

Failed Test Purchases The Penalties

- If M&B fail a test purchase and are caught allowing U18's to play Gaming Machines, what could happen?
- Any person under the age of 18 playing a Gaming Machine, including those permitting or participating in the play by an under 18 year old are potentially liable for prosecution which may incur a fine and the loss of the permit to site Gaming Machines on the premises
- The young person may be fined up to £1,000 and an adult is potentially liable to be fined, on conviction up to £5,000 and or 51 weeks imprisonment
- As well as being fined for allowing U18's to play a Gaming Machine, the premises license could also be the subject of review.









Age Verification Testing Actions Taken to Date

- A third-party test purchase programme, testing 100% of our pubs biannually which
 increases in difficulty (phase 1a -3); results are shared on aggregate and anonymously via
 UKH/BBPA to the Gambling Commission quarterly.
- Created a separate gaming e-Learning training module for all our pubs teams on the importance of and how to prevent under 18's playing on Category C gaming machines completed at Induction and Refresher training biannually.
- Testing of payment technology in the form of App play whereby the guest must give proof
 of age before play using the App (guest acceptance of cashless gaming on Category C
 machines is very low currently).
- On screen social responsibility messaging on digital Category C machines.
- Back of house posters displaying the various acceptable forms of ID and reminding Teams to implement the same C21 or C25 policies for Category C machines as alcohol. (re issued in March 2023).
- M&B take part in the annual national Responsible Gambling Week during November each year.
- Testing of biometric technology which is live in six businesses where we suffered multiple local authority test purchases and at were at risk of prosecution in the form of lost permits and fines for individuals.







Age Verification Testing The Plan

Phase 1 of the testing programme

• On entry to the pub, testers will go directly to a gaming machine (category C), stand within arm's length, and spend either one minute clearly browsing the machine (if it is in clear sight of the bar) or two full minutes clearly browsing the machine (if it is not in clear sight of the bar) before playing the machine for a period of three minutes if not asked for ID beforehand by a staff member.

Phase 2 of the testing programme

• As per Phase 1, but the period of browsing will reduce from one minute to 30 seconds (for a machine in clear sight of the bar) or from two to one minute (for a machine not in clear sight of the bar).

Stage at which tester is asked for ID:

Stage 1a	Asking for change at the bar to specifically play the fruit machines	PASS
Stage 1	Whilst browsing but before inserting money (stake) into the gaming	PASS
	machine.	
Stage 2	Having inserted the stake into the machine but before playing the machine	FAIL
	– either the tester is challenged by staff before playing or their stake is	
	returned by the machine.	
Stage 3	Having inserted the stake into a machine and whilst playing the machine.	FAIL
Stage 4	The period between finishing play and exiting the premises.	FAIL
Stage 5	No ID challenge in the period from browsing to exiting the premises.	FAIL



Age Verification Testing The Plan

- Check Policy will email a Pass or Fail form to Dawn Clarke, Electronic Leisure, these forms will then be shared with the RBM and OD.
- Following a failure, the RBM will be asked to conduct an investigation and ensure that all front
 of house team members are re-trained and are fully aware of their responsibilities in
 protecting young people from gambling harm.
- Failed Test purchase forms will also be shared with DDs.
- Following any subsequent failures at the same venue, the RBM will be asked to conduct further investigations and take action deemed necessary by the RBM, this could be re-training or disciplinary action.
- The results of the Check Policy test purchasing will also be shared with the Exec on a quarterly basis.



Age Verification Testing Example Pass



Region / Manager:

Address

Postcode:

Shop Name - Left: Nothing Shop Name - Right: Texaco Tester

Gender: Male

Attire

Blue trackies, brown t-shirt

Test Details

Date & Time

Date Entry Exit Duration 14/02/2019 16:10:00 16:20:00 00:10:00

Staff

Name: Claire Gender: F

Description:

Approximately 5-9〕 with blonde hair and glasses

Tester's Notes

Claire asked for my ID as I was waiting to play the machine as an older man was playing at the time I was in the pub (Harvester) for guite a while waiting for machine to be available. Only 3 people

ID Request

Result: Pass

ID Stage: 2 - Challenge while browsing

1: Challenge on entry

2: Challenge while browsing

3: Challenge during play

4: Challenge on exit

5: No challenge

Eye Contact: Y

Description:

I walked in and went to the bar to ask to change some money, the bar tender then had to get a manager who could change the money for me at the till.

