PROPOSED SCHEDULE OF ADDITIONAL PREMISES LICENCE CONDITIONS

Gambling Act 2005 – Adult Gaming Centre Premises Licence

Applicant: Golden Slots (Southern) Limited
Premises: 39 Church Road, Ashford, Surrey TW15 2QF
Licensing Authority: Spelthorne Borough Council

Preliminary provisions

These conditions are proposed as additional, premises-specific conditions under section 169 of the Gambling Act 2005, having regard to the location of the premises, the protection of children and other vulnerable persons from being harmed or exploited by gambling, and the concerns identified in the Licensing Sub-Committee's decision dated 17 October 2025.

These conditions are additional to the mandatory and default conditions applicable to an Adult Gaming Centre premises licence and to the requirements of the operator's Gambling Commission operating licence.

For the purposes of this Schedule:

- **"Licensable gambling hours"** means any period during which customers are permitted to use gaming facilities at the premises.
- **"Trained member of staff"** means an employee who has completed the training and assessment required by Condition 5.
- **"Verification"** means an identity and age check undertaken by a trained member of staff using acceptable identification and the premises' documented verification procedures.
- **"Relevant incident"** means an attempted underage entry, suspected use of false identification, exclusion breach, safeguarding concern, suspected gambling-related harm, crime or disorder incident, or substantiated complaint concerning the operation of the premises.

Condition 1 — Permitted hours

1.1. The premises shall not be open to customers for gambling outside the hours of **09:00 to 23:00 daily**.

Condition 2 — Staff-administered verification before gambling

2.1. No person shall be permitted to commence gambling at the premises until a trained member of staff has completed the premises' identity and age-verification procedure.

2.2. The procedure shall require the customer to present acceptable photographic identification sufficient to establish that the customer is aged 18 years or over and to permit the staff member to check the customer's identity against any applicable exclusion information lawfully held by the operator.

2.3. Where satisfactory verification cannot be completed, the person shall not be permitted to gamble.

2.4. A functioning ultraviolet (UV) identification scanner, or an equivalent document-authentication device, shall be installed and available at the staff-administered verification point whenever the premises are open for gambling. Trained staff shall use the device to examine identification where authenticity is in doubt and shall refuse gambling access where satisfactory verification cannot be completed. The device shall be checked for operational readiness at the start of each trading day.

2.5. The operator shall maintain a written verification procedure at the premises specifying acceptable documents, the steps to be followed where a document cannot be verified, and the process for referring doubtful cases to the duty supervisor.

2.6. Every customer wishing to gamble shall be registered under the operator's Verified Player Access customer registration scheme before gambling is permitted. The registration shall record the customer's verified identity and support checks against applicable exclusion information and the recording of relevant customer welfare interactions, subject to applicable data-protection requirements.

Condition 3 — Minimum staffing

3.1. A minimum staffing complement of **three trained operational employees** shall be rostered and physically present at the premises throughout licensable gambling hours. At least two shall remain actively on duty and deployed on the shop floor continuously monitoring the premises, with one supervising the entrance and arrivals and the other supervising the gaming area and customer welfare.

3.2. One of those employees shall be designated as the duty supervisor for each shift.

3.3. The third trained operational employee shall provide relief for staff breaks, toilet checks, customer interventions and any other operational issue. A handover shall be completed before either monitoring employee leaves their position. Employees on breaks or undertaking separate duties shall not count towards the two employees continuously monitoring the shop floor. Breaks and other duties shall be staggered, and additional trained relief shall be provided where simultaneous demands would otherwise reduce continuous shop-floor monitoring below two employees. An employee taking an authorised break may count towards the three-person complement only while physically present at the premises, but shall not count towards the two actively monitoring employees.

3.4. If fewer than three trained operational employees are physically present at the premises, or at least two cannot remain actively deployed on the shop floor continuously monitoring the entrance and gaming area, no new customer shall be admitted for gambling and the operator shall cease making gambling facilities available to customers until both staffing requirements are restored. Customers shall be managed safely during any suspension.

3.5. A staffing rota and attendance record identifying the three-person staffing complement, the designated duty supervisor, entrance-supervision, floor-monitoring and relief roles, and break and handover arrangements shall be maintained. Records shall demonstrate continuous two-person shop-floor monitoring and shall be retained for at least 12 months.

