

Pleasure and Leisure Property Corporation PLC (PLPC) Policies

As a long established operator in Great Yarmouth, a holder of existing licences and with a strong understanding of the requirements of both the 2005 Gambling Act and Great Yarmouth's (GYBC) own Gambling Policies, we will ensure the casino operations are fully compliant, robust, monitored and maintained to the required standards at all times.

We wish to outline below the main policies and approach that will be adopted. Further detail and policies will be provided at a later stage.

Crime and Disorder

PLPC will put in place systems, policies, training and monitoring to ensure the 2005 Gambling Act licensing objectives are satisfied all times:

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

PLPC will also comply with all Codes of Practice issued by the relevant regulatory bodies and GYBC, and operate a safe and secure environment free of crime and disorder with a particular focus, but not exclusively, on:

- Money Laundering
- Illegal gambling
- Under 18's entering the premises
- Responsible gambling
- Antisocial behaviour
- Use of drugs
- Alcohol misuse
- Violence

Already with established and successful relationships with the police and key stakeholders, PLC will continue to provide the action and support necessary; consult and communicate actively with key bodies; monitor, review and evaluate the policies and systems in place, and make sure the building layout and design helps to minimise any crime issues.

A robust and detailed approach will be taken to security including CCTV, door supervision, training and police liaison.

Money laundering prevention

PLPC will establish detailed policies and systems to ensure Anti Money Laundering legislation is complied with and make sure that any efforts to launder the proceeds of criminal activity through the casino operations are prevented.

PLPC will appoint designated staff responsible for the implementation, monitoring and compliance with The Money Laundering Regulations 2007; delivering a clear auditing process, and liaising with the Gambling Commission (GC), Police, Serious Organised Crime Agency (SOCA) and GYBC Licensing Department where necessary.

Money lending between customers

PLPC will ensure that any money lending inside the casino is terminated immediately, and detailed training will be in place to identify suspicious activity and report and act immediately. This would focus on:

- Commercial (Profitable, money-making) lending
- Organised (Prearranged, planned) lending
- Systematic (Orderly, regular) lending
- Activity that involves Money Laundering

CCTV systems

The systems installed will be market leading and act as a tool to management in all respects including security, surveillance and training. This will be established with the support of the police.

The areas covered will include external perimeters; reception/lobby area; gaming and non-gaming areas, and the cash desk and count room area. A tight control and monitoring of results will be in place.

Social Responsibility Policy

“The Edge” will be a unique and exciting leisure and entertainment destination, and PLPC will continue to deliver a socially responsible development by complying with all the requirements of the Licence Conditions and Codes of Practice. As an existing leisure operator in the town, PLPC will also work closely with Gamcare and other socially responsible bodies in the gambling industry.

PLPC is fully aware of our duty to provide customers with a Duty of Care. This is particularly the case to ensure customers understand gambling, that they play in a safe environment; they enjoy their gambling and that they play responsibly.

To deliver a comprehensive socially responsible programme, PLPC will pay particular attention to:

- Training, on-going assessment and updated policies
- Robust age verification standards and implementation. This will include the nationally verified "Think 21" policy to prevent the underage from entering the casino
- Comprehensive security
- Thorough self-exclusion policies and systems for helping customers
- 'Help' literature promoting responsible gambling including leaflets, posters and sources of help. These will include indicators of problem gambling and self-exclusion processes. A designated relaxation and private area is already identified and the machines and tables will all include sources of help literature including the Gamcare helpline number
- Ensuring the marketing is not deliberately targeted at children or young people and that it complies with relevant policies and industry codes of practice

Staff training

PLPC is already a major employer in the town across a number of venues requiring a range of different skills. The staff training for the casino will cover:

- All employees
- Raising awareness of any issues and supporting the staff to deal with situations in an appropriate manner
- Social responsibility throughout the training process

Procedure for Self-Exclusion

PLPC's duty of care to its customers includes for those customers where gambling has unfortunately become a problem, and will include the provision of a self-exclusion facility. This allows customers to request their exclusion from the casino for a minimum of six months and a maximum period of five years. At the end of the period of self-exclusion the customer can opt for a further period of self-exclusion or can make a request to re-commence gambling.

The customer is provided with full details of the self-exclusion policy, explaining the full implications, before commencing, as the self-exclusion scheme cannot be withdrawn or amended during the period.

If a customer decides to self-exclude all relevant staff are informed for the period specified in the self-exclusion. At the end of any self-exclusion period, a full review takes place to determine if the exclusion should be extended or ended and agree any other parameters appropriate. If the decision is to recommence, a 24 hour cooling off period is in place.