

BIRMINGHAM CITY COUNCIL

LICENSING SUB-COMMITTEE A

MONDAY, 18 JANUARY 2021 AT 10:00 HOURS
IN ON-LINE MEETING, MICROSOFT TEAMS

Please note a short break will be taken approximately 90 minutes from the start of the meeting and a 30 minute break will be taken at 1300 hours.

A G E N D A

1 NOTICE OF RECORDING/WEBCAST

The Chairman to advise/meeting to note that this meeting will be webcast for live or subsequent broadcast via the Council's Internet site (www.civico.net/birmingham) and that members of the press/public may record and take photographs except where there are confidential or exempt items.

2 DECLARATIONS OF INTERESTS

Members are reminded that they must declare all relevant pecuniary and non pecuniary interests arising from any business to be discussed at this meeting. If a disclosable pecuniary interest is declared a Member must not speak or take part in that agenda item. Any declarations will be recorded in the minutes of the meeting.

3 APOLOGIES AND NOTIFICATION OF NOMINEE MEMBERS

3 - 14

4 MINUTES

To confirm and sign the Minutes of the meeting held on 12 October 2020.

15 - 354

5 GAMBLING ACT 2005 PREMISES LICENCE - GRANT MERKUR SLOTS, 1076 WARWICK ROAD, ACOCKS GREEN, BIRMINGHAM, B27 6RD

Report of the Interim Assistant Director of Regulation and Enforcement.
N.B. Application scheduled to be heard at 10:00am

**6 LICENSING ACT 2003 PREMISES LICENCE – VARIATION COUCH,
1466 PERSHORE ROAD, STIRCHLEY, BIRMINGHAM, B30 2NT**

The report of the Interim Assistant Director of Regulation and Enforcement.
N.B. Application scheduled to be heard at 11:30am.

7 OTHER URGENT BUSINESS

To consider any items of business by reason of special circumstances (to be specified) that in the opinion of the Chairman are matters of urgency.

BIRMINGHAM CITY COUNCIL

<p>LICENSING SUB-COMMITTEE A 12 OCTOBER 2020</p>

MINUTES OF A MEETING OF THE LICENSING SUB-COMMITTEE A HELD ON MONDAY 12 OCTOBER 2020 AT 1000 HOURS AS AN ON-LINE MEETING.

PRESENT: - Councillor Philip Davis in the Chair;

Councillors Mary Locke and Bob Beauchamp.

ALSO PRESENT

Bhapinder Nandhra – Licensing Section
Joanne Swampillai – Legal Services
Katy Townshend – Committee Services

(Other officers were also present for web streaming purposes but were not actively participating in the meeting)

NOTICE OF RECORDING/WEBCAST

- 1/121020 The Chairman advised, and the Committee noted, that this meeting would be webcast for live or subsequent broadcast via the Council's Internet site (www.civico.net/birmingham) and that members of the press/public would record and take photographs except where there are confidential or exempt items.

2/121020 **DECLARATION OF INTERESTS**

Members were reminded that they must declare all relevant and pecuniary and non-pecuniary interests arising from any business to be discussed at this meeting. If a disclosable pecuniary interest is declared a Member must not speak or take part in that agenda item. Any declarations will be recorded in the minutes of the meeting.

APOLOGIES AND NOTIFICATION OF NOMINEE MEMBERS

- 3/121020 No apologies were submitted.
-

MINUTES

4/121020 The Minutes of meeting held on 7th September September 2020 were circulated, confirmed and signed by the Chairman.

LICENSING ACT 2003 PREMISES LICENCE – GRANT – FLAMINGO CAFÉ & RESTAURANT, 104 VILLA ROAD, LOZELLS, BIRMINGHAM, B19 1NN

Report of the Interim Assistant Director of Regulation and Enforcement was submitted:-

(See document No. 1)

On Behalf of the Applicant

Duncan Craig – Barrister, Citadel Chambers
Samsom Kahsay – Applicant

Those Making Representations

Councillor Zaffar – Local Ward Councillor.
Mohammed Ali – Resident

* * *

The Chairman introduced the Members and officers present and the Chair asked if there were any preliminary points for the Sub-Committee to consider. At this stage Duncan Craig confirmed that he had sent some supporting documents and wanted to be sure that the Committee had received them.

The Chairman confirmed that the supporting documents had been received and read by all three Members.

Cllr Zaffar interjected and queried whether the documents submitted by Mr Craig were within the statutory time frames, the Licensing Officer, Bhupinder Nandhra advised Cllr Zaffar that the procedural rules were 'best practice' only and not statutory, therefore Mr Craig had acted within the rules and procedures.

The Chairman then explained the hearing procedure prior to inviting the Licensing Officer, Bhupinder Nandhra to outline the report.

Afterwards, the Chairman invited the applicant or their representative to outline their application, at this stage Mr Craig made the following points: -

- a) That the supplementary documents were served at that time as Mr Craig was making efforts to contact the two Councillors who had made representations. He rang Cllr Zaffar's office on Tuesday and sent numerous emails, unfortunately he never received any response.

- b) The representation from Cllr Zaffar was based on misapprehension and misunderstanding of the application and the circumstances behind it.
- c) Within the framework of the Section 182 Guidance it was encouraged for parties to enter dialog so issues can be narrowed down and in order that matters may be resolved.
- d) The local Cllr did not take the opportunity to discuss matters with himself or his client and he was unsure why in Cllr Zaffar's mind it was not appropriate or necessary to engage with the applicant.
- e) Efforts were also made to speak with Cllr Hussain who had also made representations, however Cllr Hussain was hesitant to speak with him and even suggested that it wasn't appropriate to speak with Mr Craig. Therefore, an email was sent to Cllr Hussain, given that he was uncomfortable engaging with Mr Craig, copied into the email was BCC's Licensing team. The email was at page 3 of the supporting documents.
- f) That he based his practice on collaboration and discussion, as it was normally the case that progress could be made.
- g) That in future perhaps both Cllr's would consider engaging as it would assist the Members making the decision but also may assist the process and their constituents as well.
- h) The applicant already held a premises licence on Villa Road and given the discussions with WMP (West Midlands Police) the hours applied for on this licence were less than the current licence.
- i) The new site needed some work which had already started, and the building was much more pleasing than the current one.
- j) The applicant didn't want to operate the other business and that's why Mr Craig proposed another condition to hopefully bring a degree of comfort to the Committee. The condition proposed was that if the new licence was granted, no licensable activity could take place until the other licence was suspended.
- k) That many of the conditions were duplicated and there would be no need to have two sets of conditions on the same points.
- l) The conditions that had been copied from the existing licence with the further condition of SIA door staff should be included.
- m) The conditions comprehensively mitigated any concerns and in a more robust fashion than the existing licence – the police conditions should be adopted into the premises licence if the Committee were minded to grant the application.

- n) The conditions about deliveries only during the day time needed to be considered as he wasn't sure it was sufficiently precise and might be better to stipulate hours to ensure it was enforceable.
- o) There were also two conditions about waste and therefore the Committee should impose the one that is more onerous on the business.
- p) The objection from Cllr Zaffar was dated 20th September after the email from WMP representative Mark Swallow which was dated 4th September. Cllr Zaffar stated that WMP said there should never be the sale of alcohol from the premises, however, that was clearly at odds with WMP as they had agreed conditions for the licence to be granted.
- q) Cllr Zaffar also referred to the Bulls Head which was shut down 12 years ago. It was a long time ago and ultimately lots of premises had their licences revoked and then new applications submitted and granted. It wasn't buildings that were bad but the individuals who ran them. It was irrelevant.
- r) There were no indications of issues with crime and disorder at the current premises and this premises would be run by the same licence holder.
- s) The reference about stabbings was also not relevant to the application.
- t) In terms of the parking situation it was not relevant to the promotion of the licensing objectives and there was no evidence that granting the licence would change the parking situation.
- u) The reference to another revocation of a premises on Baker Street was not relevant as all applications should be dealt with on their own merits.
- v) Much of the representation was based on speculation.
- w) Cllr Hussain was said to have received many representations from nearby residents yet none of them made representations individually and therefore, Mr Craig questioned the strength of the resident's concerns.
- x) That he wasn't a huge fan of petitions, and only submitted one because his client had gone to the trouble of getting one. Petitions were of limited value and had a huge number of question marks in terms of the provenance of the signatures and therefore he expected the Committee to attach the appropriate weight to them and consider what he had said about it.
- y) He hoped he had reassured those with concerns that there simply wouldn't be any further licensable activity until the existing licence was suspended. And the licence, if granted, would have more robust conditions and the endorsement of WMP and EH.

In answer to questions from Members Duncan Craig, on behalf of the applicant made the following points: -

- a) That the premises had all Covid mitigation measures in place and if they weren't complying then he expected WMP or EH to be proactive.
- b) That training was dealt with at page 33.
- c) The new premises was larger than the existing one, but that was good with Covid and social distancing.
- d) The rear area would be for smoking.
- e) That WMP were content with the application.

Members asked further questions which were answer by the applicant, Mr Kahsay: -

- a) That it was a family run business. His 2 brothers and his wife worked at the premises.
- b) The new shop was a bit wider but it was a nicer premises.

At this stage Cllr Zaffar was invited to make his representation. Cllr Zaffar made the following points: -

- a) That Mr Craig had been disingenuous by saying that there had been a lack of communication as there had been discussions between himself and the applicant.
- b) Therefore, Mr Craig painting a picture that local Councillors were not bothered was largely unfair. Mr Craig had made assumptions that he had not been in conversations with WMP, when he had been in communication with WMP and the local police team over the application. The position of WMP was clear however the local police team were in a very different place. The same officers were involved in the Bulls Head 12 years ago and they were campaigning to get the building closed.
- c) 12 years was a long time ago, however there were still major challenges in Villa Road.
- d) WMP had allocated extra resources to the local police team.
- e) There had been an illegal club operating in Villa Road, which had no link to the application but there were still significant issues.
- f) An incident took place last week just yards away from the premises, it was very serious, and the police were seeking evidence on it.
- g) The Bulls Head revocation was very serious.
- h) There was also an unresolved murder across the road as well as drug issues and gang issues.

- i) The Observatory pub was also located 50-100 yards from the premises and that had its licence revoked.
- j) That he welcomed the applicant making investment in a bigger premises, along with creating jobs – he considered himself to be ‘pro business’.
- k) His concern was the alcohol licence itself. The Observatory pub down the road couldn’t meet the demand and issues were then spilling out onto the street. Once people hear that the Bulls Head is reopening it would create serious challenges.
- l) That the comments Mr Craig made about the petition were concerning and demeaning of residents. The residents signed the petition because they were deeply concerned that should the licence be granted it would significantly impact their quality of life.
- m) There were also concerns over parking illegally. This was very much the case with the previous licence that was in place at the premises.
- n) That painting a picture that WMP were entirely behind the application would be unfair.
- o) He was making a plea on behalf of residents and granting the licence at the property with previous issues would be unfair and setting them back.

Mr Ali was then invited to make his submission and made the following points: -

- a) He had been a resident in Lozells all his life and lived close to the premises. He had experienced people robbing children, urinating on properties and the road was a ‘no go zone’.
- b) He found it demeaning that Mr Craig did not accept the petition as it was accepted by government and he didn’t get the sense that Mr Craig had any understanding of what residents were feeling.
- c) The premises was located near gangs and people drug dealing.
- d) That if Mr Craig wanted evidence he had plenty of CCTV footage of the issues.
- e) There was already parking issues and people obstructing driveways, the granting of the licence would only make that worse.
- f) That a nearby road was a bottleneck and he was worried the premises would only make the issues worse; causing further accidents, damage to properties and ASB (anti-social behaviour).
- g) That it would be in public interest to postpone activities at premises under government guidance changed.

The Chairman invited Members to ask questions to Cllr Zaffar and Mr Ali. They gave the following responses: -

- a) Cllr Zaffar advised that the conversations he had with WMP local officers and neighbourhood teams indicated that they had concerns. Lozells was already a priority area for them. Licensing police team had gone away and done a back-door deal with the applicant. If the Committee grant the licence it would make the police position difficult.
- b) That he had a family business on the corner of Villa Road and remembers as a child he wasn't allowed to go to the business by walking as it wasn't safe.

In summing up Cllr Zaffar made the following points: -

- That he was making a plea on behalf of his constituents and community activists who worked hard to make the area a better place for residents and others.
- That by granting the licence with the history of the Bulls Head the Committee would be making the local police teams' job harder.
- It was a bigger premises and therefore would attract a lot more people.
- That he wanted Villa Road to return to the brilliant environment it was years ago.
- He pleaded with the Committee to reject the application and keep the Bulls Head closed.

In summing up Mr Ali made the following points: -

- That his main issue was the parking, the premises couldn't accommodate parking for clients.
- The police didn't have the resources to manage the premises and the further problems that would arise.
- The applicant wasn't prepared to deal with the increased public safety issue.
- The licence should be refused in order to promote public safety.

In summing up Mr Craig, on behalf of the applicant made the following points: -

- That Cllr Zaffar was out of order saying he was disingenuous and to suggest that he would mislead a hearing and what that would entail for his reputation was laughable.

Licensing Sub-Committee A – 12 October 2020.

- He was not aware that his client had spoken with Cllr Zaffar and maybe if Cllr Zaffar had responded to his email that could have been discussed.
- Cllr Zaffar had not referenced why he didn't contact Mr Craig.
- That Cllr Zaffar suggested that WMP had done a back-door deal – he wasn't sure what Cllr Zaffar was implying in terms of WMP. He was also saying he needed to protect WMP as they couldn't make rational decisions themselves, however Mr Craig stated that they were great officers who were highly capable of making a decision on the application and were the Committee's main source of advice when it came to crime and disorder.
- That the comments about petitions that Mr Craig made were in general terms and included his client's petition as well.
- That residents hadn't made personal representations or attended the hearing.
- The application involved the surrender of the existing licence. The licence would have more stringent conditions, better management and mitigation measures in place. For all those reasons Mr Craig invited the Committee to grant the application.

At this stage the meeting was adjourned in order for the Sub Committee to make a decision and all parties left the Teams meeting. The Members, Committee Lawyer and Committee Manager conducted the deliberations in private and decision of the Sub-Committee was sent out to all parties as follows: -

5/121020

RESOLVED:-

That the application by Samsom Kahsay for a premises licence in respect of Flamingo Café and Restaurant, 104 Villa Road, Lozells, Birmingham B19 1NN, **BE GRANTED** with the terminal hour for licensable activities from Sunday to Thursday to be 23.00, and on Friday and Saturday to be 01.00.

It shall be a condition of the licence that the premises shall not undertake licensable activities until the premises licence for 83 Villa Road (**Licence number 5015**) is surrendered.

