

LUXURY LEISURE, TALARIUS LTD & RAL LTD
NOVOMATIC GROUP
Fifth Avenue Plaza
Queensway North
Team Valley Trading Estate
Gateshead
NE11 0BL

Statement of Security and Compliance for

Admiral 39-41 Wellington House,

Manchester.

M1 1LQ

13 January 2023

At Luxury Leisure Talarius, we adopt a risk-based approach to our security and social responsibility provision to ensure we uphold the Licensing Objectives at every location where we operate. The security department within Luxury Leisure has 13 members of staff, including a National Security Manager, five Regional Security Managers and four auditors, whilst our compliance department has an additional three members of staff, including a National Compliance Manager, Safer Gambling Manager and Data Protection Officer, all working under the Risk and Compliance Director.

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 a more elderly, often retired customer base by providing a modern high street alternative to bingo clubs, casinos and bookmakers. Currently our national statistics show that 65% of our customers are females aged over 45.

As with all of our venues the **Admiral Manchester** premises 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 with extensive CCTV coverage and are equipped with 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 alarm activation is monitored live at the alarm monitoring station. In our **Admiral Manchester** Piccadilly venue we have 47 cameras including 4 externally, covering the perimeter of the building.

Intruder Alarm – All of our venues are fitted with an intruder alarm system and this is monitored.

Hold-Up Alarm – We install and use ‘live monitored’ hold-up alarm systems in our venues. They use technologies that allow the monitoring station to view a venue where the alarm has been activated via a live CCTV stream and communicate with the venue staff through two-way audio. Monitoring station interventions often de-escalate incidents but if there is an emergency, then the call is made to the Police or other emergency service.

This has the impact of removing the risk of false activations and the demand on local police resource as well as enabling live monitoring of any event by trained staff who can intervene via the ceiling mounted speakers to assist staff by deterring potential offenders and de-escalating confrontational situations.

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 – The automatic doors in **Admiral Manchester** can be turned on to allow a physical control of access but we employ door supervisors between the hours of 16:00hrs and 04:00hrs Monday – Thursday and between 12:00hrs and 07:00hrs Friday – Sunday.

Our reporting also shows that there have been zero security incidents between the hours of 04:00hrs and 08:00hrs since June 2019 when we commenced a trial of 24 hours operation.

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.

We train our staff to ‘Know your customer’. This is an approach advocated by 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 such as and contributing to intelligence sharing with our local partners. We are active members of the **Manchester Business Crime Reduction Partnership (MBCRP)** and the **Betwatch** sub-group at which we are always represented and liaise with local police, licensing and other stakeholders.

Where we do operate in the late evening or at night, we often recruit staff specifically for night working and this is the case in **Manchester**. All of our supervisors and above are required to supply a Disclosure and Barring Service (DBS) report and all of our staff receive training as part of their

induction and also 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.

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 a specific venue.

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 2022 our test purchase pass rate was 94% compared with the rest of the AGC sector at 83% and 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 also have installed in all of our venues, the technology to support Gamblewise, an application that allows customers to set themselves limits on the times and location they want to play and alerts them should they attend a location or visit a venue at a time or date when they have elected not to. The system also alerts staff who are trained to then conduct an interaction with the customer. We pay for this so it is free of charge for our customers to use.

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. It should be noted that as part of delivering our 'best in class' service and maintaining a high level of supervision and safety, a minimum of 4 employees are always on duty in **Admiral Manchester**. This does not include door supervisors during the times when they are on duty.

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 the Licence Conditions and Codes of Practice that govern the gambling sector and are designed to ensure the Licensing Objectives are upheld by operators, was the subject of an

in-depth Gambling Commission Corporate Assessment in 2020. And we were the first UK operator to achieve the global G4 accreditation for social responsibility.

Mark Thompson
Risk and Compliance Director
