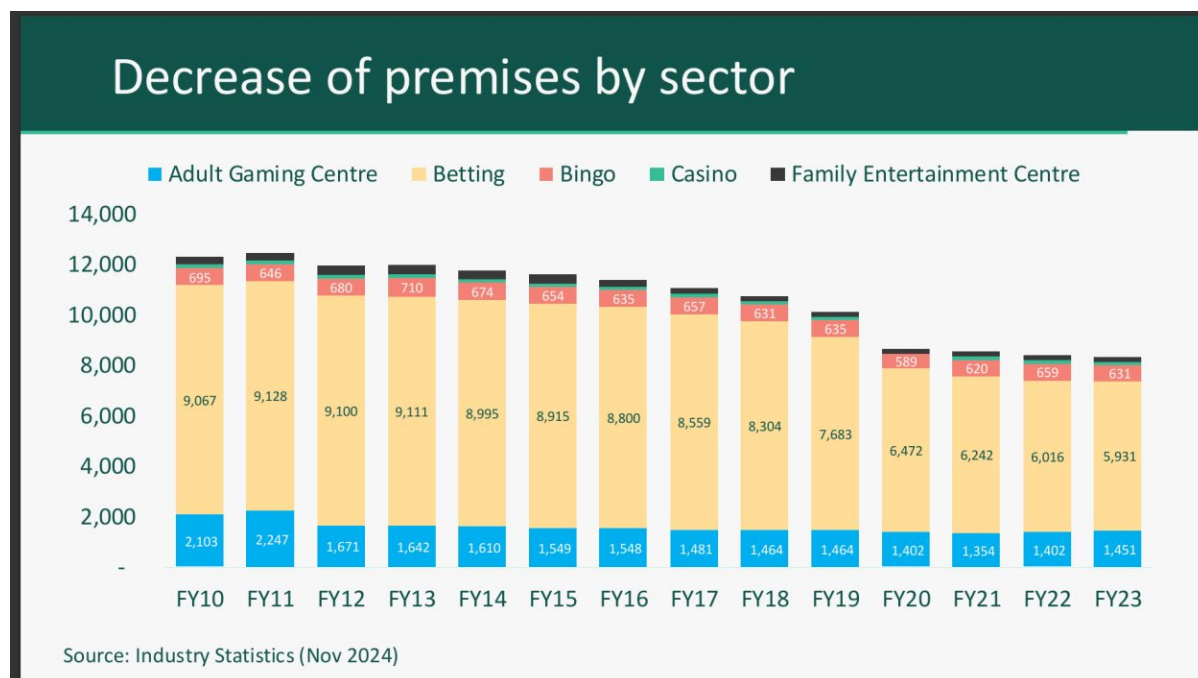
Within the AGC an operator can offer unlimited category C and D machines but only 20% of the gaming machines can be category B3. These machines are random number generators; the generated values are unpredictable and cannot be reasonably predicted better than by random chance. There are legal limits on the minimum amount that must be returned to player (RTP) which are programmed into the machines. The RTP is set at between 84-86% for a 10p stake and 94-96% for £2 stakes with variations on stakes in between.

### **Industry Background**

Prior to the introduction of the Gambling Act 2005 (The Act), businesses like the Applicant simply needed a section 34e Permit issued by the licensing authority under the Gaming Act 1968; it cost £250 and was valid for 3 years. There was little in the way of regulation and no talk of socially responsible gambling. The Act introduced a regulated regime requiring most businesses offering gambling facilities to hold an Operating Licence. The application process for an Operating Licence is costly; application fees start at around £1400 with annual fees in excess of £1500. In the land-based sector there is also the requirement for a Premises Licence as well. The application fees for an AGC Premises Licence can be as much as £2000 with annual fees of £1000.

Contrary to recent media speculation, the Gambling Commission's [July 2025 Industry data](#) shows a decline in premises licensed under the Act. In 2011 there was a combined total of 12,307 licensed premises, by March 2024 that number had dropped

across all sectors to a total of 8,329, with the largest declines seen in Betting and AGCs premises (fig 1).



The [Commission's latest industry data](#) shows that total Gross Gambling Yield (the gross profit) for the land-based gambling sectors in 2023/24 (£4647.69m) was £235million less than it was in 2008/9 (£4882.87m). Yet over that 15-year period the average annual rate of inflation was 2.9%, with the population growing by circa 10%. The gross gambling yields across the land-based sector fell sharply during the pandemic, and whilst it is recovering it is still below pre pandemic levels, with betting being the largest sector in terms of GGY.

Despite the decrease in premises, gambling creates local employment opportunities (circa 82,000 according to the latest DCMS publication) and provide economic benefits locally through business rates. For the vast majority who take part in visit gambling premises, gambling is their social interaction, their fun and enjoyment, and leisure time. Sometimes their 'only' leisure time and human interaction.

The Gambling Commission's latest data on participation rates (detailed below), sets out how and where people are gambling, highlighting the fact that lottery ticket purchases are by far the most popular gambling activity.

In May 2025 the Gambling Commission published its findings from the [Gambling Survey for Great Britain, for the period September 2024 to January 2025](#), where a nationally representative sample of 5,191 adults aged 18 and over were surveyed.

- Overall participation in any gambling activity was 46%, down from 49% in the previous period.
- When those who only took part in a lottery draw are excluded from the overall gambling participation rate, gambling participation falls to 28 percent..
- The in-person gambling participation rate was 28% and this falls to 18% when lottery draw only players are removed
- The most popular in-person gambling activities were buying tickets for a National Lottery draw (15%); buying a scratchcard (12%) or buying tickets for another charity lottery draw.
- The online gambling participation rate was 37% falling to 17% when lottery draw only players were removed, highlighting the large proportion of online players that only gamble on lottery draws (whether online or in person).

The Commission's most recent official statistics about young people's exposure to and involvement in gambling, Young People and Gambling November 2024 collected data from pupils aged 11 – 17 years old and found:

- 27% of those surveyed had spent their own money on any gambling activity in the 12 months prior to completing the survey
- The most common types of gambling activity were legal and did not feature age restricted products, namely:
  - Penny pusher/claw grab arcade machines (20%)
  - Placing bet for money between friends or family (11%)
  - Playing cards for money with family or friends (5%)
- 6% of those who had gambled had spent their own money on regulated forms of age restricted gambling (up from 4% in 2023). This included placing a bet in person or online and playing casino games in person or online.

Since 2007 the Problem Gambling Severity Index (PGSI) has been used to estimate Great Britain's population prevalence of problem gambling. Data collected via the NHS Health Surveys showed rates were consistently in the range of 0.3%-0.7% over that period.

The Gambling Survey for Great Britain (GSGB) first started collecting data in July 2023, and reported a rate of 2.5% - ten times higher than the figure reported in the NHS "Health Survey" for England in 2021. However there are serious concerns over the reliability of the GSGB number.

Professor Patrick Sturgis of the London School of Economics and Political Science was asked by the Gambling Commission to carry out an independent evaluation of the GSGB in 2024 ; he highlighted the risk that the GSGB substantially overstates rates of

harmful gambling. As a result the Commission published guidance stating that the GSGB should not be used to calculate an overall rate of gambling related harms in Great Britain nor to gross up the prevalence of problem gambling or the consequences of gambling to whole population.

In May 2025 the Office for Statistics Regulation's (OSR) undertook a compliance review to assesses the GSGB statistics against the Code of Practice for Statistics.

The OSR's 9 recommendations included that the Gambling Commission should:

- *clearly communicate to users within the statistical releases the potential biases that may affect the GSGB estimates, the possible impact of these, and Professor Sturgis' conclusion regarding the risk that the statistics potentially overestimate some gambling behaviour; and*
- *do more to investigate the coherence and comparability of GSGB statistics with other relevant data, such as from the Health Survey for England and the Adult Psychiatric Morbidity Survey that will be published later in 2025 and communicate these findings to users.*

In June 2025 the Adult Psychiatric Morbidity Survey (APMS) Survey of Mental Health & Wellbeing, England (2023/24) was published. Chapter 7 of the report, focuses on gambling behaviour, with some of the key findings being:

- Overall, 1.6% of adults experienced at least moderate risk gambling (PGSI score of 3+). **0.4% of adults experienced problem gambling** (as indicated by a PGSI score of 8+). ***This is significantly lower the GSGB's 2.5% and not dissimilar to the NHS Health Survey evidence.***
- Most adults experiencing moderate risk gambling had never used services or support specifically related to gambling. Whereas 25% of adults with a PGSI score of 3+ had used some form of gambling-specific treatment or service.

## **Gambling Regulations**

When processing an application for an Operating Licence the Gambling Commission carries out lengthy and detailed due diligence to ensure that an applicant is suitable to hold an operating licence. It checks:

- The identity and ownership of the applicant
- The integrity of the applicant
- The competence of the applicant, to carry on the licensed activities in a manner consistent with the pursuit of the licensing objectives
- The financial and other circumstances of the applicant past and present
- The criminality of the applicant



This is then rechecked every time there is a change of ownership.

To support an application, a business must submit detailed policies and procedures that demonstrate how it will conduct its business so that it complies with the legislation and regulations governing the industry. A copy of my Clients latest Compliance policies were submitted with this application. The Commission also carries out compliance checks, including site visits to land-based Operators to ensure they are conducting their business in a manner consistent with the licensing objectives.

The Gambling Commission is also required under the Act to issue Licence Conditions and Codes of Practice (LCCPs) that all licensed Operators must comply with. A breach of the LCCPs can result in the Gambling Commission reviewing an Operator's Licence with potential sanctions including a fine, suspension or revocation of the Operating Licence. Furthermore, a breach of a Social Responsibility Code set out within the LCCPs can result in prosecution. A copy of the LCCPs applicable to the arcade sector is at Appendix 1 to this document and which may be referred to at the hearing.

### **LCCPs - Section 3 Socially Responsible Codes applicable to the Protection of children and other vulnerable persons**

As the majority of the Representations raise concerns about the protection of children and other vulnerable persons Section 3 of the Codes of Practice that specifically deals with the protection of Children and other vulnerable persons is particularly relevant.

There is no definition of a vulnerable person, within the Act. The Commission's says that *..for regulatory purposes we consider that the group of 'other vulnerable persons' will include:*

- *people who spend more money and/or time gambling than they want to*
- *people who gamble beyond their means*
- *people who may not be able to make informed or balanced decisions about gambling, for example because of health problems, learning disability, or substance misuse relating to alcohol or drugs.*

The Act clearly did not intend it to include everyone; if it did then the third licensing objective would simply state to protect everyone from being harmed or exploited by gambling.

When considering this application it is important to take into account the obligations set out in Socially Responsible Code provisions that apply to the Protection of children and other vulnerable persons. A summary is set out below.

**SR Code 3.2.3 dealing with underage gambling requires Operators to have procedures for:**

- checking the age of apparently underage customers
- removing anyone who appears to be underage and cannot produce an acceptable form of identification
- taking action when there are attempts by under-18s to enter the premises.

Operators must

- take account of the layout of their premises
- not deliberately provide facilities that appeal particularly to children or young people
- must refuse service where an adult is accompanied by a child or young person.
- train Staff on their responsibilities for preventing underage gambling.
- only accept valid photo ID which includes a date of birth
- must conduct age test purchasing and provide the results to the Gambling Commission, annually.

**SR Code 3.3.1** Operators to make information readily available to customers on how to gamble responsibly and how to access information about and help for problem gambling.

The information must cover:

- any measures to help individuals monitor or control their gambling, such as restricting the time spent gambling or the amount of money they can spend
- timers and 'reality checks'
- self-exclusion options
- information about the availability of further help or advice.

The information must be

- displayed prominently
- available in all areas where gambling facilities are provided and adjacent to ATMs
- available to take away
- and in locations which enable the customer to obtain it discreetly.