The relevant mandatory conditions under the Licensing Act 2003 will form part of the licence issued, together with those conditions as agreed with West Midlands Police and with Environmental Health in advance of the meeting, as follows:

- The Premises Licence Holder shall install and maintain CCTV inside and outside the premises
- CCTV will be recording at all times the premises are open for any

licensable activities and images will be held for a minimum of 28 days and made available immediately on request by any of the Responsible Authorities

- The Premises License Holder will ensure that a trained member of staff will be on duty and be available to download the CCTV to any of the Responsible Authorities
- Any person who appears drunk/aggressive will not be permitted on the premises
- SIA Supervisors will be appointed every Friday, Saturday from the hours of 23:00 until the premises close (being 1.00am Friday & Saturday as per the applicant's agreement to modify opening hours). Details of all SIA Supervisors will be kept in a register
- The Premises Licence Holder shall ensure floor staff will conduct physical sweep inside the premises to remove hazardous objects/waste as deemed necessary by the management
- The Designated Premises Supervisor is aware of their responsibilities to the staff and customers in respect of public safety and will take all reasonable steps to ensure the maintenance of all provided safety arrangements and equipment in accordance with the requirements of current installations
- All deliveries will be received between the hours of 08.00 and 18.00 to control noise nuisance
- Signs will be displayed on exits asking customers to leave quietly
- A refusal register will be maintained as well as an incident log
- The Designated Premises Supervisor and staff will at all times remain aware of their responsibilities under the objectives, including that alcohol shall not be sold to anyone under the age of 18. Staff on duty will be trained and made aware of a challenge 25 policy and the requirements, and the need to demand an acceptable form of age ID
- No adult entertainment is permitted at these premises
- All members of staff must receive training regarding the: four licensing objectives contained in the Licensing Act 2003; responsible retailing of alcohol, and the law; protection of children from harm (and this must include how to competently check customers' identification where necessary); authorised hours for licensable activities and the conditions attached to the premises licence. All training provided to staff will be recorded and each member of staff will sign and date the training records to confirm they have received and understood the training and ongoing refresher training every six months. The staff training records will be maintained at the premises and made available to any Responsible Authority upon request
- To avoid nuisance being caused to neighbours the DPS, or other nominated person/staff, shall monitor the external areas of the premises after 23:00 hours, including the frontage onto Villa Road. If necessary, they shall remind customers to be respectful of neighbours and where necessary they shall limit the number of customers going outside to use the smoking area, and take appropriate steps to avoid customers who use the frontage of the

premises causing a nuisance

- All external doors and windows shall be kept closed except as necessary for safe and effective access and egress
- There shall be no live music or amplified music, speech or sound other than background music, and any such background music shall be inaudible outside the building
- The DPS shall, within 3 months of the date of issue of this licence, submit in writing a noise management plan to the Environmental Protection Unit of Birmingham City Council. The noise management plan shall outline the measures to be adopted to reduce the noise impact of activities associated with the premises including deliveries, recycling and refuse collections, smoking areas, customers and taxi pick up. The noise management plan shall be updated regularly and all staff shall be adequately trained in their role in implementing the plan
- No waste or recyclable material, including bottles, shall be moved, removed or placed in areas outside the premises building between the hours of 22.00 and 08.00
- No drinks shall be removed from the premises
- Patrons shall not remove from the premises any late night refreshment provided at the premises
- The premises shall have an approved documented dispersal policy (approval needed in writing from the Environmental Protection Unit of Birmingham City Council), which shall be implemented for dispersal at all times the premises are open for licensable activity. The policy shall include the dispersal of customers exiting the premises away from nearby residential properties. The dispersal policy shall be reviewed periodically, or in the event of noise complaints relating to dispersal activities, and revised as necessary, and the revised policy shall be submitted in writing to the Environmental Protection Unit of Birmingham City Council for approval. All operational controls and management actions required by the approved dispersal policy shall be instigated at all times
- There shall be no speakers used for amplified music, speech or sound outside the building
- Protection of Children from Harm - the premises licence holder will implement and operate a Challenge 25 age verification policy to prevent the sale or supply of alcohol to persons under 18 years of age. A copy of the written age verification policy must be signed by all members of staff to confirm they have read and understand the policy and the signed copy must be maintained at the premises and made available for inspection by any Responsible Authority on request.
- The Premises Licence Holder shall ensure notices are displayed at all entrances and exits of the premises advising customers to have respect for the nearby residents and keep noise levels to a minimum as they depart.
- The outside area shall not to be used for any licensable activities outside of the hours of 10.00 - 23.00

Members carefully considered the representations made by other persons, but were not convinced that there was an evidential and causal link between the issues raised and the effect on the licensing objectives. Two of the objectors (one a Ward Councillor, the other a local resident), attended the meeting and addressed the Sub-Committee.

It appeared that their fears were based mainly on a previous operator, entirely unconnected to Mr Kahsay, who many years ago had operated a public house on the site until the licence was revoked in 2008. The Sub-Committee observed that the revocation of that licence had happened some twelve years ago; it was not relevant to the instant application and the Members therefore disregarded it. Similarly a discussion about “an illegal nightclub”, which the Ward Councillor said had recently been discovered nearby, was not relevant to an application for a café and restaurant premises. Other objections were speculative in nature – for example relating to potential parking difficulties.

The Sub Committee deliberated the operating schedule put forward by the applicant and the likely impact of the application, including the agreed conditions, and concluded that by granting this application, the four licensing objectives contained in the Act will be properly promoted. Mr Kahsay confirmed that it would be a family-run business. The old licence, for 83 Villa Road, would be surrendered before licensable activities began at 104 Villa Road. The Sub-Committee noted in particular that the hours were shorter than those at the old premises; it was therefore unlikely that there would be any adverse effect on the licensing objectives in granting the application. The agreed conditions had been suggested by West Midlands Police and were comprehensive; this was therefore sufficient to allay the fears of those making representations.

In reaching this decision, the Sub-Committee has given due consideration to the City Council’s Statement of Licensing Policy, the Guidance issued under section 182 of the Licensing Act 2003 by the Secretary of State, the application for a premises licence, the written representations received and the submissions made at the hearing by the applicant via his legal adviser, and by those making representations.

All parties are reminded that under the provisions contained within Schedule 5 to the Licensing Act 2003, there is the right of appeal against the decision of the Licensing Authority to the Magistrates’ Court, such an appeal to be made within twenty-one days of the date of notification of the decision.

Please note, the meeting ended at 1205.

BIRMINGHAM CITY COUNCIL

PUBLIC REPORT

Report to:	Licensing Sub Committee A
Report of:	Interim Assistant Director of Regulation & Enforcement
Date of Meeting:	Monday 18th January 2021
Subject:	Gambling Act 2005 Premises Licence - Grant
Premises	Merkur Slots, 1076 Warwick Road, Acocks Green, Birmingham, B27 6RD
Ward affected:	Acocks Green
Contact Officer	Shaid Yasser, Senior Licensing Officer, licensing@birmingham.gov.uk

1. Purpose of report:

To consider relevant representations made in respect of an application for a Bingo Premises Licence.

2. Recommendation:

To consider the representations that have been made and to determine the application.

3. Brief Summary of Report:

Premises Licence application received on 5th November 2020 in respect of Merkur Slots, 1076 Warwick Road, Acocks Green, Birmingham, B27 6RD.

Representations have been received from Interested Parties.

4. Compliance Issues:**4.1 Consistency with relevant Council Policies, Plans or Strategies:**

The report complies with the City Council's Statement of Licensing Principles and the Council's Corporate Plan to improve the standard of all licensed persons, premises and vehicles in the City.

5. Relevant background/chronology of key events:

Cashino Gaming Limited submitted an application for a Bingo Premises Licence on 5th November 2020 for Merkur Slots, 1076 Warwick Road, Acocks Green, Birmingham, B27 6RD.

Representations have been received from Interested Parties and these are attached as Appendices 1 and 2.

Birmingham City Council Licensing Enforcement visited the premises and confirmed that they have no objections to the application. Their confirmation and additional conditions are attached at Appendix 3.

The application, including supporting documents, is attached as Appendix 4.

Site Location Plan Appendix 5.

When carrying out its licensing function, a licensing authority shall aim to permit the use of premises for gambling in so far as the authority think it is in accordance with any relevant codes of practice issued by the Gambling Commission, in accordance with guidance to licensing authorities issued by the Commission, in accordance with the authorities' statement of licensing principles and is reasonably consistent with the licensing objectives, which 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
- c. Protecting Children and other vulnerable persons from being harmed or exploited by gambling.

6. List of background documents:

Representation as detailed in Appendices 1 and 2
Birmingham City Council Licensing Enforcement no objection confirmation, Appendix 3
Application Form, including supporting documents, Appendix 4
Site Location Plan, Appendix 5

7. Options available

To Grant the application
To Refuse the application
Grant the application with conditions

From: Councillor John O'Shea
Sent: 30 November 2020 19:43
To: Licensing
Subject: Re: Application for bingo licence at 1076 Warwick Road

Hi,

Please find attached representations with regards to this application.

Regards,

John

Cllr John O'Shea
Cabinet Member for Street Scene and Parks
Birmingham City Council

Labour Councillor for Acocks Green
Council House | Victoria Square | Birmingham | B1 1BB

Application for Bingo Licence at 1076 Warwick Road

“Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this guidance, any relevant Commission code of practice, its own statement of licensing policy, and the licensing objectives.”

I know that the committee takes the role seriously and it is vital that it takes into account local knowledge.

I have two areas of concern regarding this application and I do not believe that this application is in accordance with the licensing objectives

Local Area Risk Assessment - unfit for purpose

This contains generic answers where only the name of the establishment has been changed. It does not deal with the specific concerns raised by the vague assessment.

The assessment claims that Merkur already operate six other venues in the area licensed by Birmingham City Council, but none of those are listed on the application form. The venue listed on the application form is not listed on the Local Area Profile. This adds to the evidence that the documents have not been completed with the care that the authority should expect from someone who holds a number of licences.

The Acocks Green shopping centre – known locally as The Village – is a reasonably vibrant shopping centre. While it has suffered in the past few months from the effects of the pandemic on retail, it still maintains a range of national brands and local specialist shops and serves a wide population from Acocks Green, Tyseley and Olton in Solihull.

It has had problems – there is a persistent issue with street drinking, often focussed on the area in front of the library, not far from this site; and there is also a significant issue with aggressive begging, which has required police action on a number of occasions. The area also has a high number of premises used as supported housing for vulnerable people with a number of addiction and other issues. As the LARA notes, we have also suffered from an increase in violent and sexual offences, as well as more generalised anti-social behaviour, widespread street drug dealing and

graffiti. This causes concern for me, as violence towards gambling machines and the threat to users, staff and residents is not a trivial matter.

The LARA draws a very tight border for the “local area” – stating that the “*Merkur Slots Birmingham area has a population of 1412 residents.*” There is no source evidence for this information. I suspect that they may have drawn on the Lower Super Output Area data for Birmingham 089E, which places that small part of Acocks Green in the 2nd decile for deprivation in the country. This relates solely to a small area to the north of the Warwick Road, with a 2019 population of 1474. There are some 28,000 residents across Acocks Green and many of them live in areas that fall into the top 10% of the most deprived areas in the country.

I do not consider that sufficient care has been taken in the preparation of the Local Area Risk Assessment in this case.

Protecting children and the vulnerable

The LARA notes that there are already three adult gaming centres and three bookmakers, all with fixed odds betting terminals, within a short walk of this site (the local area assessment does not mention Ladbrokes – a further indication of the shortfalls of that document). The first four are within 100m of the proposed site.

Cash Fall – 17 Shirley Road, B27 7XU

Shaws – 13 Shirley Road, B27 7XU

Admiral Casino – 1105 Warwick Road, B27 6RA

Ladbrokes – 1111 Warwick Road, B27 6RA

BetFred – Unit 1, 1160 Warwick Road, B27 6BP

Coral – 1192 Warwick Road, B27 6BT

There is also a long-established Mecca Bingo hall further away from the centre, on Stockfield Road.

The relevance to the licensing objectives is that at a concentration of machine-gaming venues will stimulate competitive promotions, in turn that will stimulate players to increase their gambling – including the most vulnerable. Further, their close proximity will lead to gamblers moving between the venues easily, again, putting the vulnerable at risk and breaching the licensing objective of protecting children and the vulnerable.

I have no doubt that Cashino will act as a responsible operator, notwithstanding the errors in their document, but their processes have limits – we still have issues in Acocks Green, despite the actions of other operators, evidencing that these controls have limits to their efficacy. The courts have upheld that the risks arising from overprovision of machine gaming are a legitimate area for control and I would argue that it is a key matter of public protection for the most vulnerable in our society.

In the Gibraltar case (*Gibraltar Betting & Gaming Association Ltd --- and --- (1) The Secretary of State for Culture, Media & Sport (2) The Gambling Commission --- and --- The Government of Gibraltar (2) The Gibraltar Gambling Commissioner*) it was established that competition may “*increase consumer welfare problems (eg addiction)*” and “*in the very specific market of games of chance, that is to say, between several operators authorised to run the same games of chance, is liable to have detrimental effects, owing to the fact that those operators would be led to compete with each other in inventiveness to make what they offer more attractive than what their competitors offer, and thereby to increase consumers’ expenditure on gaming and the risks of their addiction.*”

Put simply, increasing competition increases the risks of addiction. It is good for the providers, but not for the consumer. Adding a seventh venue would add to the risk for the vulnerable residents of and visitors to Acocks Green.

From:

Sent: 02 December 2020 09:49

To: Licensing

Subject: licensing application

Dear Sirs reference to the licensing application for Bingo premises under section 159 of the Gambling Act 2005 for MERKUR SLOTS 1076 Warwick Road, Acocks Green Birmingham B27 6RD. I refer to Birmingham City Councils statement of Licensing policy 2015 , section 14.1 on page 18 regarding cumulative effects on the area. We already have six other gambling outlets in a small shopping area i.e Sun amusements, Cashfalls, Corals. Betfred, Ladbrokes and William Hill plus others therefore the cumulative effect of another gambling outlet would have a negative impact on the area with all these other premises of a similar type. This application if approved would saturate the area . There are other concerns about disabled access and facilities and further concerns about parking in the area as parking facilities in the area quite limited. There are local schools nearby and feel that this would possibly encourage young people to gamble and get involved in these activities. I sincerely hope that these concerns and objections are taken into account when a decision is made about this licensing application.

submission on behalf of Acocks Green Focus Group.

From: Gary Callaghan
Sent: 02 December 2020 09:24
To: Arvinder Layal
Subject: Bingo Grant

RE:Merkur Slots
1076 Warwick Road
Acocks Green
Birmingham
B27 6RD

Hi Arvi,

I can advise that I have no objection to the grant of the above premises, however this is subject to the premises being constructed as per plans submitted and a prior opening inspection before the premises open, Once inspected I will update you that I am happy for the licence to be issued (See attached)

I have contacted the agent Felix Faulner who advised at the present time his client does not have timescale when the premises may hope to trade, but stated he will keep me updated.

Regards
Gary

[Gary Callaghan](#)
Licensing Enforcement Officer
Birmingham City Council Licensing Enforcement

**Birmingham City Council
Licensing Service**

Additional conditions to be attached in respect of applications made under the Gambling Act 2005 for the grant of a bingo premises licences at:

- Cashino Gaming Limited
T/A
Merkur Slots
- 1076 Warwick Road
Acocks Green
Birmingham
B27 2HJ

a) As the premises intends to carry out works the issue of the licence will be subject to the premises being constructed in accordance with the deposited plans and will not trade until such time as they have been inspected and approved by officers of the Council.

b) The Licence will be offered for surrender should the premises not have been completed in accordance with the deposited plans.

Reason for attaching conditions listed above.

To ensure that the Licensing Authority are satisfied that the premises meet the requirements of the Gambling Act 2005, the Commission's Guidance, and the mandatory and default conditions

Gary Callaghan
Licensing Enforcement Officer

**Application for a premises licence
under the Gambling Act 2005 (standard form)**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

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

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

Part 1 – Type of premises licence applied for

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

Do you hold a provisional statement in respect of the premises? Yes ☐ No **X**

If the answer is "yes", please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

Part 2 – Applicant Details

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

Section A

Individual applicant

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

2. Surname: Other name(s):

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

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

Postcode:

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

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

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

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

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation: **Cashino Gaming Limited**

7. The applicant's registered or principal address:

Seebeck House

1A Seebeck Place

Knowlhill

Milton Keynes

Postcode: **MK5 8FR**

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

000-003266-N-103444

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

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

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

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known): **Merkur Slots**

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

1076 Warwick Road

Acocks Green

Birmingham

Postcode: **B27 6RD**

12. Telephone number at premises (if known): **N/A**

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

Ground Floor High Street Location

14(a) Are the premises situated in more than one licensing authority area? **No**

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

N/A

Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? **No**

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

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

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates: **N/A**

Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued):

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? **No**

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application. ☐

19(a). Do you hold any other premises licences that have been issued by this licensing authority?

Yes

19(b). If the answer to question 19(a) is yes, please provide full details:

220 High Street, Erdington, B23 6SJ – Bingo Premises Licence No. 383/1

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

The Applicant operates a national estate of licensed bingo premises which include the provision of bingo tablets and Bingo Plus and Bingo Express terminals. Substantive facilities for non-remote bingo will be made available in accordance with legislative provisions.

The operator has full authority to provide licensed bingo by the provision of an Operating Licence granted by the Gambling Commission. The UK's Gambling Regulator has therefore approved the measures implemented to ensure that effective anti-money laundering procedures are implemented and policies have been developed to ensure responsible trading in accordance with the gambling legislation, the licensing objectives and the licence conditions and code of practice.

