

Proposed Licensing Conditions

Merkur Slots, 1076 Warwick Road, Acocks Green, Birmingham, B27 6RD

Licensing Sub-Committee Hearing – 18th January 2021

1. The premises shall install and maintain a comprehensive CCTV system, which shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days. Viewing of recordings shall be made available upon the request of Police or an authorised officer of the Licensing Authority, subject to data protection legislative requirements.
2. Notices shall be prominently displayed within the premises stating that CCTV is in operation.
3. An incident log shall be kept at the premises and made available on request to an authorised officer of the Licensing Authority or the Police. Details to include:
 - a. all crimes reported to the venue
 - b. all ejections of patrons
 - c. any complaints received concerning crime and disorder
 - d. any incidents of disorder
 - e. all seizures of drugs or offensive weapons
 - f. any visit by a relevant authority or emergency service.
 - g. any attempts by children and young persons to gain access to the premises to gamble
 - h. any Challenge 25 Refusals.
4. A think 25 proof of age scheme shall be operated at the premises where any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry. Acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
5. Signage advertising the aforementioned proof of age scheme shall be prominently displayed throughout the premises.
6. Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises.
7. The appropriate staffing levels will be assessed by way of risk assessment and cognisance will be taken of any police advice
8. The licensee shall participate in a local Betwatch or similar scheme, where available.

9. The licensee shall take reasonable steps to prevent nuisance directly outside the Premises.
10. Maglock will always be available use.

LICENSING SUB - COMMITTEE HEARING – 18TH JANUARY 2021

SUPPLEMENTAL STATEMENT – AMANDA KIERNAN

Cashino Gaming Limited

1. I am a Chartered Institute of Internal Auditors (IIA) Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries, including High Street Retail and Optical Health. In 2011 I started working in the Gambling Industry occupying the role of Internal Audit Manager for Praesepe, responsible for all internal and external audit policies and procedures. During 2018 a merge of the Audit and Compliance departments created the role of Head of Compliance, I now hold this position and am responsible for Internal Audit, Risk/Fraud Management and the Regulatory Compliance of the Praesepe organization.
2. Cashino Gaming Limited operates a national estate of over 190 licensed bingo, adult gaming centre and family entertainment centre premises.
3. Cashino Gaming Limited is a leading national operator of bingo premises with clear and proactive policies to promote the Gambling Licensing Objectives. We always endeavour to liaise with Responsible Authorities concerning the operation of our premises and pre-consult with the police prior to making new applications.
4. Cashino Gaming Limited has full authority to provide bingo facilities through the grant of an Operating Licence issued by the Gambling Commission, which has approved the measures which Cashino Gaming Limited has put in place to ensure that it implements effective anti-money laundering procedures, security procedures and trades responsibly in accordance with gambling legislation, the Licensing Objectives and the Licence Conditions and Codes of Practice.
5. Cashino Gaming has never had a review of a bingo premises licence.
6. Cashino Gaming Limited holds key positions within the Bingo Association and BACTA (the trade association for the amusement and gaming machine industry in the UK) Executive and Social Responsibility Committees, working closely with these groups to innovate and promote Compliance and Social Responsibility within the industry.
7. Cashino Gaming Limited has 50 Personal Management Licence Holders throughout its Operational structure, all of which are aware of their roles and responsibilities in regard to the Licence Conditions and Codes of Practice (LCCP). Legal obligations are placed upon personal licence holders to promote the Licensing Objectives whilst undertaking their respective duties.
8. Cashino Gaming Limited has appointed a dedicated team of compliance auditors that work independently of the Company's Operations Team to continually assess premises' compliance with the governing legislative standards and Company Policy and Procedure. The Company conducts a minimum of two compliance audits per year in each venue. Audits include Regulatory Compliance, Customer Interaction, Incidents, Self-exclusion breaches and Age Verification records. During the audits, premises staff are tested on their level of knowledge and understanding of all relevant criteria. Venues may be re-visited and any additional training needs addressed. Records of incidents, interactions, self-exclusion breaches and age verification checks are collated on a central hub, which is regularly reviewed and monthly reports are provided to Operations Teams.

9. Cashino Gaming Limited operates a strict marketing and promotional guidelines policy, which has been developed in accordance with the Gambling Commission's Licence Conditions and Codes of Practice and the Advertising Standards Authority's Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP) Codes. A copy of the Company's Marketing Code of Practice and sample window displays are attached (Exhibit AK1).
10. Venue window displays are designed in consideration of premises location, particularly in busy high street areas where Children and Young Persons may pass by, and maintain the Company's focus that all gambling should be carried out in a socially responsible manner. Direct line of sight into premises is blocked by appropriate window displays and barriers adjacent to entrances, which minimise exposure of underage individuals to ambient gambling.

Relationship with the Responsible Authorities and Interested Parties

11. Cashino Gaming Limited takes its duty to operate safe and Gambling Act 2005 compliant premises seriously. To this end, the Company has always sought to maintain good relations with local police and licensing authority teams.
12. For the purposes of the current application the local Police Licensing team was initially approached in September 2020 and PC Mark Swallow confirmed he had no issues with the proposal and did not identify any specific concerns regarding gambling premises.
13. It is rare for our venues that operate throughout the night to attract customers leaving alcohol licensed venues as the entertainment offering is significantly different. Cashino Gaming Limited's late night operation appeals to shift workers and employees of the late night economy and our detailed policies, procedures and safeguards are designed to ensure that premises operation remains safe and secure for both staff and our customers.
14. All Cashino venues operate a strict zero tolerance drugs policy and refuse service to individuals who are deemed to be under the influence of alcohol. The company's extensive training, which incorporates Gamcare approved social responsibility and customer interaction tools are designed to ensure minimal conflict and successful implementation of our strict policies. In our experience, incidents of customers attempting to enter our venues whilst intoxicated or attempting to consume alcohol within our venues remains low across the Company's licensed estate regardless of premises location.
15. None of the Responsible Authorities under the Gambling Act 2005, those of most relevance being the Licensing Authority, Gambling Commission, Environmental Health and Child Protection teams, have raised any specific concerns regarding Cashino Gaming Limited's bingo premises licence proposals. None have objected.
16. During the consultation period no trade body or organisation specialising in adult or child vulnerability support have raised any concerns regarding Cashino Gaming Limited's proposals for the new bingo premises.
17. No evidence has been provided to suggest that the grant of the new bingo premises licence would have a detrimental effect on the local population, with particular regard to crime and disorder and vulnerability, and Cashino Gaming Limited's detailed policies and procedures are designed to ensure that all gambling in Company premises remains responsible, controlled and that the Licensing Objectives are continually promoted.
18. Cashino Gaming Limited has considered local police crime statistics and the premises location along with the Council's Statement of Licensing Principles under the Gambling Act 2005.

19. Lines of communication will be maintained with the local police and the Licensing Authority to ensure that local knowledge is continuously shared and that the premises adapt to any emerging risks or local concerns identified.
20. We have identified local providers of vulnerability support services within the local area risk assessment. Whilst these organisations have not raised any concerns regarding the current proposals, the Company will contact local organisations to offer information regarding responsible play, discuss gambling addiction support services that can be referred to, and will invite feedback on any local concerns that can be incorporated into premises training and evaluation.

Cashino Gaming Limited Compliance – Protection of Children and Vulnerable

21. Cashino Gaming Limited was selected by the Gambling Commission as one of the first top 40 licensees to prepare an annual assurance statement due to its size and scale of operation. Annual Assurance Statements enable an annual comprehensive review of the business, completed at Board level, in consideration of the effectiveness of the Company's governance and risk management arrangements designed to facilitate positive consumer protection, address gambling-related harm and crime prevention measures. This process ensures that the highest standards are implemented across the Company's estate from Board through to premises level.
22. In August 2020, Praesepe Limited, Cashino Gaming Limited's parent Company, and Cashino Gaming Limited's Merkur brand premises obtained G4 Global Gambling Guidance Group accreditation (Exhibit AK2). G4 is a group of international experts in the field of problem gambling and responsible gambling and accreditation is awarded to responsible operators. Audit reports identified that 'Customer care is of an exemplary standard in all Merkur Venues, regulatory compliance policies and procedures are excellent...and provide a strong foundation for consistent approaches to Responsible Gambling across the (Company's) estate'.
23. Cashino Gaming Limited operates training upon recruitment and then 6-monthly refresher training programmes for all employees. Training modules include 'The Essentials of Compliance and Social Responsibility' which covers the Gambling Act 2005, Licence Conditions and Codes of Practice, the Licensing Objectives under the Gambling Act 2005 and 'Safeguarding Children & Vulnerable People', which focus on assisting staff to recognise and respond to indicative behaviours of potential problem gambling and vulnerability and how to conduct effective customer interaction. Initial six week, classroom based, induction training is completed for all new venue teams and includes customer interaction role play and exposure to operation and customers in live venues. Following site opening, new teams are provided regular follow up and support. The Company also incorporates Gamcare and Bingo Association accredited Social Responsibility and Interaction training for its premises management teams. Excerpts from the Company's training platform are provided at Exhibit AK3.
24. Cashino Gaming Limited has two National Training Centres where venue teams receive face to face training which includes identifying signs of potential problem gambling and other vulnerabilities such as homelessness. Staff are rigorously trained to take appropriate action, such as where to offer gambling control support including managing time spent playing (time outs), controlling stake limits, providing information on gambling support agencies such as GambleAware, offering participation in the Bingo Association's national self-exclusion scheme and refusing service where deemed necessary.
25. Cashino Gaming Limited ensures that all staff continue to promote responsible gambling through customer behaviour observation and interaction. As part of this process, customer play, duration and spend is monitored and customer interactions are triggered to ensure play remains responsible.