**SR Code 3.4.1** Operators must interact with customers to minimise the risk of customers experiencing harms associated with gambling. This must include:

- identifying customers who may be at risk of or experiencing harms associated with gambling.
- interacting with customers who may be at risk of or experiencing harms associated with gambling.
- understanding the impact of the interaction on the customer, and the effectiveness of the Operator's actions and approach.

Operators must take into account the Commission's guidance on customer interaction, this includes evaluating the success of previous customer interactions in order to determine whether an alternative interaction may be more successful as well as consideration of an Operator led exclusion.

**SR Code 3.5.1** Operators must have a self-exclusion scheme and refuse service to anyone who has self-excluded. Procedures must be in place to ensure that an individual who has self-excluded cannot gain access to gambling including:-

- a register of those excluded;
- photo identification and a signature;
- staff training to ensure that staff can effectively administer the systems; and
- the removal of any self-excluder found in or attempting to gamble from the premises.

**SR Code 3.5.6** Operators must offer anyone self-excluding the ability to self-exclude from other local premises by participating in one or more available multi-operator self-exclusion schemes.

**It will be noted that the Applicant's policies and procedures deal with all of these Social Responsibility Code provisions. The Applicant adheres to them; failure to do so would leave the company and its directors liable to prosecution.**

## **Addressing the Licensing Authority Representations**

The Leader of Spelthorne Council was a signatory to a letter sent by Brent Council to the DCMS earlier this year demanding reform of the “Aim to Permit” set out in the Act . The DCMS has subsequently reiterated that Local Authorities have a range of powers available to them to manage gambling in their areas, both under the planning system and as licensing authorities under the Act. Those powers include setting out a local authority’s expectations in their Statements of Licensing Policy and site inspections. Statements of licensing policy form the mandate for managing local gambling provisions, it should set out how a local authority views the local risk environment and its expectations in relation to operators with premises in the locality. The Commission’s guidance to local authorities encourages the development of local area profiles as part of the licensing policy, mapping out key characteristics of the local area. Statements of policy must be prepared and published every 3 years as a minimum. Consideration was given to the Local Area Profile in Spelthorne’s Statement of Policy when the current application was drafted. The Area Profile at Annex 1 makes no reference to concerns about deprivation or cumulative impact in either Ashford or Spelthorne.

Fees from premises licences and permits submitted under the Act are ring fenced and must be used by Local Authorities for compliance and enforcement work, required under the Act. This includes conducting site visits to gambling premises, to check that Operators are conducting business in compliance with regulations and ensure that measures are in place to protect customers. Further information can be found about this at Appendix F to the Gambling Commission’s Guidance to Local Authorities <https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities/appendix-f-inspection-powers>

It should be noted that Spelthorne Licensing Authority has not conducted any gambling premises inspections in the last 5 years; presumably because it does not have any concerns about the operation of gambling premises in its jurisdiction.

In relation to the application itself, no representations or requests for clarification were raised by the Licensing Authority after the application was submitted and no attempts were made to engage with the Applicant during the 28-day consultation period. The Applicant was only made aware that the Licensing Authority had made representation 2 weeks after the closing date when the Principal Licensing Officer mentioned it in passing during a telephone conversation with the Applicants’ representative. A copy of those representation was not received by the Applicant until 15 September, nearly 3 weeks after the closing date and only then when specifically requested by the Applicants Representative.

The Applicants Local Area Risk Assessment (LARA) identified the schools in the locality. It is noted that children pass the premises on their way to and from school but they also do so at other times outside of school hours. Industry experience shows that young children are exceedingly unlikely to enter an Adult Gaming Centre unless accompanied by an adult, in which case they are both asked to leave. It is suggested that children of secondary school age maybe attempt to enter the Premises. That risk is identified in the LARA and in mitigation the entrance will be monitored by staff at all times. There will always be staff on the floor and anyone who appears to be under the age of 25 will be challenged for ID and asked to leave if they cannot prove that they are over the age of 18.

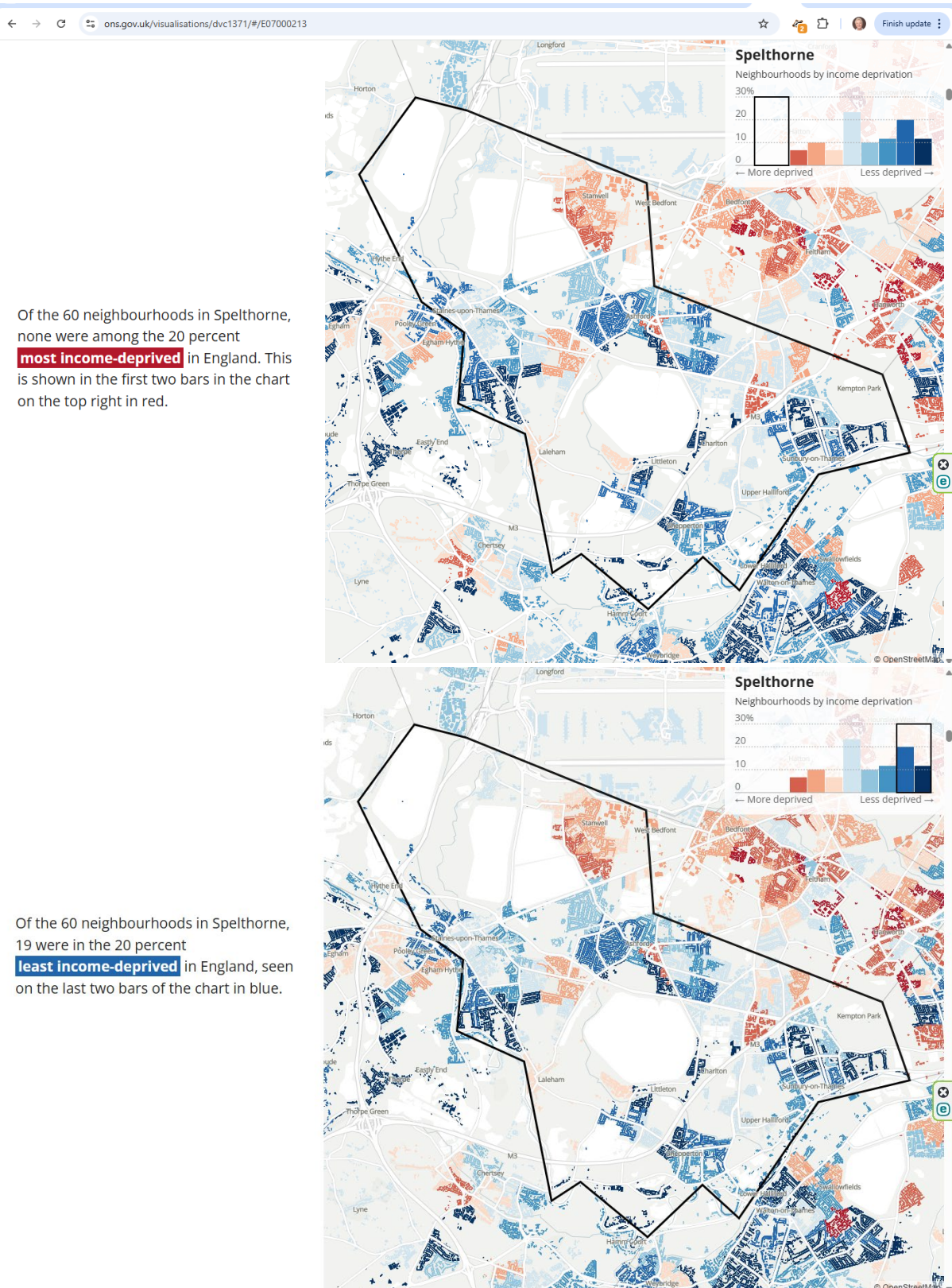
The Applicant does not want people under 18 in its premises; it is not in the Applicant's interest, for the following reasons

1. It is a criminal offence under the Act to permit any child to gamble without an exemption (s46)
2. It is a criminal offence under the Act to permit anyone under 18 to enter an AGC (s47(5))
3. It is a breach of Social Responsibility Code 3.2.3 which could result in my Client's Operating Licence being revoked and the directors liable to prosecution

The Applicant noted and included Studholme Medical Centre and Clarendon Family Centre as risks in its LARA. Noting the Licensing Authority's comments about Ashford Mental Health Clinic, enquiries have been made with the local health trust. It was confirmed that there is no mental health clinic at Ashford Health Centre which is a walk in treatment centre operated by nurses . If that changes the LARA will be updated to reflect the fact and further mitigation measures added.

The Applicants policies and procedures are designed to ensure vulnerable people are protected. Fully trained staff will be on site who will routinely interact with customers and get to know regular visitors. They are trained to spot signs of vulnerability and to talk with customers to pick up on any indicators that may not physically manifest themselves, through conversations with those customers. Those showing signs of living rough, experiencing drugs or alcohol problems will immediately be asked to leave.

The Applicant's data on deprivation has been challenged; it comes directly from the ONS website <https://www.ons.gov.uk/visualisations/dvc1371/#/E07000213> – screenshots below



Whilst it is acknowledged that Spelthorne has areas of deprivation the evidence indicates that Ashford itself is in an area of least income deprivation. “Of the 60 neighbourhoods in Spelthorne none were among the 20 percent most income deprived



in England ... 19 were in the 20 percent least income deprived, seen on the last two bars of the chart in blue”

Using Surrey’s own data referred to in the representations found at <https://www.surreyi.gov.uk/census-2021/census-2021-household-deprivation/>, it is possible to identify the data for Ashford Town showing the deprivation levels in 0 – 4 dimensions

