

Reels Casino Slots Limited

34-36 High Street Yiewsley, UB7 7DP

OPERATIONAL AND SECURITY PLAN

Background

Reels Casino Slots Limited is a responsible and experienced independent operator of Adult Gaming Centres, and holds an Operating Licence issued by the Gambling Commission who strictly regulate all gambling operators. It is a family owned business and operates licensed AGCs in London and Essex. These include 24/7 operations with residential units above. All operate without any complaints of noise, nuisance, crime or disorder.

All of Reels Casino Slots AGCs operate similarly in a mixed-use/town centre environment under the supervision of a knowledgeable and experienced senior management team including the business owners. The owners are 'hands-on' operators and regularly visit each premises and communicate directly with neighbours including residents. All of the applicant's AGCs are staffed by a team of experienced and trained employees.

The premises are a ground floor premises in Yiewsley town centre, approximately 250 metres north of West Drayton train station and close to bus stops on the High Street. Customer access is directly from the pavement along the High Street and all customers will be clearly visible to staff as they arrive and enter the premises and when departing.

As a licensed operator, Reels Casino Slots Limited adopts a risk-based approach to security and social responsibility to ensure that licensing objectives are met. In addition to the particular matters set out in this Operational and Security Plan and as a licensed operator of AGCs, Reels Casino Slots Limited must comply strictly with all Gambling Commission regulations and all conditions set out in the operating licence. Further, operations at the premises shall be subject to conditions set out by the local authority in a premises licence. Pursuant to this, Reels Casino Slots shall have in place a Local Area Risk Assessment which shall be amended from time to time and all operational and security measures in the Local Area Risk Assessment shall be complied with.

Operational and Security Measures

General operational measures

The premises shall at all times operate in compliance with all laws, regulations, licensing and planning conditions and shall not operate outside the permitted hours set out in conditions to the premise licence and planning permission. This shall also include compliance with all measures set out in the Local Area Risk Assessment.

Staff shall meet and greet all customers and visitors on arrival, and shall move regularly around the shop floor to interact with customers.

During overnight opening periods, staff will interact with customers as they leave and encourage them to leave quietly and to be respectful of local residents, directing them to local public transport where appropriate.

Staff shall monitor and observe customer and visitor behavior while on the shop floor and via CCTV, having regard to the three licensing objectives set out below and to include observing those in the area immediately outside the premises.

At all times at least one member of staff must remain on the shop floor and shall move regularly around the shop floor to interact with and observe customers and visitors.

Staff shall provide assistance such as local transport information where appropriate.

A CCTV system shall be installed, operated and maintained as set out below.

Staff shall provide appropriate assistance to disabled persons with access needs.

Toilets are available for customers throughout all opening hours.

Staff shall at all times assist management with ensuring that the premises operates in compliance with the three main licensing objectives as set out by the Gambling Commission:

- 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 people from being harmed or exploited by gambling.

Training

All staff shall be provided with a copy of this Operational and Security Plan ("the Plan", "this Plan").

The Plan shall be reviewed and updated regularly by the senior management team.

In addition to general operational and customer service training, all members of staff shall have full training with regards to the matters set out in the Plan. This shall include the relevant security and social responsibility matters and procedures, including awareness of vulnerable persons and others with particular social needs.

All staff training shall be conducted by experienced and responsive managers from the beginning of the employment period, with quarterly and annual refreshers.

Security

External lighting shall illuminate the entrance doorway during late opening hours and there shall be no recessed areas along the shop front.

A clear line of sight will be maintained through the shop floor from the entrance to the rear of the gaming area.

The entrance door will open outward and entry to the premises will be monitored and controlled by staff. There will be an audible entry sound to alert staff during the day, and a door buzzer for periods when the Maglock is in use.

A Maglock will be installed so that during late hours access can only be gained through staff opening the door throughout the hours of 10pm to 6am.