26. Following a customer interaction, customers may be offered a variety of self-help measures, where appropriate, such as the Playright App to control and monitor spend and time spent gambling, time outs, information regarding gambling support services and self-exclusion. For customers deemed to be at risk who do not agree to self-exclusion we reserve the right to bar customers, should the need arise. Staff members are provided detailed training to ensure that interaction is completed in a sensitive manner whilst ensuring that the Company's policies and procedures are effectively implemented.
27. Cashino Gaming Limited has undergone Gambling Commission inspection and Company training and compliance policies and procedures comply with the Licence Conditions and Codes of Practice attached to the Company's Operating Licence.
28. Examples of some of Cashino Gaming Limited's responsible gambling information have been provided at Exhibit AK4.
29. As part of Cashino Gaming Limited's continuing commitment to high standards of staff training and compliance, the Company has engaged the services of YGAM (Young Gamers & Gamblers Education Trust). The charity will work in partnership with another charity, Betknowmore, to develop and provide additional training and resources for venue and area managers. Training will be designed to complement our existing face to face training and will be City and Guilds accredited.
30. Cashino Gaming Limited promotes the use of the customer self-help tool called Playright. All venues have the capability for customers to sign up to the App and staff are fully trained and able to advise on its use. This responsible gambling tool enables customers to set time limits on their machine play. Subject to the customers' set permissions, the system has the ability to send an alert to the venue should the customer enter at a time they have chosen not to gamble. This alert would then trigger a customer interaction.
31. All Cashino Gaming Limited's bingo premises are adult only and operate a strict Think 25 policy. Age verification procedures are embedded in Company training platforms and responsible gambling policies. Age verification test purchasing and mystery shopper visits are frequently carried out by third party companies (Check Policy and Store Checker) and test results can be provided to the Licensing Authority upon request.
32. Extracts of Cashino Gaming Limited's Compliance and Social Responsibility policy have been included with our hearing documentation, which highlight the priority given to responsible gambling and the provision of responsible gambling information to our customers and staff members.

Proposed site location

33. A detailed local area risk assessment has been submitted designed in consideration of Birmingham City Council's Statement of Principles under the Gambling Act 2005 (2019), Gambling Local area Profile, local crime statistics, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder.
34. Local analysis is an invaluable tool to direct local resources and assists with the identification of potential risks and the development of local training and partnership to ensure that potential risks are mitigated and that gaming in Merkur Slots premises remains responsible.
35. Cashino Gaming limited operates in many large cities and towns that have higher levels of deprivation and are subject to potentially higher levels of footfall from Children and Young Persons. In our experience venues are not more susceptible to access by underage individuals due to the nature of our gaming services and customer

demographics. The Company's partnership approach and high standard of staff training, customer monitoring and interaction has continued to ensure that all potential risks are mitigated and the occurrence of incidents remains minimal.

36. As a result of the Company's commitment to responsible operation and the resources directed to responsible play, none of Cashino Gaming Limited's 190 premises licences have been subject to review proceedings or revocation.

Underage Gambling

37. Cashino Gaming Limited's detailed policies and procedures are designed to ensure that all gambling in Company premises remains responsible, controlled and that the Licensing Objectives are continually promoted.
38. By law, licensed bingo premises can permit under 18s on the premises and can also apply for a premises licence under the Licensing Act 2003. All Cashino Gaming Limited's premises are strictly adult only, operate Think 25 and none of our 90 high street bingo premises seek to obtain a licence under the Licensing Act 2003.
39. Unlike many other licensed operators, such as some licensed betting premises and adult gaming centres, the proposed Merkur Slots venue will apply our strict marketing and advertising policy, ensuring that advertising is not appealing to underage individuals and that line of site into the venue is restricted. This will ensure that children and young persons cannot see into the premises, preventing exposure to ambient gambling with all gaming activities hidden from view.
40. Merkur Slots customer demographics are up to 50% female with an average age over 30.
41. Staff training and company policy is designed to mitigate the potential risk of underage gambling and exposure to ambient gambling.

Crime and Vulnerability

42. Cashino Gaming Limited have considered local police crime statistics, the premises location, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder.
43. It is rare for our premises to be associated with anti-social behaviour or crime and disorder but our staff training procedures and security measures, including external CCTV, are designed to monitor customer behaviour and external areas for anti-social behaviour. Company policy ensures that appropriate steps are taken to minimise any risks and we record and report any incidents or concerns to Company management, for internal review and assessment, and local authorities.
44. All staff training is developed to consider local area characteristics and Merkur Slots operates on the basis that its controls and best practice are adopted at all times. Cashino Gaming Limited's training scheme and control systems are proven to be effective across the Company's licensed estate but local premises management will always work with any local authorities, other authorities, trade groups and vulnerability support services to reinforce any local concerns and identify any emerging local risks within premises' training and operation.

Representation

45. The representations received identifies potential local risks concerning vulnerable adults and Young Persons in the vicinity of the premises and the potential for increased anti-social behaviour and crime and disorder should the Licensing Sub-Committee be minded to grant the current application.

46. Cashino Gaming Limited has completed a detailed local area risk assessment, reviewed local area statistics and demographics, consulted with the local police licensing team and reviewed Birmingham City Council's detailed policies in order to effectively identify any potential risks to the proposed operation.
47. Cashino Gaming Limited will implement robust security policies and procedures to monitor customer behaviour both within the premises and immediately outside the venue, refuse service to individuals who may be under the influence of alcohol or drugs and work in partnership with the local police in the unlikely event that any incidents of crime or disorder occur.
48. The Company's detailed training procedures and evaluation tools have been designed to mitigate any local risk to the Licensing Objectives, with a particular focus on the protection of children and the vulnerable from harms associated with gambling. Having considered the concerns raised, we believe that the proposed licence conditions will mitigate any perceived risk.
49. Cashino Gaming Limited understands that local risk assessment and staff training is a live matter, which is regularly assessed and adapts to any emerging or changing risks in the locations in which it operates.
50. Due to the nature of the gaming that is provided at Cashino Gaming Limited venues, it is rare for customers to congregate outside, unlike betting premises, as there is no ongoing entertainment such as a sporting event. It is also rare for our venues to have significant customer numbers at any one time and customer dispersal rarely causes concern to our local neighbours throughout all hours of operation.
51. As part of our Cashino Gaming Limited's Socially Responsible Gambling Policy, customers are continually monitored and interactions completed where concerns are identified. As part of the interaction process, customer play is assessed to trigger customer affordability and source of funds enquiries to ensure that all gaming remains controlled.

Premises Operation

52. The premises will be managed by an experienced shop manager who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role. Training focuses on the promotion of the Licensing Objectives and a copy of our Policies and Procedures has been provided as part of our hearing bundle.
53. The Merkur Slots premises layout has been developed to facilitate customer observation and all staff members provide regular sweeps of the premises to ensure positive engagement with our customers and facilitate continuous observation and customer interaction.
54. Merkur Slots staff members are not restricted to counter positions that may be found in other licensed venues, such as betting premises. Our staff are actively encouraged to move throughout the premises and proactively engage with all customers, particularly on entry, not only to implement our Think 25 policy, but to build customer relationships and ensure effective identification of potentially vulnerable individuals.
55. All Cashino Gaming Limited's staff members actively monitor and manage the area immediately outside their premises and record all incidents should they occur. Reporting lines are set up with local police teams to ensure that any potential local issues are identified and addressed.

56. All Cashino Gaming Limited premises operate extensive CCTV throughout customer facing areas and also external areas to assist with monitoring customer behaviour and that of other individuals in the immediate vicinity of the premises. CCTV displays are appropriately situated to ensure that all customer areas are monitored.
57. It is very rare for our premises to employ dedicated SIA registered door staff as, in our experience, this is almost never necessary. We do not have SIA conditions on any of our bingo premises licences. However, staff numbers and rotas are continuously reviewed to adapt to customer numbers and cognisance is taken of police advice.
58. Cashino Gaming Limited premises have actively attempted to sign up to participate with Betwatch Birmingham and committed to signing up following the COVID-19 lockdown. This ensures that a partnership approach is taken, engaging with local residents, gambling operators, the alcohol licensed trade, other businesses and Responsible Authorities to assist with the identification and management of any local issues, which may not necessarily relate to gambling premises.

