

GALA CORAL
GROUP

The Licensing Authority
Licensing Services
Bath and North East Somerset Council
9 – 10 Bath Street
Bath
BA1 1SN

28th February 2011

By Hand

Dear Sir

GALA CASINOS LIMITED

PROPOSED GALA CASINO, GROUND, MEZZANINE & LOWER GROUND FLOOR (WITH AN ENTRANCE FROM A NEW PIAZZA OFF WALCOT STREET) OF A PROPOSED DEVELOPMENT ON LAND CURRENTLY KNOWN AS WALCOT STREET CATTLE MARKET CAR PARK, WALCOT STREET, BATH, BA1 5BD

APPLICATION FOR PROVISIONAL STATEMENT – SMALL CASINO LICENCE

GAMBLING ACT 2005

We refer to the above and enclose:

1. Notice of Application for Provisional Statement for a Small Casino Licence including:
 - (a) Annex A;
 - (b) GamCare Certificate of Social Responsibility.

2. Bundle of Photographs and Plans comprising:
 - (i) Site Location - Photograph;
 - (ii) Site Location - Plan;
 - (iii) Ground Floor Drawing Number NW1881/001;
 - (iv) Mezzanine Floor Drawing Number NW1881/002;
 - (v) Lower Ground Floor Drawing Number NW1881/003;



INVESTOR IN PEOPLE

Gala Coral Group, New Castle House, Castle Boulevard, Nottingham, NG7 1FT

Telephone 0115 851 7500 **Fax** 0115 851 7536

Gala Coral Group Limited Registered Office 71 Queensway, London W2 4QH

Web www.galacoral.com Registered in England 7254686



(vi) Proposed Cross Section.

3. Fee in the sum of £8,000.

We would be grateful if you could please kindly acknowledge receipt.

Within the application we have included a request to exclude the default condition so as to enable the proposed premises to provide facilities for gambling 24 hours a day, 7 days a week.

We can confirm that a copy of this letter and the statutory notice has been sent to the responsible authorities listed at the bottom of this letter.

We have also arranged for the application to be advertised in the local press. A copy of the newspaper will be forwarded to you in due course.

We have also arranged for the notice of application to be displayed on the site.

Should you wish to discuss this application then please do not hesitate to contact Ewen Macgregor on 0115 851 7534.

Yours sincerely,


EWEN MACGREGOR
GROUP LEGAL COUNSEL
GALA CORAL GROUP

c.c – by email and Special Delivery

The Gambling Commission, Victoria Square House, Victoria Square, Birmingham, B2 4BP
(info@gamblingcommission.gov.uk)

HM Revenue and Customs, National Registration Unit (Betting and Gambling), Portcullis House, 21 India Street, Glasgow, G2 4PZ (nrubetting&gaming@hmrc.gsi.gov.uk)

Avon and Somerset Constabulary, Licensing Bureau, Bath Police Station, Room 117 Manvers Street, Bath, BA1 1JN (liquorlicensing@avonsomerset.pnn.police.uk)

Avon Fire and Rescue, Temple Back, Bristol, BS1 6EU (licensing2003@avonfire.gov.uk)

Environmental Health Protection Manager, 9 - 10 Bath Street, Bath, BA1 1SN
(environmental_protection@bathnes.gov.uk)

Planning Services, PO Box 3343, Bath, BA1 2ZH (development_control@bathnes.gov.uk)

Local Safeguarding Children Board, PO Box 3343, Bath, BA1 2ZH
(child_protection@bathnes.gov.uk)

Application for a provisional statement under the Gambling Act 2005 (standard form)**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is in respect of a vessel the application should be made on the relevant form for that type of premises.

Part 1 – Type of premises to which the application relates

Regional Casino <input type="checkbox"/>	Large Casino <input type="checkbox"/>	Small Casino <input checked="" type="checkbox"/>
Bingo <input type="checkbox"/>	Adult Gaming Centre <input type="checkbox"/>	Family Entertainment Centre <input type="checkbox"/>
Betting (Track) <input type="checkbox"/>	Betting (Other) <input type="checkbox"/>	

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A**Individual applicant**

1. Title: Mr Mrs Miss Ms Dr Other (please specify)

2. Surname:

Other name(s):

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

3. Applicant's address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant's operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation: GALA CASINOS LIMITED