Fig 1. No Deprivation Ashford - higher than the national average of 48.8%

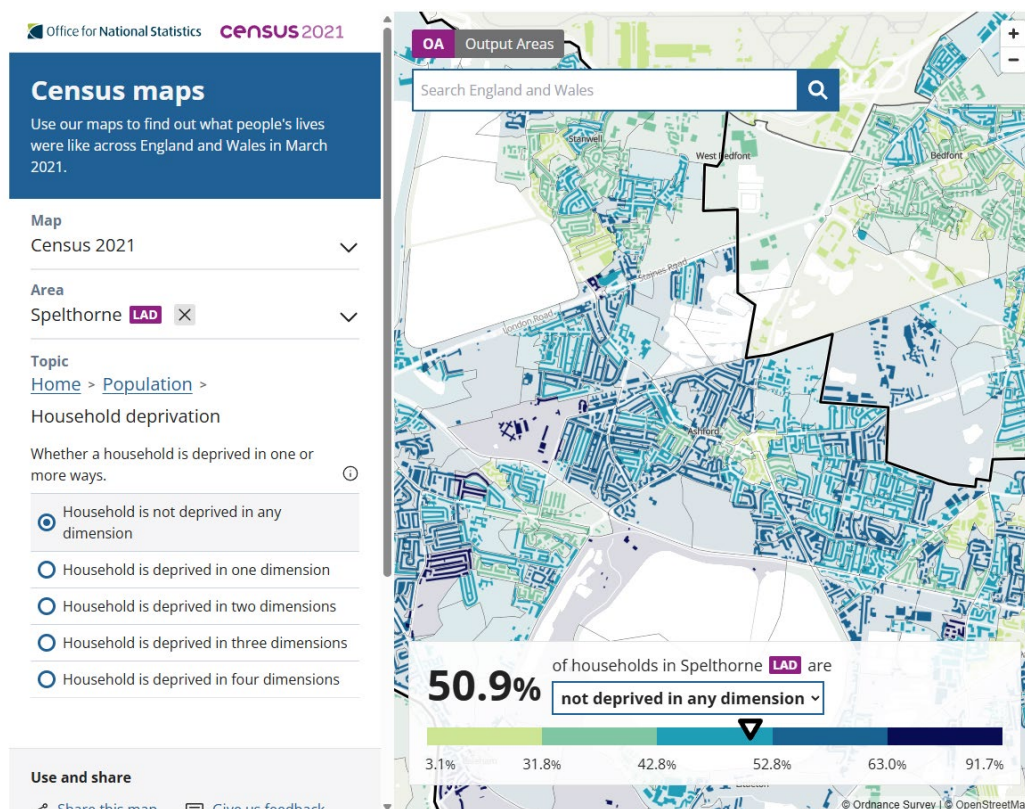


Fig 2 – Deprivation in 1 dimension – just lower than national average of 33.5%

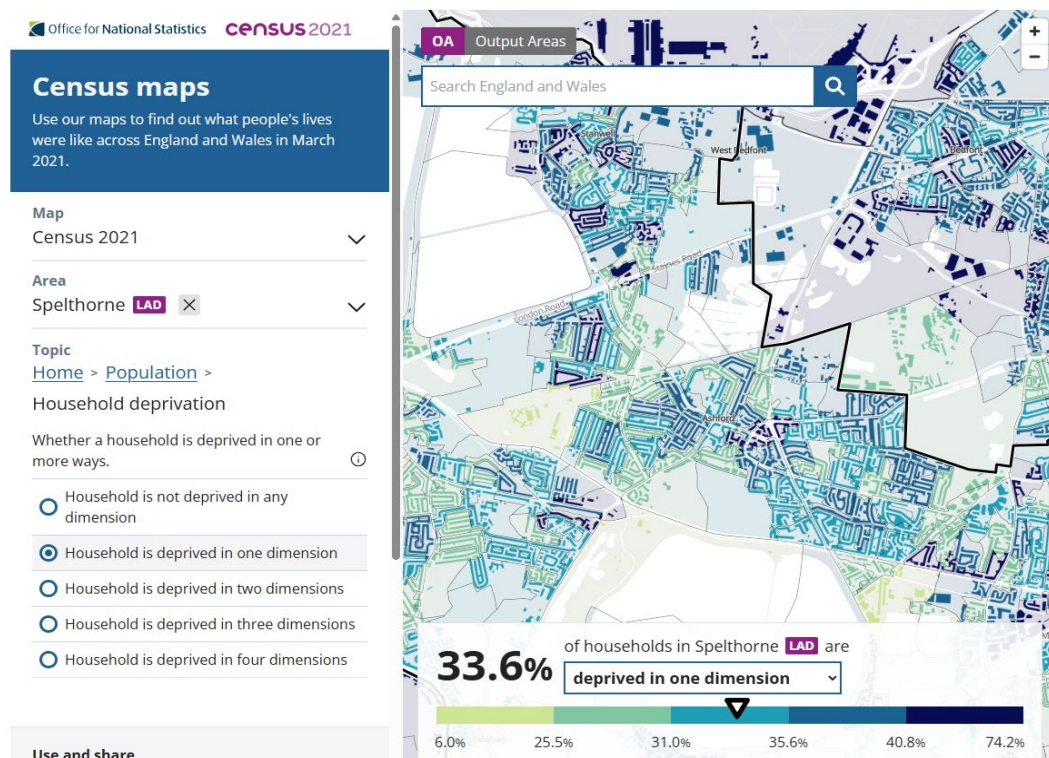


Fig 3 Deprivation in 2 dimensions - lower than national average of 14.2%

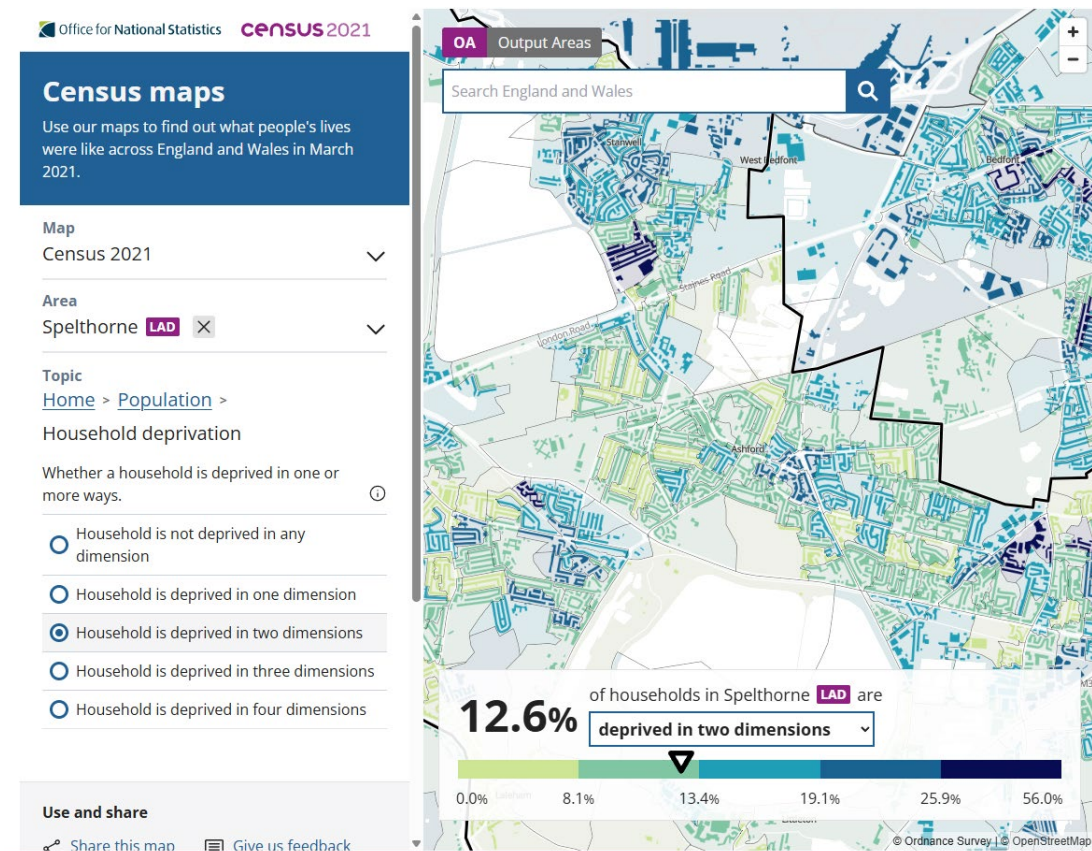




Fig 4 Deprivation in 3 dimension - below the national average of 3.7%

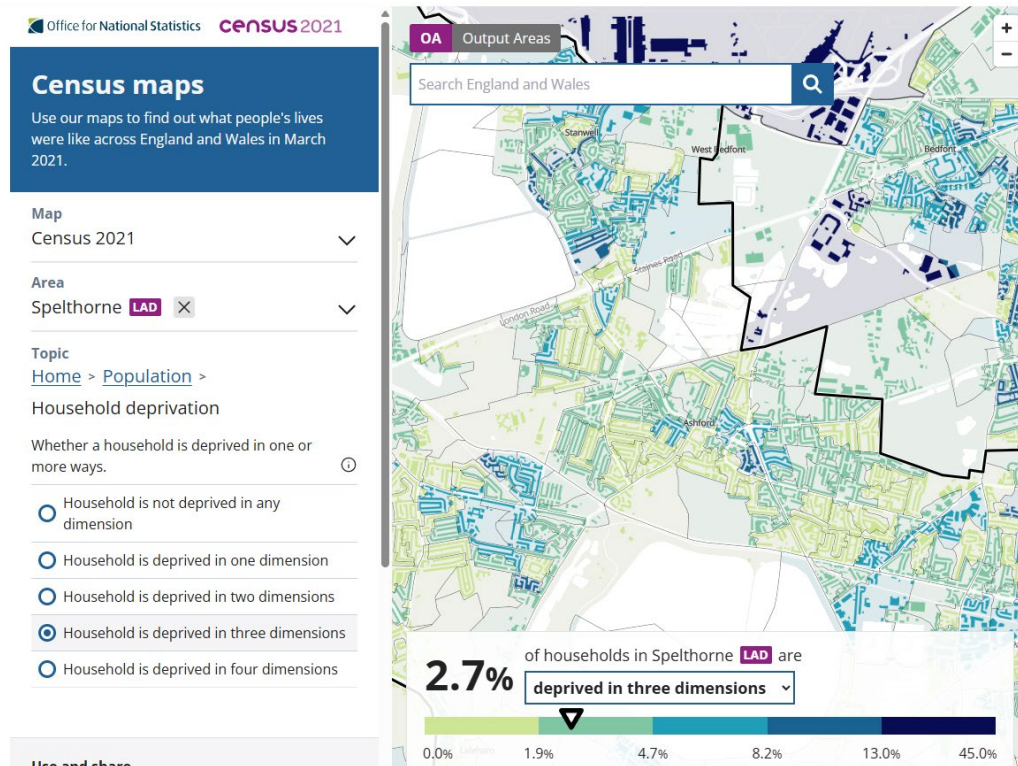
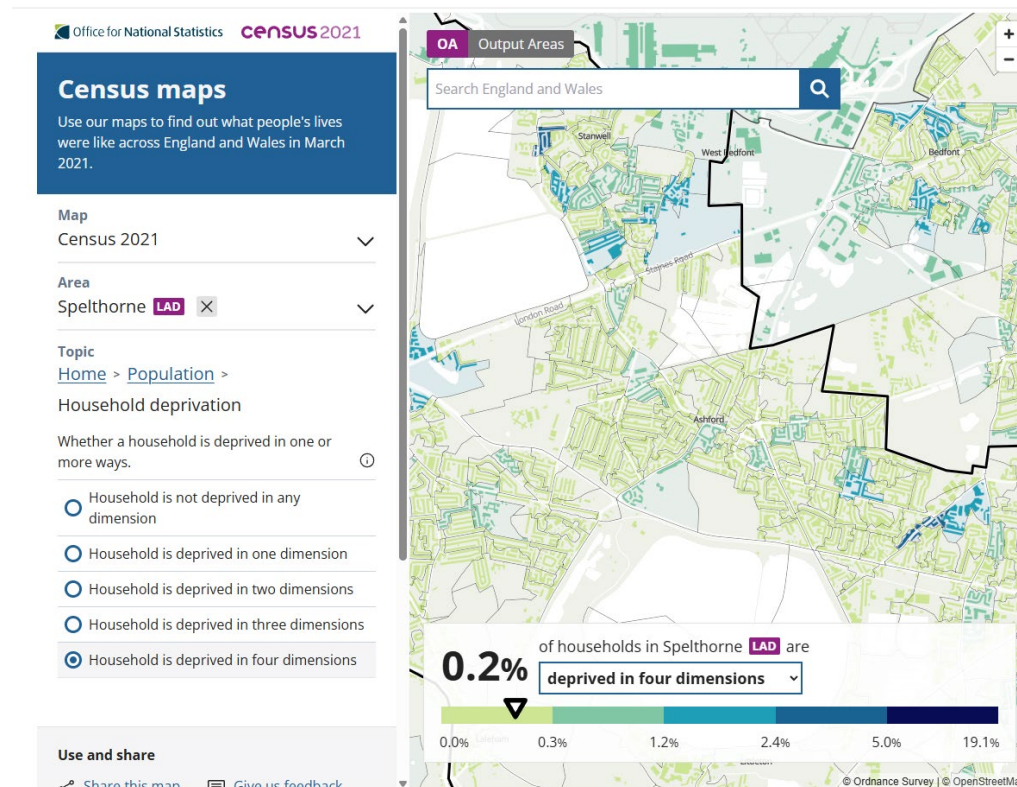


Fig 5 Deprivation in 4 dimensions – at the national average of 0.2%



There are questions raised in the licensing authority's representations, that could have been asked during the consultation periods, and which show a lack of understanding of the gambling regulations and the gambling industry. In response:

- On average the business would not expect to have more than 8 customers at a time and so the model is based on that. The Applicant does not intend to close the premises if numbers go up to 9 or even 10, from time to time, but if it is identified that there are more customers routinely visiting, then the Applicant will employ additional staff.
- The maglock will be operated at night so that the Applicant can restrict entry to customers who will be required to ring a bell for entry. There will still be at least 2 members of staff in the premises and if there are concerns about a particular person(s) wanting to enter they can refuse entry in the same way as pubs and clubs can do.
- The Applicant's LARA is intended to identify risks; it identified that there was a risk that someone under 18 might try to enter. Anyone unable to verify their age would be someone who is asked to provide proof of age and is unable to do so; they would be asked to leave immediately
- It is a legal requirement under s83 of that Act that where an Operator becomes aware that a child or young person is using or has used facilities for gambling, they must return any stake but may not give a prize to the child or young person. However that does not apply to the use of a Category D gaming machine.
- Age Test purchases are carried out, as required by SR Code 3.2.3, by an independent third party that Operators are required to engage; there are approved procedures for organisations engaged in test purchasing. The results are reported annually to the Gambling Commission and if the test is failed, a further test must be conducted. The Licensing Authority is also at liberty to conduct its own test purchases and the Gambling Commission sets out further information in Part 36 of its Guidance to Local Authorities  
<https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities/part-36-test-purchasing-and-age-verification>
- It is accepted that the LARA did not include the risk of persons trying to enter under the influence of or carrying alcohol and drugs. Nevertheless, staff are trained to identify and refuse entry to anyone showing signs of being under the influence of drugs or alcohol. Staff are also trained not to permit anyone to bring drink or drugs into the premises. The following is a Mandatory Condition on an Adult Gaming Centre Premises Licence
  - No alcohol shall be permitted to be consumed on the premises at any time during which facilities for gambling are being provided on the premises
  - A notice stating the condition in sub-paragraph (1) shall be displayed in a prominent place at every entrance to the premises.