A copy of Cashino Gaming Limited's Operational Standards has been provided in support of the application and full copies of the Applicant's policies and procedures are available, if required.

A copy of Cashino Gaming Limited's 'Working Together' document has also been supplied in support of the application, which provides an overview of the licensee's proposed operation.

Part 6 – Declarations and Checklist (Please tick)

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

X

I/ We confirm that the applicant(s) have the right to occupy the premises.

X

Checklist:

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

X

X

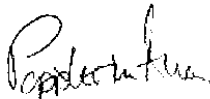
X

X

Part 7 – Signatures

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

Signature:



Print Name: Poppleston Allen

Date: 05 November 2020

Capacity: Solicitors for & on behalf of the applicant

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

Signature:

Print Name:

Date:

Capacity:

[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]

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

Part 8 – Contact Details

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

Felix Faulkner

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

24. Postal address for correspondence associated with this application:

Felix Faulkner

Poppleston Allen

37 Stoney Street

The Lace Market

Nottingham

Postcode: NG1 1LS

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



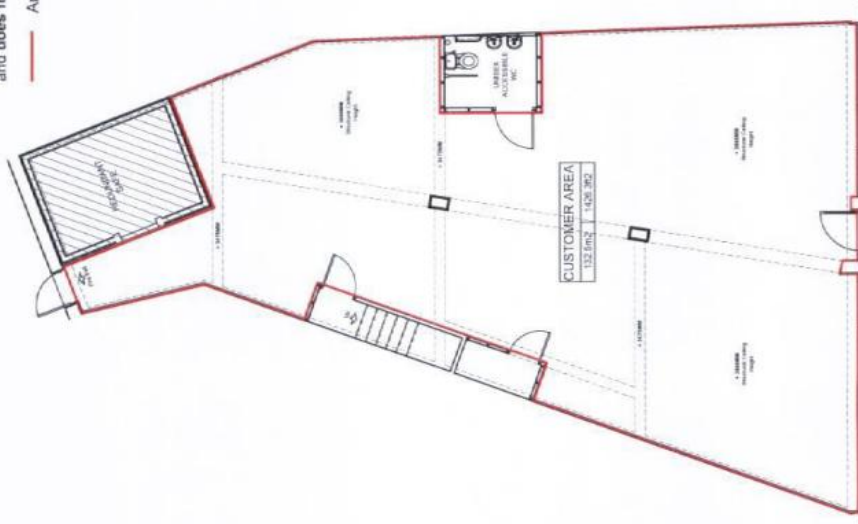
GAMBLING ACT 2005 LICENSING PLAN

Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for information purposes only and does not form part of the premises licence.

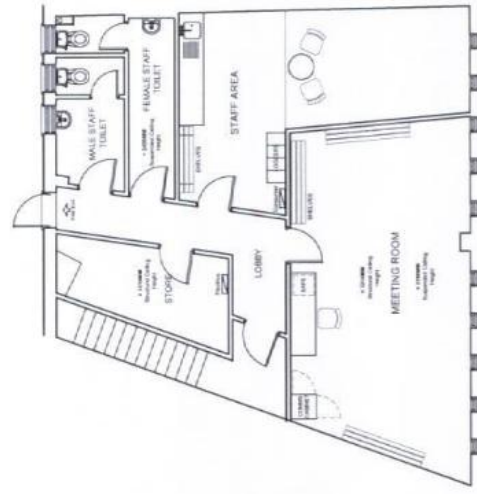
— Area in which facilities will be provided for gaming.



Location Plan 1:1250



Proposed Ground Floor Plan 1:50



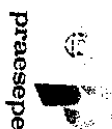
Proposed First Floor Plan 1:50



1076 WARWICK ROAD
ACOCKS GREEN
B27 6RD

LICENCE PLAN

Licence	Type	Issue
1	PROPOSED	11.06.2011
Licence No.	121020	121020
Licensee	WRIAGROUZ	121020
see attached to this licence for full details of the licence		



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

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise Address:	1076 Warwick Road, Acocks Green, Birmingham, B27 6RD
Local Authority:	Birmingham City Council
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-024 (Cashino Gaming Ltd)
Company Details:	Praesepe Group, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Cashino Gaming Limited
Name and Title of Assessor:	Gill Clulow, Senior Compliance Auditor
Date of Assessment:	30.10.2020, 3.11.2020
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots is located on Warwick Road in Acocks Green, Birmingham in the West Midlands region of England. Acocks Green is a vibrant suburb of Birmingham with shops, banks, food outlets spanning from a central roundabout. 3 AGC's are within a short walk – Admiral, Shaws and Cash Falls and bookmakers Ladbrokes, Betfred and Coral and a Mecca Bingo Hall. Merkur Casino operates the following venues licensed by Birmingham City Council, 73 Bull Street, Birmingham, 121 The Parade, Sutton Coldfield, 157 Weoley Castle Road, Weoley Castle, Unit 19, Fox & Goose Shopping Centre, 13 Watford Road, Cotteridge, 53 New Street, Birmingham.
Establishments of note:	AGC's – Cash Fall and Shaws, Select Express, 24 hour off license and convenience store all located on Shirley Road a few minutes walk away.
Adjoining premises:	Admiral AGC
Crime statistics:	Merkur Slots is located next to Card Factory and a Dental Practice. Warwick Road, Acocks Green, Birmingham, where Merkur Slots Birmingham is situated, is within the Acocks Green policing neighbourhood, under the West Midlands Police force area. Crime rate in Birmingham is lower than the average crime rate across similar areas like Stoke on Trent or Leicester but higher than average for the West Midlands force area. Number of reported crime incidents in the area has increased since 2019. Most commonly reported crimes in the last 12 months include violence and sexual offences and anti-social behaviour. In August 2020 there were 152 crime incidents recorded within half a mile from Merkur Slots Birmingham postcode predominantly consisting of violence and sexual offences (59) and anti-social behaviour (21). 8 of all crime incidents were reported directly on Warwick Road. 4 related to violence and sexual offences, 4 related to drugs, 1 possession of weapons and 1 related to criminal damage and arson. There are no currently published policing priorities from this area.
Population:	Merkur Slots Birmingham area has a population of 1412 usual residents, mainly in age groups 30-44 and 45-69. People at the retirement age make up a large proportion of local population – 30% of all residents. Relationship status of people living here does not show a significant deviation from the average figures for the UK. Warwick Road area shows lower levels of residents that report their health as good or very good (68%), which is usually indicative of areas with older population. Education and qualification levels are slightly below average. 33% of local residents has no qualifications compared with 22.9% national average and 24.7% is degree educated.
Culture:	Merkur Slots Birmingham area is ethnically diverse. 72% of local population claim to be White, which lower than UK average of 86%. Other sizable ethnic groups include Pakistani – 12%, other Asian – 8%, Black African and Caribbean – 6% and Mixed Ethnicity – 2%. 68% of the residents were born in England, which is significantly below the English average. Dominating religion is Christianity – 51% of all residents. 15% identify themselves as Muslim and 2.5% is Hindu.
Unemployment:	Unemployment rate in Warwick Road area at 8.2% is higher than current average rate of 3.9%. This area has higher than average concentration of retired residents - 19% of the resident population compared with 13.9% national average. While the UK has an aging population, less residents over 65 are choosing to retire than previously. Between the 2001 and 2011 census, the number of economically active 65-74 year olds almost doubled to 8.7%. Most of the working population here works full-time, mainly in elementary occupations such as health, social work, education, retail and administration.
Deprivation:	In 2019, Warwick Road, Acocks was ranked amongst 30% most deprived neighbourhoods in the country, the same as in 2015. Indices of deprivation which received lowest ranking include: health and disability domain, income deprivation affecting older people, crime domain and living environment. Education, skills and training domain here is better than in 50% of neighbourhoods in UK.
Local Police:	The police have not identified any issues with the proposals.

The Gambling Act 2005 sets out the three licensing objectives (LO), which are:

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

Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into account Birmingham City Council local authority Statement of Gambling Principles, reference Part C section 5 Bingo Centres and Birmingham Borough Profile 2011.

Environmental Factors

In preparing this assessment Praesepe has considered the relevance of environmental factors. In this context, environmental factors include the physical location of schools, playgrounds, residential areas, other retail premises and locations (bus stations, tube stations) which have an effect on football. We have set out below our position on risk in this area:

Protecting children and other vulnerable people from being harmed or exploited by gambling	Unemployment	Age Verification
	<p>Unemployment</p> <p>Unemployment rate in Warwick Road area at 8.2% is higher than current average rate of 3.9%. This area has higher than average concentration of retired residents - 19% of the resident population compared with 13.9% national average. While the UK has an ageing population, less residents over 65 are choosing to retire than previously. Between the 2001 and 2011 census, the number of economically active 65-74 year olds almost doubled to 8.7%. Most of the working population here works full-time, mainly in elementary occupations such as health, social work, education, retail and administration.</p> <p>Deprivation</p> <p>In 2019, Warwick Road, Acocks was ranked amongst 30% most deprived neighbourhoods in the country, the same as in 2015. Indices of deprivation which received lowest ranking include: health and disability domain, income deprivation affecting older people, crime domain and living environment. Education, skills and training domain here is better than in 50% of neighbourhoods in UK.</p> <p>Schools and Education</p> <p>Acocks Green Primary School, Westley Rd, B27 7UQ Archbishop Iley Catholic School, Victoria Rd, B27 7XY</p>	<p>Age Verification</p> <p><i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Praesepe operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Birmingham Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their stake money will be returned to them.</p>

<p>Holy Souls Catholic Primary School, Mallard Ct, B27 6BN Cottesbrooke Infant & Nursery School, Yardley Rd, B27 6LG Cedars Academy, Cedars Avenue, B27 6LL The Oaklands Primary School, Dolphin Ln, B27 7BT Ninesites School an Academy, Hatfield Cres, B27 7QG Kimichi School, 111 Yardley Rd, B27 6LL Fox Hollies Nursery, 419 Fox Hollies Rd, B27 7QA</p> <p>Community Centres and Youth Centres Friends Community Centre, 55 Yardley Rd, B27 6LL</p> <p>Parks, play grounds and sports/leisure facilities Fox Hollies Park, Pool Farm Rd, B27 7HB Westley Vale Millennium Green, The Avenue, B27 6NN Fox Hollies Park, Gospel Ln, B27 7EG</p> <p>Vulnerable and addiction support services The New Leaf Recovery Project, 16 Flint Green Rd, B27 6QA</p> <p>Homeless shelters and food banks Acocis Green Christian Centre, 100 Westley Rd, B27 7UL</p> <p>Pawnbrokers and Loan Shops H&T Pawnbrokers, 1141A Warwick Rd, B27 6RA Cash Converters, 14/15, 1160 Warwick Rd, B27 6BP CEX, 1080 Warwick Road, B27 6BH</p> <p>Medical Centres, Care Homes and Mental Health facilities Dudley Park Medical Centre, 28 Dudley Park Rd, B27 6OR The Acocis Green Medical Centre, 999 Warwick Rd, B27 6QJ Victoria Road Surgery, 21 Victoria Rd, B27 7XZ Holy House Care Home, 61 Westley Rd, B27 7UQ Christadelphian Care Homes, 17 Sherbourne Rd, B27 6AD Dudley Court Rest Home, 16 Dudley Park Rd, B27 6OR Victoria Lodge, 11 Victoria Rd Acocis Green, B27 7XZ Arden Lodge, 946 Warwick Rd, B27 6QG New Day, 45 Wynter Rd, B27 6H Alexandra House, Hillborough Rd, Otton, B27 6PF Grey Gables, 39 Fox Hollies Rd, B27 7TH Flint Green House, 4 Sherbourne Rd, B27 6AE</p>	<p>Age verification test purchasing and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the JHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>Vulnerability Training and guidance is given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p>
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<p>Gambling premises</p> <p>Shaws Amusements, 13 Shirley Road, B27 7XU Cash Fall Amusements, 17 Shirley Road, B27 7XU Bethred, Unit 1, 1160 Warwick Rd, B27 6BP Coral, 1192 Warwick Rd, B27 6BT Mecca Bingo Accods Green, Stockfield Rd, B27 6BB Admiral Casino, 1105 Warwick Rd, B27 6BA</p>	<p>Residential Areas</p> <p>Warwick Road, Accods Green in Birmingham consists predominantly of flats (65%) and detached houses (27%). There is higher than average level of social housing - 36% of household spaces. This contrasts with the national average of just over 18%. 32% of properties is rented from private landlords and 20% is owned with a mortgage. Majority of households are occupied by a single person.</p> <p>Bus stops and other Transport links</p> <p>Accods Green Village (Stop AG), B27 7XU Accods Green Station, B27 6EB</p> <p>Locally Identified Premises</p> <p>Select Express, 21-23 Shirley Road, B27 7XU Accods Green Library, Shirley Rd, B27 7XH</p> <p>Public Houses and Alcohol Licensed Premises</p> <p>INN on the GREEN, 2 Westley Rd, B27 7UH The Spread Eagle, 1146C Warwick Rd, B27 6BL</p>	<p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare; encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Player Protection</p> <p>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</p> <p><i>Failure to provide information to customers on responsible gambling</i></p> <p><i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p> <p>'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are located in prominent locations within the premise and in private areas, such as customer toilets.</p> <p>Playright App available for customers to self-manage their play and spend and is able to send alerts to Merkur Slots Birmingham if the customer enters at a time they have chosen not to play which instigates an interaction with the customer.</p> <p>Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling.</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p>
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<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p>Crime statistics Warwick Road, Acocks Green, Birmingham, where Merkur Slots Birmingham is situated, is within the Acocks Green policing neighbourhood, under the West Midlands Police force area. Crime rate in Birmingham is lower than the average crime rate across similar areas like Stoke on Trent or Leicester but higher than average for the West Midlands force area. Number of reported crime incidents in the area has increased since 2019. Most commonly reported crimes in the area has included violence and sexual offences and anti-social behaviour. In August 2020 there were 152 crime incidents recorded within half a mile from Merkur Slots Birmingham postcode predominantly consisting of violence and sexual offences (59) and anti-social behaviour (21). 8 of all crime incidents were reported directly on Warwick Road; 4 related to violence and sexual offences, 4 related to drugs, 1 possession of</p>	<p>Senior Management are members of the Bingo Association Executive and Social Responsible Committees and BACTA Divisional and Social Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> <p>Deprivation Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm. Merkur Slots operates on the basis that its controls and best practice is adopted at all times, therefore it is not a question of degrees of vigilance being implemented in different areas.</p> <p>Homelessness Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging. Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution. Staff are trained how to manage situations with homeless people seeking refuge. A line of contact will be created with local high risk premises, homeless shelters, foodbanks to provide social responsibility information.</p> <p>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late night opening.</i> Merkur Slots Birmingham is subject to a separate security risk assessment, local factors are considered and proportionate control measures/physical security measures are installed. Merkur Slots Birmingham will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p>
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<p>weapons and 1 related to criminal damage and arson. There are no currently published policing priorities from this area.</p> <p>Local Police</p> <p>The police have not identified any issues with the proposals.</p> <p>Public Houses and Alcohol Licensed Premise</p> <p>INN on the GREEN, 2 Westley Rd, B27 7UH The Spread Eagle, 1146C Warwick Rd, B27 6BL</p> <p>Pawnbrokers and Loan Shops</p> <p>H&T Pawnbrokers, 1141A Warwick Rd, B27 6RA Cash Converters, 1A/15, 1150 Warwick Rd, B27 6BP CEX, 1080 Warwick Road, B27 6BH</p> <p>Gambling premises</p> <p>Shaws Amusements, 13 Shirley Road, B27 7XU Cash Fall Amusements, 17 Shirley Road, B27 7XU Betfred, Unit 1, 1150 Warwick Rd, B27 6BP Coral, 1192 Warwick Rd, B27 6BT Mecca Bingo Acocks Green, Stockfield Rd, B27 6BB Admiral Casino, 1105 Warwick Rd, B27 6RA</p> <p>Residential Areas (Impacted by Anti Social Behaviour)</p> <p>Warwick Road, Acocks Green in Birmingham consists predominantly of flats (65%) and detached houses (27%). There is higher than average level of social housing - 36% of household spaces. This contrasts with the national average of just over 18%. 32% of properties is rented from private landlords and 20% is owned with a mortgage. Majority of households are occupied by a single person.</p> <p>Anti-social behaviour is second most commonly reported crime type in this area. There were 21 anti-social behaviour incidents reported within half a mile from Merkur Slots Liverpool postcode in August 2020 but none of them occurred directly on Warwick Road. Anti-social behaviour crime hotspots in this area include Higher Educational Building, Mayfield Road and Othon Boulevard East.</p>	<p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p>General Crime and Disorder</p> <p><i>To identify aggressive customers to prevent crime and disorder</i></p> <p>Awareness of local crime issues in the local area</p> <p>We have reviewed the Police UK hot-spot mapping for Acocks Green policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with West Midlands Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App Inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p> <p>Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.</p> <p>Merkur Slots Birmingham will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p> <p>Anti-social behaviour outside the premises</p> <p>Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a</p>
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		<p>responsibility to work in partnership with local residents and authorities to reduce environmental impacts.</p> <p>Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p> <p>Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.</p> <p>Money Laundering <i>Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.</i></p> <p>Mercur Slots has a designated Anti Money Laundering Officer (AMLO) and AML policies with clear escalation and reporting processes.</p> <p>There are 2 pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.</p> <p>IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.</p> <p>Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.</p> <p>Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.</p> <p>Adequate staff will be maintained at all times and subject to regular review and risk assessment.</p>
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	<p>Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 8pm until 6am.</p> <p>In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots will primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.</p> <p>Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.</p> <p>Merkur Slots Birmingham will operate TITO machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.</p> <p>As such staff are based predominately on the venue floor and have very little need to work in a back area, any back office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.</p> <p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.</p> <p>The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.</p> <p>Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.</p> <p>Alcohol and Drugs</p> <p>Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.</p> <p>No Alcohol Allowed signage on the door.</p> <p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p>
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		<p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p>Money Lending</p> <p>Money lending is not tolerated within our premises.</p> <p>Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>		<p>Bingo/Gaming Machine and Supervision</p> <p>The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p>Customer Complaints</p> <p><i>Failure to prevent customers complaints and disputes regarding gambling within our premises</i></p> <p><i>Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website.</p> <p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p>