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

7. The applicant's registered or principal address:

71 QUEENSWAY
LONDON

Postcode: W2 4QH

8(a) The number of the applicant's operating licence (as given in the operating licence):

000 - 002348 - N - 1024012

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

9. Tick the box if the application is being made by more than one organisation.

[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Part 3 - Premises Details

10. Proposed trading name to be used at the premises (if known): GALA CASINO

11. Address of the premises (or, if none, give a description of the premises or proposed premises and their location):

GROUND, MEZZANINE & LOWER GROUND FLOOR (WITH AN ENTRANCE FROM A NEW PIAZZA OFF WALCOT STREET) OF A PROPOSED DEVELOPMENT ON LAND CURRENTLY KNOWN AS WALCOT STREET CATTLE MARKET CAR PARK,
WALCOT STREET,
BATH

Postcode: BA1 5BD

12. Telephone number at premises (if known): UNKNOWN

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

The casino is part of a proposed 5 storey re- development of the Walcot Street Cattle Market Car Park. The casino will occupy the ground floor, and lower ground floor of the proposed development , with an entrance from a new Piazza off Walcot Street. The casino will also include a mezzanine level.

Lock up shops/restaurants will complete the frontage to the Piazza level.

At the Upper level accessed from, and on the level of, Walcot Street, the building will comprise a retail frontage flanking an entrance to the proposed Concert Hall/Conference Auditorium.

On the floors above the Auditorium there will be residential accommodation.

14(a) Are the premises or proposed premises situated in more than one licensing authority area?

NO

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises or proposed premises are partly located, **other than the licensing authority to which this application is made:**

Part 4 – Times of Operation

15(a) Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? YES [Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]

15(b) If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon	0000 <i>hh:mm</i>	0000	
Tue	0000	0000	
Wed	0000	0000	
Thurs	0000	0000	
Fri	0000	0000	
Sat	0000	0000	
Sun	0000	0000	

16. If you want the premises licence to have a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:

Part 5 – Miscellaneous

17(a) Does the application relate to premises or proposed premises which are part of a track or other sporting venue which already has a premises licence: NO

17(b) If the answer to question 17(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application:

18(a) Do you hold any other premises licences that have been issued by this licensing authority?
NO

18(b) If the answer to question 18(a) is yes, please provide full details:

19. Please set out any other matters which you consider to be relevant to your application:

PLEASE SEE ATTACHED ANNEX A

Part 6 – Declarations and Checklist (Please tick)

I/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. I/ We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

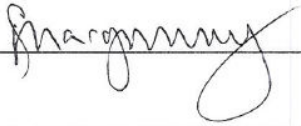
Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises or proposed premises is enclosed
- I/ we understand that if the above requirements are not complied with the application may be rejected
- I/ we understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

Part 7 – Signatures

20. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:



Print Name: EWEN MACGREGOR

Date: 25/02/2011 (dd/mm/yyyy) Capacity: GROUP LEGAL COUNSEL

21. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name:

Date: (dd/mm/yyyy) Capacity:

[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 20 and 21.]

[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]

Part 8 – Contact Details

22(a) Please give the name of a person who can be contacted about the application:

EWEN MACGREGOR

22(b) Please give one or more telephone numbers at which the person identified in question 22(a) can be contacted:

0115 851 7534

23. Postal address for correspondence associated with this application:

GALA CASINOS LIMITED
NEW CASTLE HOUSE
CASTLE BOULEVARD
NOTTINGHAM

Postcode: NG7 1FT

24. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

ewen.macgregor@galacoral.com

GALA CASINOS

ANNEX A

Introduction

The Gala Coral Group (“the Group”) is the only gambling company in the UK with significant businesses in the bookmaking, bingo and casino markets, both on the high street and online. The Group employs over 15,000 people across its various trading divisions.

In addition, the Group has a strong international business which not only includes the online Eurobet brand, but also has a newly established land-based betting shop business in Italy.

The Group is proud to be the first gambling company to have received full GamCare accreditation across all its UK divisions.

Gala Casinos Limited (“GCL”) is part of the Gala Coral Group and currently operates 26 casinos across the United Kingdom.