Conclusion

59. The business of Cashino Gaming Limited is the provision of safe and pleasant gaming environments. It remains crucial to the business that customers feel safe and welcome in Merkur Slots premises. This principle is fundamental to Company management strategy from head office to premises level. It is a principle which as a company we have achieved in all of our venues, which provide safe, welcoming and congenial environments for our customers.
60. In the rare case that issues do arise, the resources and commitment are in place to ensure that they are speedily resolved. For obvious reasons, Cashino Gaming Limited does not wish to run licensed venues which cause regulatory issues, and the Company devotes a great deal of time and resources to ensuring that there are none.
61. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
62. In my experience I can state that it is rare for our premises to be the cause of, or otherwise associated with, crime, disorder or nuisance to nearby premises due to the nature of our gaming premises and our customer base.
63. Cashino Gaming Limited continues to take very seriously any issue which its presence creates, both out of respect for the local community and because its licence and commercial reputation depends upon it.

Ms Amanda Kiernan, Head of Compliance, Cashino Gaming Limited

Date: 7th January 2021

MARKETING CODE of PRACTICE

A guide to getting our advertising and promotions right – every time !

The Marketing Department provides an annual programme of National promotions activity. All these communications and point-of-sale/display materials are legally compliant and present our customers with a fair and professionally managed image of a responsible gaming provider. HOWEVER, occasionally 'local' activity may need to be arranged by YOU – so use this guide to ensure your activity meets our code by always being...

LEGAL - DECENT - HONEST - TRUTHFUL

1. All our advertising and promotions must be legally compliant and **MUST NOT** be misleading or indecent
2. All our advertising and promotions must be socially responsible and **NOT** promote gambling for financial gain
3. All our advertising and promotions must be **TRANSPARENT** and clearly state the offer and any requirements or conditions applied to obtaining it
4. Any terms or conditions related to the offer, including offer end dates **MUST BE** displayed clearly at the point-of-sale and/or on any related printed literature or publicity materials
5. Any printed literature, display or point-of-sale material **MUST** contain the company's approved compliance baseline (see example below) which includes the over 18 symbol and Gamble Responsibly statement alongside your business name, brand/logo
6. Advertising and promotions **MUST NOT** be targeted at, or exploit children, or those vulnerable to gambling. The law states :
Advertisements and Promotions should not be specifically and intentionally targeted towards people under the age of 18 through the selection of media, style of presentation, content or context in which they appear. All advertisers and gambling operators should already be aware that it is an offence under Section 46 of the Gambling Act 2005 to invite a child or young person to gamble.
7. The use of models, photographic images or illustrations in advertising or promotions must look a minimum of 25 years of age
8. **DO NOT** make purchase a condition of entry into a draw or raffle – buying a 'chance' of winning is a lottery, so always state **NO PURCHASE NECESSARY** (even if for charitable causes)
9. **DO NOT** present offers which reward extended play or incentivise disproportionate stake levels
10. **ALWAYS** communicate offers clearly in grammatically correct English, avoiding slang, expletives or abusive text. Avoid anything customers could perceive as offensive or discriminatory and remember the 4 key code words :

SHORTEST SKIRT
GUARANTEES WIN!



PLAY THIS & DOUBLE
YOUR MONEY



YOU WILL WIN
A FORTUNE!
(no terms or conditions)



BEST BEFORE
END 2020



OVER **18** ONLY



18



THINK **25** +



FREE TO
ENTER?



PLAY LONGER
WIN MORE



LEGAL - DECENT - HONEST - TRUTHFUL

IMPORTANT: If you are unclear or unsure whether your local activity complies with this code, please firstly consult or present your proposals to the Marketing Department on: 07880 570585 (Simon Coombes) - 07584 706892 (Sharon Lewis) - 07557 561795 (Jay Bhatti)



BeGambleAware.org

PLAY
SENSIBLY

PLAY
ENJOYABLY

PLAY
AFFORDABLY

Think

25

If you are lucky enough to look under 25 years of age,
we need to check your ID.

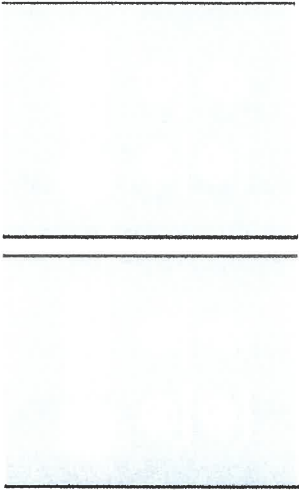
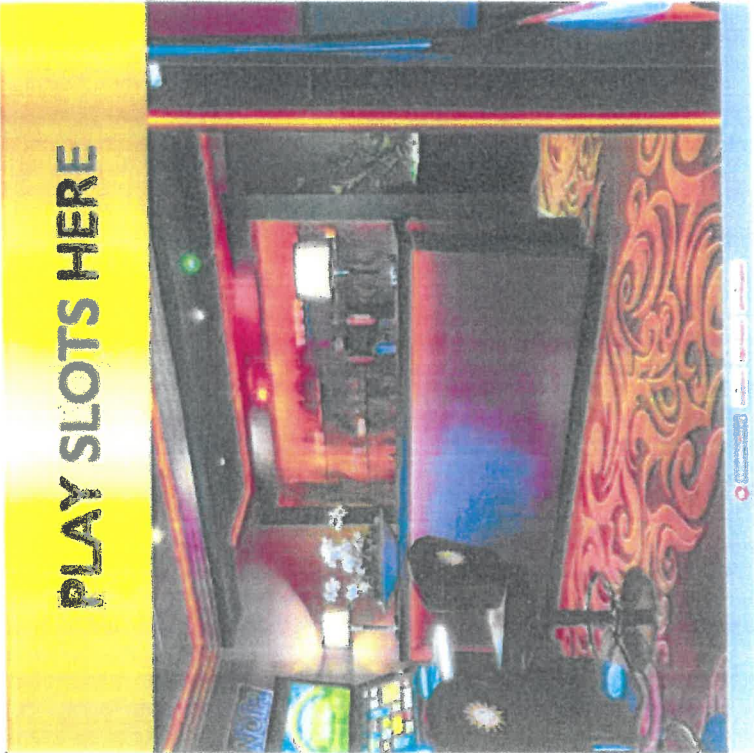
Please do not be offended.

Acceptable forms of ID are: Driving Licence, Passport or Citizen Card





AK1



Compliance
580mm x 1035mm

ANZ

INTERNATIONAL CERTIFICATE OF ACCREDITATION

G4



GLOBAL GAMBLING GUIDANCE GROUP

In accordance with the responsible
gaming policies, procedures and
standards set by the Global
Gambling Guidance Group (G4),
Amsterdam, the Netherlands,
accreditation is hereby granted to:

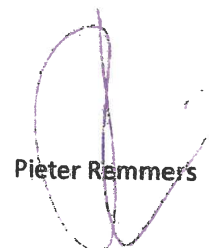
Praesepe Group
Merkur Slots, Merkur Cashino & Beacon Bingo

audit dates: 5 – 10 August 2020

Certificate Number: EG - 00120
Original Approval: 10 August 2020
Current Certificate: 10 August 2020
Certificate Expiry: 10 August 2023

On behalf of the G4 Foundation:


Jeffrey Derevensky


Pieter Rammers

INTERNATIONAL RESPONSIBLE GAMING ACCREDITATION SYSTEM



(Excerpts from training platform – six monthly refresher training)

Safeguarding Children & Vulnerable People

Our suite of Compliance training seeks to ensure you understand the Gambling Act and its 3 main objectives and that you follow the businesses defined processes to ensure we operate within the law.

Within the Gambling Act we have a duty to protect children and vulnerable people.

Safeguarding is the responsibility of everyone in our business and this session explains why its so important and how you can play your part.

What is Safeguarding *(Lesson 1)*

Safeguarding is a term usually associated with children; it makes us think about the protection of children, social services, abuse and the mistreatment of children. As a socially responsible operator, Praesepe and its operating businesses take a different view on Safeguarding and what it means:

The term actually means:

something that serves as a protection or defence or that ensures safety

For most of our customers gambling is an enjoyable hobby and a social event, however; we must be aware of players that may become addicted to gambling.

When a Customers gaming changes from enjoyment/social to a problem or addiction we **MUST** safeguard. Safeguarding is very much an action required within our business.

- We should:

- ✓ Train staff on how to recognise and respond to indicators of concern
- ✓ Train staff to know how to protect their own safety if customers behave aggressively
- ✓ Make information and advice about gambling responsibly generally and discretely available, and provide contact details about where to get help
- ✓ Interact with customers to spot warning signs of a problem
- ✓ Offer/explain the Play Right App to help control time spent playing
- ✓ If the customer opts to self exclude make sure you provide the right information and follow the process for self exclusion (detailed in Compliance training)
- ✓ Encourage customers to register or become members so we have a point of contact

AK3

Children (Lesson 2)

The protection of children is vitally important to us as a business. We have a separate and detailed training module dedicated to this area (Age Verification) as well as the Essentials of Compliance training.

The Challenge 25 scheme

MUST be operated by

ALL staff and only
recognised proof of age
accepted (for example
photo driving licence or
passport; PASS cards)



Signage **MUST BE**

prominently displayed at
all points of entry
regarding the prohibition
of under 18's



Signage **MUST BE**

displayed on machines
highlighting age
restrictions



Vulnerable People (Lesson 3)

The Gambling Commission puts a high priority on the social responsibilities operators have to **protect** vulnerable adults from the harm associated with gambling and policies must be in place to support the protection of vulnerable adults.