Condition 4 — Entrance supervision

4.1. During licensable gambling hours, the entrance shall be subject to active supervision by a trained member of staff.

4.2. The entrance shall be managed so that a person cannot proceed into the customer gambling area without passing through the verification procedure required by Condition 2.

4.3. Staff shall monitor the entrance and the area immediately adjoining the premises frontage for attempted underage entry, excluded persons attempting entry, disorder and safeguarding concerns associated with the operation of the premises.

4.4. Where a relevant incident occurs at the entrance or immediately outside the premises, staff shall take appropriate action within the operator's lawful control and record the incident in accordance with Condition 8.

4.5. This condition does not require staff to police the public highway or exercise powers over persons outside the operator's lawful control.

Condition 5 — Staff training and safeguarding

5.1. Before undertaking duties involving customer admission, supervision or gambling-related customer interaction, each relevant employee shall complete documented training covering:

a. Age verification and identification of false documents;
b. Prevention of underage gambling;
c. Identification of visible and less readily apparent indicators of gambling-related harm;
d. Customer interaction and escalation procedures;
e. Self-exclusion and refusal of entry;
f. Safeguarding of children and vulnerable adults;
g. Management of intoxicated or disorderly persons; and
h. Incident reporting and emergency procedures.

5.2. Completion of training shall be assessed and recorded before the employee undertakes the relevant duties without direct supervision.

5.3. Documented refresher training shall be completed at intervals not exceeding six months. Additional training shall be provided promptly following any material change to the verification, safeguarding, safer-gambling or exclusion procedures, or where an audit or incident identifies a training need.

5.4. A designated safeguarding lead shall be identified for the premises, together with a named deputy or alternative escalation contact.

5.5. Training records, assessment records and the current safeguarding escalation procedure shall be available at the premises, electronically or in hard copy, for inspection by authorised officers.

Condition 6 — CCTV

6.1. A digital CCTV system shall be installed and maintained in working order whenever the premises are open for gambling.

6.2. The system shall provide coverage of:

a. The customer entrance and exit;
b. The verification point;
c. The customer gambling area;
d. The customer service or cash-handling position; and
e. The premises frontage and immediate external entrance area, insofar as lawful and reasonably practicable.

6.3. Recorded images shall be of sufficient quality to permit identification of persons entering the premises, subject to the limitations of lighting and camera positioning.

6.4. CCTV recordings shall be retained for a minimum of 31 days, unless a longer period is required for a specific lawful investigation.

6.5. A trained member of staff shall be capable of retrieving and exporting relevant footage for lawful disclosure to the police or other authorised regulatory bodies.

6.6. A CCTV operational check shall be carried out at the start of each trading day and recorded.

6.7. Any material failure affecting entrance, verification-point or customer-area coverage shall be recorded immediately. Where the failure prevents effective supervision or verification and no effective alternative control is available, customer admission for gambling shall cease until adequate coverage or an equivalent temporary safeguard is restored.

Condition 7 — Independent age-verification testing

7.1. The operator shall commission independent test-purchasing or age-verification compliance testing at the premises at least once every six months.

7.2. Testing shall assess the effectiveness of the premises' admission and age-verification arrangements, including different operating periods where reasonably practicable.

7.3. The operator shall retain the test report and a record of any corrective action for at least 24 months.

7.4. Where a test identifies a failure, the duty manager or senior management shall be notified immediately and shall review the failure without delay and in any event within seven days. Appropriate corrective action shall be implemented and documented. Any affected employee shall complete targeted retraining within 24 hours of notification of the failure, or shall not

perform verification duties without direct supervision until that retraining is completed. A repeat independent test shall be commissioned within 14 days of the failure and carried out as soon as reasonably practicable. A second failure shall be escalated to senior compliance management with a documented corrective-action plan.

Condition 8 — Recorded safeguarding and safer-gambling interventions

8.1. The premises shall maintain an incident and customer-interaction recording system.

8.2. The following shall be recorded:

a. Refusals of entry arising from age, identification, exclusion, intoxication or safeguarding concerns;
b. Suspected attempts by children to enter the premises;
c. Suspected breaches of self-exclusion;
d. Customer interactions prompted by indicators of gambling-related harm;
e. Referrals or escalations to the duty supervisor or safeguarding lead;
f. Relevant crime, disorder or antisocial-behaviour incidents associated with the premises; and
g. Complaints relating to the premises' effect on the immediate locality.

8.3. Each record shall include the date, time, nature of the concern, action taken, responsible staff member and any required follow-up.