GCL notes that in the “Guidance for Application for the Grant of a Small Casino Premises Licence” (“the Guidance”), the Council states that:-

“In considering the merits of the application at Stage 1, the Committee will apply the test set out in s.153 of the Gambling Act 2005. In particular, it must aim to permit the use of the premises for gambling insofar as it thinks it is:

- (a) in accordance with any relevant codes of practice issues by the Gambling Commission;
- (b) in accordance with any relevant guidance issued by the Gambling Commission;
- (c) reasonably consistent with the licensing objectives (subject to paragraphs (a) and (b)); and
- (d) in accordance with the statement published by the Authority under s. 349 (subject to paragraphs (a) – (c)).”

Furthermore the Guidance continues by stating that “in making its determination the authority must disregard:

- 1) the expected demand for the proposed facilities;
- 2) whether or not the proposal is likely to be permitted in accordance with the law relating to planning or building.”

In order to assist the Council on those matters that are relevant to the Stage 1 application GCL has set out in this Annex details of the following:-

- How GCL seeks to uphold the objectives under the Gambling Act 2005 (“the Act”);
- GCL Policies and procedures in respect of Responsible Gambling;
- How GCL ensures compliance with the Licence Conditions and Codes of Practice (“LCCP”) applicable to casinos.

A copy of the Group GamCare Certificate is also attached to this Annex

The Licensing Objectives

The Act established 3 Licensing Objectives:-

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
2. Ensuring that gambling is conducted in a fair and open way; and
3. Protecting children and other vulnerable persons from being harmed or exploited by gambling

The Licensing Objectives act as the cornerstone to the way GCL operates all of their casinos. In addition to being subject to close scrutiny by the Commission, the Casinos are also closely monitored by the Gala Compliance & Licensing Department and Executive Committee.

The absolute requirement made upon Gala is that we are fully compliant not only with the Act but also the Licence Conditions and Codes of Practice as issued by the Gambling Commission which is relevant to operation of casinos.

1. Policy to ensure that Gala Casinos is protected from being a source of crime or disorder, being associated with crime or disorder or used to support crime.

- a) All staff are trained on induction with an overview of current gambling legislation and Licence Conditions and Codes of Practice.
- b) Staff are trained on security of table gaming.
- c) All casinos have access to their own CCTV system to review incidents and save footage of any incidents where necessary.
- d) Each casino has perimeter cameras to monitor activity outside the casino.
- e) A Money Laundering Manual is maintained and staff receive six monthly training.
- f) Each casino has been 'Risk Assessed' in relation to Money Laundering.
- g) Money lending is prohibited.
- h) A "zero tolerance" policy in relation to substance abuse policy is in place.
- i) Each casino is audited 3-4 times per year by the Internal Audit Team.
- j) Employees/customers caught stealing or inclusion will be reported to the Police depending on available evidence.

2. Policy to ensure that Gambling is conducted in a Fair and open way.

- a) GCL provide CCTV coverage on all gaming tables, as well as in other public areas of the casino, and can review footage for dispute resolution.
- b) All Gaming Machines have their category and percentage return to the customer displayed on the gaming machine.
- c) A House Edge Leaflet is available in each casino.
- d) How to play leaflets are available for each game offered.
- e) Variations to Standard Rules/Odds are displayed to the customer.
- f) Minimum and maximum table stakes are displayed.
- g) Odds of each staking combination are displayed.
- h) A non fraternisation policy is in place.
- i) Gala have a complaints and disputes procedure and make this available to its customer by way of 'If you're not happy with us...' leaflets.
- j) Staff gaming policy is in place.
- k) A comprehensive Gaming Manual is provided for each staff member.

3. Policy to ensure that children and other vulnerable person will be protected from being harmed or exploited in gambling.

- a) Under 18's are excluded from Gala casinos by virtue of the Act.
- b) Photographic Proof of age is required.
- c) All casinos operate a "Think 21" Policy (see below) which is subject to testing by an external agency.
- d) Management are specifically trained in problem gambling and how to carry out customer interactions when a customer exhibits problem gambling behaviours.
- e) Staff are retrained on an annual basis on the social responsibility areas of the LCCP.
- f) Gala provide sources of information where help can be obtained by people who may have a problem with gambling, in the form of:
 - Staying in Control Leaflets
 - Employee Guide to Responsible Gambling

- g) ATM's machines are located so that any customer wishing to use this facility has to take a break in gaming to use them.
- h) Electronic gaming devices are limited so that they only provide 50 spin/hands per hour.

Policies and procedures in respect of Responsible Gambling

Responsible Gambling Policy

The Gala Coral Group was the first gaming and betting group in the UK to be fully accredited by GamCare (the main treatment agency for problem gamblers since 2003) across all of our businesses. We achieved this accolade in early 2007.