It's is not possible to tell who is at risk by looking at them. Most customers are **in control** and enjoy the **social** element of gambling

Safeguarding means we have to look a little deeper and think about **those at risk of developing a problem**.

It's about the **signs and signals** we **see and hear** whilst our customers are in our premises.

Social responsibility/Safeguarding is about **using your eyes and ears** to understand who is vulnerable.

Click on the + signs to understand more about those people at risk:

Risks Factors: Developing a problem

+

Risk Factors: Impact

+

Managing The Risks

+

4/5

The Stages of Change (Lesson 4)

Gambling becomes a problem when people are not in control. Staying in control is vitally important and is the ethos we at Cashino & Beacon all work too.

When someone starts to change their gambling behaviour, there are often different stages of awareness that they move through. These include:

Stage One - No problem	+
State Two - Awareness	+
Stage 3 - Wanting to Make a Change	+
Stage 4 - Take Action	+
Stage 5 - Sticking to it	+
Stage 6 - Final Stage - Self Exclusion	+

Often the person who's gambling doesn't think that he or she has a problem; they don't see the subtle changes. Sometimes **YOU** will spot the problem first, because the customer might be convincing him/herself that everything is fine when really it isn't. It's important to use positive communication rather than being confrontational or critical. It's also important to be genuine and talk to the customer in a natural way.

For example:



Once you've started the conversation, listen carefully to what they have to say in response and be patient. Don't jump in or cut them off mid sentence, as this might drive them back into their shell or make them turn defensive. Being calm and caring is really important as is knowing what advice and support we can offer

Ultimately we as a business have a responsibility

Am 3

Taking Action (Lesson 5/Observation module 6)

As a business we have several processes and tools in place to ensure we are promoting responsible gambling. These include:

- 1 Think 25 Policy
- 2 PlayRight App
- 3 Gamcare Information and Leaflets
- 4 Complaints Procedure and ADR (Alternative Dispute Resolution)
- 5 Responsible advertising
- 6 Self Exclusion Policy and Process
- 7 and most importantly - **YOU OUR EMPLOYEES**

These processes and interventions only work if our employees know and understand them and to ensure you do we have the following training modules which refresh every 6 months to keep you up to date and trained to the latest standards



The Essentials of Compliance and Social Responsibility - Casino

Compliance booklet for Casino
Available fully Online Jan 2018



Age Verification

Age Verification Training Online



The Essentials of Compliance and Social Responsibility - Beacon

Compliance booklet
Available fully Online Jan 2018



PlayRIGHT

Playright available online
for live venues

Dealing with Anger & Aggression (Lesson 7)

It is true that when Customers start to lose control of their gambling they may become agitated or upset and get angry and perhaps become confrontational; remember - this is a sign of a problem and rather than ignore it we have to deal with the situation and help the customers.

Things to avoid:

- ❶ Do not make threats you cannot carry through, such as threatening to remove the person.
- ❷ Do not be defensive or take it personally. What is being said may seem insulting and directed at you, but this is not really about you.
- ❸ Do not use humour unless you are sure it will help and you have a very good relationship with the customer
- ❹ Do not use sarcasm or humiliate the customer
- ❺ Do not put yourself at risk; use **staffguard** if you are alone and feel vulnerable

Advertising Responsibly (Lesson 8)

Whilst we do all we can to safeguard children and vulnerable people in our premises; we need to be aware of the messages that are reaching them outside of venues and clubs

Earlier we referred to the research on underage gambling undertaken on behalf of the Gambling Commission. In terms of advertising the figures are far reaching

(click to enlarge):



% of 11 - 15 year olds seeing promotional materials/advertising

i When we run promotions locally we must adhere to the marketing code of conduct to ensure that we are safeguarding children and vulnerable people when we promote and advertise our business. Please read the code of conduct attached below. This is available as a printable poster in Knowledge base.

[Marketing Code of Practice 2018.pdf](#)

GamCare/Support (Lesson 9)

Our role is to be **aware** and provide **support** to any customer at risk. The industry has strong links to **organisations** that can help anyone who **thinks** they have a **problem with gambling**. It is our duty to provide this information readily and freely:



Every Venue and Club has Staying in Control Leaflets

Make sure you know where they are, the information in them and do not hesitate to share this information with customers who feel they need to make a change

It's our responsibility to provide this information and support customers in their decision making

Behaviours Quiz (Lesson 10)

Lesson 10 of 11

Behaviours

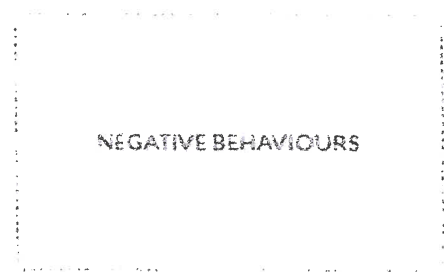
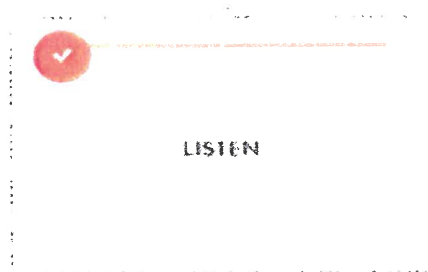


Concept Training

What behaviours should YOU our employees adopt in order to safeguard?

Look at the words on each card. Each word describes either a positive behaviour and is what we should be doing or a negative behaviour and what we should NOT be doing

THINK 25



ifeguarding

Safeguarding
Children &
Vulnerable People

**You have completed Part 1: Training
You now need to complete Part 2;
Knowledge Check**

REMEMBER:

- **Listen, Observe, Interact and Break Play**
- **Follow the Think 25 policy**
- **Provide support and information to Customers at Risk**
- **Be Gamble Aware**

Let's all do our bit to be Socially Responsible

**Please now complete Part 2 - Knowledge
Check in order to finish your training**



INFORMATION



CODE OF PRACTICE

Persons under the age of 18 years are prohibited from entering the premises.

The management reserves the right to refuse admission.
The company cannot be held responsible for personal items left on these premises.
No cash or credit cards are accepted.
Stalls are provided for player use only - restricted to one stall per machine.
Dogs are not allowed on these premises (except guide dogs).
Alcoholic beverages or take-away food cannot be consumed on these premises.
The management reserves the right to alter or withdraw promotions without prior notice or due to circumstances beyond their control.
Persons entering the premises must be sober and of legal age.
An attendant must be called to witness bank payments. Failure to do so can result in delay or refusal of payment. Manager's decision is final.
Please check your change before leaving the Cash Desk as mistakes cannot be rectified later.
Please note tokens cannot be exchanged for cash.
In the interest of security, all activities on these premises are recorded.
Draw prize does not obligate you to participate in any other company activities.
Draw code should be appropriate in the manner that the good name of the Company, and its standing within the industry, is maintained.
Management will conduct business in a manner which complies with all relevant Gambling Commission codes of practice.
Unrestricted complaints or disputes regarding repayments, or any other retail issues, should be brought to the attention of the Duty Manager in the first instance.
If the issue cannot be resolved by this procedure, the customer will be given a copy of the report document and advised how to make an official complaint in writing to: The Operations Manager, Casino Gaming, Seabrook House, 3a Seabrook Place, Bournemouth, Dorset BH2 9PL.
Please ask a member of staff for a copy of our Complaints and Disputes leaflet.

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Please ask a member of staff for a copy of our Complaints and Disputes leaflet.

BINGO RULES

- Before Play**
1. Prior to the commencement of each game, the following information will be announced:
(a) Which game is in play, (line/full house/bonus/etc) and
(b) Which line/full house (or any other combination) has to be completed to win.
 - During Play**
 2. Any player whose card number will be selected by means of the Random Number Generator in the full view of the majority of players. Members must ask their cardboards in such a way that the number is sufficiently legible to be easily checked beyond dispute.
In the event of a discrepancy between a number announced by the Caller and that illuminated on the indicator board, the actual number produced by the Random Number Generator shall prevail.
 - Stopping the Game**
 3. The point at which the next number is designated to have been called will be the moment the Caller has pronounced the number in our design. Once a number has been called, it will be accepted and the number will become the last number called. The winning cardboards must contain the last number called as part of the winning sequence.
No further claims will be accepted for a line, or two lines, or other combinations after the next number has been called. No further claims will be accepted after the next number has been called. It is the responsibility of each player to stop the game before the next number is called. No member of staff will be allowed to take that responsibility on behalf of a Member.
 - Claiming the Prize**
 4. If the bookkeepers are being used then these must be taken upon checking a claim.
5. If the bookkeepers are not being used then the following items will be announced/displayed:
(a) the game being played;
(b) the colour and type of card;
(c) the last number called;
(d) the other numbers on the card.
6. The caller must announce their decision. If they do not allow the claim they will endeavour to obtain the player's agreement to that decision. The reason why the claim has not been allowed will be announced.
7. Multiple Winners
8. In the case of a special game for a prize (not cash) provided by the Proprietor, the Caller will announce before the game the procedure to be adopted in the event of more than one winner sharing the prize. In the event of more than one winner in a cash game, all prizes will be equally shared between the winners.
9. The Venue Manager's decision will be final in all matters.

