



CROWN LONDON ASPINALLS' **RESPONSIBLE GAMBLING POLICY 2017**

1. Introduction

For the vast majority of people, gambling is an enjoyable leisure and entertainment activity.

Crown London Aspinalls is committed to providing gambling services in a responsible manner and recognises that some patron's gambling behaviours may cause them personal and financial difficulties, and potentially their family, friends and the wider community may also be impacted.

An enormous emphasis has been placed on the protection of the young and the vulnerable in the *Gambling Act 2005 (Act)*. The need to adopt a responsible approach can be found throughout the Act, starting with the three objectives, one of which is 'protecting the young and vulnerable persons from being harmed or exploited by gambling'. The detailed requirements on how the 'young and vulnerable should be protected' is covered by the Commission's Licence Conditions and Codes of Practice (**LCCP**) document, and through conditions applied to the Operator's Licence.

The LCCP also focuses on a number of customer protection measures. These practices are organised into the following broad categories:

- Provision of Information;
- Self-Exclusion Provisions;
- Advertising and Marketing;
- Under 18's;
- Staff Training; and
- Customer Interaction.

2. Crown London's Responsible Gambling Policy

Crown London Aspinalls' Responsible Gambling Policy (**Policy**) is designed to ensure that gambling on its premises is conducted in a sustainable, safe and socially responsible manner. Crown London Aspinalls acknowledges that gambling is a person's individual choice and encourages patrons to gamble in a responsible manner.

All customer facing staff receive training and have a full understanding of the Policy in order to provide assistance and referral information available to patrons in the Club.

Management can provide responsible gambling information brochures and advice about the self-enrolment national self-exclusion scheme (**SENSE**), including information pertaining to any other problem gambling service that may be available.

SENSE is a voluntary self-exclusion scheme operated by the National Casino Forum on behalf of its members. SENSE is intended to provide the opportunity for patrons who believe they have a problem with their casino gambling to voluntarily self-exclude for a minimum period of 6 months from all land based casinos in the UK participating in the scheme. SENSE has replaced the Crown London Aspinalls' Voluntary Self Exclusion (VSE) programme.



3. Policy Objectives

Crown London Aspinalls' policy for identifying and assisting patrons who may have a problem with their gambling behaviours, is underpinned by a number of key objectives.

The objectives are:

- To protect the young and vulnerable;
- To promote safe and responsible gambling practices on its premises;
- To provide information to staff on observable signs that may indicate a customer is experiencing problems with their gambling behavior;
- To support patrons in managing their gambling behavior; and
- To provide appropriate information and referral for help.

These objectives set an overall framework for Crown London Aspinalls, in which Managers and staff contribute towards creating a safer gambling environment for patrons. They are consistent with provisions dealing with problem gambling, harm prevention, minimisation and enforcement, under gambling legislation.

Procedures for implementing the Crown London Aspinalls Policy comprises of three specific steps:

1. General practices to encourage responsible gambling;
2. Early interaction where potential problem gambling behaviour is suspected; and
3. Interaction where support and referral is required

4. General Practices

Both passive and active initiatives are used to raise awareness of problem gambling behaviours, to reduce the risks of gambling harm and to develop a culture of awareness amongst casino employees.

Initiatives include:

- SENSE brochures at prominent locations detailing the scheme, help available, information on treatment providers and information on how to gamble responsibly;
- The Gambling Helpline phone number of the displayed on all ATMs;
- Regular staff training on observable signs of problem gambling behaviour and social responsibility;
- Adherence to the policy;
- Best practices in serving alcohol through the Responsible Service of Alcohol Policy; and
- Information brochures available to employees in the staff areas.

a) Early Interaction

Procedures aim to identify observable signs that may indicate problem gambling behaviour and taking action in accordance with training.

Crown London Aspinalls undertakes to:



- Maintain strategies to intervene in an effective manner where problem gambling behaviours are identified;
- Ensure patrons take reasonable breaks and are not displaying observable signs of problem gambling behavior; and/or
- Use intervention methods to enquire, interview or, if appropriate, consider excluding individuals when lesser options are ignored.

b) Full Interaction

Should a patron display observable signs of problem gambling behaviour, where initiatives in early intervention are ignored, declined, or where the patron self identifies as a problem gambler Crown London Aspinalls may:

- Recommend enrolment onto SENSE, for a minimum period of six months;
- If the patron refuses to enroll onto SENSE, an automatic Company Led Exclusion (**CLE**) from the Club for a minimum period of 6 months; and/or
- Referral to the Gambling Helpline and/or specialist treatment providers

5. Signs of Problem Gambling Behaviours

Observable signs of problem gambling behaviours may include but are not limited to:

- Self-disclosing a problem of gambling behaviours or request to self-exclude;
- Signs of distress, including extended displays of anger while gambling.
- Fatigued or falling sleep on premises.
- Gambling for long periods without a break.
- Becoming argumentative and displaying unacceptable behavior.
- Irrational beliefs or remarks about gambling.
- Being uncomfortable or distressed by the amount of money or time they spend on their gambling.
- Attempting to borrow money from others
- Mood swings, irritability, agitation, restlessness, nil care about appearance and/or personal hygiene.
- Persistently demanding a refund of gambling losses, or seeking to borrow money from a third party.