		<p>Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints.</p> <p>Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p>Marketing Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages. No Under 18's allowed, Think 25, Bingo Played Here, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
Other	<p>Places of worship and Religious Buildings Acocks Green Methodist Church, 1 Botteville Rd, B27 7YE The Parish Church of Acocks Green, 1 St Marys Cl, B27 6QX St Mary's Parish Church, 34 Dudley Park Rd, B27 6QR Sacred Heart and Holy Souls Church, 1151 Warwick Rd, B27 6RG Acocks Green Christian Centre, 100 Westley Rd, B27 7UL Acocks Green Baptist Church, 39 Yardley Rd, B27 6HG Acocks Green Christadelphian Ecclesia, 32 Station Rd, B27 6DN Rizvia Mosque, Alexander Rd, B27 6ET</p>	<p>Ethnicity and Local Area Demographic Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training & Social Responsibility Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Praesepe have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p>

		<p>Prasepe work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People; Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Managers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice yearly.</p> <p>COVID 19</p> <p>All staff receive training on COVID-19 guidelines.</p> <p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p> <p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the iHL SMART Tablet.</p>
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Merkur Slots Birmingham Premise Layout

Premise level:	Merkur Slots, Acocks Green is a ground floor premises on a busy junction in the centre of Acocks Green.
Premise frontage:	Merkur Slots Birmingham will be a property will be of a style which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions will comply with LCCP and standards set by the Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP)
Counter Position:	<p>Merkur Slots Birmingham floor layout will be of the design to avoid blind spots and enable supervision of entrances and machines from the central service area and staff will regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons.</p> <p>The central service area serves as the main support area for staff to manage the venue without having to leave the floor:</p> <ul style="list-style-type: none"> - TTto machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines. - Beverage and snacks are provided from the service area - IHL SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists - The CCTV monitor on the central desk allows staff to view the exterior at all times.
Floor layout:	Merkur Slots Birmingham floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed and staff will regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and leaflets will be located in prominent locations within the premise.
Machine Positions:	<p>Merkur Slots Birmingham will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and live calling. G Tabs are linked to Merkur bingo venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one.</p>
Hidden Areas:	Merkur Slots Birmingham will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points. CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.

Additional Comments

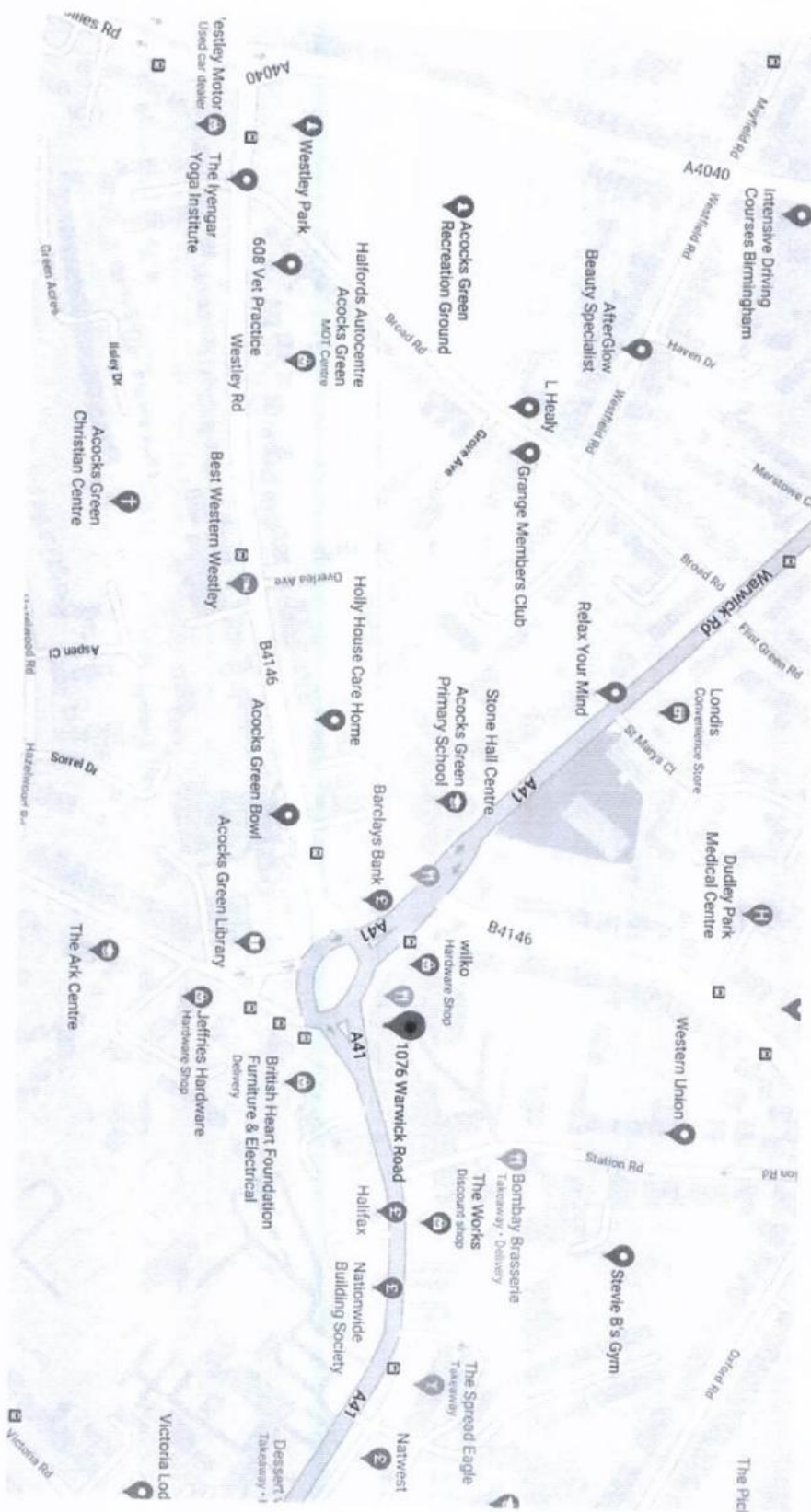
I have worked in the Gaming industry for 25 years in operations as a venue manager for 4 years and area manager for 20 years before moving to the Audit and Compliance department in 2019, prior to which I was in retail management. During my time in the industry, I have managed venues and areas in many locations from market towns such as Loughborough to large cities like Glasgow and Luton. When I was required to complete a Local Area Risk Assessment for the new Merkur Slots premises in Accods Green I researched the area and then visited the location. I found Accods Green to be a vibrant area with a variety of national and independent retailers and food outlets. Despite Covid 19 the area was busy with shoppers, I did not observe any evidence of street lifestyle persons or of any rough sleeping. Merkur Casino operates 5 venues within Birmingham and the expertise and experience of the teams there will be used to support and train the new team as they are recruited for Merkur Slots.

This document provides an assessment of risk at premise level relating to the provision of these facilities for gambling. Praesepe is a national operator and employs a number of standard policies, procedures and control measures across all premises. These issues are clearly articulated in the "Compliance Manual", to be found in the premise and in our Player Protection Framework. The company also carries out premises security risk assessments (available on request) and health and safety risk assessments which inter alia relate to the objective of keeping crime out of gambling.

Where relevant, Praesepe has also taken into account any substantive local risks identified in a wide range of policy statements related to gambling and local area profiles specifically related to gambling. However the company does not operate discriminatory policies against any identified groups based on social demographic or ethnic origin. Therefore identification of issues relating to gambling related harm are based on individual customer behaviour, even where particular groups are identified through research at being at greater risk of gambling related harm.

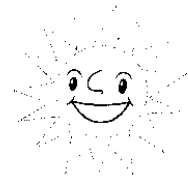
Assessors Name:	Gill Clulow
Signature:	
Date:	30.10.2020

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



Cashino Gaming Limited

Operational Standards



THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

Objective 1 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

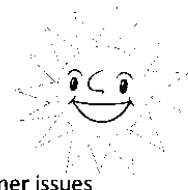
- Cashino Gaming Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Cashino Gaming Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Cashino Gaming Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Cashino Gaming Limited premises operate digital CCTV and customer areas are supervised.
- Cashino Gaming operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- The employees in Cashino Gaming premises are required to carry a portable alarm which is provided by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Cashino Gaming Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Cashino Gaming employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Cashino Gaming operate a robust late night working policy, which is fully supported by a full-time Night Manager.
- Cashino Gaming does not operate a single-manning policy between 8pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

Objective 2 - Ensuring that gambling is conducted in a fair and open way.

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.

Cashino Gaming Limited

Operational Standards



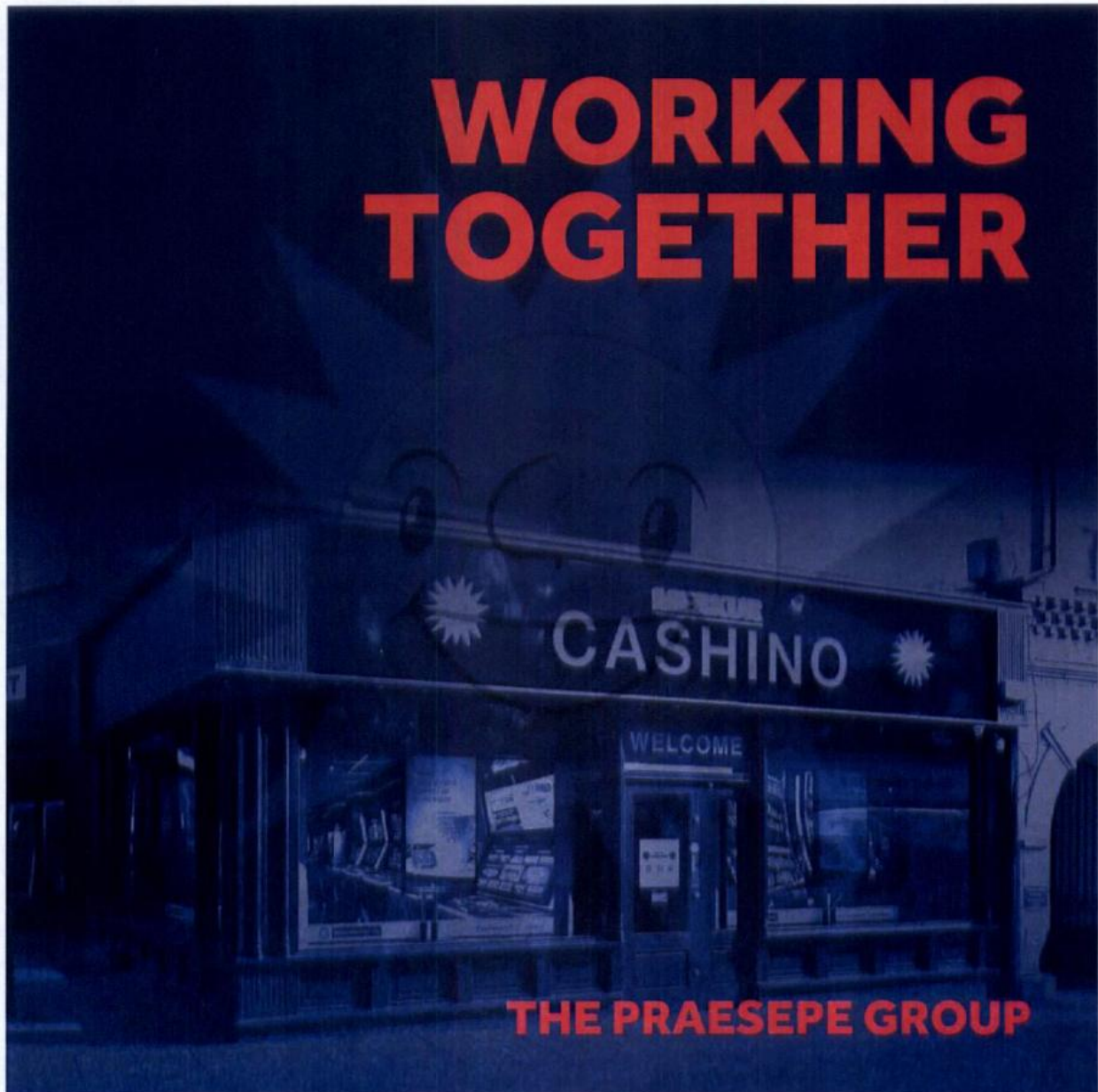
- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers attend our National Training Centre for a thorough induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during the course of their employment to ensure that potential issues can be addressed at the earliest opportunity.

Objective 3 - Protecting children and other vulnerable persons from being harmed or exploited by gambling

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and Check Policy are our third-party independent partner for compliance testing.
- All licensed premise employees receive induction and six-monthly refresher training during the course of their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Playright is installed in all licensed premises - this is a self-help App available to customers to enable them to manage spend and play time.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.
- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, education and treatment of problem gambling.

All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

WORKING TOGETHER



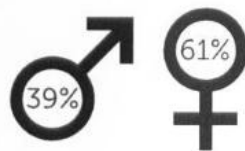


PART OF THE GAUSELMANN GROUP

A Strong Partner For More Than 60 Years

Praesepe is a subsidiary of the family run Gauselmann Group who are based in Espelkamp (Germany). Over the last 60 years the group has grown to operate more than 700 venues across Europe under the Merkur Brand. Millions of enthusiastic guests at home and abroad know our logo. The laughing MERKUR Sun is a guarantor for the best Entertainment.

Praesepe employs over 1,600 people (61% female*) over the 5 Bingo Clubs, 160 High Street Gaming centres (73 High Street Bingos and 87 Adult Gaming Centres) and 5 Family Entertainment Centres under three main brands:



61% of employees are female

39% of employees are male



Merkur Cashino is an established brand in the UK and represents the very best in terms of exciting "slot gaming" and high street bingo entertainment through delivering to our customers the latest in venue product and atmosphere. These venues are known for their highly trained teams and first class face to face service.



Merkur Slots is a new up and coming brand in the UK bringing the latest fun slots & bingo experience in smaller sized high street locations.



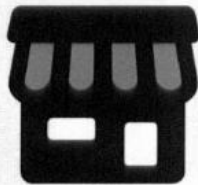
Beacon Bingo clubs are very important to our customers in their local communities. Our teams strive to deliver not just great service but a bingo experience which focusses on ambience, safety and fun in a modern environment. The flagship venue at Cricklewood, in North London, is the largest in Europe.