The LARA has been updated to reflect this additional risk – updated copy as Appendix 2

The level of crime in any town or city is a matter for the police, using the resources that they have available. It is not a valid reason for refusing an application where an applicant can demonstrate that it has measures in place to ensure the operation of its business will not contribute to local criminal activity. There is no evidence to support the assertions that an Adult Gaming Centre will increase the risk of criminal activity including shoplifting. It is also noted that whilst addressing the public's concerns about potential crime the Planning Appeal Decision says at point 31.

*I note the concerns regarding the perceived risk of crime and antisocial behaviour associated with the proposed development. However, there is no compelling evidence before me to directly show that AGCs contribute toward increased crime and disorder in the area. The Council also confirms that the local Police Crime Officer did not raise any specific concerns while noting that any crime and / or antisocial behaviour issues would be a matter for the licensing regime.*

A Licensing Enforcement Officer with Surrey Police has stated that there is no evidence of criminal activity linked to the nearby AGC in Staines.

The conditions agreed with the Police were in addition to conditions the Applicant had already proposed in its application and are intended to be preventive measures that will prevent the premises having a negative impact on crime and anti-social behaviour in the area.

## Addressing Public Health Representations

Gambling premises are found in town and city centres as well as at the coast, as part of the leisure and hospitality sector. Around every town and city centre there are areas of deprivation where those on the lowest income live; often immediately behind the commercial area and in industrial towns on the windward side.

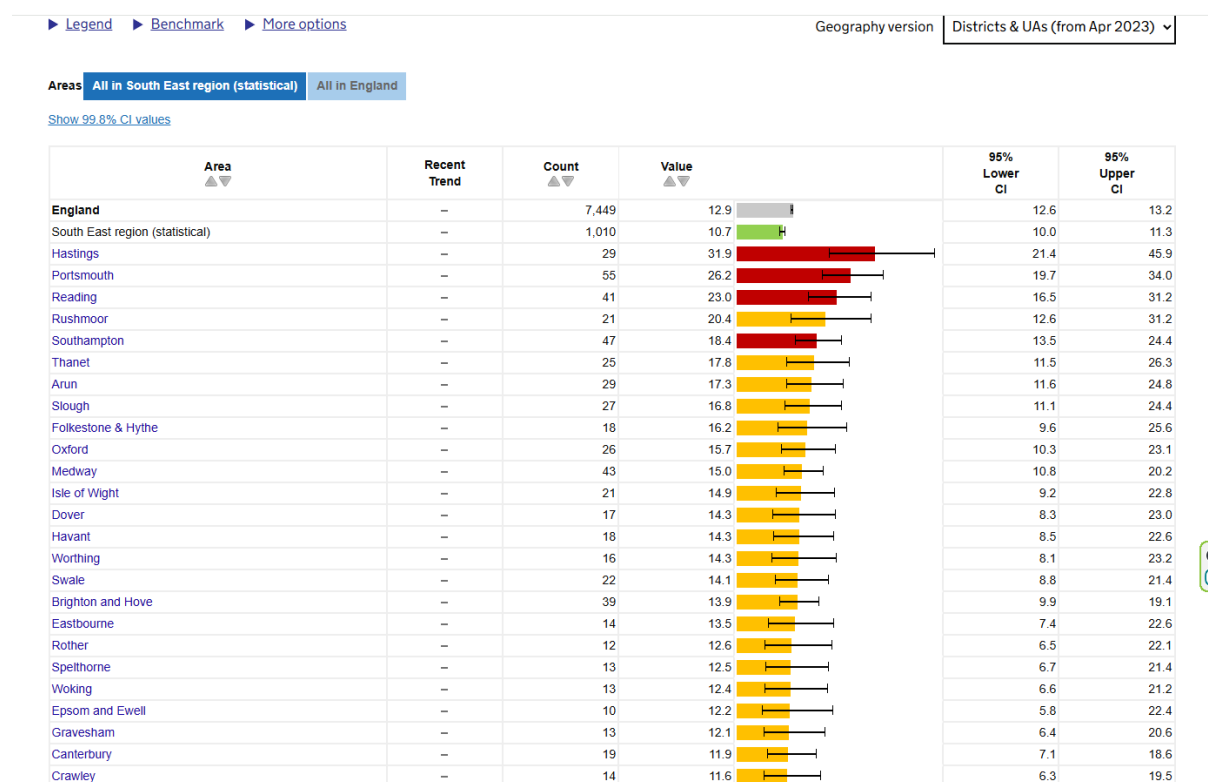
Public Health England has referred to there being a higher proportion of people in Spelthorne scoring one or more on the Problem Gambling Severity Index (14.4%) compared to GB as a whole (13.4%). Although the Applicant has not been served a copy of the data file it is assumed to come from Gambleaware's constituency data <https://www.gambleaware.org/our-research/publication-library/treatment-and-support-survey/gambleaware-gb-maps-constituency-data/>

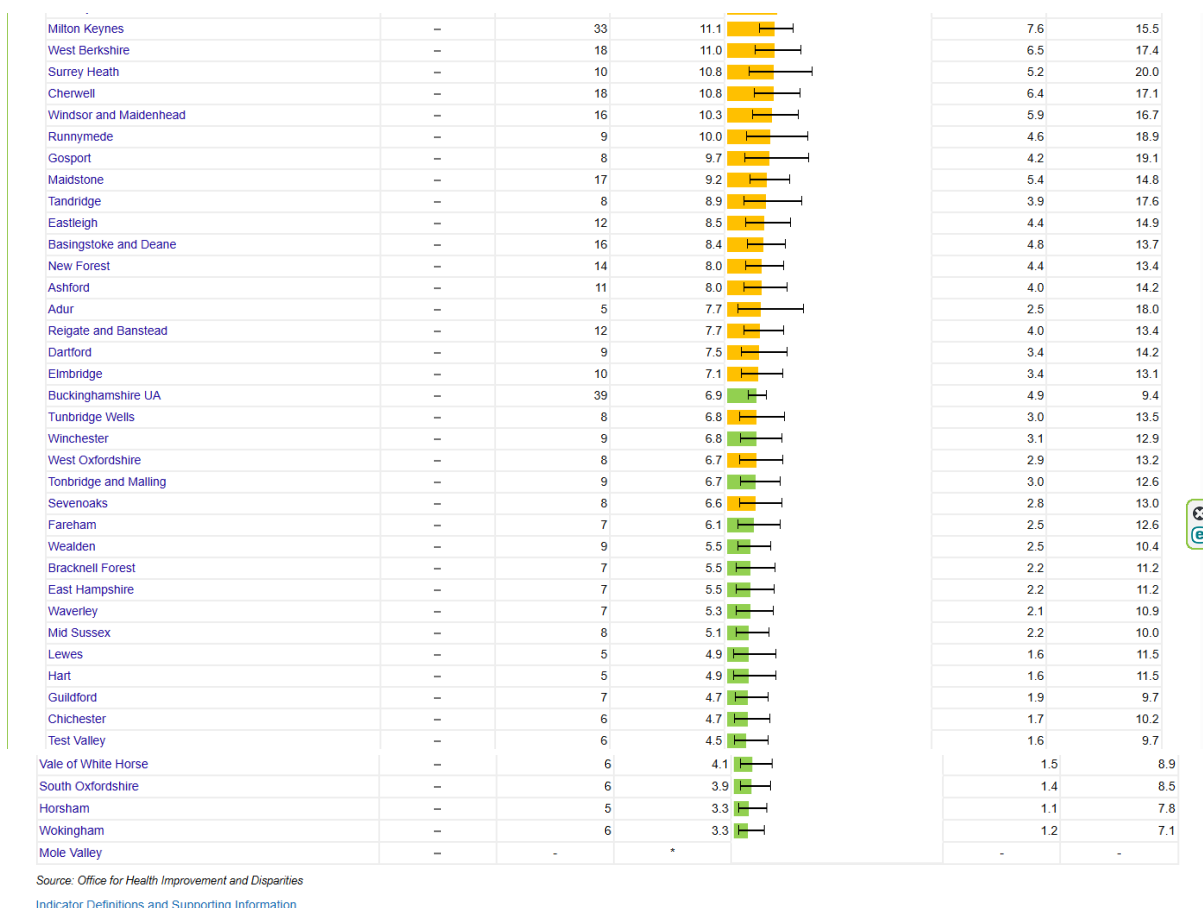


This data suggests that the prevalence of gambling problems in Spelthorne is lower than the national average but in any case this is relevant to Spelthorne as a whole and not Ashford itself. More importantly it must be read in light of previous NHS Health Survey evidence and the Adult Psychiatric Morbidity Survey (APMS) Survey of Mental Health & Wellbeing, England (2023/24) previously referred to and which found that overall, 1.6% of adults experienced at least moderate risk gambling (PGSI score of 3+) and 0.4% of adults experienced problem gambling (as indicated by a PGSI score of 8+). And yet

Gambeaware is not using that data; if it is using the GSGB's estimates then it has ignored the Gambling Commission's published guidance stating that the GSGB should not be used to calculate an overall rate of gambling related harms in Great Britain nor to gross up the prevalence of problem gambling or the consequences of gambling to whole population.

The Department of Health's and Social Care indicators for the determinants of health as quoted by Public Health should also be seen in context against the whole of the South East of England which ranges from 3.3 to 31.9 and then compared to the England average of 12.9%, noting that Spelthorne is 12.5%.





The Review by the University of Bristol referred to by Public Health was a scoping review of other literature and therefore has a number of limitations that mean that less weight should be attached to its findings.