The above list is not exhaustive.

6. Responsible Gambling Programme

The Club has adopted a programme incorporating four action levels of action, designed to implement the Policy.

The levels are:

- A compulsory staff training and awareness programme;
- Effective self-exclusion process promoting SENSE;
- Effective Company Led Exclusion application where it may be necessary for Crown London Aspinalls to be proactive in supporting a patron who is displaying observable signs of problem gambling behaviours and has refused to enroll onto SENSE;



- Use of appropriate responsible gambling literature; and
- Adherence to the LCCP.

a) Training

It is important to remember that casino employees are not counsellors or psychologists, qualified to diagnose or counsel problem gamblers. However, casino employees are trained to respond appropriately to those who display distress or request help.

This training is implemented and maintained by Crown London Aspinalls.

b) Patrons who self- identify as Problem Gamblers

Crown London Aspinalls has an operational policy of arranging for patrons who self-identify as a problem gambler, to be excluded from its premises. In caring for those individuals, Crown London Aspinalls' will ensure:

- The patron has the opportunity of voluntarily self-excluding from all land-based casinos operated locally and nationally by enrolling on to the SENSE scheme;
- However, if the patron declines to enroll onto the scheme they will be automatically excluded from Crown London Aspinalls through the Company Led Exclusion programme; and
- Referral to the Gambling Helpline and/or specialist treatment providers.

Crown London Aspinalls' policy is to remove, any excluded patron who attempts to enter or remain on the premises.

c) Advertising and Marketing

Crown London Aspinalls is under a responsibility to ensure that any advertising and marketing that is used complies with the *Gambling Act 2005*, the Code of Practice issued by the Committee of Advertising Practice (**CAP**) and the Broadcasting equivalent (**BCAP**) accompanied by a voluntary Gambling Industry Code of Practice.

A number of measures are in place to ensure compliance.

d) Responsible Serving of Alcohol

Crown London Aspinalls has a separate guidance promoting the responsible serving of alcohol to its patrons. This policy should be read in conjunction with the Crown London Aspinalls' Responsible Service of Alcohol Policy.

To summarise:

- Patrons who appear to be intoxicated are not allowed to enter the premises;
- Patrons who appear to be showing signs of intoxication are not to be served with further alcohol;
- Patrons on the gaming floor are not to be targeted with requests to consume alcohol but must be asked if they would like to 'take refreshment';
- Alcohol will not be used to promote gaming activities;
- Staff must not encourage excessive alcohol usage as a way of increasing service staff gratuities; and



- Any patron or guest under the influence of alcohol, are not permitted to gamble.

e) Challenge 21 Rule

Crown London Aspinalls is under a legislative responsibility and a mandatory condition of the Premises 05 Licence, to ensure that any person under the age of 18 is prohibited from entry to the premises.

A number of measures, controls and procedures are in place to comply with this important requirement including signs endorsing age verification.

Anyone on Crown London Aspinalls' premises appearing to be under the age of 21 will be required to show appropriate photographic identification. If ID cannot be provided, the patron will be required to leave immediately.

f) Approaching staff

If a patron approaches a member of staff and indicates that they have a problem with their gambling, the staff member will contact a member of the Management team as soon as possible. The staff member may also, if the opportunity arises, advise the patron of the whereabouts of the SENSE brochures¹ which will be of assistance to the patron.

g) SENSE

The national voluntary self-exclusion scheme replaces the company Voluntary Self-Exclusion programme. Enrolling onto SENSE will be for a minimum period of six months and cannot be withdrawn during this period. Removal from the SENSE exclusion list is not automatic once the six months has elapsed; a patron may approach any casino participating in the scheme to request removal.

h) Company Led Exclusion (CLE)

If a patron does not wish to enroll onto SENSE and Crown London Aspinalls is concerned about their gambling behaviours, Crown London Aspinalls will enter the patron automatically on to a Company Led Exclusion (CLE). The CLE will be in place for a minimum period of 6 months and this will not be lifted until such time the Company is satisfied the patron no longer has a problem with their gambling behaviours.

i) Crown Aspinalls VSE Programme²

Patrons who have voluntarily self-excluded (VSE) prior to the introduction of SENSE, will continue on the VSE programme, in line with the prescribed VSE procedure.

¹ The SENSE leaflet explains the scheme, offers helpline numbers; there is additional information on how to gamble responsibly.

² Withdrawn and replaced by SENSE 3 August 2015



j) Excluded Patrons

In the event an excluded patron gains entry into Crown London Aspinalls and gambles, the following will take place:

- The patron wins; the initial stake money will be returned to the patron with the remainder of funds retained and donated to a responsible gaming charity of Senior Management choice.
- The patron loses: The original stake is returned to the customer with the remainder of funds donated to a responsible gaming charity of Senior Management choice.