HIGH STREET BINGO



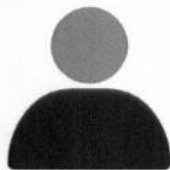
What is it?

Bingo is one of the UK's favourite pastimes and Praesepe is one of the UK's largest operators of licensed bingo and arcade premises. Our High Street Bingo Venues:



Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.

Our teams remain with the customers on the venue floor rather than behind a counter.



Our customers can attend and play bingo at any time with the numbers auto-called.

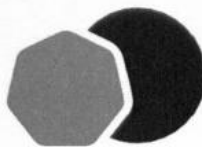


The market on the high street has evolved with venues now providing Electronic Bingo Tablets.



Bingo is available for play from 9am until midnight.

Our Bingo terminals offer B3, Cat C and Cat D products with an average stake of between 30-40p stake.



Bingo Terminals



Think 25

RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging



Players in Venue



We Are Not A Problem

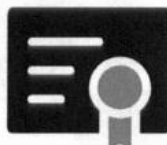
Being a responsible operator is high priority across the Gauselmann group and in the UK Praesepe is always looking at ways to adhere to the three licensing objectives as technology and customer behaviour changes.

GAMBLING COMMISSION

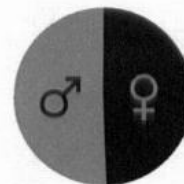
Praesepe is regulated by the
Gambling Commission and
Licensing Authorities



We provide complimentary refreshments, teas and coffees, to customers and do not sell alcohol. Our staff will not allow anyone into the premises who appears to be intoxicated.



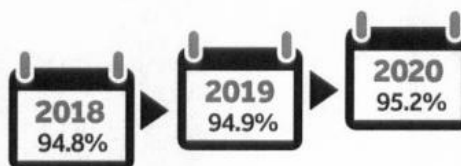
We are immensely proud of the fact that we have never had a licence revoked or even reviewed. Incidents are extremely rare. We simply do not generate noise and anti social behaviour.



Our venues operate a Think 25 policy whereby any person's who look under 25 have to produce a form of photo ID.



Our venues appeal to all ages with our membership gender database split of 52 % Male / 48% Female



Our venues have 3 external age test visits per year with a compliance rate of over 94% for the last 3 years, compared to other industries that sit around 80%.

SOCIAL RESPONSIBILITY MEASURES IN PLACE



In Venue

Operationally we have a number of measures in place to protect our customers. Throughout the business Praesepe also has a number of socially responsible gambling tools, management and training that include:



All staff complete on-boarding and six-monthly refresher training on "The Essentials of Compliance and Social Responsibility" and "Safeguarding Children and Vulnerable People".



Dedicated Learning & Development Team and National training centres.

IHL SMART tablet in every venue for the recording of customer interactions, self-exclusions, incidents and alerts.

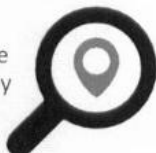


All Data is centrally reviewed and evaluated by an independent Audit/Compliance team.



Six monthly compliance audits to help identify training needs in venue.

Local Area Risk Assessments are updated annually to identify any changes in the local area.



PlayRight app installed in all venues that is a self help tool for customers to manage their gambling.

Compliance



Training Centre



PlayRight App



Online Training





Machine Messaging



Customer Interaction Training



SOCIAL RESPONSIBILITY MEASURES IN PLACE

All Levels

We provide an annual assurance statement to the Gambling Commission. This officially details the Board's commitment to the company values, purpose and culture and the accountability placed on delivery of the licensing objectives.



The statement contains information on how we operate effective governance, regulatory risk management, compliance controls, social responsibility and safer gambling initiatives.



It is also an opportunity to set out any initiatives relating to significant changes being introduced to improve control systems, risk-management, governance and safer gambling – Our recent commitments include; Socially Responsible Machine Messaging; Customer Set Your Limits; SMART Alert application to report criminal activity; opening our Second National Training Centre; Think 25 messaging and Customer Interaction Training.

Praesepe also engages with the **Bingo Association** and **Bacta** trade groups:



- Senior Manager representation Divisional meetings.
- Operations Director is the Vice Chair for division 3 representing Adult Gaming Centres.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Social Responsibility Committee.



- Operations Director and Head of Compliance are Directors.
- Head of Compliance is a member of the Social Responsibility Committee.

BENEFITS TO THE HIGH STREET



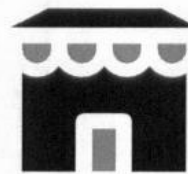
Benefits for your High Street Include:



Investment from £100,000 to £250,000 in long standing vacant venues.



Increased footfall to the high Street.



Linked trips with other shops helping to support other businesses.



Local jobs of between 6 and 12 people depending on the hours of operation.



We provide an important natural surveillance on the high street, particularly late into the evenings.

COMMUNITY & CHARITY



Praesepe has raised in excess of £1.2m for good causes since 2005 and currently supports the Bacta Charitable Trust.

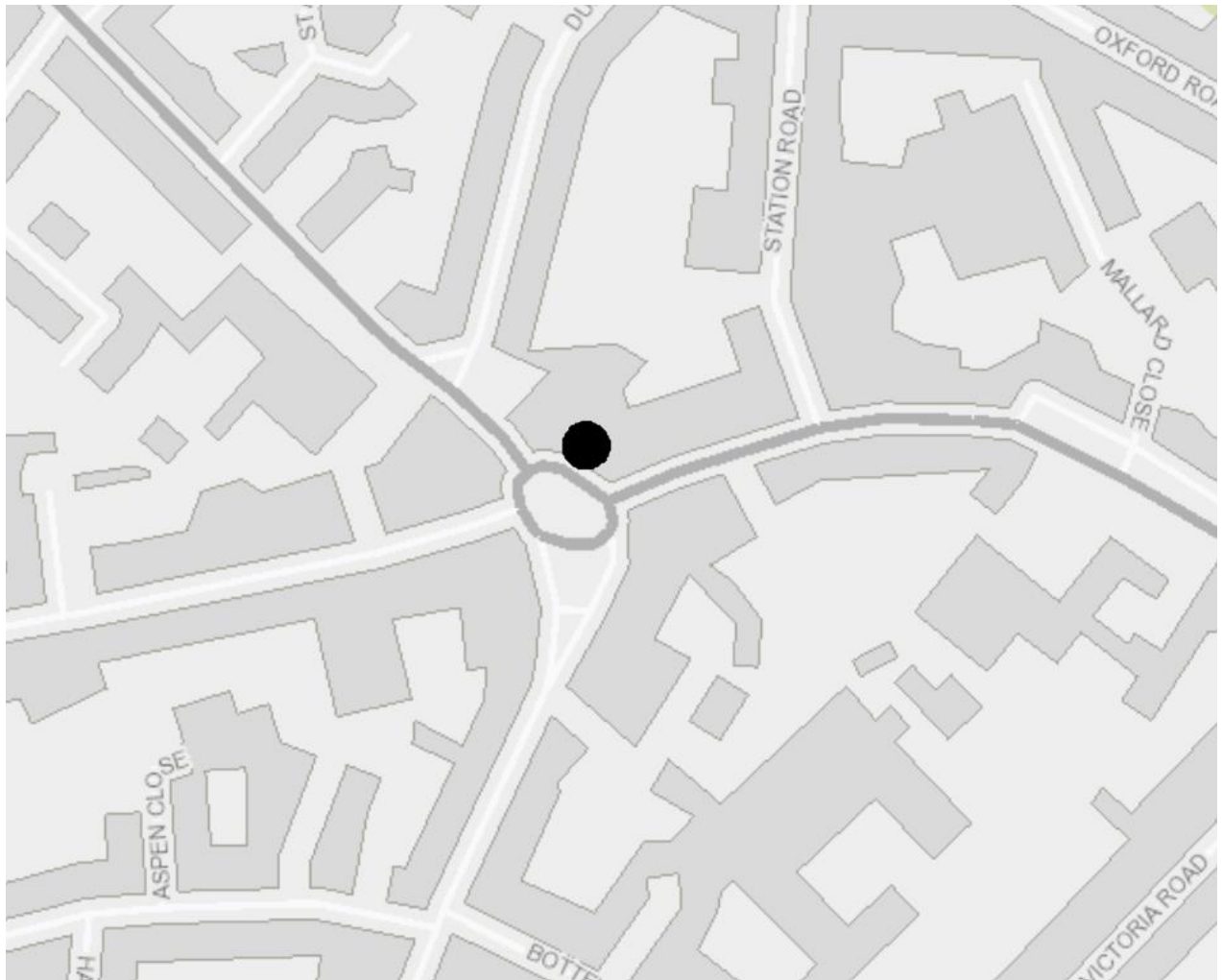
Please contact us.

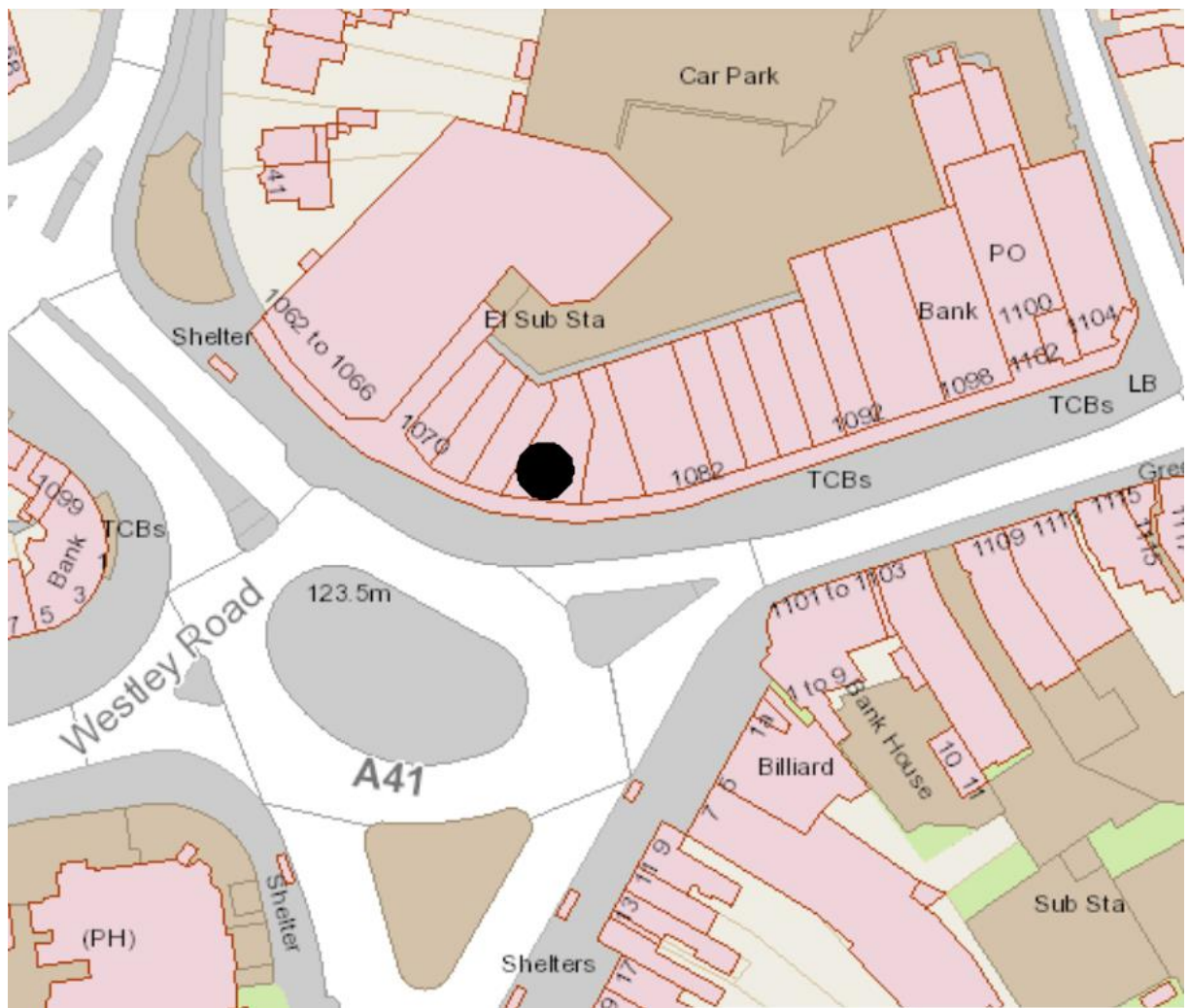
Praesepe PLC

Seebeck House
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Knowlhill
Milton Keynes
MK5 8FR

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MERKUR CASHINO, 1076 WARWICK ROAD, ACOCKS GREEN, BIRMINGHAM, B27 6RD**LICENSING SUB-COMMITTEE HEARING****18TH JANUARY 2021****REMOTE HEARING – CORE HEARING BUNDLE INDEX**

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d. Machine Fraud Policy e. Machine Ratio Check Policy; f. Smoking/Vaping Policy	
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Merkur Cashino, 1076 Warwick Road, Acocks Green, Birmingham, B27 6RD

OPERATIONAL MANAGEMENT PLAN & SECURITY MEASURES

January 2021

Cashino Gaming Ltd is an experienced and responsible operator. As with all our premises, we will operate a 'good neighbour' policy and will ensure that all neighbours are respected. We will implement a robust operational management plan and implement robust security measures to ensure that the premises, our customers and our relationship with our neighbours are all well managed.

All staff will be provided with a copy of this Operational Management Plan. All members of the management team will have full training with regards to the management plan. Refresher training will be held with relevant staff members at least every 6 months.

The Operational Management Plan in the first year will be reviewed on a 6 monthly basis in order to react to any changes in our initial trading pattern and then annually thereafter.

General

A member of the management team will be on site at all times.

Our teams will remain with the customers on the shop floor rather than behind a counter.

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.

Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises.

We will place a notice visible from the exterior of the premises stating that drinking of alcohol directly outside the premises is forbidden and that those who do so will be banned from the premises.

We will only play background music in the premises and there will not be any tannoy systems.

The main entrance doors will not be fixed or propped open at any time whilst the premises is trading.

Dispersal Policy

The premises will not attract large crowds of people and there will not be a mass departure of rowdy people at closing time due to the nature of our premises and customer base, therefore we do not have formal dispersal policies in place in our premises.

Our premises attract individuals and couples rather than large groups, and our customer base beyond midnight is predominantly the local entertainment workforce and shift workers who like to relax after their busy shifts. It is also unusual for our customers to loiter outside the premises after closing time. However, the following steps will be taken at closing time:

- Staff will alert customers that the premises will be closing 30 minutes before closure.

- Customers will be reminded to respect our neighbours when they leave.
- No waiting outside the premises will be permitted after close. Customers found to be loitering near the building will be politely asked by staff to move on.
- Staff, on request, will provide relevant information to customers who require a taxi or directions to the nearest station or bus stop.

Security Measures

The premises shall install and maintain a comprehensive CCTV system.

Subject to Data Protection guidance and legislation, the management of the premises will ensure that key staff are fully trained in the operation of the CCTV.

The entrance doors will be fitted with a magnetic door locking system.

The entrance doors will have a concealed maximum security deadlock.

The shopfront will have 10.8mm laminated (toughened) glass and the doors will have 6.4mm laminated (toughened) glass.