In particular it should be noted that the introduction to the Review chapter on *Spatial inequalities and gambling harm*, says in relation to Electronic Gaming Machines (EGMs); *EGMs have attracted significant attention in Great Britain in recent years, specifically through the positioning of Fixed Odds Betting Terminals (FOBTs) within betting shops that offer the opportunity to gamble on digital roulette and slots-based games. FOBTs were subject to regulation in April 2019, when the maximum spend possible on FOBTs was reduced from £100 per spin to £2 per spin. Industry data show that 24,347 FOBTs were operating in Britain as of March 2022 (Gambling Commission, 2022). Whilst this is a sharp decline since 2019 when 32,776 were in operation, FOBTs still generated just over £1 billion for the industry in 2021/2022, amounting to 7.6% of the sector's total Gross Gambling Yield (Gambling Commission, 2022). Recent action in Palmers Green demonstrates the desire of communities to prevent further venues which house FOBTs, such as adult amusement centres, from entering the high street (Allin, 2023).*

The authors of the Review have used research that mistakenly assumed that FOBTs are permitted Adult Gaming Centres, which they are not. FOBTs are only permitted in Casinos, Betting shops and Tracks with Pool Betting-not Adult Gaming Centres. Furthermore the Review included literature from the US, Canada and Australia where the regulation of gaming machines is very different to the of the UK which is one of the most highly regulated gambling industries. In addition the literature it reviewed for Great Britain was in the main relevant to FOBTs in betting shops prior to the date of the reduction in stakes in 2019.

In addressing the concerns about a proliferation of gaming machines it should be noted that the Licensing Authority has granted only 13 gambling premises licences that are currently in operation

- 1 Adult Gaming Centre on Staines High Street which can offer cat B/C/D gaming machines
- 11 Betting Shops which can only have up to 4 cat B gaming machines including 2 in Ashford
- 1 Track betting licence for Kempton

It has also issued

- 9 Gaming machine permits authorising the use of cat C /D gaming machines
- 9 Club Machine Permits which permit up to 3 cat B gaming machines

It has received 34 gaming machine notifications that a pub will operate up to 2 cat C gaming machines. However that number is unlikely to be up to date as a new notification must be served for each change of landlord and with pubs closing at a rate of one a day.

Turning to Ashford Town itself it has only 2 Betting Offices and 4 pubs:

- The Kings Head with 3 cat C machines
- The Freeman Arms with 4 cat C machines
- The King's Fairway with 2 cat C machines
- The District Arms with 2 cat C gaming machines

That is a total of 8 cat B gaming machines and 11 cat C gaming machines for an adult population of circa 18,000 (census 2021)

To have 2 betting shops close in a commercial area of a town/city is not unusual. The fact that there is not an AGC or bingo premises in Ashford is however unusual and which was why the Applicant has seen the opportunity of locating there. It offers an alternative to betting and playing category B2 roulette style gaming machines;



furthermore AGCs are often preferred by women who feel more comfortable in less male orientated surroundings.

Public Health Surrey have suggested that the evidence produced in their representations demonstrates a significant risk to children and young people and vulnerable people based on the nature of the business. There are risks in everything that we do, and businesses are required to undertake risk assessments and put in place policies and procedures to mitigate those risks. Alcohol poses a risk to everyone's health, especially alcoholics, and tobacco and vapes pose a risk to everyone's health particularly those with comorbidities and the law ensures that children and young people are protected with the same measures that are required in the gambling industry. According to the Addiction Treatment UK 0.75% of the population have a shopping addiction spending thousands of pounds, in shops and online, mounting up huge debts with no protection at all.

The gambling industry acknowledges there are risks and it is regulated to a high level; much higher than many other industries in order to protect those that maybe at risk of harm. But there are many adults who are not at risk of harm and their needs should also be taken into account.

### **Comments by planning and the public – opening hours**

Much has been made of the fact that the premises has planning consent to operate 0900-2300 and the Applicant does not intend to breach that condition. Nevertheless it may at a later date revisit the opening hours once it has demonstrated that there is not an issue with noise and disturbances. At that time it would prefer not to have the additional expense of also having to apply to vary the Premises Licence to remove any conditions on operating hours. That is the sole reason for not stating alternative opening hours on the application.



## APPENDIX 1

LICENCE CONDITIONS AND CODES OF PRACTICE APPLICABLE TO THE AMUSEMENT  
ARCADE SECTOR – also available on line at

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/online>

APPENDIX 2  
APPLICANTS UPDATED LARA

# **Extract of Licence Conditions and Codes of Practice (LCCP) for Arcades**

**Version effective from 7 August 2025**

## 1.1.1 - Qualified persons – qualifying position

### Applies to:

All operating licences, except ancillary remote licences, issued to small-scale operators.

1. In this condition the terms ‘small-scale operator’, ‘qualifying position’ and ‘qualified person’ have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006<sup>1</sup>.
2. Schedule X<sup>2</sup> lists those individuals notified to the Commission as qualified persons.
3. If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act<sup>3</sup> for amendment of the details of the licence set out in Schedule X.
4. An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
5. In this condition ‘qualified person’ has the same meaning as in the Gambling Act 2005(Definition of Small-scale Operator) Regulations 2006.

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<sup>1</sup> [Gambling Act 2005 \(Definition of Small-scale Operator\) Regulations 2006](#)(opens in new tab).

<sup>2</sup> The schedules mentioned here will be attached to individual licences.

<sup>3</sup> [Section 104\(1\)\(b\) of the Act \(opens in new tab\)](#)

## 4.2.1 - Disclosure to customers

### Applies to:

All operating licences, except gaming machine technical, gambling software, host, ancillary, remote bingo, and ancillary remote casino licences.

1. Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
2. Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
3. In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
  - a. cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
  - b. winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and

c. any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

## 5.1.1 - Cash and cash equivalents

### **Applies to:**

All operating licences except gaming machine technical, gambling software and host licences.

1. Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (for example, bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
2. Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

## 6.1.1 - Provision of credit

### **Applies to:**

All gaming machine general operating licences for adult gaming centres and family entertainment centres.

1. Licensees must neither:
  - a. provide credit themselves in connection with gambling; nor
  - b. participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.



## 7.1.1 - Fair and transparent terms and practices

### Applies to:

All operating licences except gaming machine technical and gambling software licences.

1. Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015<sup>1</sup>. Licensees must comply with those terms.
2. The contractual terms on which gambling is offered and any consumer notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
3. Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes to terms before they come into effect.
4. Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008<sup>2</sup>, at any stage of their interactions with consumers.

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<sup>1</sup> [Consumer Rights Act 2015 \(opens in new tab\)](#)

<sup>2</sup> [Consumer Protection from Unfair Trading Regulations 2008 \(opens in new tab\)](#)

## 12.1.1 - Anti-money laundering - Prevention of money laundering and terrorist financing

### Applies to:

All operating licences except gaming machine technical and gambling software licences.

1. Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
2. Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
3. Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission<sup>1</sup> from time to time.

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<sup>1</sup> [Guidelines on the prevention of money laundering and combating the financing of terrorism \(opens in new tab\)](#)

## 14.1.1 - Access to premises

### Applies to:

All operating licences.

1. Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act<sup>1</sup>.

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<sup>1</sup> [Part 15 of the Gambling Act 2005 \(opens in new tab\)](#).

## 15.1.1 - Reporting suspicion of offences etc – non-betting licences

### Applies to:

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences.

1. Licensees must as soon as reasonably practicable, in such a form or manner as the Commission may from time to time specify, provide the Commission with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.<sup>1</sup>

Read additional [guidance on the information requirements](#) contained within this section.

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<sup>1</sup> These matters are to be reported to us online via our '[eServices](#)' digital service on our website

## 15.1.3 - Reporting of systematic or organised money lending

### Applies to:

All non-remote casino, non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences.

1. Licensees must as soon as reasonably practicable, in such form or manner as the Commission may from time to time specify, provide the Commission with any information relating to cases where they encounter systematic, organised or substantial money lending between customers on their premises, in accordance with the ordinary code provisions on money lending between customers.<sup>1</sup>

Read additional [guidance on the information requirements](#) contained within this section.

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<sup>1</sup> These matters are to be reported to us online via our '[eServices](#)' digital service on our website

## 15.2.1 - Reporting key events

### **Applies to:**

All operating licences.

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, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following 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<sup>1</sup>.

### Operator status

1. Any of the following applying to a licensee, any person holding a key position for a licensee, a group company or a shareholder or member (holding 3% or more of the issued share capital of the licensee or its holding company):
  - presenting of a petition for winding up
  - making of a winding up order
  - entering into administration or receivership
  - bankruptcy (applying to individuals only)
  - sequestration (applicable in Scotland), or
  - an individual voluntary arrangement.

### Relevant persons and positions

2. In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.
3. The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.
4. The appointment of a person to, or a person ceasing to occupy, a 'key position' (including leaving one position to take up another). A 'key position' in relation to a licensee is:
  - a. in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006<sup>2</sup>
  - b. in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
  - c. a position where the holder of which has overall responsibility for the licensee's anti-money laundering and/or terrorist financing compliance, and/or for the reporting of known or suspected money laundering or terrorist financing activity.
  - d. any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)

## Financial events

5. Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
6. Any breach of a covenant given to a bank or other lender.

7. Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
8. Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

#### Legal or regulatory proceedings or reports

9. The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
10. Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities of a person in a 'key position', where such an investigation could result in the imposition of a sanction or penalty which could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
11. Any criminal investigation by a law enforcement agency in any jurisdiction in which the licensee, or a person in a 'key position' related to the licensee, is involved and where the Commission might have cause to question whether the licensee's measures to keep crime out of gambling had failed.
12. The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor, or a professional,



statutory or other regulatory or government body (in whatever jurisdiction)) about the provision of facilities for gambling: a summary of the nature of the concerns must be provided.

13. The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
14. The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
15. The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002<sup>3</sup> or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000<sup>4</sup> (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency<sup>5</sup> in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

### Gambling facilities

16. Any security breach to the licensee's environment that adversely affects the confidentiality of customer data; or prevents the licensee's customers, staff, or legitimate users from accessing their accounts for longer than 12 hours.
17. Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).

18. In the case of remote gambling, the commencement or cessation of trading on website domains (including mobile sites or mobile device applications) or broadcast media through which the licensee provides gambling facilities (including domains covered by 'white label' arrangements). In this condition: 'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006<sup>6</sup> or any statutory modification or re-enactment thereof
- a. in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006<sup>7</sup> or any statutory modification or re-enactment thereof
  - b. a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

Read additional [guidance on the information requirements](#) contained within this section.

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<sup>1</sup> Key events are to be reported to us online via the ['eServices'](#) ([opens in new tab](#)), digital service on our website.

<sup>2</sup> [Gambling Act 2005 \(Definition of Small-scale Operator\) Regulations 2006](#) ([opens in new tab](#)).

<sup>3</sup> [Proceeds of Crime Act 2002](#) ([opens in new tab](#))

<sup>4</sup> [Terrorism Act 2000](#) ([opens in new tab](#))

<sup>5</sup> [United Kingdom Financial Intelligence Unit of the National Crime Agency](#) ([opens in new tab](#))

<sup>6</sup> [Section 1173 of the Companies Act 2006](#) ([opens in new tab](#))

<sup>7</sup> [Section 1159 of the Companies Act 2006 \(opens in new tab\)](#).

## 15.2.2 - Other reportable events

### Applies to:

All operating licences.

1. 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<sup>1</sup>:
  - 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<sup>2</sup>, or Part III of the Terrorism Act 2000<sup>3</sup>, 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.

In this condition:

- a. 'group company' has the same meaning as in condition 15.2.1; and
- b. without prejudice to section 327 of the Gambling Act 2005<sup>4</sup>, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

Read additional [guidance on the information requirements](#) contained within this section.

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<sup>1</sup> Key events are to be reported to us online via the ['eServices'](#) ([opens in new tab](#)) digital service on our website.

<sup>2</sup> [Proceeds of Crime Act 2002](#) ([opens in new tab](#))

<sup>3</sup> [Part III of the Terrorism Act 2000](#) ([opens in new tab](#))

<sup>4</sup> [Section 327 of the Gambling Act 2005](#) ([opens in new tab](#))

## 15.3.1 - General and regulatory returns

### Applies to:

All operating licences.

On request, licensees must provide the Commission with such information as the Commission may require, in such a form or manner as the Commission may from time-to-time specify, about the use made of facilities provided in accordance with this licence and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on.