Play Details & Signage



Age Verification Testing Example Fail



Region / Manager:

Address:

Postcode:

Shop Name - Left: Shop Name - Right:

Tester

Gender:

Male

Attire:

Blue joggers and a brown tee

shirt

Test Details

Date & Time

Date Entry Exit Duration 14/02/2019 16:38:00 16:48:00 00:10:00

Staff

Name: No name badge

Gender:

Description:

Approximately 23 years old 5-4― with tattoos on arm wearing black shirt amd apron she had black hair

Tester's Notes

The restaurant and bar was busy and the staff members were walking around the venue waiting tables

ID Request

Result: Fail

ID Stage: 5 - No challenge

- 1: Challenge on entry
- 2: Challenge while browsing
- 3: Challenge during play
- 4: Challenge on exit
- 5: No challenge

Eye Contact: Y

Description:

I entered and asked at the bar for change to play the machine and was not asked for ID, I then went to the machine and browsed for 2 mins in front of machine then after 2 min I played and there was no challenge.

Age Verification Till Button

BC&T have developed a Gaming Challenge Button in the Zonal tills.

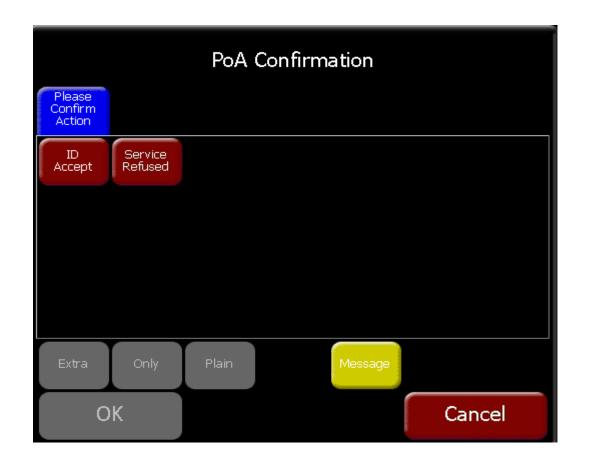






Age Verification Till Button

• Upon pressing the button, a pop-up choice menu will be displayed, please choose the appropriate response, press OK when you have entered your response.





Age Verification Testing Acceptable ID

Action: Poster to be displayed back of house on Team Notice Boards

Forms for acceptable ID are as follows:

- International Passport.
- UK or European Union Photocard Driving Licence (full or provisional).
- Proof of Age Card with 'PASS' hologram.
- UK Military Identification Card (MOD Form 90).
- Biometric Residence Permit.



Serving with pride, since 1898

Challenge 21/25 Stickers All Gaming Machines

76mm



- 51mm

76mm





Digital Gaming Machines On Screen Messaging







Digital Gaming Machines Start Up Screen Messaging

- Digital Category C products will also carry a message that will be displayed for 20 seconds when a machine is switched on.
- The message will say:
- THIS IS A CATEGORY C GAMING MACHINE ONLY TO BE PLAYED BY PERSONS

 AGED 18 OR ABOVE
- IT IS OUR RESPONSIBILITY TO ENSURE THE MACHINE IS NOT PLAYED BY ANYONE UNDER THE AGE OF 18
- ALL STAFF ARE REQUESTED TO BE VIGILANT.
- IF STAFF SEE ANYONE PLAYING OR ABOUT TO PLAY THIS MACHINE WHO APPEARS

 TO BE UNDER THE AGE OF 25 THEY MUST BE ASKED TO PROVIDE EVIDENCE TO

 PROVE THEY ARE NOT UNDER 18 IN ACCORDANCE WITH COMPANY POLICY.



Age Verification Testing What You Should Know

- All Category C machines must be located so that they are <u>effectively supervised</u> from the bar servery.
- All front of house staff must be trained and be aware of the Social Responsibility and the Law around gaming.
- Failure to improve puts M&B and its staff at risk of fines, prosecution, the loss of the machine revenue stream and potentially the loss of premises licenses.







YOTI Age Verification Cameras Set at C25