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

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise Address:	1076 Warwick Road, Acocks Green, Birmingham, B27 6RD
Local Authority:	Birmingham City Council
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-024 (Cashino Gaming Ltd)
Company Details:	Praesepe Group, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Cashino Gaming Limited
Name and Title of Assessor:	Gill Clulow, Senior Compliance Auditor
Date of Assessment:	30.10.2020, 3.11.2020
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots is located on Warwick Road in Acocks Green, Birmingham in the West Midlands region of England. Acocks Green is a vibrant suburb of Birmingham with shops, banks, food outlets spanning from a central roundabout. 3 AGC's are within a short walk – Admiral, Shaws and Cash Falls and bookmakers Ladbrokes, Betfred and Coral and a Mecca Bingo Hall. Merkur Casino operates the following venues licensed by Birmingham City Council, 73 Bull Street, Birmingham, 121 The Parade, Sutton Coldfield, 157 Weoley Castle Road, Weoley Castle, Unit 19, Fox & Goose Shopping Centre, 13 Watford Road, Cotteridge, 53 New Street, Birmingham.
Establishments of note:	AGC's – Cash Fall and Shaws, Select Express, 24 hour off license and convenience store all located on Shirley Road a few minutes walk away. Admiral AGC
Adjoining premises:	Merkur Slots is located next to Card Factory and a Dental Practice.
Crime statistics:	Warwick Road, Acocks Green, Birmingham, where Merkur Slots Birmingham is situated, is within the Acocks Green policing neighbourhood, under the West Midlands Police force area. Crime rate in Birmingham is lower than the average crime rate across similar areas like Stoke on Trent or Leicester but higher than average for the West Midlands force area. Number of reported crime incidents in the area has increased since 2019. Most commonly reported crimes in the last 12 months include violence and sexual offences and anti-social behaviour. In August 2020 there were 152 crime incidents recorded within half a mile from Merkur Slots Birmingham postcode predominantly consisting of violence and sexual offences (59) and anti-social behaviour (21). 8 of all crime incidents were reported directly on Warwick Road: 4 related to violence and sexual offences, 4 related to drugs, 1 possession of weapons and 1 related to criminal damage and arson. There are no currently published policing priorities from this area.
Population:	Merkur Slots Birmingham area has a population of 1412 usual residents, mainly in age groups 30-44 and 45-69. People at the retirement age make up a large proportion of local population – 30% of all residents. Relationship status of people living here does not show a significant deviation from the average figures for the UK. Warwick Road area shows lower levels of residents that report their health as good or very good (68%), which is usually indicative of areas with older population. Education and qualification levels are slightly below average. 33% of local residents has no qualifications compared with 22.9% national average and 24.7% is degree educated.
Culture:	Merkur Slots Birmingham area is ethnically diverse. 72% of local population claim to be White, which is lower than UK average of 86%. Other sizable ethnic groups include Pakistani – 12%, other Asian – 8%, Black African and Caribbean – 6% and Mixed Ethnicity – 2%. 68% of the residents were born in England, which is significantly below the English average. Dominating religion is Christianity – 51% of all residents. 15% identify themselves as Muslim and 2.5% is Hindu.
Unemployment:	Unemployment rate in Warwick Road area at 8.2% is higher than current average rate of 3.9%. This area has higher than average concentration of retired residents - 19% of the resident population compared with 13.9% national average. While the UK has an aging population, less residents over 65 are choosing to retire than previously. Between the 2001 and 2011 census, the number of economically active 65-74 year olds almost doubled to 8.7%. Most of the working population here works full-time, mainly in elementary occupations such as health, social work, education, retail and administration.
Deprivation:	In 2019, Warwick Road, Acocks was ranked amongst 30% most deprived neighbourhoods in the country, the same as in 2015. Indices of deprivation which received lowest ranking include: health and disability domain, income deprivation affecting older people, crime domain and living environment. Education, skills and training domain here is better than in 50% of neighbourhoods in UK.
Local Police:	The police have not identified any issues with the proposals.

The Gambling Act 2005 sets out the three licensing objectives (LO), which are:

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

Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into account Birmingham City Council local authority Statement of Gambling Principles, reference Part C section 5 Bingo Centres and Birmingham Borough Profile 2011.

Environmental Factors

In preparing this assessment Praesepe has considered the relevance of environmental factors. In this context, environmental factors include the physical location of schools, playgrounds, residential areas, other retail premises and locations (bus stations, tube stations) which have an effect on footfall. We have set out below our position on risk in this area:

Licensing Objectives	Local Area	Control Measures
Protecting children and other vulnerable people from being harmed or exploited by gambling	<p>Unemployment</p> <p>Unemployment rate in Warwick Road area at 8.2% is higher than current average rate of 3.9%. This area has higher than average concentration of retired residents - 19% of the resident population compared with 13.9% national average. While the UK has an aging population, less residents over 65 are choosing to retire than previously. Between the 2001 and 2011 census, the number of economically active 65-74 year olds almost doubled to 8.7%. Most of the working population here works full-time, mainly in elementary occupations such as health, social work, education, retail and administration.</p> <p>Deprivation</p> <p>In 2019, Warwick Road, Acocks was ranked amongst 30% most deprived neighbourhoods in the country, the same as in 2015. Indices of deprivation which received lowest ranking include: health and disability domain, income deprivation affecting older people, crime domain and living environment. Education, skills and training domain here is better than in 50% of neighbourhoods in UK.</p> <p>Schools and Education</p> <p>Acocks Green Primary School, Westley Rd, B27 7UQ Archbishop Ilsley Catholic School, Victoria Rd, B27 7XY</p>	<p>Age Verification</p> <p><i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Praesepe operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Birmingham Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p>

<p>Holy Souls Catholic Primary School, Mallard Ct, B27 6BN</p> <p>Cottesbrooke Infant & Nursery School, Yardley Rd, B27 6LG</p> <p>Cedars Academy, Cedars Avenue, B27 6UL</p> <p>The Oaklands Primary School, Dolphin Ln, B27 7BT</p> <p>Ninestiles School an Academy, Hartfield Cres, B27 7QG</p> <p>Kimichi School, 111 Yardley Rd, B27 6LL</p> <p>Fox Hollies Nursery, 419 Fox Hollies Rd, B27 7QA</p> <p>Community Centres and Youth Centres</p> <p>Friends Community Centre, 55 Yardley Rd, B27 6LL</p> <p>Parks, play grounds and sports/leisure facilities</p> <p>Fox Hollies Park, Pool Farm Rd, B27 7HB</p> <p>Westley Vale Millennium Green, The Avenue, B27 6NN</p> <p>Fox Hollies Park, Gospel Ln, B27 7EG</p> <p>Vulnerable and addiction support services</p> <p>The New Leaf Recovery Project, 16 Flint Green Rd, B27 6QA</p> <p>Homeless shelters and food banks</p> <p>Acocks Green Christian Centre, 100 Westley Rd, B27 7UL</p> <p>Pawnbrokers and Loan Shops</p> <p>H&T Pawnbrokers, 1141A Warwick Rd, B27 6RA</p> <p>Cash Converters, 14/15, 1160 Warwick Rd, B27 6BP</p> <p>CEX, 1080 Warwick Road, B27 6BH</p> <p>Medical Centres, Care Homes and Mental Health facilities</p> <p>Dudley Park Medical Centre, 28 Dudley Park Rd, B27 6QR</p> <p>The Acocks Green Medical Centre, 999 Warwick Rd, B27 6QJ</p> <p>Victoria Road Surgery, 21 Victoria Rd, B27 7XZ</p> <p>Holly House Care Home, 61 Westley Rd, B27 7UQ</p> <p>Christadelphian Care Homes, 17 Sherbourne Rd, B27 6AD</p> <p>Dudley Court Rest Home, 16 Dudley Park Rd, B27 6QR</p> <p>Victoria Lodge, 11 Victoria Rd Acock, s Green, B27 7XZ</p> <p>Arden Lodge, 946 Warwick Rd, B27 6QG</p> <p>New Day, 45 Wynford Rd, B27 6JH</p> <p>Alexandra House, Hillborough Rd, Olton, B27 6PF</p> <p>Grey Gables, 39 Fox Hollies Rd, B27 7TH</p> <p>Flint Green House, 4 Sherbourne Rd, B27 6AE</p>	<p>Age verification test purchasing and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the Industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>Vulnerability</p> <p>Training and guidance is given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Customer Interaction</p> <p>Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p>
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	<p>Gambling premises Shaws Amusements, 13 Shirley Road, B27 7XU Cash Fall Amusements, 17 Shirley Road, B27 7XU Betfred, Unit 1, 1160 Warwick Rd, B27 6BP Coral, 1192 Warwick Rd, B27 6BT Mecca Bingo Acocks Green, Stockfield Rd, B27 6BB Admiral Casino, 1105 Warwick Rd, B27 6RA</p> <p>Residential Areas Warwick Road, Acocks Green in Birmingham consists predominantly of flats (65%) and detached houses (27%). There is higher than average level of social housing - 36% of household spaces. This contrasts with the national average of just over 18%. 32% of properties is rented from private landlords and 20% is owned with a mortgage. Majority of households are occupied by a single person.</p> <p>Bus stops and other Transport links Acocks Green Village (Stop AG), B27 7XU Acocks Green Station, B27 6EB</p> <p>Locally Identified Premises Select Express, 21-23 Shirley Road, B27 7XU Acocks Green Library, Shirley Rd, B27 7XH</p> <p>Public Houses and Alcohol Licensed Premise INN on the GREEN, 2 Westley Rd, B27 7UH The Spread Eagle, 1146C Warwick Rd, B27 6BL</p>	<p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare; encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Player Protection To identify signs associated with problem gambling and people who may be at risk of gambling related harm</p> <p>Failure to provide information to customers on responsible gambling</p> <p>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</p> <p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p> <p>"Stay In Control" Posters and Leaflets containing the Gamcare helpline number are located in prominent locations within the premise and in private areas, such as customer toilets.</p> <p>Playright App available for customers to self-manage their play and spend and is able to send alerts to Merkur Slots Birmingham if the customer enters at a time they have chosen not to play which instigates an interaction with the customer. Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p>
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<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p>Crime statistics Warwick Road, Acocks Green, Birmingham, where Merkur Slots Birmingham is situated, is within the Acocks Green policing neighbourhood, under the West Midlands Police force area. Crime rate in Birmingham is lower than the average crime rate across similar areas like Stoke on Trent or Leicester but higher than average for the West Midlands force area. Number of reported crime incidents in the area has increased since 2019. Most commonly reported crimes in the last 12 months include violence and sexual offences and anti-social behaviour. In August 2020 there were 152 crime incidents recorded within half a mile from Merkur Slots Birmingham postcode predominantly consisting of violence and sexual offences (59) and anti-social behaviour (21). 8 of all crime incidents were reported directly on Warwick Road: 4 related to violence and sexual offences, 4 related to drugs, 1 possession of</p>	<p>Senior Management are members of the Bingo Association Executive and Social Responsible Committees and BACTA Divisional and Social Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> <p>Deprivation Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm. Merkur Slots operates on the basis that its controls and best practice is adopted at all times, therefore it is not a question of degrees of vigilance being implemented in different areas.</p> <p>Homelessness Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging. Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution. Staff are trained how to manage situations with homeless people seeking refuge. A line of contact will be created with local high risk premises, homeless shelters, foodbanks to provide social responsibility information.</p> <p>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late night opening</i> Merkur Slots Birmingham is subject to a separate security risk assessment, local factors are considered and proportionate control measures/physical security measures are installed. Merkur Slots Birmingham will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p>
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	<p>weapons and 1 related to criminal damage and arson. There are no currently published policing priorities from this area.</p> <p>Local Police</p> <p>The police have not identified any issues with the proposals.</p> <p>Public Houses and Alcohol Licensed Premise</p> <p>INN on the GREEN, 2 Westley Rd, B27 7UH The Spread Eagle, 1146C Warwick Rd, B27 6BL</p> <p>Pawnbrokers and Loan Shops</p> <p>H&T Pawnbrokers, 1141A Warwick Rd, B27 6RA Cash Converters, 14/15, 1160 Warwick Rd, B27 6BP CEX, 1080 Warwick Road, B27 6BH</p> <p>Gambling premises</p> <p>Shaws Amusements, 13 Shirley Road, B27 7XU Cash Fall Amusements, 17 Shirley Road, B27 7XU Betfred, Unit 1, 1160 Warwick Rd, B27 6BP Coral, 1192 Warwick Rd, B27 6BT Mecca Bingo Acocks Green, Stockfield Rd, B27 6BB Admiral Casino, 1105 Warwick Rd, B27 6RA</p> <p>Residential Areas (Impacted by Anti Social Behaviour)</p> <p>Warwick Road, Acocks Green in Birmingham consists predominantly of flats (65%) and detached houses (27%). There is higher than average level of social housing - 36% of household spaces. This contrasts with the national average of just over 18%. 32% of properties is rented from private landlords and 20% is owned with a mortgage. Majority of households are occupied by a single person.</p> <p>Anti-social behaviour is second most commonly reported crime type in this area. There were 21 anti - social behaviour incidents reported within half a mile from Merkur Slots Liverpool postcode in August 2020 but none of them occurred directly on Warwick Road. Anti-social behaviour crime hotspots in this area include Higher Educational Building, Mayfield Road and Olton Boulevard East.</p>	<p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p>General Crime and Disorder</p> <p><i>To identify aggressive customers to prevent crime and disorder</i></p> <p><i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for Acocks Green policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with West Midlands Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App Inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p> <p>Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.</p> <p>Merkur Slots Birmingham will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p> <p>Anti-social behaviour outside the premise</p> <p>Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a</p>
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responsibility to work in partnership with local residents and authorities to reduce environmental impacts.

Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.

Incidents of anti-social behaviour are recorded on the IHL SMART-Tablet Incident App.

Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.

Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.

Money Laundering

Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.

Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML policies with clear escalation and reporting processes.

There are 2 pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.

IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.

Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.

Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.

Adequate staff will be maintained at all times and subject to regular review and risk assessment.

Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 8pm until 6am.

In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots will primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.

Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.

Merkur Slots Birmingham will operate TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.

As such staff are based predominately on the venue floor and have very little need to work in a back area, any back office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TiTo and GeWeTe management of cash within the venue.

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.

Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.

Alcohol and Drugs

Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.

'No Alcohol Allowed' signage on the door.

Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.

	<p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p>Money Lending Money lending is not tolerated within our premises.</p> <p>Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
Ensuring that gambling is conducted in a fair and open way	<p>Bingo/Gaming Machine and Supervision The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G-Tabs are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p>Customer Complaints <i>Failure to prevent customers complaints and disputes regarding gambling within our premises</i></p> <p><i>Failure to resolve customer's complaints and disputes regarding our gambling premises.</i> Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website.</p> <p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p>

	<p>Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints.</p> <p>Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p>Marketing</p> <p>Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages. No Under 18's allowed, Think 25, Bingo Played Here, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p> <p>Ethnicity and Local Area Demographic</p> <p>Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training & Social Responsibility</p> <p>Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Praesepe have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p>
Other	<p>Places of worship and Religious Buildings</p> <p>Acocks Green Methodist Church, 1 Botteville Rd, B27 7YE</p> <p>The Parish Church of Acocks Green, 1 St Marys CJ, B27 6QX</p> <p>St Mary's Parish Church, 34 Dudley Park Rd, B27 6QR</p> <p>Sacred Heart and Holy Souls Church, 1151 Warwick Rd, B27 6RG</p> <p>Acocks Green Christian Centre, 100 Westley Rd, B27 7UL</p> <p>Acocks Green Baptist Church, 39 Yardley Rd, B27 6HG</p> <p>Acocks Green Christadelphian Ecclesia, 32 Station Rd, B27 6DN</p> <p>Rizvia Mosque, Alexander Rd, B27 6ET</p>

	<p>Praesepe work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People; Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice yearly.</p> <p>COVID 19 All staff receive training on COVID-19 guidelines.</p> <p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p> <p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p>
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Merkur Slots Birmingham Premise Layout


Premise level:	Merkur Slots, Acocks Green is a ground floor premises on a busy junction in the centre of Acocks Green.
Premise frontage:	Merkur Slots Birmingham will be a property will be of a style which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions will comply with LCCP and standards set by the Committee of Advertising Practise (CAP) and Broadcast Committee of Advertising Practise (BCAP)
Counter Position:	<p>Merkur Slots Birmingham floor layout will be of the design to avoid blind spots and enable supervision of entrances and machines from the central service area and staff will regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons.</p> <p>The central service area serves as the main support area for staff to manage the venue without having to leave the floor:</p> <ul style="list-style-type: none"> - TITO machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines. - Beverage and snacks are provided from the service area - IHL SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists - The CCTV monitor on the central desk allows staff to view the exterior at all times.
Floor layout:	Merkur Slots Birmingham floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed and staff will regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets will be located in prominent locations within the premise.
Machine Positions:	<p>Merkur Slots Birmingham will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur bingo venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one.</p>
Hidden Areas:	Merkur Slots Birmingham will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.