SOCIAL MEDIA

The group will often take photographs and videos of events that are posted on social media. However, we understand that our customers have a reasonable expectation of privacy in any advertising campaign.

CCTV

GAMBLING ACT 2005

- The Three 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 - we operate our business with integrity and have systems in place such as cash handling to minimise the risk of crime.
 2. Ensuring that gambling is conducted in a fair and open way. Gambling machines comply with the Commission's technical standards and exhibit safe and prize levels, and the Commission's licensing - our terms are fair and gaming rules are easily understood by customers.
 3. Protecting children and other vulnerable persons from being harmed or exploited by gambling - policies prevent under age gambling and we contribute to the responsibility in Gambling Trust for the treatment of problem gambling.

STAYING IN CONTROL

The Golden Rules

- Playing machines is buying fun. NOT investing money
- Only play with money you can afford to lose
- Set LIMITS on how much you will spend
- Playing within your means can be FUN and exciting
- Spending outside your means can create PROBLEMS for yourself and others

As the only casino and gaming company in the South of England, we are committed to the highest standards of responsible gaming.

GamCare:
0800
8020 133

GamCare.org.uk



GamblingAware

FOOD HYGIENE RATING

AWAITING INSPECTION

FOOD ALLERGENS AND INTOLERANCES

If you require further information regarding food served on these premises please speak to a member of staff who will advise you accordingly.

NO ALCOHOL

It is against the law to consume alcohol on these premises



STRICTLY OVER 18s ONLY



NO SMOKING

It is against the law to smoke on these premises



CUSTOMER CARE

Please either call 0800 808 5335 or email cashinocustomers@praesepeplc.com

BeGambleAware.org



STAYING IN **C**ONTROL

The Golden Rules of playing Fruit Machines

- **Playing machines is buying fun, NOT investing money**
- **Only play with money you can AFFORD to lose**
- **Set LIMITS on how much you will spend**
- **Playing within your means can be FUN and exciting**
- **Spending outside your means can create PROBLEMS for yourself and others**

A leaflet with more guidance is available here. If you feel you are in difficulty with your gambling or know someone who is and would like help, call the free GamCare helpline.

GamCare:
0808 8020 133

GAMCARE is the national centre for information, advice and practical help regarding the social impact of gambling. Their helpline is run by trained staff, who can offer counselling, information and advice to problem gamblers, family members and to friends of gamblers.



GamCare.org.uk
f t @GamCare

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GambleAware[®]

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Charity No. 1060005



BeGambleAware.org[®]

LICENSING SUB-COMMITTEE HEARING – 18TH JANUARY 2021

SUPPLEMENTAL STATEMENT - ANDY TIPPLE

Cashino Gaming Limited

1. Cashino Gaming Limited has reviewed Birmingham City Council's Statement of Licensing Principles under the Gambling Act 2005 and the local area profile. A detailed local area risk assessment has been designed to identify all potential local risks and the measures that will be implemented to mitigate those risks.
2. The Company is committed to working in partnership with local Responsible Authorities and local groups, including those providing support services to vulnerable individuals. The Company will contact local organisations, to provide information regarding responsible play and self-help tools, and also request any information regarding any relevant or emerging matters which can then be incorporated, as appropriate, in our site protocols and training.
3. Cashino Gaming Limited operates over 90 'High Street Bingo' premises, 5 bingo clubs, 5 Family Entertainment Centres and 87 Adult Gaming Centres throughout Great Britain.
4. The development of High Street Bingo has occurred because customers are decreasingly interested in attending large, sub-regional bingo halls and, even when they do, increasingly wish to play bingo with an electronic terminal rather than marking numbers off a card. Accordingly the High Street Bingo model has evolved, with a customer offer of live and automated bingo played on terminals together with gaming machines in accordance with the permission provided by a bingo premises licence.
5. The governing legislation provides strict limits on the types of gaming machines that may be made available in bingo premises, which is the same as that permitted in licensed Adult Gaming Centres.
6. Cashino Gaming Limited premises do not operate Fixed Odds Betting Terminals (FOBTs/category B2 gaming machines) unlike licensed betting premises.
7. High Street Bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to £2.
8. Across Cashino Gaming Limited's venues the average stake placed is between 30p and 40p. Only 20% of the machines may be category B3s. The remainder, being the category C gaming machines, have the same stake and prize levels as those offered in pubs.
9. Merkur Slots, Acocks Green will not operate 'infill' gaming machines.
10. All Cashino Gaming Limited premises are sufficiently staffed to ensure effective implementation of the Company's Think 25 policy and all staff are fully trained on the three Licensing Objectives under the Gambling Act 2005, with particular focus on the protection of vulnerable persons from being harmed or exploited by gambling. Full written details of the training and the Company's operating procedures have been provided in the hearing bundle.

Mr Andy Tipple, Head of Product, Cashino Gaming Limited

Date: 7th January 2021

LICENSING SUB - COMMITTEE HEARING – 18TH JANUARY 2021

SUPPLEMENTAL STATEMENT – GILL CLULOW

1. I have worked in the Gaming Industry for 25 years in operations as a venue manager for 4 years and area manager for 20 years before moving to the Audit and Compliance department in 2019, prior to which I was in retail management.
2. During my time in the industry, I have managed venues and areas in many locations from market towns such as Loughborough to large cities like Glasgow and Luton.
3. When I started as a manager in 1995 the venues looked somewhat different to what they do today but the make-up of the customers has remained fundamentally the same – around 50% female, aged 30 plus attending alone or in couples.
4. Visits often centre on a game of bingo over a cup of tea and biscuits and whilst bingo is now played on tablets rather than a traditional bingo rig, the game and enjoyment for customers is the same.
5. Throughout my years working in the gambling industry I can state categorically that it is rare for Cashino Gaming Limited's venues and specifically its high street bingo premises, to be associated with anti-social behavior or local nuisance.
6. Whilst I appreciate this may be different to perceived risks that may be associated with other licensed gambling venues, such as betting premises, I believe this is a reflection of the type of gaming operated by Cashino Gaming Limited and its customer demographic.
7. Due to the nature of the gaming services provided at our high street bingo venues, customers do not congregate outside our venues, unlike betting premises that may show sporting events over long periods of time. In our high street venues there is no 'event' taking place.
8. Across the high street bingo estate, average customer numbers at any one time remain relatively low, in single figures, and customer numbers between 5 and 10 at any one time would be considered an exceptionally busy period.
9. All our venues operate CCTV throughout, which is designed to not only assist with monitoring all customer facing areas but to cover the area immediately in front of our venues, which provides additional security in the high street areas in which we operate.
10. Our premises provide a different gaming environment to other operators, such as bookmakers, providing a comfortable and convivial atmosphere. Our staff are smart and friendly. They are not positioned behind a counter and are present on the trading floor, circulating and interacting with customers and offering tea and snacks.
11. Staff levels are continually risk assessed to ensure that sufficient numbers are maintained to not only enable effective premises management but to also ensure that customers can be continually monitored and assisted where necessary.
12. Customer monitoring, interaction and any incidents including implementation of our Challenge 25 policy are recorded on electronic IHL tablets. This technology enables all recording to be logged whilst staff are present in customer facing areas and it is rare for staff to be called away to back office areas during their shifts. IHL tablets are linked through a central system so that Cashino Gaming Limited's independent audit team can regularly monitor all records.
13. The Company's Audit Department collate and evaluate monthly reports on venue operations and management to allow continued assessment of operational compliance, including monitoring self-exclusions, under age checks, aggressive behavior, and any incidents relating

to anti-social behavior. The monitoring process allows venues to adapt to any emerging risks and staff training requirements.

14. Our venues operate a ticket in ticket out system, which minimises the need for cash handling on site during opening hours. Machine emptying is only carried out when customer numbers are low and security systems implemented which include activating the premises maglock and ensuring sufficient staff remain on duty.
15. Cashino Gaming Limited venues also operate time delay safes where keys are stored. All cash is retained within the GeWeTe change machine on the venue floor where customers insert tickets from machines and are paid out cash.
16. Venues are equipped with our staff guard system, which allows direct communication with a central monitoring station through audio and CCTV communication. The central monitoring station would then contact the relevant emergency services should incidents occur.
17. Venue teams will seek to form genuine relationships with local police, town centre groups, and Betwatch or Pubwatch schemes, where available. Our staff are proud of the areas in which they live and work and don't wish to see any level of anti-social behavior.
18. All of these features mean that premises provide safe and congenial environments and do not impact on their localities. This is generally understood by responsible authorities. In my experience, while concerns are sometimes expressed by local residents about such impacts when applications are made, such concerns vanish once premises actually open.

Mrs Gill Clulow, Senior Compliance Auditor, Cashino Gaming Limited

Date: 7th January 2021

WITNESS STATEMENT

(CJ Act 1967. s. 9, MC Act 1980, s.s.5A (3a) and 5B MC Rules 1981, r70)

Statement of: Darrell John
Butterworth

Occupation: Licensing and Security
Compliance Manager

Age if under 18: Over 18

(if over 18 insert "over 18")

This statement (consisting of 11 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Dated the 21st December 2020

Signature: D J Butterworth

1. My name is Darrell John Butterworth and I currently operate as a self-employed Licensing and Security Authority Compliance Consultant. I have conducted this business since creating a company, Edmund Locard Licensing and Security Solutions, on the 1st January 2011. I make this statement in relation to an application for a Premises Licence by Merkur Slots at 1076 Warwick Road Acocks Green Birmingham B27 6RD ("The Venue").