In particular within 28 days of the end of each quarterly period licensees must submit an accurate Regulatory Return to the Commission containing such information as the Commission may from time to time specify.

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<sup>1</sup>Regulatory returns are to be submitted to us online via the '[eServices](#)' digital service on our website.

### Ordinary code

These do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner.

Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty.

### **Social responsibility code**

Compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution.

## 1.1.1 - Cooperation with the Commission

### Ordinary code

#### Applies to:

All licences.

1. As made plain in its Statement of principles for licensing and regulation<sup>1</sup>, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

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<sup>1</sup> [Statement of principles for licensing and regulation \(opens in new tab\)](#)



## 1.1.2 - Responsibility for third parties – all licences

### Social responsibility code

#### Applies to:

All licences.

1. Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
2. Licensees must ensure that the terms on which they contract with such third parties:
  - a. require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
  - b. oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
  - c. enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

## 1.1.3 - Responsibility for third parties – remote

### Social responsibility code

#### Applies to:

All remote licences.

1. Remote licensees must ensure in particular:
  - a. that third parties who provide user interfaces enabling customers to access their remote gambling facilities:
    - i. include a term that any such user interface complies with the Commission's technical standards for remote gambling systems<sup>1</sup>; and
    - ii. enable them, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of that term.

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<sup>1</sup> [Remote gambling and software technical standards \(opens in new tab\)](#)

## 2.1.2 - Anti-money laundering – other than casino

### Ordinary code

#### Applies to:

All licences except casino licences.

1. As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002<sup>1</sup> and the Terrorism Act 2000<sup>2</sup>, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, \*Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators<sup>3</sup> (excluding casino operators). \*

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<sup>1</sup> [Proceeds of Crime Act 2002](#) (opens in new tab)

<sup>2</sup> [Terrorism Act 2000](#) (opens in new tab)

<sup>3</sup> [Proceeds of Crime Act 2002 – Advice for operators](#) (opens in new tab)

### 3.1.1 - Combating problem gambling

#### Social responsibility code

#### Applies to:

All licences.

1. Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.

### 3.2.3 - AGC SR code

#### Social responsibility code

##### Applies to:

All adult gaming centre licences.

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
2. This must include procedures for:
  - a. checking the age of apparently underage customers
  - b. removing anyone who appears to be under age and cannot produce an acceptable form of identification
  - c. taking action when there are attempts by under-18s to enter the premises.
3. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
4. Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.
5. In premises restricted to adults, service must be refused in any circumstances where any adult is accompanied by a child or young person.

6. Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and the legal requirements on returning stakes and not paying prizes to underage customers.
7. Licensees must only accept identification which:
  - a. contains a photograph from which the individual can be identified
  - b. states the individual's date of birth
  - c. is valid
  - d. is legible and has no visible signs of tampering or reproduction.
8. All licensees must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Gambling Commission, in such a form or manner as the Commission may from time to time specify.

Read additional [guidance on the information requirements](#) contained within this section.

## 3.2.4 - AGC ordinary code

### Ordinary code

#### Applies to:

All adult gaming centre licences.

1. The Commission considers acceptable forms of identification to include any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should put into effect procedures that require their staff to check the age of any customer who appears to them to be under 25.
3. Licensees should consider permanent exclusion from premises for any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission<sup>1</sup> and the police, and making available information on problem gambling.
5. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Read additional [guidance on the information requirements](#) contained within this section.

<sup>1</sup> These matters are to be reported to us online via our 'eServices' digital service on our website.



### 3.2.5 - Bingo and FEC SR code

#### Social responsibility code

##### Applies to:

All non-remote bingo and family entertainment centre licences.

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
2. This must include procedures for:
  - a. checking the age of apparently underage customers
  - b. refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
  - c. taking action when there are unlawful attempts to enter the adult-only areas.
3. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
4. Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
5. Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which

must cover:

- a. all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
- b. the legal requirements on returning stakes and not paying prizes to underage customers; and
- c. procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.

6. Licensees must only accept identification which:

- a. contains a photograph from which the individual can be identified
- b. states the individual's date of birth
- c. is valid
- d. is legible and has no visible signs of tampering or reproduction.

7. All licensees must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Read additional [guidance on the information requirements](#) contained within this section.

## 3.2.6 - Bingo and FEC ordinary code

### Ordinary code

#### Applies to:

All non-remote bingo and family entertainment centre licences.

1. The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should require a person who appears to relevant staff to be under the age of 25 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
3. Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission<sup>1</sup> and the police, and making available information on problem gambling to the child or young person concerned.

5. Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
6. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Read additional [guidance on the information requirements](#) contained within this section.

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<sup>1</sup> These matters are to be reported to us online via our '[eServices](#)' digital service on our website.

## 3.2.11 - Remote SR code

### Social responsibility code

#### Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except lottery licences, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo licences.

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these.
2. Such procedures must include:
  - a. Verifying the age of a customer before the customer is able to:
    - i. deposit any funds into their account;
    - ii. access any free-to-play versions of gambling games that the licensee may make available; or
    - iii. gamble with the licensee using either their own money or any free bet or bonus.
  - b. warning potential customers that underage gambling is an offence;
  - c. regularly reviewing their age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves;
  - d. ensuring that relevant staff are properly trained in the use of their age verification procedures; in particular customer services staff must be appropriately trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of legal age; and

e. enabling their gambling websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites.

### 3.2.12 - Remote ordinary code

#### Ordinary code

#### Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences.

1. Licensees should, and should request their contracted partners to, draw attention to parental responsibility as part of the purchasing process of facilities such as mobile phones and interactive television.

### 3.3.1 - Responsible gambling information

#### Social responsibility code

##### Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences.

1. Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
2. The information must cover:
  - a. any measures provided by the licensee 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
  - b. timers or other forms of reminders or 'reality checks' where available
  - c. self-exclusion options
  - d. information about the availability of further help or advice.
3. The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
4. For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other

facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

### 3.3.2 - Foreign languages

#### Ordinary code

#### Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences.

1. Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
  - a. the information on how to gamble responsibly and access to help referred to above
  - b. the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
  - c. the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.



### 3.3.4 - Remote time-out facility

#### Social responsibility code

##### Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting licences, remote betting (remote platform), gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading room only) licences.

1 Licensees must offer a 'time out' facility for customers for the following durations:

- a. 24 hours
- b. one week
- c. one month or
- d. such other period as the customer may reasonably request, up to a maximum of 6 weeks.

## 3.4.1 - Premises-based customer interaction

### Social responsibility code

#### Applies to:

All non-remote licences (except non-remote lottery, gaming machine technical, gambling software and host licences); only the following remote licences – ancillary remote bingo, ancillary remote casino, ancillary remote betting, remote general betting limited, and remote betting intermediary (trading rooms only).

1. Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
  - a. identifying customers who may be at risk of or experiencing harms associated with gambling.
  - b. interacting with customers who may be at risk of or experiencing harms associated with gambling.
  - c. understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
2. Licensees must take into account the Commission's guidance on customer interaction<sup>1</sup>.

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<sup>1</sup> [Customer interaction: formal guidance for premises-based operators \(opens in new tab\)](#)

### 3.5.1 - Self exclusion – Non-remote and trading rooms SR code

#### Social responsibility code

##### Applies to:

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences.

1. Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to

prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.

6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
  - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
  - b. photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
  - c. staff training to ensure that staff are able to administer effectively the systems; and
  - d. the removal of those persons found in the gambling area or attempting to gamble from the premises.
7. Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.
8. Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

## 3.5.2 - Self-exclusion – non-remote ordinary code

### Ordinary code

#### Applies to:

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences.

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
2. Individuals should be able to self-exclude without having to enter gambling premises.
3. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
4. Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
5. Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
6. Customers should be given the opportunity to discuss self-exclusion in private, where possible.

## 7. Licensees should take steps to ensure that:

- a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
- b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
- c. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
- d. at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
- e. where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
- f. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.

8. The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.

9. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.

10. Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.
11. Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
12. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

### 3.5.3 - Self-exclusion – remote SR code

#### Social responsibility code

##### Applies to:

All remote licences except: gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, betting intermediary (trading room only) and remote betting (standard) (remote platform) licences. Paragraph 8 does not apply to ancillary remote betting licences, remote general betting (limited), or any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries.

1. Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.



5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
  - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
  - b. a record of the card numbers to be excluded;
  - c. staff training to ensure that staff are able to administer effectively the systems; and
  - d. the removal of access from those persons found to have gambled or who have attempted to gamble on the facilities.
7. Licensees must when administering the self-exclusion signpost the individual to counselling and support services.
8. Customers must be given the opportunity to self-exclude by contacting customer services and in addition by entering an automated process using remote communication. In order to avoid inadvertent self-exclusion it is acceptable for an automated process to include an additional step that requires the customer to confirm that they wish to self-exclude. The licensee must ensure that all staff who are involved in direct customer service are aware of the self-exclusion system in place, and are able to direct that individual to an immediate point of contact with whom/which to complete that process.

## 3.5.4 - Self-exclusion – Remote ordinary code

### Ordinary code

#### Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, remote betting intermediary (trading rooms only) and remote betting (standard) (remote platform) licences.

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude:
  - a. over the internet; this can be a box that must be ticked in order to indicate that they understand the system
  - b. by telephone; this can be a direct question asking whether they understand the system.
2. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
3. Licensees should encourage the customer to consider extending their self-exclusion to other remote gambling operators currently used by the customer.
4. Within the licensee's information about self-exclusion policies, the licensee should provide a statement to explain that software is available to prevent an individual computer from accessing gambling internet sites. The licensee should provide a link to a site where further information is available.

## 5. Licensees should take all reasonable steps to ensure that:

- a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months;
- b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months;
- c. the self-exclusion arrangements give customers the option of selecting a self-exclusion period of up to at least five years;
- d. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
- e. at the end of the period chosen by the customer, self-exclusion remains in place, for a minimum of 7 years, unless the customer takes positive action to gamble again;
- f. where a customer chooses not to renew, and makes a positive request to begin gambling again, during the 7 year period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed to access gambling facilities. Contact must be made via phone or in person; re-registering online is not sufficient; and
- g. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.

6. The licensee should retain the records relating to a self-exclusion agreement for as long as is needed to enable the self-exclusion procedures set out in paragraph 5 above to be implemented.

7. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to

access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.

8. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

### 3.5.5 - Remote multi-operator SR code

#### Social responsibility code

##### Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting when relied upon to provide facilities for betting via a machine (commonly known as self-service betting terminals) on premises where a betting or track premises licence has effect, remote general betting (remote platform), remote betting intermediary (trading room only), gaming machine technical, gambling software, host, ancillary remote bingo, and ancillary remote casino licences.

1. Licensees must participate in the national multi-operator self-exclusion scheme.

## 3.5.6 - Multi-operator non-remote SR code

### Social responsibility code

#### Applies to:

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres.

1. Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

## 3.6.5 - AGCs

### Ordinary code

#### Applies to:

All adult gaming centre licences.

1. Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
  - a. to employ them to provide facilities for gambling;
  - b. if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
  - c. to employ them to carry out any other function on adult gaming centre licensed premises while any gambling activity is being carried on in reliance on the premises licence.
2. As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
3. Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
  - a. children and young persons are never asked to perform tasks within 1a or 1b, above
  - b. all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.

#### 4. Licensees should consider adopting a policy that:

- a. children and young persons are not employed to work on adult gaming centre licensed premises at any time when the premises are open for business
- b. gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

## 3.6.6 - FECs

### Ordinary code

#### Applies to:

All family entertainment centre licences.

1. Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
  - a. to employ them to provide facilities for gambling; and
  - b. if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time.
2. As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
3. Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
  - a. children and young persons are never asked to perform tasks within 1a or 1b, above; and
  - b. all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
4. Licensees should consider adopting a policy that:



- a. children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place; and
- b. gaming machines sited in adult-only areas are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

### 3.8.2 - Money-lending – other than casinos

#### Ordinary code

#### Applies to:

All non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences.

1. Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

### 3.9.1 - Identification of individual customers - remote

#### Social responsibility code

##### Applies to:

All remote licences (including ancillary remote betting licences) except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences.

1. Licensees must have and put into effect policies and procedures designed to identify separate accounts which are held by the same individual.
2. Where licensees allow customers to hold more than one account with them, the licensee must have and put into effect procedures which enable them to relate each of a customer's such accounts to each of the others and ensure that:
  - a. if a customer opts to self-exclude they are effectively excluded from all gambling with the licensee unless they make it clear that their request relates only to some forms of gambling or gambling using only some of the accounts they hold with the licensee;
  - b. all of a customer's accounts are monitored and decisions that trigger customer interaction are based on the observed behaviour and transactions across all the accounts;
  - c. where credit is offered or allowed the maximum credit limit is applied on an aggregate basis across all accounts; and
  - d. individual financial limits can be implemented across all of a customer's accounts.
3. Licensees which are companies or other bodies corporate must take all reasonable steps to comply with the above provision as if reference to a customer holding more than one account

with them included a reference to a customer holding one or more accounts with them and one or more accounts with a group company.

4. A company is a 'group company' in relation to a licensee if it is the holding company of, subsidiary of, or shares a common holding company with, the licensee. For these purposes 'holding company' and 'subsidiary' have the meanings ascribed to them by section 1159 of the Companies Act 2006<sup>1</sup> or any statutory modification or re-enactment thereof.

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<sup>1</sup> [Section 1159 of the Companies Act 2006 \(opens in new tab\)](#).

## 4.1.1 - Fair terms

### Social responsibility code

#### Applies to:

All licences, except gaming machine technical and gambling software licences.

1. Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

## 5.1.1 - Rewards and bonuses – SR code

### Social responsibility code

#### Applies to:

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences.

1. If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
  - a. the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
  - b. neither the receipt nor the value or amount of the benefit is:
    - i. dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
    - ii. altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
  - c. if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
  - d. if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.

2. If a licensee makes available incentives or reward schemes for customers, designated by the licensee as 'high value, 'VIP' or equivalent, they must be offered in a manner which is consistent with the licensing objectives.

Licensees must take into account the Commission's guidance on high value customer incentives<sup>1</sup>.

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<sup>1</sup> [Guidance on high value customer incentives \(opens in new tab\)](#).

## 5.1.2 - Proportionate rewards

### Ordinary code

#### **Applies to:**

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences.

1. Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

## 5.1.6 - Compliance with advertising codes

### Social responsibility code

#### Applies to:

All licences, except lottery licences.

1. All marketing of gambling products and services must be undertaken in a socially responsible manner.
2. In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP)<sup>1</sup> and the Broadcast Committee of Advertising Practice (BCAP)<sup>2</sup> as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
3. The restriction on allowing people who are, or seem to be, under 25 years old (that is, those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

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<sup>1</sup> [Committee of Advertising Practice \(opens in new tab\)](#)

<sup>2</sup> [Broadcast Committee of Advertising Practice \(opens in new tab\)](#)

## 5.1.8 - Compliance with industry advertising codes

### Ordinary code

#### Applies to:

All licences.

1. Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising<sup>1</sup>.

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<sup>1</sup> [Gambling Industry Code for Socially Responsible Advertising \(opens in new tab\)](#)

## 5.1.9 - Other marketing requirements

### Social responsibility code

#### Applies to:

All licences.

1. Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008<sup>1</sup>) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
2. Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
3. The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.



<sup>1</sup> [Consumer Protection from Unfair Trading Regulations 2008 \(opens in new tab\)](#)

## 5.1.10 - Online marketing in proximity to information on responsible gambling

### Ordinary code

#### Applies to:

All licences.

1. Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

## 5.1.11 - Direct electronic marketing consent

### Social responsibility code

#### Applies to:

All licences.

1. Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

## 6.1.1 - Complaints and disputes

### Social responsibility code

#### Applies to:

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences.

1. Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
2. Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
3. The services of any such ADR entity must be free of charge to the customer.
4. Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
5. Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.

6. Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission<sup>1</sup> from time to time.
7. Licensees should keep records of customer complaints and disputes and make them available to the Commission on request.

In this Code, 'ADR entity' means

- a. a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015<sup>2</sup> and,
- b. whose name appears on the list of providers<sup>3</sup> that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

Read additional [guidance on the information requirements](#) contained within this section.

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<sup>1</sup> [Complaints and disputes: Guidance published by the Gambling Commission \(opens in new tab\)](#)

<sup>2</sup> [The Alternative Dispute Resolution for Consumer Disputes \(Competent Authorities and Information\) Regulations 2015 \(opens in new tab\)](#)

<sup>3</sup> [List of approved Alternative Dispute Resolution providers \(opens in new tab\)](#)

## 7.1.2 - Responsible gambling information for staff

### Social responsibility code

#### Applies to:

All licences, including betting ancillary remote licences, but not other ancillary remote licences.

1. Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

## 8.1.1 - Ordinary code

### Ordinary code

#### Applies to:

All licences.

1. As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
2. Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify<sup>1</sup>, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence<sup>2</sup>:
  - a. any material change in the licensee's structure or the operation of its business
  - b. any material change in managerial responsibilities or governance arrangements
  - c. any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

Read additional guidance on the information requirements contained within this section.

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<sup>1</sup> These matters are to be reported to us online via our 'eServices' digital service on our website.

<sup>2</sup> Events which must be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

## 10.1.1 - Assessing local risk

### Social responsibility code

#### Applies to:

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

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy<sup>1</sup>.
2. Licensees must review (and update as necessary) their local risk assessments:
  - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
  - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
  - c. when applying for a variation of a premises licence; and
  - d. in any case, undertake a local risk assessment when applying for a new premises licence.

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<sup>1</sup>This is the [statement of licensing policy \(opens in new tab\)](#) under the Gambling Act 2005.



## 10.1.2 - Sharing local risk assessments

### Ordinary code

#### Applies to:

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

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

## **LOCAL GAMBLING RISK ASSESSMENT**

**Premises:** Golden Slots 39 Church Road Ashford TW15 2QF

**Operator:** Golden Slots (Southern) Limited

**Operating Licence:** 043695-N-323074-011

**Prepared by:** Debbie Bollard

**Date:** 20 May 2025

### **Requirement to Comply**

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

#### **Social responsibility code provision 10.1.1**

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.
2. Licensees must review (and update as necessary) their local risk assessments.
  - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
  - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
  - c. when applying for a variation of a premises licence; and
  - d. in any case, undertake a local risk assessment when applying for a new premises licence.

#### **Ordinary code provision 10.1.2**

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

**Premises Location**

The Premises are located on the ground floor of a three-storey building previously occupied by a bank which has Sui Generis (Amusement) planning permission.

The premises will be open 24/7 with at least 2 members of staff working on site at any given time on the basis of a maximum of 8 customers, if the numbers increase then an additional member of staff will be used for busier periods. A maglock will be in use between the hours 2200 and 0800 with the door locked during those hours and opened by a member of staff when a customer wants to enter the premises. This will also be used when the machines are being emptied and refloated when the Premises will be closed. The Company is a participant of the Boomerang SmartEXCLUSION multi-operator self-exclusion scheme, a member of the Bacta the trade body representing industry members.

The site is in Ashford Surrey, 3 miles from Heathrow Airport, located on the corner of Church Road and Dudley Road, with a single entrance off Church Road and a fire exit onto Dudley Road. Church Road (B378) is a primary route through Ashford and is lined with a variety of typical high street businesses, often with residential above. To the West side of Church Road behind the commercial development is mainly low density residential bounded by the A308, London Road to the north and Ashford Golf club to the south. To the east of Church Road is also mainly residential with a mixture of houses and purpose built flats bounded to the north by the railway line, Bedfont Lakes Country Park to the east and the A308. At the time of the 2011 census there were 2,388 detached house, 4,380 semi-detached, 1,672 terraced houses and 2,618 apartments.

Immediately next door is a Wimpy restaurant and a furniture store; Dudley Road is an entrance to a large residential area. Church Road comprises of a mixture of retail, food outlets, personal care salons and public amenities. There are 2 Betting shops on Church Road – Coral and William Hill within 500 feet of the location on either side of the road. Both are part of large national chains with robust compliance policies in place particularly around social responsibility. The nearest Adult Gaming Centre is Casino Slots in Feltham nearly 3 miles away as is the nearest Bingo Hall Buzz Bingo. Public community buildings include Ashford Library almost across the road.

**Demographics**

Ashford is located in Spelthorne District Council with a population of circa 23k (2021 census) with over half being of working age and predominantly white British ethnicity. The average debt per person is £670 (Local Gov Reports 2023) and child poverty in Ashford is circa 10%, which is below the national average of 22%. Spelthorne is the most deprived borough in Surrey (<https://www.surreyi.gov.uk/census-2021/census-2021-household-deprivation/>) with 7.9% of the population income deprived. However the area of Ashford where the Premises are located is in one of the least deprived wards and is in the 20 percent least income deprived neighbourhoods in England (fig 1)

Spelthorne has a low rate of unemployment being sited close to Heathrow: 1.4% of those economically active aged 16 to 64, compared to the South East (2.2%) and UK as a whole (3.5%). Average wages are slightly above regional averages at £827 per week for full-time employees (ONS).

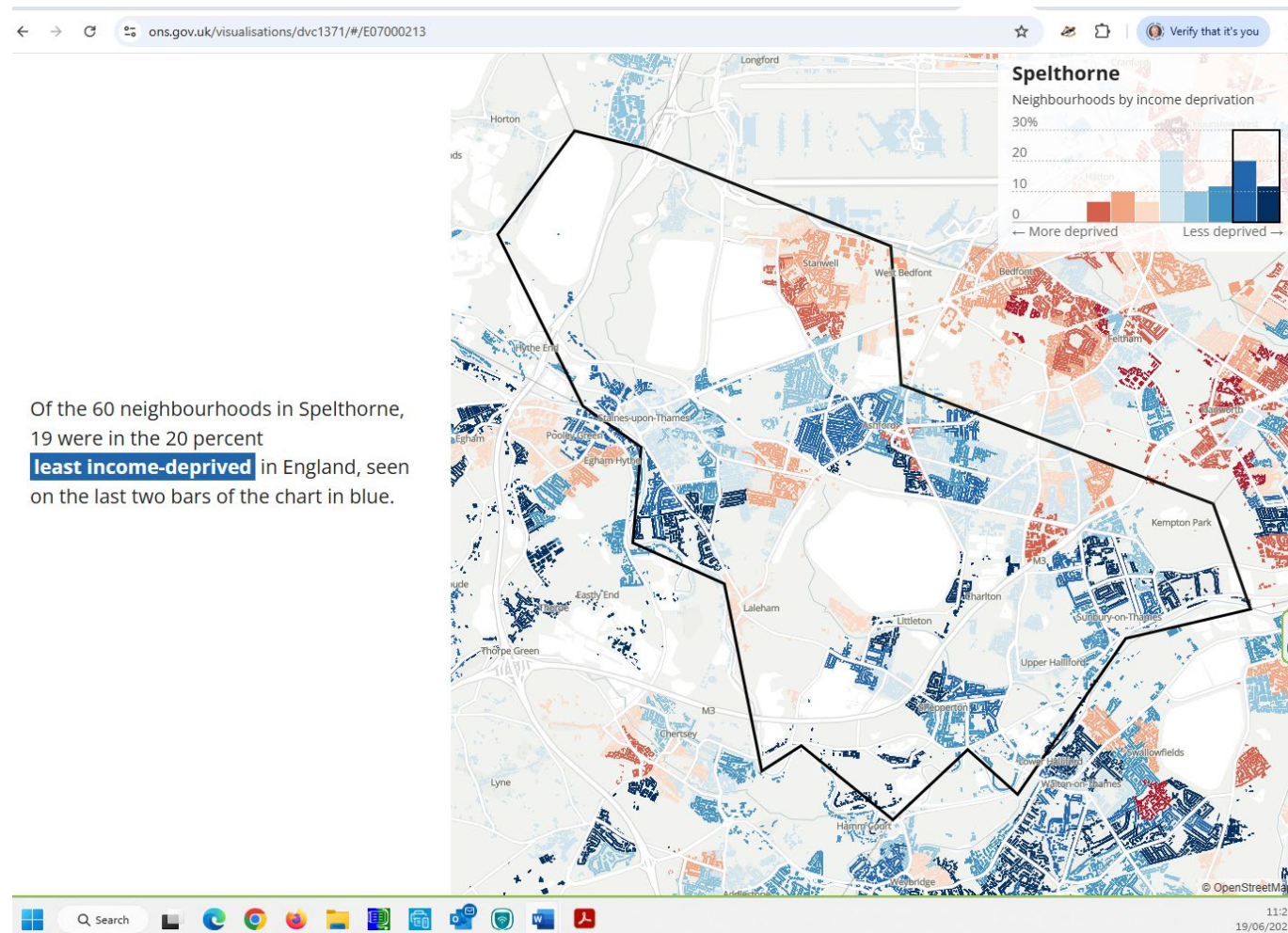


Fig 1

The health of people in Spelthorne is generally better than the England average. About 12.6% (2,225) children live in low-income families. Life expectancy for both men and women is higher than the England average. Life expectancy is 5.6 years lower for men and 6.0 years lower for women in the most deprived areas of Spelthorne than in the least deprived areas such as Ashford (Public Health England).