Additional Comments

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. 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. When I was required to complete a Local Area Risk Assessment for the new Merkur Slots premises in Acocks Green I researched the area and then visited the location. I found Acocks Green to be a vibrant area with a variety of national and independent retailers and food outlets. Despite Covid 19 the area was busy with shoppers, I did not observe any evidence of street lifestyle persons or of any rough sleeping. Merkur Cashino operates 6 venues within Birmingham and the expertise and experience of the teams there will be used to support and train the new team as they are recruited for Merkur Slots.

This document provides an assessment of risk at premise level relating to the provision of these facilities for gambling. Praesepe is a national operator and employs a number of standard policies, procedures and control measures across all premises. These issues are clearly articulated in the "Compliance Manual"; to be found in the premise and in our Player Protection Framework. The company also carries out premises security risk assessments (available on request) and health and safety risk assessments which inter alia relate to the objective of keeping crime out of gambling.

Where relevant, Praesepe has also taken into account any substantive local risks identified in a wide range of policy statements related to gambling and local area profiles specifically related to gambling. However the company does not operate discriminatory policies against any identified groups based on social demographic or ethnic origin. Therefore identification of issues relating to gambling related harm are based on individual customer behaviour; even where particular groups are identified through research at being at greater risk of gambling related harm.

Assessors Name:	Gill Clulow
Signature:	
Date:	30.10.2020

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

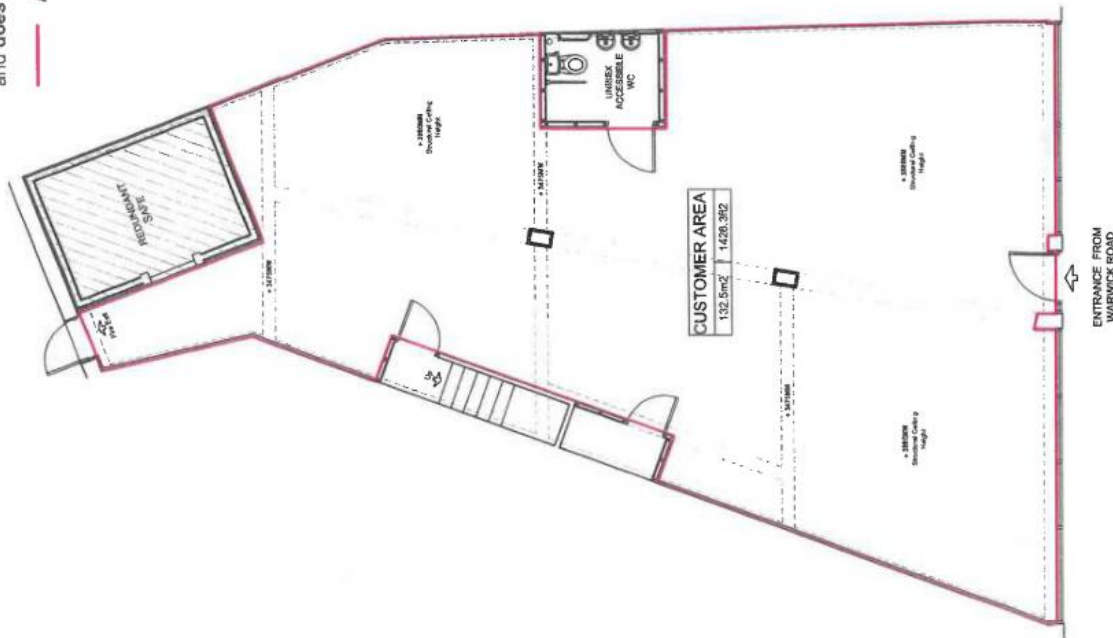




GAMBLING ACT 2005 LICENSING PLAN

Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for information purposes only and does not form part of the premises licence.

— Area in which facilities will be provided for gaming.



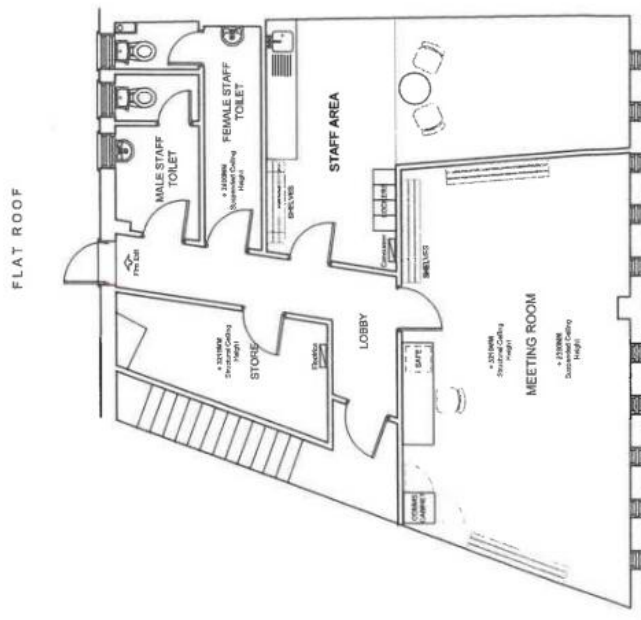
Proposed Ground Floor Plan

1:50



Location Plan

1:1250

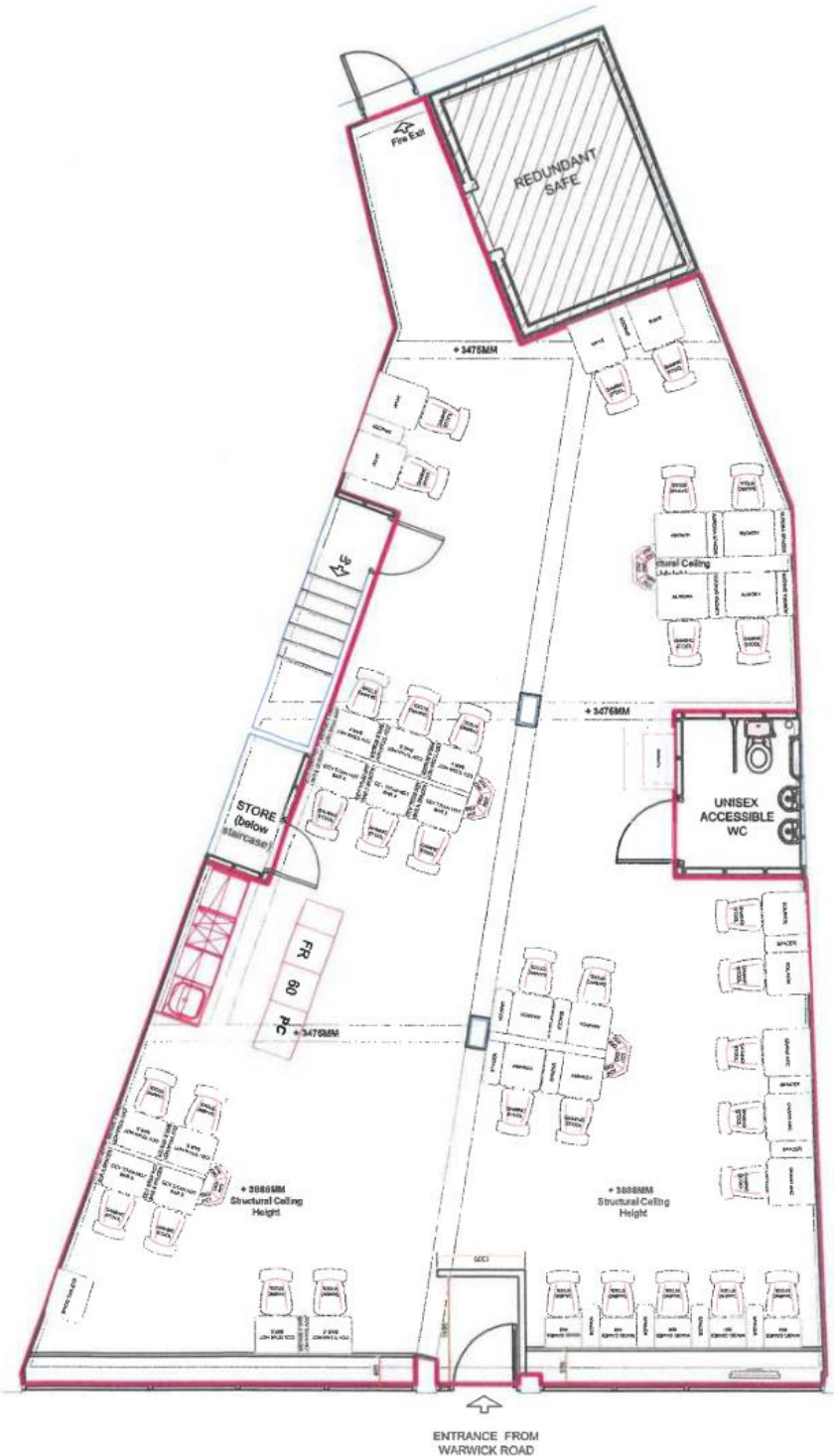


Proposed First Floor Plan

1:50



1076 WARWICK ROAD ACOCKS GREEN B27 6RD	
LICENCE PLAN	
Drawn: JMA Date: 20/07/2020 Scale: 1:50 @ A1	Checked: WR/AGR/02 Date: 13/07/2020 Scale: 1:50 @ A1
Licence Number: 1076 Warwick Road, Acock's Green, War. B27 6RD	



Proposed Ground Floor Plan **1:75**

**FOR ILLUSTRATION
PURPOSES ONLY**

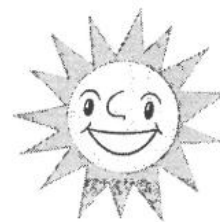
CUSTOMER AREA	
132.5m ²	1426.3m ²



REVISIONS		REFERENCE DRAWINGS	
FIT OUT TYPE Merkur Slots		SCALE 1:75	
PROJECT Merkur Slots		DRAWN BY	
1076 WARWICK ROAD ACOCKS GREEN B27 6RD		DATE 04/10/2020	
DESCRIPTION PROPOSED MACHINE PLAN		DRAWING No.	
		REVISION Lockdown	



CONTRACT IS RESERVED BY MERKUR SLOTS P.L.C. AND IS ISSUED ON THE CONDITION THAT IT IS NOT TO BE REPRODUCED OR USED IN ANY MANNER WITHOUT THE WRITTEN CONSENT FROM MERKUR SLOTS P.L.C.
THIS DRAWING SHOULD NOT BE SCALED. THE CONTRACTOR SHOULD CHECK ALL DIMENSIONS ON SITE. ANY ERROR OR OMISSION SHOULD BE REPORTED TO MERKUR SLOTS P.L.C.



THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

Objective 1 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

- Cashino Gaming Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Cashino Gaming Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Cashino Gaming Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Cashino Gaming Limited premises operate digital CCTV and customer areas are supervised.
- Cashino Gaming operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- The employees in Cashino Gaming premises are required to carry a portable alarm which is provided by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Cashino Gaming Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Cashino Gaming employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Cashino Gaming operate a robust late night working policy, which is fully supported by a full-time Night Manager.
- Cashino Gaming does not operate a single-manning policy between 8pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

Objective 2 - Ensuring that gambling is conducted in a fair and open way.

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.

Cashino Gaming Limited

Operational Standards



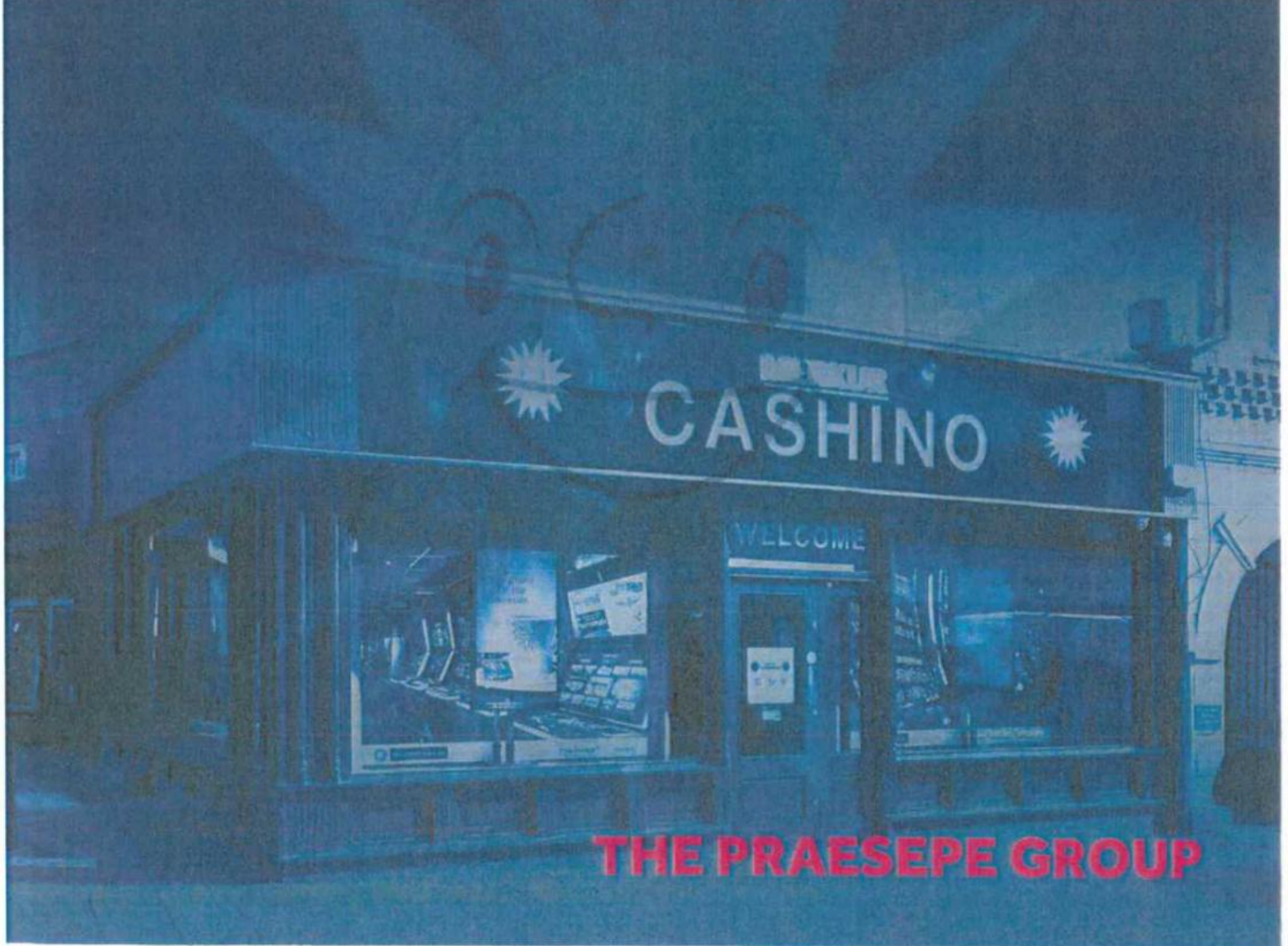
- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers attend our National Training Centre for a thorough induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during the course of their employment to ensure that potential issues can be addressed at the earliest opportunity.

Objective 3 - Protecting children and other vulnerable persons from being harmed or exploited by gambling

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and Check Policy are our third-party independent partner for compliance testing.
- All licensed premise employees receive induction and six-monthly refresher training during the course of their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Playright is installed in all licensed premises - this is a self-help App available to customers to enable them to manage spend and play time.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.
- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, education and treatment of problem gambling.

All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

WORKING TOGETHER



THE PRAESEPE GROUP



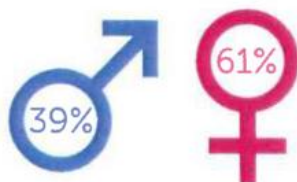
PART OF THE GAUSELMANN GROUP

A Strong Partner For More Than 60 Years



Praesepe is a subsidiary of the family run Gauselmann Group who are based in Espelkamp (Germany). Over the last 60 years the group has grown to operate more than 700 venues across Europe under the Merkur Brand. Millions of enthusiastic guests at home and abroad know our logo. The laughing MERKUR Sun is a guarantor for the best Entertainment.