8.4. The duty supervisor shall review recorded incidents before the end of the relevant shift, or as soon as reasonably practicable where an incident requires urgent attention.

8.5. Records shall be retained for at least 12 months, subject to applicable data-protection requirements, and shall be made available to authorised officers upon lawful request.

Condition 9 — Exclusion controls

9.1. The premises shall maintain and operate procedures for enforcing self-exclusion and other lawful exclusions applicable to the premises.

9.2. Before a person is permitted to gamble, the verification procedure shall include a check against the exclusion information lawfully available to the operator.

9.3. Where an applicable exclusion is identified, the person shall not be permitted to gamble.

9.4. Any attempted breach of exclusion shall be recorded in accordance with Condition 8.

9.5. Staff shall receive training in the operation of exclusion procedures and the appropriate response where an excluded person attempts to enter or gamble.

Condition 10 — Management audit

10.1. A documented compliance audit shall be completed by the premises manager or another suitably trained manager at least once every calendar month.

10.2. The audit shall cover:

a. Three-person staffing compliance, continuous two-person shop-floor monitoring and relief arrangements;
b. Entrance supervision and verification procedures;
c. CCTV operation and recording checks;
d. Age-verification testing and corrective action;
e. Training records;
f. Safeguarding and customer-interaction records;
g. Exclusion procedures; and
h. Complaints and incidents associated with the immediate locality; and
i. Shopwatch / Betwatch participation and radio availability.

10.3. Any non-compliance shall be assigned a corrective action, responsible person and target completion date.

10.4. A senior manager shall review the audit findings at least quarterly.

10.5. Audit records and corrective-action records shall be retained for at least 24 months and made available to authorised officers upon lawful request.

Condition 11 — Frontage and locality-related incidents

11.1. Staff shall undertake and record a visual inspection of the premises entrance and immediately adjoining frontage at opening, at closing and at intervals not exceeding two hours during trading.

11.2. The inspection shall identify any apparent obstruction, disorder, safeguarding concern or other incident reasonably associated with the operation of the premises.

11.3. Where such a concern is identified, staff shall take action within the operator's lawful control and, where appropriate, contact the police, local authority or other relevant service.

11.4. Complaints received from residents, businesses or other members of the public concerning the operation of the premises shall be logged, acknowledged within five working days where contact details are supplied, and reviewed by the premises manager.

11.5. The premises manager shall include relevant frontage incidents and complaints in the monthly audit required by Condition 10.

Condition 12 — Pre-opening verification

12.1. No licensable gambling shall take place at the premises until the following have been completed:

a. Installation, commissioning and operational testing of the CCTV and mandatory facial recognition systems;
b. Establishment and testing of the verification procedure;
c. Provision and testing of the identification-authentication equipment;
d. Completion of the required staff training and assessments;

e. Approval and practical testing of a staffing rota demonstrating the three-person complement, continuous two-person shop-floor monitoring, relief, breaks and handovers required by Condition 3;
f. Establishment of safeguarding, incident-recording and exclusion procedures; and
g. Appointment of the designated safeguarding lead and escalation contacts.

12.2. A written pre-opening compliance checklist shall be completed and signed by a senior manager of the operator.

12.3. The completed checklist and supporting test records shall be retained at the premises and made available to authorised officers upon lawful request.

12.4. Where a safeguard required by Conditions 2–6, 9 or 16 is absent or materially ineffective, the premises shall not commence licensable gambling until the deficiency has been remedied.

Condition 13 — Shopwatch / Betwatch participation

13.1. Before the premises opens for gambling, the operator shall apply to join the local Shopwatch, Betwatch or equivalent business crime-reduction scheme serving Ashford, where such a scheme is operating and accepts Adult Gaming Centre premises as members.

13.2. Where membership is available, the operator shall maintain active membership throughout the period during which the premises operates, comply with the scheme's lawful participation requirements and ensure that the duty supervisor has access to the scheme's current incident-reporting and communication arrangements.

13.3. Where the scheme provides a radio communication network and permits the premises to participate, a functioning scheme radio shall be available for use during licensable gambling hours. Staff shall be trained in its use and shall use it, where appropriate, to report or receive information concerning crime, disorder, antisocial behaviour and safeguarding incidents relevant to the premises.

13.4. Evidence of the application, membership status, relevant staff training and any periods when the scheme or radio facility is unavailable shall be retained at the premises and made available to authorised officers upon lawful request.