Experience

2. Prior to taking up this role with Edmund Locard Ltd I completed 30 years' service with the Greater Manchester Police in a variety of uniform and non-uniformed roles. The longest period of attachment to a department was between 1998 and 2006 when I performed the role of Force Licensing Inspector. This role involved the supervision of 12 divisional licensing officers, tasking and management of a covert licensing unit comprising a sergeant and six constables, developing force policy and enforcement in relation to all licensed units and employment and briefing of a licensing solicitor to act on behalf of the force in more complex licensing hearings.
3. During the period as the Force Licensing Inspector I was responsible for the good conduct and compliance of premises operating under a variety of licences including outlets involved in selling alcohol but also those that provided gambling, betting and bingo facilities. I have represented Greater Manchester Police at Magistrates Court hearings, Crown Court Appeals, The High Court, The Court of Appeal and Council Licensing

Signature D J Butterworth

Committee hearings to oppose unsuitable applications and to take enforcement action against those premises whose standards had fallen below an acceptable level.

4. Throughout my period in the central licensing role Assistant Chief Constable Robert Taylor, also from the Greater Manchester Police, was the Association of Chief Police officers (ACPO) lead spokesman on Alcohol and Licensing matters. As a result of this connection I became secretariat to the ACPO National Licensing officers' group and National Licensing Forum (NLF).
5. During my time in charge of the Licensing Unit I worked very closely with David Thornton, the local Gambling Commission Inspector, conducting joint operations on both legal and illegal gaming establishments.
6. In 2006 on leaving the Central Licensing Unit I received a Chief Officers Commendation, recognising the contribution I had made to licensing enforcement across Greater Manchester, particularly in relation to my leadership and commitment shown in developing force policy and training in response to the Licensing Act 2003 and Gambling Act 2005.
7. Between 2006 and my retirement from the Greater Manchester Police in December 2010 I took up the role of Neighbourhood Inspector for the town of Heywood on the Rochdale division. This involved the supervision of over 50 police officers, community support officers and civilian support staff. Within my role as a Neighbourhood Policing Team Inspector I was required to conduct analysis of crime and incident trends to ensure that resources and tactics were deployed appropriately. The outcome of this analysis ensured that resources were deployed in the right numbers, in the right areas at the right time. On a monthly basis I also presented these statistics to the town's multi agency tasking group to ensure all agencies had the relevant information on crime trends.
8. I have continued my professional development regarding licensing knowledge by taking and passing the National Licensees Certificate and National Door Supervisors course. This enabled me to successfully apply for a Personal Licence and become approved by the Security Industry Authority (SIA) as a front line operative. In September 2011 I successfully applied to become a nominated tutor with the BII enabling me to carry out training in the award for responsible alcohol retailing and award for personal licence holders. In October 2018 I attended a training course on Licensing Hearings and Appeals and in November 2019 I attended a seminar for Licensing Consultants

Signature *D J Butterworth*

9. In March 2013 I spent 3 days in the London Borough of Newham visiting 111 different betting shop premises to observe customer usage and monitoring their compliance with the Gambling Objectives. In April 2013 I spent 7 days in the London Borough of Newham visiting 109 different betting shop premises to observe customer usage and monitoring their compliance with the Gambling Objectives. In May 2013 I spent 5 days in the London Boroughs of Brent and Haringey visiting 174 different betting shop premises and monitoring customer usage and their compliance with the Gambling Objectives.
10. In November 2013 I spent 2 days in the London Borough of Newham visiting 13 betting shop premises to observe customer usage and their compliance with the Licensing Objectives. In December 2013 I spent 4 days in the London Borough of Newham visiting 24 different betting shop premises to observe customer usage and their compliance with the Licensing Objectives. In April 2014 I lived in the Haringey area of London for a four-day period visiting several betting shop premises and conducting observations on criminal and antisocial behaviour.
11. In August 2018 I spent a day in the London Boroughs of Camden, Tottenham and Kilburn visiting venues operated as Adult Gaming Centres. In these areas similar concerns had been raised by local councillors and the Public Health Authority that the venues would lead to increased crime and disorder in the area and vulnerable people would be adversely affected. Whilst conducting these visits I did not observe any of the issues raised in the representations submitted in respect of that application.
12. In August 2020 I spent two days in the Rochdale and Droylsden suburbs of Manchester, conducting observations. The application subject of those observations received a number of representations from church leaders, residents and local councillors regarding the deprivation in the locality of the proposed venue, crime and disorder and the locality being located near to other gambling type and alcohol led premises. During my observations I found no evidence to support these representations and the licence was granted following a hearing.
13. In September 2020 I spent two days in the Harehills area of Leeds conducting observations in respect of an application for a new Gambling Premises licence. The Harehills area is one of the most socially deprived in the City and is prominent in many of the indices used to measure social deprivation. In the same month I also attended the High Road, Tottenham visiting an Adult Gaming Centre and 4 betting offices. Licences in both these areas were granted following a hearing.

Signature *D J Butterworth*

14. In October 2020 I spent two days in Blackpool and two days in Newbury conducting observations in respect of an application for a new gambling premises licence. Already in the Blackpool area were 3 adult gaming centres and 3 betting shops. 1 adult gaming centre and 3 betting shops already operated in the Newbury town centre area.
15. Also, in October 2020 I attended a zoom conference aimed at Licensing Consultants, Police officers, and local authorities when updates were given on amendments to the Gambling Act and amended guidance from the Gambling Commission.
16. In addition to acting on behalf of operators I have also conducted observations on behalf of residents and in September 2017 I conducted 2 days of investigations on behalf of the London Borough of Camden. It is important to stress that when conducting my observations I act totally independently of those instructing me and record accurately what I observe. To ensure that my visits accurately reflect the true situation I always insist that local operators are not made aware of my visits taking place. I am informed by those instructing me that this was the case for the current investigation.

Terms of reference

17. I have been requested by Richard Bradley of Poppleston Allen solicitors to investigate a new Gaming Premises Licence application at 1076 Warwick Road Acocks Green Birmingham B27 6RD. The application has received representations from a local councillor, and the following terms of reference for the investigation have been agreed with those instructing me.
 - i. To visit the areas of the proposed site and conduct observations to verify the veracity, or otherwise, of the statements made within the representations.
 - ii. To visit similar locations where Merkur Slots currently operate licences to assess the impact of those venues on the local communities.
 - iii. To analyse the current crime trends in the area to see what impact the existing premises have on Crime and Disorder.
18. To address my investigations to the matters of concern I have seen and read the application, representations submitted and local area impact assessment report. I ascertained that representations had been made on the following grounds:
 - Anti-social behaviour
 - Protection of vulnerable people
 - Aggressive begging
 - Drug misuse

Signature *D J Butterworth*

Crime and Disorder

19. In my experience, it is unusual for an application to receive representations based on current crime, disorder or anti-social behaviour, or anticipation of such issues likely to be created by the granting of a licence, without an objection from the local neighbourhood policing team. None of the representations that have been submitted seek to criticise the operator or the way they operate other venues in other more challenging locations. The representations appear to be about the Acocks Green area and the local community in which the proposed premises are located. However, no evidence has been provided to show that the current gambling centres operated in Warwick Road and Shirley Road create any of the issues raised in representations against the current application.
20. In my experience the crime, disorder and anti-social behaviour issues created from premises licensed as an Adult Gaming Centre or Bingo premises are much lower than those created from a licence granted to a betting office. There are several reasons for this, including the fact that people tend to go to the Adult Gaming Centres and Bingo premises on their own or in small numbers. Other than playing bingo or machines there is no event taking place, such as horse racing or football matches for customers to engage with each other, nor use the venues as a social meeting place.
21. The staff employed at an Adult Gaming Centre are not engaged or distracted by taking or paying out on bets so they can spend more time on the "shop floor" observing customer behaviour and resolving any low level issues before they can escalate. The general environment of an Adult Gaming Centre is also generally cleaner and tidier than commonly found in ordinary bookmakers as there are no need for betting slips, newspapers and pens which often get discarded on the floor.
22. As a result of this less intimidating environment many of the managers of bingo premises are female and this was certainly the case in the venues I have visited. A further difference between high street Bingo premises and traditional betting offices are people tend to spend less time at a venue on each visit. They do not wait around the venue for an event to start or to finish. As a result of this, customers of high street bingo premises do not tend to loiter at a premise other than when playing bingo and the machines and do not smoke at the front of the venue between events taking place. I did not observe any issues regarding customers congregating outside the betting offices during this period of observations
23. As a result of the representations made regarding the area subject to the application, and that there appeared to be no criticism regarding the

Signature *D J Butterworth*

manner that the applicant operated elsewhere, I decided to visit the area of the current application and Rochdale where the applicant currently operates a bingo Centre, an area which I believe is more socially deprived than Acocks Green and equally as challenging to operate gambling premises in as the Warwick Road location.