The Group works constructively with the numerous organisations that operate in the field of research, education and treatment of problem gambling.

The Group has recently had their accreditation renewed following GamCare visits to a number of our sites to conduct face to face interviews with members of staff and management to test their knowledge in the area of responsible gambling.

A copy of the Groups current GamCare Accreditation is attached to this annex.

The Group participates in research in to gambling. We also employ a dedicated Group Corporate Responsibility Manager.

The management of our gambling products and retail outlets, in addition to the training we give to employees, as well as the support we give to our customers is critical.

The Group is committed to ensuring that it operates in a safe environment, having due regard to customers and employees alike.

The Group continues to make a significant financial contribution to support the key organisations in the field that distribute funding. This contribution goes to support organisations that work on the Research, Education and Treatment (RET) agenda.

The Act created a new environment in which gambling companies operate and we have commitments in respect of this that require us to operate in a responsible manner towards our customers and employees.

A key element of the Act requires that we pay particular attention to support the Research, Education and Treatment (RET) of problem gambling.

Think 21 Policy and Underage Persons

The Act states that individuals under the age of 18 are not allowed on casino premises.

To ensure compliance with this requirement, all GCL casinos operate a 'Think 21' Policy.

The Think 21 Policy requires that all customers who appear to be under 21 are approached and their age verified by the production of the appropriate identification. The appropriate identification should be one that:-

- Contains a clear photograph
- Contains the individual's date of birth
- Is valid

- Is legible and has no visible signs of tampering or reproduction

Examples of acceptable forms of identification are:

- Passport;
- Driving Licence with photograph;
- Identification Card with PASS logo.

Once the individual's age has been verified the type of document and reference number will be recorded on the casino membership system.

Should a customer, when challenged under the Think 21 Policy, be unable to provide identification to verify their age, entry will be refused.

A record is maintained of all people that have been challenged under the 'Think 21' Policy with details of the result of the challenge. The 'Think 21 Interaction' form will be used to record each challenge and this form will be maintained in the 'Think 21' log.

In cases where an associate of an individual knowingly allows and/or supports someone who is less than 18 in their attempt to gain access to gambling, that individual will be issued with a 3 month suspension from all Gala Casinos.

GCL ensures that where it has been identified that an underage individual has attempted (whether assisted or not) to gain access to gambling an incident report is completed.

Where someone under the age of 18 repeatedly attempts to enter and gamble on the premises they will be informed that this is an offence and that their actions will be reported to the Gambling Commission and potentially the police.

Protecting the Vulnerable

It is a requirement of the LCCP that all operators of casinos interact with their customers if they believe they may be showing signs that indicate a gambling problem.

In order to comply with this statutory requirement, all Staff are trained on the Indicators of Problem Gambling. In the event that a member of staff identifies someone whom they suspect may be displaying signs of problem gambling then they will report their concern to the Duty Manager, who will then deal with matter appropriately.

Gala's approach to the Customer Interaction is split in to three component parts:

- 1. Assessment of Gambling Problem;**
- 2. Interaction with the Customer; and**
- 3. Recording the Interaction with the Customer.**

Assessment of Gambling Problem

In conjunction with the wider industry, GCL has identified some Indicators of Problem Gambling that are listed below.

- **Extended period of time engaged in gambling activity (particularly machines).**
- **Paranoid belief that their gambling losses are as a result of the game being “fixed”.**
- **Mood swings, irritability, agitated, restlessness, not caring about their appearance or even personal hygiene.**
- **Obvious money difficulties and debts.**
- **Sees gambling as a way to “make money”.**
- **Totally absorbed in the activity, continually trying to beat the system.**
- **Displays signs of anxiety believing that only with continued play, chasing losses, will they retrieve their losses.**
- **Creates arguments, rows and uses rude behaviour in anger over their losses.**
- **Gambler’s admission that he or she is distressed by the amount of money they spend on their gambling.**
- **Constant, repetitive and competitive discussion about money losses and blaming others for it.**
- **Trying to borrow money from others or from staff.**
- **Frequently spending ALL the money they have brought with them.**
- **Using our products several times a week for long periods of time.**
- **Repeats a pattern of leaving the business and returning the same day with more cash to gamble.**
- **Repeated use of the ATM.**

If it is suspected that a customer possesses a number of the characteristics above a Customer Interaction should be considered.

