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Luxury Leisure Talarius – Security and Social Responsibility

Dear Sir/Madam,

At Luxury Leisure Talarius, we adopt a risk based approach to security and social responsibility at all of our stores to ensure we uphold the Licensing Objectives. The security department within Luxury Leisure has eight members of staff, including a National Security Manager, three Regional Security Managers and three auditors, whilst our compliance department has an additional three members of staff, including a National Compliance Manager, all working under the Head of Risk and Compliance. The majority of our stores are in prominent town centre locations and appeal to a wide demographic of clientele, ranging from young professionals through to retired individuals by providing a modern high street alternative to bingo clubs, casinos and bookmakers but currently our national statistics show that 65% of our customers are females aged over 45.

The assessment of risk to the licensing objectives at a particular venue location is supported by a bespoke open source risk identification tool designed exclusively for Luxury Leisure Talarius and used to compile comprehensive local risk assessments that deal with the threats local issues may present to the licensing objectives. In this way, the measures we employ to mitigate identified risks are tailored to that specific store.

We operate a 'Think 25 policy' nationally and invest heavily in staff training and independent 'Test Purchasing' conducted by Serve Legal (a well-known and respected national company who work across all licencing sectors). As a result of our compliance policies and processes, in 2018 our test purchase pass rate was 93.8% compared with the nearest competitor at 83% and the best of the operators in the LBO sector at 89%. (Source: Serve Legal).

We have very few issues related to crime, disorder or anti-social behaviour and where we identify individuals involved in such, they are banned from all of our stores immediately.

We are members of the two multi-operator self-exclusion schemes (MOSES) that are available in the AGC sector, Smart Exclusion and the BACTA scheme so that those who wish to self-exclude can do so from all of our premises and other AGC's in the locality.

We operate a system that our customers can use to help manage their time spent gambling – GambleWise. The system uses iBeacon technology and a phone based app that customers can use to set themselves time and attendance limits. If they visit a venue during a time period they have elected not then the system alerts them via their mobile device, it alerts the venue staff via an automated phone call and also a notification to the venue tablet so that staff can interact with the customer.

Quality local management, staff and training are our key strength, as this establishes strong and positive relationships with our customers, neighbours and local authorities, which ultimately leads to a solid reputation for responsible operating

Alcohol is not served or consumed on any of our premises and we have robust policies and procedures in place to ensure our compliance with regards to both the law and the License Conditions and Codes of Practice so that those under the influence of alcohol cannot enter our premises. Our compliance with Social Responsibility regulation was the subject of an in-depth Gambling Commission Corporate Assessment in 2015/2016 and no shortfalls were identified.

As a minimum standard, all of our stores have the following physical security measures and key security processes are recorded in a location security manual held on all sites and available on our company intranet.

CCTV - All of our stores are fitted for extensive CCTV coverage and our newest sites boast the latest HD cameras and digital recording equipment that ensure we retain a minimum of 28 days' footage. The CCTV can be viewed and reviewed remotely by key managers and security staff and in the event of an activation is monitored live at the Alarm Receiving Centre (ARC).

Intruder Alarm – All of our intruder alarm systems are monitored.

In this venue we will operate an enhanced security system using 'Protek' hold-up alarm technology where the alarm receiving centre can monitor via live CCTV footage and communicate with the venue staff via two-way audio communication, therefore removing the risk of false activations and the demand on local police resource as well enabling live monitoring of any event by trained staff who can intervene via the ceiling mounted speakers to assist staff.

Three safe system – Each of our stores utilises a system of 'day safe', time-lock safe and deposit safe to reduce the risk of cash loss in the event of a robbery or burglary.

Access Control – We will install a maglock to enable staff to control access during the late evening and night when required and this will be supplemented by the deployment of a Door Supervisor wearing a body-worn camera during the late afternoon and evening.

Third Party Cash in Transit (CIT) Service – Loomis, a professional and experienced CIT service provider, are contracted to service all of our stores with cash collection and coin delivery.

'Know your customer', is a best practice approach advocated by our regulator, the Gambling Commission and has been adopted as a core tenet of our customer service provision ensuring that we operate in a way that is socially responsible by assisting our staff identify problem gambling and also minimising the risk of crimes such as theft, money laundering and fraud. There is a key focus on training, retraining and testing in these areas.

We trade a significant number of businesses 24 hours a day due to the ever-increasing demands from our customers to have extended leisure time which is simply reflective of changing working patterns and the growing night time economies in our large towns and cities.

Where they exist, we subscribe to and are active members of local town centre 'shop watch' type schemes, utilizing any radio networks and contributing to intelligence sharing.

Where we do operate in the late evening or at night we often recruit staff specifically for night working. All of our supervisors and above are required to supply a CRB disclosure and all of our staff receive training as part of their induction and regular refresh training. At these stores, we constantly review the safety of both our customers and staff by providing door to door transport as required.

Mark Thompson
Head of Risk and Compliance