Friday 14th August 2020

Merkur Slots Yorkshire Street Rochdale

24. My observation commenced in the Yorkshire Street area of Rochdale from 12:30 pm and concluded at 14:50 that day. The Rochdale location was chosen as I have resided in the town all my life. I was also stationed as an Inspector on the Rochdale division from 1996-1998 and 2006-2010. I was aware that a Gaming Premises had been at this location for over 30 years and during my time as an Inspector I am unaware of any problems being raised by its presence.
25. As well as having a local knowledge of the area, in 2019 Rochdale town centre was deemed to be the most deprived area in Greater Manchester and 31st most deprived area in the country.
Latest government figures show the LSOA (Lower-layer Super Output Area) which includes Rochdale town centre and parts of the neighbouring estates of College Bank and Lower Falinge is the 31st most deprived place in England.
26. On arrival on Yorkshire Street I noticed the regular presence of groups of street drinkers and a male sat on an old blanket begging. I photographed the Merkur Slots venue (exhibit reference letter DJB 1 refers). The unit advertised as being open 24/7. I then looked around the area for signs of local authority-controlled CCTV cameras which are often located in areas of high crime and disorder. One such dome camera was located immediately outside the premises at the junction of Yorkshire Street and New Bailey Street.
27. I then looked around the area for signs of residential accommodation which I could not find in the immediate vicinity. Two other gambling machine premises were located at 55 (LeisureTime) and 88 (Admiral) Yorkshire Street. A pawn brokers (H & T) was located opposite, William Hill next door but one, and Paddy Power and Betfred bookmakers diagonally opposite.
28. The nearest educational establishment was the Rochdale sixth form college on St Mary's gate and the nearest religious building was the parish church of St Mary located in the Baum. The Regal Moon Weatherspoon's and Roebuck public houses were within 50 metres of the premises.

Signature *D J Butterworth*

29. At 1244 I observed a dishevelled looking male searching through the rubbish bins on Yorkshire Street. 1 person was betting in Betfred, 9 customers in Paddy Power and 8 customers in William Hill. I then entered the Merkur Slots venue where 4 customers, wearing face masks were using the machines. A male and female member of staff were present, and I noted signage containing the Gambling Premises Licence, Challenge 25, responsible gambling and No alcohol. Face covering was mandatory and hand sanitisers were positioned in several locations around the premises. I later returned to the venue and took a photograph of the signage (exhibit reference DJB 2 refers).
30. I then visited the LeisureTime and Admiral premises. LeisureTime was advertised as opening from 0830 till late and had 11 customers. Admiral was advertised as opening until 11pm and did not have any customers inside. I then visited the Regal Moon public house which had approximately 90 customers, the majority of whom appeared to be consuming intoxicants.
31. I then positioned myself opposite the front of the Merkur Slots machine and conducted observations on the patrons entering and leaving and the passing pedestrians. Without exception the passing pedestrians appeared to be indifferent to the presence of the gambling premises. Customers entering and leaving the premises appeared to be aged 30+ and was 50% male and female. None of the street drinkers or beggars went near the premises, attempted to enter or harassed the customers entering or leaving. Between 1315 and 1330 315 people passed along Yorkshire Street past the front of the premises.
32. At 1333 two Rochdale Council refuse collectors entered the Merkur Slots premises and exited a few minutes later holding mugs of tea which they drank whilst enjoying the afternoon sunshine. At 1354 two males sat on the public benches opposite the shop and talked in loud voices about football and horse bets that they had put on.
33. At 1418 a male aged approx. 27 asks one of the males sat on the bench for a rizzla paper which is handed over. Neither of the males were customers of Merkur Slots. Between 1415 and 1430 407 pedestrians walk past the shop
34. At 1433 there were 4 customers in Betfred, 8 in Paddy Power and 5 in Merkur Slots. I then identified myself to the two members of staff in Merkur Slots to make a more detailed assessment of the unit. Both members of staff wore ID badges and a challenge 25 pin badge. Irene the assistant manager informed me that the premises had 67 machines. They did not feel that the premises were an intimidating place to work and infrequently they had to ask customers to prove their age. At 1448 I then left the premises and revisited William Hill (9 customers),

Signature *D J Butterworth*

LeisureTime (12 customers) and Admiral (2 customers and two female members of staff). I then ceased my observations.

Liverpool Airport (Airside Departure Lounge)

35. On Friday 28th August 2020 I was travelling via Liverpool airport when I noted a gaming machine premises located in the airside departure lounge. The venue was in an adjoining unit to a children's play centre but did not appear to attract any attention from the young travellers passing through the airport. I took a photograph of the locality (exhibit reference DJB 3 refers). I have also seen similar set ups at other airports and in motorway service areas. The siting of these units does not appear to attract young people to gaming nor create crime and disorder issues.

Friday 18th December 2020

Application premises, 1076 Warwick Road Acocks Green Birmingham

36. Arrived in the Acocks Green area of Birmingham at 14:00 hours on this date and commenced my observations that were recorded onto a notes document and which I later transferred onto a record of observations log for the purpose of this report (exhibit reference letter DJB 4 refers). I located the proposed premises at 1076 Warwick Road and noted that the legal notice, outlining the current application remained affixed to the front door and clearly visible to any passers-by.
37. I then looked around the area for signs of local authority controlled CCTV cameras. One such camera was located immediately outside the proposed venue which appeared to have a line of sight to the front door and whole shop frontage.
38. The nearest residential property identified nearby and most likely to be impacted on by any activities at the bingo shop was to the rear of the property on Dudley Park Road and to the side of the venue in Arden House. The nearest education establishments located were Acocks Green Primary School, All Souls Primary School and Archbishop Ilsley School on Warwick Road. The nearest religious building identified was The Sacred Heart Church also on Warwick Road.
39. I then looked around the area for other gambling premises that were currently operating. Three slot machine type venues were identified and three traditional betting shops. The three slot machine premises were not open as the area was in Tier 3 Covid restrictions. Coral, BetFred and Ladbrokes were all located on Warwick Road and were open during the period of observations.
40. I entered the 3 current betting shops in the area on numerous occasions during the period of observations. At no time were magnetic door locks

Signature *D J Butterworth*

used on any of the venues visited. Double staffing appeared to be common place and all 3 venues had a 15 minute maximum stay within the premises. Only BetFred had a physical sign on the door informing customers entering of the 15 minute policy. The other 2 premises gave this information verbally. Ladbrokes also requested my name for Covid-19 track and trace monitoring.

41. At 15.00 hrs the schools in the area appeared to close and the number of young primary school children in the area increased. I took a number of footfall counts at this time and during the observations. The footfall count between 15.05 – 15.20 showed this period to be the busiest recorded.
42. At 15.26 a male was seen sitting at the car park entrance to Morrison's begging from pedestrians passing by. The same male was also seen earlier in the day at the entrance to Aldi. The male was not aggressive and did not outwardly interact with passers-by. The only indication that he was begging was a collection bowl. By 16.35 the male was no longer in the area.
43. At 17.30 a male was seen standing at the bus stop on Shirley Road drinking from a can of lager. No other begging or street drinking was observed during the period of these observations. At 19.30 I revisited all 3 betting offices which remained open.
44. Still open at 20.30 are Sea Spray Takeaway, Caspian Pizza, Yummy Garden, Acocks Green Convenience store, Lahore Grill, Dixy Chicken, Village Kebab House, Morrison's, Pepe's Piri Piri, Hawam Grill, Dragon I , Porto Duoro, Aldi, Farm Foods, Moghul, Select Express, Karachi King and Dessert Village, Village Green Pharmacy, Pasta De Piazza and Pizza Hut.
45. Nothing further of note occurred. Remaining open at 21.30 were Sea Spray Takeaway, Caspian Pizza, Yummy Garden, Acocks Green Convenience Store, Lahore Grill, Dixy Chicken, Village Kebab House, Morrison's, Pepe's Piri Piri, Hawam Grill, Dragon I , Aldi, Farm Foods, Moghul, Select Express, Karachi King and Dessert Village, Village Green Pharmacy, Pasta De Piazza and Pizza Hut.
46. My observations ceased at 22.00hrs and I left the area.

Summary

47. During these periods of observations, I did not observe any conduct outside any of the gambling premises which came close to the comments made within some of the representations in respect of the application. No criminal conduct, drug dealing or drug misuse was observed during this period of observations. The most serious incident

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of anti-social behaviour observed was the male begging outside the supermarkets and the male drinking lager on Shirley Road. None of the conduct occurred outside any of the nearby gambling premises.

48. During the 8 hours I spent in Acocks Green I saw no signs of routine foot or mobile patrolling of the areas by police or police community support officers. None of the gambling premises engaged door security officers or needed to use magnetic door locks to keep out unwanted customers, policies often associated with areas of high incidence of Crime and Disorder.
49. Begging was observed in the area but this was not at a level that I have observed in other deprived city and town centre areas. The nature of the begging was not aggressive or intimidating to passers-by.
50. At paragraph 14, 15 and 16 above I outlined what I consider to be major differences between a betting office premises and a Gaming Centre. What I observed during these observations confirms and reinforces my experiences outlined above. In my experience the change of use of these premises from an empty retail unit to a bingo machine premises will improve the area for local residents and businesses and reduce the levels of crime, disorder and anti-social behaviour in Warwick Road.