13.5. Where the relevant scheme declines membership, ceases operating or does not offer a radio facility to the premises, the operator shall retain written evidence of that circumstance and review the availability of an equivalent local scheme at least once every six months.

Condition 14 — No automated teller machines

14.1. No automated teller machine (ATM), cash machine or other self-service cash-withdrawal facility shall be installed, operated or made available within the premises.

14.2. No automated teller machine (ATM), cash machine or other self-service cash-withdrawal facility shall be installed, operated or made available on the external frontage or any other external area forming part of, or under the control of, the premises.

14.3. The operator shall not advertise, direct customers to, or facilitate access to a cash-withdrawal facility as part of the operation of the premises. This condition does not restrict customers from using independently operated facilities elsewhere in the locality.

Condition 15 – Mandatory Community Wellbeing and Safeguarding Engagement

15.1. The premises licence holder shall, before the commencement of gambling operations, formally contact Spelthorne Borough Council's Community Wellbeing and Housing Committee, or any successor committee exercising equivalent functions, to establish arrangements for ongoing engagement concerning community wellbeing, safeguarding and gambling-related harm.

15.2. The premises licence holder shall be required to seek opportunities to engage with the Committee and relevant Council officers concerning the protection of children, vulnerable persons and the wider community, including participation in appropriate meetings, consultations and safeguarding initiatives where invited or permitted.

15.3. The premises licence holder shall maintain a documented programme of community engagement and shall make formal contact with the Committee or its designated officers at least once every six months, offering to provide relevant information concerning safeguarding arrangements, community concerns, gambling-related harm prevention and the effectiveness of the premises' protective measures.

15.4. The premises licence holder shall consider and formally respond to any relevant safeguarding recommendations received through this engagement and shall document any resulting changes to its operating procedures, staff training or Local Area Risk Assessment.

15.5. A Community Engagement Register shall be maintained recording all correspondence, meeting requests, meetings attended, recommendations received, actions taken and reasons for any recommendations not adopted.

15.6. The Community Engagement Register shall be reviewed by senior management at least every six months and made available to the Licensing Authority upon reasonable request.

15.7. Where the Committee declines engagement, does not respond or is unable to accommodate the premises licence holder's participation, the premises licence holder shall retain documentary evidence of its reasonable attempts to engage and shall continue to discharge its obligations under this condition.

15.8. Compliance with this condition shall not depend upon the Committee agreeing to meet, accepting the premises licence holder as a participant or endorsing the operation of the premises.

Condition 16 — Mandatory facial recognition safeguards

16.1. The premises licence holder shall install, commission and introduce mandatory facial recognition before permitting any licensable gambling at the premises and shall operate the

system throughout licensable gambling hours. The system shall support the identification of persons subject to applicable exclusions and the verification of registered customers.

16.2. The licence holder shall maintain documented data-protection governance for the mandatory facial recognition system, including its Article 6 lawful basis, applicable Article 9 condition, data protection impact assessment, necessity and proportionality assessment, privacy notices, data minimisation, retention, access controls and security arrangements.

16.3. Before licensable gambling commences, a senior manager shall sign and retain a commissioning and operational-readiness record confirming installation, system testing, staff training and the documented safeguards required by Condition 16.2.

16.4. The mandatory facial recognition system shall be operational during licensable gambling hours and shall be checked at the start of each trading day. Staff shall be trained in its operation, limitations, false matches and escalation procedures. No person shall be refused admission or gambling solely on an automated facial-recognition match without trained staff review and an appropriate opportunity to challenge the result.

16.5. Facial recognition shall supplement, and shall not replace, staff-administered identity and age verification under Condition 2, entrance supervision under Condition 4, safeguarding interventions under Condition 8 or exclusion checks under Condition 9.

16.6. System failures, suspected misidentifications, complaints and material data-protection incidents shall be documented, escalated and reviewed. If the mandatory facial recognition system is unavailable, admission for gambling and the provision of gambling facilities shall be suspended until the system is restored. Customers shall be managed safely, and all other mandatory safeguards shall be maintained.

16.7. Records of the legal assessment, commissioning, training, daily operational checks, failures, corrective actions and periodic reviews shall be retained in accordance with applicable data-protection requirements and made available to authorised regulators upon lawful request.

16.8. Facial recognition is a mandatory operating safeguard. Installation, commissioning and operation shall not be treated as optional or deferred until after opening. The licence holder shall maintain the system and remedy faults promptly, with any interruption managed in accordance with Condition 16.6.