A comprehensive CCTV system will be installed and maintained:

- Notices shall be prominently displayed within the premises stating that CCTV is in operation.;
- The system will comprise approx. 16 cameras with continuous audio and HD visual recording, and will cover all areas of the shop floor, entrance (internal and external), staff areas and external rear access/ storage areas;
- All recordings will be stored for 30 days and all staff can access CCTV audio-visual recordings where necessary to provide access to police and other authorised local authority officers
- Four of the CCTV cameras will focus on the shop floor and staff areas. Recordings from these will also be stored on a cloud-based system;
- All external cameras will be capable of providing good images in low light/at night;

- Staff can monitor live CCTV from a wall-mounted screen in the rear office. Managers also have remote access to CCTV using a mobile app.

Staff-only areas to the rear have keypad access and a wall mounted screen fitted to enable CCTV monitoring of the shop floor .

Staff carry personal Staffguard security fobs. Once activated these allow a remote third-party alarm provider to monitor premises CCTV and speak directly to staff.

Every gaming machine is on the TITO (ticket-in, ticket-out) ticketing system and any cash gaming transactions with customers are limited to the single secure paystation on the shop floor. All gaming machines are connected online to enable remote monitoring of suspicious activity. Staff also have access to live monitoring of all gaming machine transactions

Social Responsibility

Reels Casino Slots Limited apply a risk-based approach to deal with social responsibility. We have in place all necessary operating policies and procedures to promote the three licensing objectives.

Managers of Reels Casino Slots Limited engage actively with local authorities, other gambling premises and local watch schemes to share information about local crime, ASB, vulnerable persons.

We provide a safe environment for both customers and employees. Over 50% of customers are aged 40+ and typically over 60% are female.

A Local Area Risk Assessment will be produced in the course of the application for a premises licence. That document will deal with any local issues that present a risk to the community and neighbours or would otherwise prevent the operation from achieving the licensing objectives.

No person under 18 is allowed to enter the premises, whether or not accompanied by an adult. We operate a *Challenge 25* policy at all our premises. All customers who do not clearly look over 25 and have not previously provided satisfactory ID are challenged at the point entry.

Reels Casino Slots is a member of the national trade organization BACTA and works with other operators and BACTA to implement best practice operating measures. As part of BACTA and as part of its obligations under the Gambling Act 2005 regulations the business is subject to unannounced age-verification checks carried out by an independent third party.

Staff are trained to monitor customers and visitors and to look out for any problem behaviors, vulnerable persons, or other persons at risk.

All relevant interactions with customers and visitors are logged (see below) and problematic individuals may be banned from all of our venues immediately.

Alcohol is not served, consumed or otherwise permitted to be present on any of our premises, and inebriated or otherwise intoxicated individuals are refused entry.

Notices will be displayed with regard to the proof of age scheme and no alcohol.

Logging / recording for security and social responsibility

In addition to CCTV recording, the premises will keep a log and record all relevant interactions and incidents, ranging from simple low-level interactions concerning behavior, to refusals of entry, self-exclusions and behavior leading to individuals being banned from all venues other relevant issues.

Reels Casino Slots Limited use IHL's Smarhub tablet system for logging interactions and monitoring

customer self-exclusions. This is accessible to all staff and includes a daily log-in section where customer images and notes can be viewed by staff to ensure they are up-to-date and aware of any problem, banned or self-excluded persons. The system enables reference to images, for example of banned individuals, and also provides access to relevant information from other venues - such as where individuals are banned or self-excluded from all venues.

All new customer interactions and incidents database logs are reviewed daily by managers and can also be reviewed remotely by senior management.

Proposed Conditions

- There will be no more than 12 customers allowed on the premises between 10pm and 6am.
- There will be a minimum of 2 members of staff on the premises between 10pm and 6am.
- The front door will be closed between 10pm and 6am and during those hours customer access will be controlled by staff using a Maglock system.
- Between the hours of 10pm and 6am a member of staff will meet and greet each customer at the front door and staff will also be present when customers leave to open the door and will encourage them to leave quietly.