

BA CLUBS LTD GAMBLING POLICY

Under the Gambling Act 2005, it is a requirement that any form of gambling should be conducted in accordance with the Licensing Objectives. These are:

- (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
 - (b) ensuring that gambling is conducted in a fair and open way, and
 - (c) protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 1 All gambling within BA Clubs is conducted strictly in accordance with the laws which apply to private members' clubs.
 - 2 All lotteries, draws and other competitions involving gambling which are conducted by BA Clubs or club sections must be run in accordance with rules approved by the General Manager of BA Clubs. Authority for the approval of such activities may be delegated to the Finance Controller of BA Clubs.
 - 3 Such rules must ensure that every competition is conducted fairly for all participants, that the method of choosing winners, whether manually or by means of an electronic random number generator or other device, is clear and transparent and that observers from among the club membership are permitted to attend and witness any draw or selection to ensure that it is conducted fairly.
 - 4 BA Clubs has an established procedure for any complaint regarding the conduct of any club activity, including gambling, and any member aggrieved by the manner in which such a competition is or has been conducted should contact in the first instance the General Manager, who will ensure that the matter is investigated thoroughly.
 - 5 In any cases where a member or other competitor is aggrieved by the decision of a club officer in respect of a gaming activity organised or conducted by the club, the matter may be referred to an independent arbitrator experienced in club and gambling issues chosen by agreement between the parties or, in the case of lotteries conducted under the club's operating licences, by the independent arbitration service IBAS through the Lotteries Council, of which BA Clubs is a member.
 - 6 No person under the age of 18 years shall be permitted to take part in gambling activities and the rules of all such competitions shall make this clear.
 - 7 Lottery participation will be controlled through the computer records of participant members. Advice and counselling will be offered to anyone thought to be at risk. A self-exclusion form will be available. No member who has opted for self-exclusion will be permitted to enter any form of gambling activity promoted by the club for a period of at least six months from the date of submitting the form to the club's office. If any form of money laundering through gambling is suspected, the matter shall be immediately brought to the attention of the Finance Director and, if necessary, the procedures outlined for reporting such matters to the Gambling Commission shall be followed.
 - 8 A report shall be prepared for each year on gambling activities within the club and any problems encountered, to be delivered to the General Manager of BA Clubs.