Interaction with the Customer

Having assessed the customer’s perceived gambling problem the Duty Manager will need to determine if and how an interaction should take place. This is known as the “Trigger Point”.

Each interaction and trigger point will be unique and dependent on the situation; therefore a prescriptive approach which covers all situations cannot be given.

It is important that the Duty Manager is careful about the point at which they show concern for the customer, and it could be that the customer is approached at an appropriate time throughout the session, as they leave for the session, or at the start of a subsequent visit to the Casino.

In serious issues of problem gambling it may be necessary to stop the cycle of play of the customer, this could be conducted at a time at which it is safe to do so, and then the main purpose of this interaction will be to ensure that the customer “cools off”. In simple terms however, a customer interaction is in effect a conversation with the customer about their wellbeing, which may or may not result in further action.

Outcomes of an Interaction

There are various outcomes of a customer interaction, again it is difficult to prescribe definitive outcomes, however the interaction could lead to a range of outcomes such as:

- The customer does not engage in any conversation which supports the belief that they do have a gambling problem or the interaction with the customer does lead to an acknowledgement that the gambling has got out of control, in which case:
 - The customer could decide through discussion with the Duty Manager to take time away from the Casino; or
 - The customer decides to Self-Exclude
- If the customer decides to take time away from the Casino then if, on a subsequent occasion, there is a repeat occurrence, the Duty Manager should suggest Self-Exclusion after an interaction.
- If the customer does not acknowledge a problem but on a subsequent occasion the Duty Manager believes that another Interaction is necessary then the Duty Manager may need to advise Self-Exclusion.
- It needs to be made clear that the outcome should depend on the discussion, and the customer must acknowledge some level of gambling problem in the first instance. Customer Interaction is not a “clear cut” issue and needs to be treated sensitively and without harm.

Recording the Interaction with the Customer

Any interaction must be recorded.

All details of the interaction are recorded as objectively as possible, describing the interaction with the Customer and the Outcome. As much detail about the interaction is recorded as possible.

The Licence Conditions require the number of Customer Interactions to be recorded and sent to the Gambling Commission.

Self-Exclusion

The Act requires that licensees enable customers to self-exclude from the gambling environment. As detailed above the desire to self-exclude may result from the Customer Interaction process or it may be an unsolicited request from a customer to any member of staff. Any employee who receives such a request is instructed to report this to the Duty Manager who is responsible for dealing with this enquiry.

The self-exclusion period is a minimum of 6 months but can be extended to any period up to five years at the request of the customer.

A customer who has decided to enter into a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period.

The customer’s details on the casino membership system will be immediately amended to show as ‘Suspended’. They will also be excluded from receiving further marketing material.

All self exclusions are reported to the Commission.

Reinstatement

Reinstatement should only occur at the request of the customer.

Reinstatement cannot be considered within the period of self-exclusion even if the customer has extended this period beyond the minimum 6 months.

Once the request has been received a 24 hour cooling-off period is instigated and the customer informed of this. At the end of this period the customer is free to gamble again and the licensee does not need to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should be permitted to gamble.

Should the member request to reinstate over the telephone, the reinstatement form should be completed by the Duty Manager and a confirmation signature obtained on the form from the customer on their first subsequent visit. The customer must be informed of the 24 hour cooling-off period.

Where a self-excluded member is found to be on the premises they should be asked to leave immediately. An incident report will be completed and distributed to the Compliance and Licensing Department.

Staff Responsible Gambling Training

Gala ensures that all its staff and management fully understand its commitment to the responsible gambling policy and the procedures contained in compliance documentation and training materials.

All staff receives training of the social responsibility elements of the Licence Conditions and Codes of Practice, including identifying areas that may lead to a person having a gambling problem, Self-Exclusion, Reinstatement, Think 21 etc.

All staff are issued with:-

- Employee guide to responsible gambling leaflets
- Social Responsibility, What you must know leaflets

In addition staff and management receive training tailored to their standing in the casino that equips them with the knowledge they require to deal with responsible gambling issues for their roles in the casino.



Certificate of Social Responsibility

Gala Coral Group

This is to certify that following an inspection of a number of premises operated by the above company, GamCare is pleased to award certification for high standards of socially responsible practices

A handwritten signature in black ink, appearing to read "Andy McLellan".

Andy McLellan, Chief Executive, GamCare



Valid until 06/09/11