### **Crime**

The nearest police station is Staines Police Station 22 Kingston Road Staines TW18 4LQ open Monday to Sunday during the hours of 08:00-22:00. Alternate Hounslow Police Station 3-5 Montague Road TW3 1LB open 24/7

Ashford is the reported as the most dangerous medium-sized town in Surrey, and in the top 10 most dangerous of all communities in Surrey. The overall crime rate in was 102 crimes per 1,000 people which compares poorly to Surrey's overall crime rate, of 61 per 1,000 daytime population. For England, Wales, and Northern Ireland as a whole, Ashford is the 87th most dangerous medium-sized town, and the 995th most dangerous location out of all towns, cities, and villages (crimerae.co.uk/surrey/ashford)

In January – April 2025 nearly 700 crimes were committed in Ashford, the most common crimes in Ashford are violence and sexual offences, and anti social behaviour (police.uk/surrey/ashford)

### **Schools**

- **Primary**

- Clarendon Primary School (01784 253379) 0.2 miles
- St Michael's Primary School (01784 253333) 0.4 miles
- Fordway Centre SSS (01784 243365) 0.4 miles
- Ashford Primary School (01784 253310) 0.8 miles
- The Echelford Primary School (01784 253233) 1.0 mile
- Ashford Park Primary School ((01784 250305) 1.0 mile
- The Matthew Arnold School (01784 457275) 1.4 miles

- **Secondary**

- St James Senior Boys School (01784 266930) 0.3 miles
- Thomas Knyvette College (01784 243824) 0.6 miles

**Banks & ATMs**

Tesco ATM	less than 0.1 mile
Sainsbury's ATM	less than 0.1 miles
NatWest Bank	0.2miles
Stanwell Road Post Office	0.4 miles
Lloyds	1.7 miles

**Pawn Shops - nil****Pubs and Bars**

Kings Head (0.4 miles)  
Kings Fairway (0.5 miles)  
The District Arms (0.8 miles)

**Churches**

Ashford Congregational Church – Clarendon Road (<0.1 mile)  
St Michael's Fordbridge Road (0.2 miles)  
Ashford Baptist Church (0.2 miles)  
Woodthorpe Methodist Clarendon Road (0.2 miles)  
St Matthew - Church Road 0.3 miles  
St Hilda's – Stanwell Road/Woodthorpe Road - (0.4 miles)  
Salvation Army Woodthorpe Road (0.5 miles)  
There are no known mosques or temples in the vicinity

**Care Homes**

Cedars Care Home (01784 242356)	0.2 miles
Echelforde Care Home (01784 819505)	0.2 miles
Acacia Lodge (01784 452855)	1.8 miles

**Transport Hubs**

Bus stop Dudley Road

Bus stop Church Road Car Park

Ashford Railway Station

**Area of general interest to children**

The Kub Club 0.2 miles

Ashford Youth Club 0.9 miles

Woodthorpe Road Play Area 0.9 miles

Hengrove Park 1.1 miles

**Centres for vulnerable people**

Studholme Medical Centre (0.1 mile)

Clarendon Family Centre (0.2 miles)

RISKS	LEVEL	IMPACT	RISK MANAGEMENT	DATE REVIEWED
Children entering the site unnoticed or unchallenged particularly after school and during school holidays	Low	Severe to Business  Severe to Child	<p>The latest gambling participation survey (2024) reports the most common types of gambling activity that young people participated in were legal such as penny pushers or claw grab machines (20%), 4% played on fruit or slot machines and did not feature age restricted products, but only.</p> <p>There is only one entrance/exit from Church Road which is effectively monitored by staff at all times from the customer service desk and by the floor walkers.</p> <p>The site frontage is designed to obscure the interior so as not to be attractive to children and there is no advertising that is designed to be attractive to children at the entrance.</p> <p>Over 18s notices are clearly displayed at entrance to the Premises</p> <p>The site is strictly 18+ and the Operator has a Think 25 policy in place; anyone appearing to be under 25 will be asked to provide photographic ID . The Operator will only accept passports photo card driving licences and HM Forces ID cards. Anyone unable to verify their age is asked to leave immediately.</p> <p>Staff age verification training is delivered, with staff receiving training on induction and at least annually. Additional/remedial training is given when considered necessary. All training is recorded and stored electronically and in paper format on staff files.</p> <p>Gaming machines are clearly labelled as 18+ and set out so that players are not obscured from view. CCTV cameras and monitor screens are in use around the premises in the gaming area to monitor players at all times. CCTV is recorded, backed up by equipment in the back office and is available to download for 30 days.</p> <p>Stakes are returned to anyone who has played a category C or B gaming machine and unable to verify their age</p>	



			Age test purchasing is undertaken at least annually and the results are reported to the Gambling Commission on an annual basis. Any failure will be reviewed by senior management and additional training put in place. Further testing will be arranged within a week.	
Out of control gambling by other vulnerable people and failure to recognise signs associated with problem gambling or substantial changes in gambling behaviour	Low	<p>Moderate to business</p> <p>Severe to Vulnerable people</p>	<p>The Operator has a robust customer interaction policy &amp; procedure</p> <p>Staff receive training on induction and at least annually on how to identify customers who are or may be at risk of harm from gambling and how to interact with them.</p> <p>Customers are offered a number of self-help tools including timers, time outs and self-exclusion.</p> <p>Customer interactions are reviewed and assessed weekly for effectiveness. Where appropriate further and alternative interactions are used if no change in behaviour is seen.</p> <p>Operator led exclusions are used as a last resort where a customer displaying problems refuses to engage in customer interactions and continues to display signs of extreme problem gambling</p> <p>The site is designed to have effective monitoring of all customers at all times. CCTV cameras and monitor screens are in use around the premises in the gaming area to monitor players at all times. CCTV is recorded, backed up by equipment in the back office and is available to download for 30 days.</p> <p>The results of all customer interactions are recorded on SmartEXCLUSION tablet and reported to the Gambling Commission quarterly</p> <p>Marketing and advertising complies with the LCCPs, the CAP and BCAP standards and is not designed to attract vulnerable persons or encourage gambling beyond means</p>	

Failure to provide information on responsible gambling to players	Low	Severe to business  Severe to customers	<p>The Operator has stay in control posters displayed prominently</p> <p>The Cat B gaming machines display safer gambling messages and are programmed with reality checks</p> <p>Stay in control leaflets are made available in racks &amp; discreet locations</p> <p>Regular audit of poster &amp; leaflets to maintain stock levels</p>	
Failure to properly administer the self-exclusion process & maintain its effectiveness, including breaches & reinstatements	Low	Severe to business  Severe to customer	<p>At least two members of staff are employed at any given time on the basis of a max 1:4 ratio.</p> <p>Staff are required to review the self-exclusion data before starting each shift so they are familiar with those who have recently self-excluded from the site and other local AGCs.</p> <p>The site layout is designed for effective monitoring of customers entering premises from the customer service desk and by floor walkers</p> <p>CCTV at entrance to the premises and monitors on the walls aid identification of known excluders</p> <p>Use of on-site &amp; SmartEXCLUSION self-exclusion schemes</p> <p>Use of group WhatsApp to notify staff of customers attempting to, or actual breaches of self-exclusions</p>	
Failure to deal with customers making complaints about the gaming machines	Moderate	Moderate to business	<p>All gaming machines are sourced from licensed suppliers only</p> <p>All gaming machines are regularly maintained and switched off immediately where the outcome of a gambling fault is identified.</p>	

		Severe to customers	<p>Terms and conditions displayed at premises provide details of how to make a complaint</p> <p>Paper copies of complaints procedure and complaints form are available</p> <p>Staff are trained on induction on how to deal with customer disputes, including referrals to IBAS the ADR provider</p>	
Failure to identify attempts by third parties to launder money through the business	Low	<p>Severe to business</p> <p>Low to customers</p>	<p>There are no pawn shops identified in the local vicinity</p> <p>Effective monitoring of customers' behaviour by good line of sight from customer service desk and CCTV with monitors sited on the walls</p> <p>Staff are regularly trained to identify counterfeit money</p> <p>Staff are trained to identify unusual customers behaviour such as anonymous large spenders and customers trying to cash out without playing</p> <p>Change machines &amp; note takers are regularly inspected</p> <p>Incidents of concern including money lending are reported through the SmartEXCLUSION system and to the MRLRO</p>	
Poor security increasing vulnerability to crime	Low	<p>Severe to business</p> <p>Severe to customers</p>	<p>Cash float and money for banking are retained in a locked safe and deposited at the bank as soon as possible.</p> <p>Toilets are locked and can only be accessed by asking a member of staff to unlock them .</p> <p>Liaison with local police teams as appropriate</p> <p>Effective CCTV with monitors sited on the walls, with data recorded and stored for 30 days and available to download.</p>	

			<p>Toughened glass windows and doors with mag-lock fitted and in operation during hours of 2200-0800 and when refloats and empties are in progress</p> <p>All incidents recorded in incident log and reported to the Gambling Commission quarterly</p> <p>Intruder alarm installed and regularly serviced; staff will be issued with personal attack alarms if the need is identified</p>	
Failure to identify people entering the premises under the influence of or carrying drink or drugs	Low	<p>Severe to business</p> <p>Severe to Customers</p>	<p>Staff are trained to look out for customers entering the premises who may be under the influence of alcohol and/or drugs and to refuse entry or ask them to leave immediately</p> <p>Staff are trained to monitor customers entering the premises carrying alcohol and/or drugs and to refuse entry or ask them to leave immediately</p> <p>The customer toilet is locked and customers must ask a member of staff for the key</p> <p>Signs at the entrance to the Premises that no alcohol is permitted in the property</p>	
Anti-social behaviour outside the premises	Low	<p>Moderate to business</p> <p>Low to customers</p>	<p>The Operator acknowledges its public responsibility to ensure its Premises are not a source that public nuisance and disorder. It will work closely with the police and other local partnerships to reduce the risk of any impact.</p> <p>Staff are trained to monitor the external area around the entrance for any anti-social behaviour and to take appropriate steps. Anyone seen loitering around the entrance will be asked to move away.</p>	

			Where an incident appears to be escalating the staff with use the mag-lock to lock the door and engage with local partnerships to minimise the risk	
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