Crime and Disorder in the area

51. In my experience it is unusual for objections to be made to an application based on the crime and disorder in the area that the premises are operated in without a representation from the Police as custodians of intelligence reports, incidents and crime records.
52. During this period of observations, I did not witness any crime and disorder and saw very low levels of anti-social behaviour. In addition, I did not observe any of the current gambling premises having to take increased crime prevention measures to address any current problems other than by limiting patrons stay to 15 minutes. I did not witness any evidence of criminal damage to property or acts of drug taking which I have often observed during visits to other towns and cities.
53. Another indication that a town centre suffers from irresponsible criminal behaviour is the security measures taken by stores. Some of the shop frontages had roller shutter security to prevent damage when closed or prevent unauthorised access out of hours. Shop windows in Acocks Green without shutters remained intact and the street furniture appeared to be well maintained and undamaged.

Conditions proposed by the applicant

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54. Although I did not see any crime and disorder in the area, I have seen the list of conditions that have been proposed by the applicant in support of this application. These conditions go above and beyond those attached to the Gambling premises currently operated in this area. I believe that these conditions demonstrate that the applicant is a responsible operator and goes beyond the minimum requirement needed to ensure they do not create the types of issues referred to in the representations.

Conclusion

55. Due to the area visited being in Tier 3 Covid-19 restrictions none of the alcohol licensed premises or slot machine type premises were operating. This may clearly have had an impact on the footfall and the conduct of those present in the Acocks Green area.
56. Throughout my observations I saw no groups of people congregating outside the current betting offices and no breaches of conditions by any operator. As a result, the only conclusion I can arrive at, is that the current gaming venues in this area are not the source of crime and disorder: gambling is conducted in an open and fair way: and I saw no evidence that children and other vulnerable people are harmed by gambling in this area.
57. In my experience of hearings in other areas no evidence has ever been produced to show that a machine type premises, as proposed in Acocks Green, currently operating in an area creates the crime and disorder that those making representations fear. In some instances, Gambling Committees are refusing applications for Gambling Premises Licences on the grounds of a connection with crime and disorder and anti-social behaviour when no such connection exists.

Appendix

Exhibit reference letter DJB 1 Photograph of Merkur Slots site at Rochdale

Exhibit reference letter DJB 2 Photograph of Merkur Slots signage at Rochdale

Exhibit reference letter DJB 3 Photograph of machine premises Liverpool Airport

Exhibit reference letter DJB 4 Observation Log Acocks Green

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Observations Log PRO FORMA Exh ref letter DJB 01

Premises

Name of premises	Merkur Slots
Address of premises	1076 Warwick Road, Acocks Green, Birmingham, B27 6RD
Day/ Date of visit	Friday 18 December 2020
Name of consultant conducting visit	Darrell Butterworth

Time	Comment
<u>14.00</u>	<p>Arrived in Acocks Green area of Birmingham located the proposed premises noted licensing application was posted to front door. I then looked around the area for any local authority controlled CCTV cameras, One such camera was located immediately outside the proposed premises which appeared to give line of sight to the sop frontage. I then looked around the area for signs of residential accommodation which may have been affected by the operation of the premises. The nearest residents located were in in Dudley Park Road and Arden House. Acocks Green primary school, All Souls Primary school and Archbishop Ilsley School were located nearby. The sacred heart church on Warwick road was the nearest religious establishment located.</p> <p>Other gambling premises located in the area were Coral, Betfred and Ladbrokes, all on Warwick Road and Shaw's amusements and Cashfall amusements on Shirley Road. Admiral, Shaw's and Cashfall were all closed.</p>
<u>14.51</u>	Entered Betfred, no maglock in operation on the door, 1 male and 1 female member of staff, 4 male customers. A prominent sign on the door stated a 15 minute maximum stay.
<u>14.55</u>	Entered Ladbrokes, no maglock, 2 female staff, and 1 male and 1 female customer. One of the female staff members asked me for my name for the Covid-19 monitoring and said that I had 15 minutes max.
<u>15.00</u>	The schools in the area appeared to close and the number of young primary school children in the area increased.
<u>15.05 - 15.20</u>	176 pedestrians walked past the site of the proposed premises.
<u>15.26</u>	Male seen sat begging outside Morrison's car park, also 1 outside the entrance to Aldi.

Every contact leaves an impression

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<u>15.37</u>	Entered Coral, no maglock, 1 female and 1 male member of staff, and no customers, female member of staff approached me and said I would have to leave after 15 minutes.
<u>16.02</u>	Male beggar remains outside Morrison's.
<u>16.05 – 16.20</u>	90 pedestrians walked past the site of the proposed venue
<u>16.32</u>	Entered Ladbrokes, no maglock, 1 female staff member, 1 male customer.
<u>16.35</u>	Beggar had gone from outside Morrison's
<u>17.05- 17.20</u>	78 pedestrians walked past the site of the proposed venue
<u>17.30</u>	Male is seen drinking a can of lager whilst standing in the bus shelter outside Yummy Garden Takeaway on Shirley Road.
<u>17.33</u>	Entered Ladbrokes, no maglock, 2 female staff members, and 1 male customer.
<u>17.37</u>	Entered Betfredd, no maglock, 1 male, 1 female staff, 4 male customers.
<u>17.41</u>	Entered Coral, no maglock, 1 female, 1 male staff member, no customers.
<u>18.05- 18.20</u>	48 pedestrians walk past the site of the proposed venue.
<u>19.05</u>	19 pedestrians walk past the site of the proposed venue
<u>19.30</u>	Ladbrokes Coral and Betfred remain open.
<u>20.05- 20.20</u>	14 pedestrians walk past the site of the proposed venue
<u>20.30</u>	Still open in the area are The Sea Spray Takeaway, Caspian Pizza, Yummy Garden, Acocks Green Convenience store, Lahore Grill, Dixy Chicken, Village Kebab House, Morrison's, Pepe's Piri Piri, Hawam Grill, Dragon I , Porto Duoro, Aldi, Farm foods, Moghul, Select Express, Karacachi King and Dessert Village, Village Green Pharmacy, Pasta De Piazza.
<u>21.05- 21.20</u>	7 pedestrians walk past the site of the proposed venue.

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SCHEDULE 2

Regulations 10 and 11

Conditions attaching to bingo premises licences

PART 1

Mandatory conditions attaching to bingo premises licences

1. A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.

2. No customer shall be able to enter the premises directly from any other premises in respect of which one of the following permissions has effect—

- (a) a casino premises licence;
- (b) an adult gaming centre premises licence;
- (c) a betting premises licence other than a track premises licence; and

3.—(1) This paragraph shall apply where children or young persons or both are permitted by the licence holder to enter the premises, and Category B or C gaming machines are made available for use on the premises.

(2) Any area of the premises to which category B and C gaming machines are located—

- (a) shall be separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for the purpose;
- (b) shall be supervised at all times to ensure children or young persons or both do not enter the area; and
- (c) shall be arranged in such a way that ensures all parts of the area can be observed by the persons mentioned in sub-paragraph (3).

(3) The reference to supervision in this paragraph means supervision by—

- (a) one or more persons whose responsibilities include ensuring children or young persons or both do not enter the area; or
- (b) closed circuit television which is monitored by one or more persons whose responsibilities include ensuring that children or young persons or both do not enter the area.

(4) A notice stating that no person under the age of 18 years is permitted to enter the area shall be displayed in a prominent place at the entrance to any area of the premises in which Category B or C gaming machines are made available for use.

4.—(1) In the case of a charge for admission to the premises, a notice of that charge shall be displayed in a prominent place at the principal entrance to the premises.

(2) In the case of any other charges in respect of gaming, a notice setting out the information in sub-paragraph (3) shall be displayed at the main point where payment for the charge is to be made.

(3) The notice in sub-paragraph (2) shall include the following information—

- (a) the cost (in money) of each game card (or set of game cards) payable by an individual in respect of a game of bingo;
- (b) in respect of each game card (or set of game cards) referred to in paragraph (a) the amount that will be charged by way of a participation fee for entitlement to participate in that game; and

- (c) a statement to the effect that all or part of the participation fee may be waived at the discretion of the person charging it.
 - (4) The notice may be displayed in electronic form.
 - (5) A reference in this paragraph to a charge in respect of gaming does not include an amount paid for an opportunity to win one or more prizes in gaming to which section 288 of the 2005 Act (meaning of “prize gaming”) applies.
- 5.—(1) The rules of each type of game that is available to be played the premises other than games played on gaming machines shall be made available to customers within the premises.
- (2) The condition in sub-paragraph (1) may be satisfied by—
 - (a) displaying a sign setting out the rules,
 - (b) making available leaflets or other written material containing the rules, or
 - (c) running an audio-visual guide to the rules prior to any bingo game being commenced.
6. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.

PART 2

Default conditions attaching to bingo premises licences

1. Subject to paragraph 2, no facilities for gambling shall be provided on the premises between the hours of midnight and 9am.
2. The condition in paragraph 1 shall not apply to making gaming machines available for use.