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

Luxury Leisure Talarius – Security and Social Responsibility

Dear Sir/Madam,

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 15 members of staff, including a National Security Manager, 6 Regional Security Managers and 4 auditors, whilst our compliance department has an additional 6 members of staff, including a National Compliance Manager, two Safer Gambling Managers and a 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 customers by providing a modern high street alternative to bingo clubs, casinos and bookmakers.

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 2023 our test purchase pass rate was 94% compared with the rest of the AGC sector at 76% and the LBO sector at 91%. (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. All staff complete an internal **conflict management training** module, reinforced through a workshop delivered by our

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internal training ambassadors and in some areas we use and SIA accredited external company provide further training in conflict management to venue staff.

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

We offer a range of gambling management tools and encourage and assist our customers to manage their gambling in order to prevent behaviour that may be harmful. To assist with this, we have installed the technology to support **Gamblewise,** an application that allows customers to set themselves limits on the times and locations 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.

This is in addition to other measures we deploy such as training our staff to identify potential indicators of problem gambling and to **interact** with customers, providing them with advice and **signposting** them to sources of help should they need it.

Quality local management, staff and training are our key operational strengths, 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 2 employees are always on duty. 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 Licence Conditions and Codes of Practice so that those under the influence of alcohol cannot enter our premises. In addition we have stringent policies to refuse and remove those who appear intoxicated through either alcohol or drugs or appear vulnerable in other ways, such as homelessness. We are registered with the Streetlink network so that our staff can report instances of homelessness.

Indeed, our compliance with the Licence Conditions and Codes of Practice that govern the gambling industry was the subject of an in-depth Gambling Commission corporate assessment in 2023 which found no short-comings in our policies and processes, and we were the first UK operator to achieve the global **G4 accreditation** for social responsibility.

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 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 30 days' footage to standard BS 62676. 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.

Intruder Alarm – All of our venues are fitted with an intruder alarm system to standard BS PD6662 and this is monitored.

Hold-Up Alarm – We install and use a 'live monitored' hold-up alarm system in our venues called **Protek**. It uses the latest technologies that allow the monitoring station to view a venue 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 directed 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. If police are called then a meaningful commentary of events is given before they arrive, further reducing the risk to them.

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 through the segregation of cash and restrictions on access. The safes we use are Grade 1 with a £10,000 cash rating.

Access Control – The doorset incorporates a 'Maglock' device that allows staff to control access during specific time frames or as required.

Where required, we employ SIA accredited door supervisors through a reputable company we work with nationally.

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

Our staff are trained to 'Know your customer'. This approach 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.

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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 'Business Crime Reduction Partnerships' or equivalent schemes, utilizing any radio networks and contributing to intelligence sharing.

We are also part of the 'Walksafe' safe space network, providing safe places for women and vulnerable people using the Walksafe app to seek refuge when in need.

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 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.

Mark Thompson
Risk and Compliance Director

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