Praesepe employs over 1,600 people (61% female*) over the 5 Bingo Clubs, 160 High Street Gaming centres (73 High Street Bingos and 87 Adult Gaming Centres) and 5 Family Entertainment Centres under three main brands:



61% of employees are female

39% of employees are male



Merkur Casino is an established brand in the UK and represents the very best in terms of exciting "slot gaming" and high street bingo entertainment through delivering to our customers the latest in venue product and atmosphere. These venues are known for their highly trained teams and first class face to face service.



Merkur Slots is a new up and coming brand in the UK bringing the latest fun slots & bingo experience in smaller sized high street locations.



Beacon Bingo clubs are very important to our customers in their local communities. Our teams strive to deliver not just great service but a bingo experience which focusses on ambience, safety and fun in a modern environment. The flagship venue at Cricklewood, in North London, is the largest in Europe.

HIGH STREET BINGO



What is it?

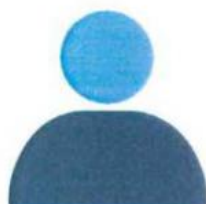
Bingo is one of the UK's favourite pastimes and Praesepe is one of the UK's largest operators of licensed bingo and arcade premises. Our High Street Bingo Venues:



Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.



Our teams remain with the customers on the venue floor rather than behind a counter.



Our customers can attend and play bingo at any time with the numbers auto-called.



The market on the high street has evolved with venues now providing Electronic Bingo Tablets.



Our Bingo terminals offer B3, Cat C and Cat D products with an average stake of between 30-40p stake.



Bingo is available for play from 9am until midnight.

Bingo Terminals



Think 25

RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging



Players in Venue



We Are Not A Problem

Being a responsible operator is high priority across the Gauselmann group and in the UK Praesepe is always looking at ways to adhere to the three licensing objectives as technology and customer behaviour changes.

GAMBLING COMMISSION

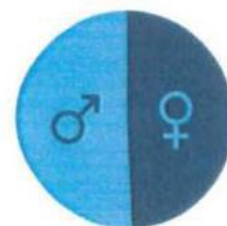
Praesepe is regulated by the
Gambling Commission and
Licensing Authorities



We provide complimentary refreshments, teas and coffees, to customers and do not sell alcohol. Our staff will not allow anyone into the premises who appears to be intoxicated.



We are immensely proud of the fact that we have never had a licence revoked or even reviewed. Incidents are extremely rare. We simply do not generate noise and anti social behaviour.



Our venues operate a Think 25 policy whereby any person's who look under 25 have to produce a form of photo ID.



Our venues appeal to all ages with our membership gender database split of 52 % Male / 48% Female



Our venues have 3 external age test visits per year with a compliance rate of over 94% for the last 3 years, compared to other industries that sit around 80%.

SOCIAL RESPONSIBILITY MEASURES IN PLACE



In Venue

Operationally we have a number of measures in place to protect our customers. Throughout the business Praesepe also has a number of socially responsible gambling tools, management and training that include:



All staff complete on-boarding and six-monthly refresher training on "The Essentials of Compliance and Social Responsibility" and "Safeguarding Children and Vulnerable People".



Dedicated Learning & Development Team and National training centres.

IHL SMART tablet in every venue for the recording of customer interactions, self-exclusions, incidents and alerts.



All Data is centrally reviewed and evaluated by an independent Audit/Compliance team.



Six monthly compliance audits to help identify training needs in venue.

Local Area Risk Assessments are updated annually to identify any changes in the local area.



PlayRight app installed in all venues that is a self help tool for customers to manage their gambling.

Compliance



Training Centre



PlayRight App



Online Training





Machine Messaging



Customer Interaction Training



SOCIAL RESPONSIBILITY MEASURES IN PLACE

All Levels

We provide an annual assurance statement to the Gambling Commission. This officially details the Board's commitment to the company values, purpose and culture and the accountability placed on delivery of the licensing objectives.



The statement contains information on how we operate effective governance, regulatory risk management, compliance controls, social responsibility and safer gambling initiatives.



It is also an opportunity to set out any initiatives relating to significant changes being introduced to improve control systems, risk-management, governance and safer gambling – Our recent commitments include; Socially Responsible Machine Messaging; Customer Set Your Limits; SMART Alert application to report criminal activity; opening our Second National Training Centre; Think 25 messaging and Customer Interaction Training.

Praesepe also engages with the [Bingo Association](#) and [Bacta](#) trade groups:



- Senior Manager representation Divisional meetings.
- Operations Director is the Vice Chair for division 3 representing Adult Gaming Centres.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Social Responsibility Committee.



- Operations Director and Head of Compliance are Directors.
- Head of Compliance is a member of the Social Responsibility Committee.

BENEFITS TO THE HIGH STREET



Benefits for your High Street Include:



Investment from £100,000 to £250,000 in long standing vacant venues.



Increased footfall to the high Street.



Linked trips with other shops helping to support other businesses.



Local jobs of between 6 and 12 people depending on the hours of operation.



We provide an important natural surveillance on the high street, particularly late into the evenings.

COMMUNITY & CHARITY



Praesepe has raised in excess of £1.2m for good causes since 2005 and currently supports the Bacta Charitable Trust.

Please contact us.

Praesepe PLC

Seebeck House
1A Seebeck Place
Knowlhill
Milton Keynes
MK5 8FR

phone 01908 351200

email info@praesepeplc.com



G-TAB Bingo



**Bringing Traditional Bingo
to the High Street**

G-Tab is a multi-purpose gaming device offering live link Bingo Games, Bingo Variant Games and participation in the National Bingo Game which is played twice daily. Bingo tablets are bingo machines that provide games of both remote and non-remote bingo with remote bingo being the linked games operated via WiFi and the internet on licensed premises. All equipment and games comply with the appropriate Gambling Commission Technical Standards and Machine Guidance.

Standalone Tablet Terminal

Bingo numbers announced and shown live on the top display



Charges to play clearly displayed



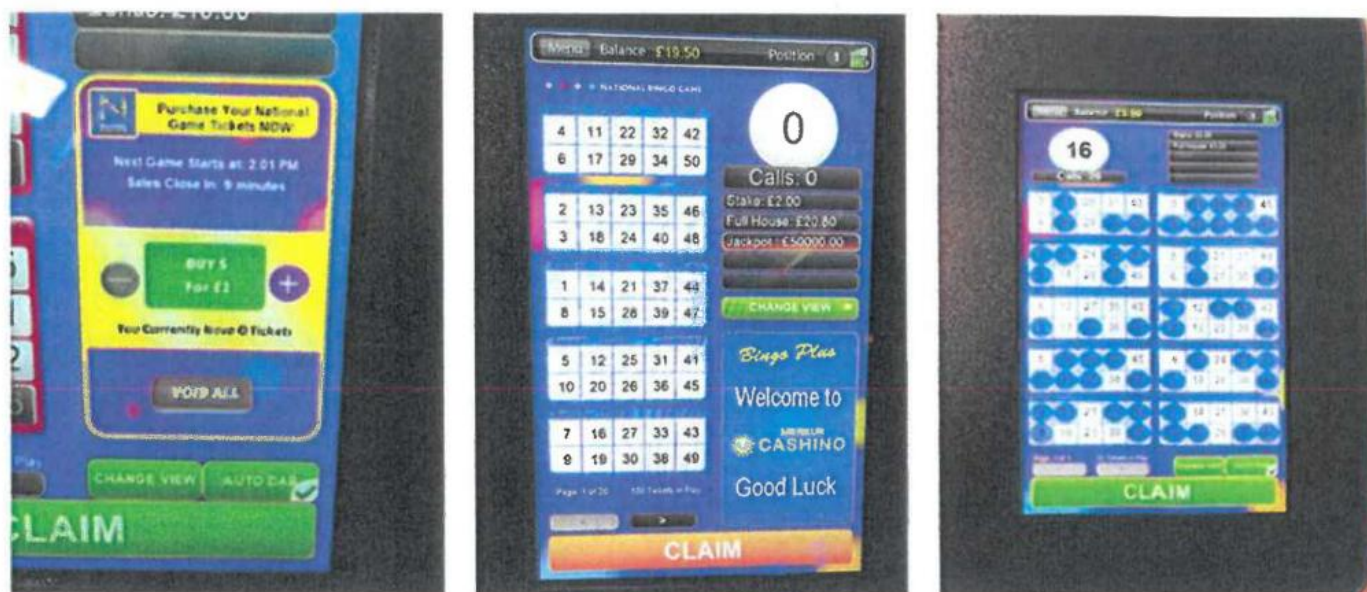
Requires customer interaction to credit the device and cash out



Customers cannot stake-up once game has commenced

“Making all traditional forms of Bingo like ‘Shutter Bingo’ played at the sea-side or ‘main-stage’ Bingo played in Clubs available”

National Bingo Game, linked to all Bingo Clubs (such as Mecca and Buzz) played twice daily (2pm and 7pm) at £2.00 for 5 tickets, maximum tickets 100 per position, making £40 maximum stake which is within the Bingo Association guidelines. Prize money including the National Jackpot is based on the number of cards in play, including bonus lines and is clearly displayed on the main display caller's unit, prior to the game commencing and on the individual tablets throughout the game.



Live Link Bingo played throughout the day from 50p for 3 cards, maximum 15 cards per position, making maximum stake of £2.50 per game. The prize money, based on number of cards in play, including bonus lines is clearly displayed on the main display caller's unit, prior to the game commencing, and on the individual tablet throughout the game.



Bingo Variant (BV) Games are available 9:00 till midnight. The game of bingo stands alone on the tablet and does not connect via remote communication to a server or link to games across premises.

Bingo Riches: play from 10p (25p/50p/£1 options) per card, maximum 4 cards, so maximum stake £4 per game, fixed odds bingo game, with 24 bingo balls drawn and marked off various patterns to give a varied winplan, maximum prize £40 on 10p stake.



Lucky Charm: play from 10p (20p/50p/£1 options) per card, maximum 4 cards, so maximum stake £4 per game, fixed odds bingo game, with 24 bingo balls drawn and marked off various patterns to give a varied winplan, maximum prize £50 on 10p stake.



Low stake games:

The device also offers the player a choice of games – Slots and Casino style games - which can be played from as little as 5p (maximum £1) a game all of which comply with Cat C technical standards.



SCHEDULE 5

Regulations 14 and 15

Conditions attaching to betting premises licences

PART 1

Mandatory conditions attaching to betting premises licences (other than track premises licences)

1. A notice stating that no person under the age of 18 years is permitted to enter the premises shall be displayed in a prominent place at every entrance to the premises.
- 2.—(1) Access to the premises shall be from a street or from other premises with a betting premises licence.
(2) Without prejudice to sub-paragraph (1), there shall be no means of direct access between the premises and other premises used for the retail sale of merchandise or services.
3. Subject to anything permitted by virtue of the 2005 Act, or done in accordance with paragraphs 4, 5, 6 and 7 below, the premises shall not be used for any purpose other than for providing facilities for betting.
4. 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 leave any gaming machine or betting machine in order to do so.
5. No apparatus for making information or other material available in the form of sounds or visual images may be used on the premises, except for apparatus used for the following purposes—
 - (a) communicating information about, or coverage of, sporting events, including—
 - (i) information relating to betting on such an event; and
 - (ii) any other matter or information, including an advertisement, which is incidental to such an event;
 - (b) communicating information relating to betting on any event (including the result of the event) in connection with which betting transactions may be or have been effected on the premises.
6. No publications, other than racing periodicals or specialist betting publications, may be sold or offered for sale on the premises.
7. No music, dancing or other entertainment shall be provided or permitted on the premises, save for entertainment provided in accordance with paragraph 5.
- 8.—(1) No alcohol shall be permitted to be consumed on the premises at any time during which facilities for gambling are being provided on the premises.
(2) A notice stating the condition in sub-paragraph (1) shall be displayed in a prominent place at every entrance to the premises.
9. A notice setting out the terms on which customers are invited to bet on the premises shall be displayed in a prominent place on the premises to which customers have unrestricted access.

Status: This is the original version (as it was originally made). This item of legislation is currently only available in its original format.

PART 2

Default conditions attaching to betting premises licences (other than in respect of tracks)

No facilities for gambling shall be provided on the premises between the hours of 10pm on one day and 7am on the next day.

Other provisions and legislation

- 4.7 Conditions on premises licences should relate only to gambling, as considered appropriate in light of the principles to be applied by licensing authorities under s.153 of the Act. Accordingly, if the Commission's [Licence Conditions and Codes of Practice](#) (LCCP) or other legislation places particular responsibilities or restrictions on an employer or the operator of premises, it is not necessary or appropriate to impose similar conditions on a premises licence issued in accordance with the Act.
- 4.8 Similarly, where other legislation confers powers on inspection and enforcement agencies in relation to separate activities or concerns, the Act does not affect the continued use of such powers, for example, the powers of an environmental health officer in respect of statutory nuisance under the Environmental Protection Act 1990.

Licensing authority decisions

- 4.9 S.153 provides that licensing authorities shall aim to permit the use of premises for gambling in so far as they think it is:
- a. in accordance with any relevant code of practice under s.24
 - b. in accordance with any relevant guidance issued by the Commission under s.25
 - c. reasonably consistent with the licensing objectives (subject to a and b above)
 - d. in accordance with the licensing authority's statement of licensing policy (statement of policy) (subject to a to c above).
- 4.10 Therefore, a licensing authority has no discretion in exercising its functions under Part 8 of the Act, to grant a premises licence where that would mean taking a course which it did not think accorded with the Guidance contained in this document, any relevant Commission code of practice the licensing authority's own statement of policy or were reasonably consistent with the licensing objectives.

Delegations

- 4.11 The decision making powers of licensing authorities may be delegated, as set out in s.154 of the Act for England and Wales and s.155 for Scotland. Decisions that are delegated to a licensing committee, may be further delegated to a sub-committee, which may then arrange for the decision to be taken by an officer of the authority.
- 4.12 It is open to licensing committees to choose not to delegate decisions. An important consideration in determining whether any particular decision should be delegated will be whether delegation might give rise to a risk of judicial review challenge, particularly on the basis of appearance of bias.
- 4.13 The tables at Appendix G set out a summary of licensing authority delegations permitted under the Act for England and Wales, and for Scotland.

Part 5: Principles to be applied by licensing authorities

Licensing objectives

- 5.1 In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:
- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
 - ensuring that gambling is conducted in a fair and open way
 - protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 5.2 It is expected that the licensing authority will have set out their approach to regulation in their statement of policy, having taken into account local circumstances. This is dealt with in more detail at Part 6.

Objective 1 : Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

- 5.3 Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6.
- 5.4 A licensing authority will need to consider questions raised by the location of gambling premises when:
- formulating its statement of licensing policy
 - receiving relevant representations to an application
 - dealing with applications as a responsible authority in its own right
 - considering applications before it.
- 5.5 In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.
- 5.6 Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.
- 5.7 Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003 / Licensing (Scotland) Act 2005, in which context they have wider powers to also take into account measures to prevent nuisance.

- 5.8 In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in Part 9 of this Guidance.
- 5.9 There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. Further information can often be found on the website of industry trade associations⁵.
- 5.10 Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

Objective 2 : Ensuring that gambling is conducted in a fair and open way

- 5.11 Generally the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness is likely to be a matter for either the way specific gambling products are provided and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. However, if licensing authorities suspect that gambling is not being conducted in a fair and open way this should be brought to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.
- 5.12 In relation to the licensing of tracks, the licensing authority's role will be different from other premises in that track owners will not necessarily have an operating licence. In those circumstances the premises licence may need to contain conditions to ensure that the environment in which betting takes place is suitable. Further information can be found in Part 20 of this Guidance.

Objective 3 : Protecting children and other vulnerable persons from being harmed or exploited by gambling

- 5.13 In exercising their powers under s.153, licensing authorities should consider whether staff will be able to adequately supervise the gambling premises, as adequate staffing levels is a factor to consider regarding the prevention of underage gambling. The Commission would expect the operator and the licensing authority to work together to consider how any impediments to the supervision of premises might be most appropriately remedied. Supervision also applies to premises that are themselves not age-restricted (eg bingo and family entertainment centre (FEC) premises) but which make gambling products and facilities available.

⁵ For example, The Safe Bet Alliance's Voluntary Code of Safety and Security National Standards for Bookmakers

- 5.14 Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.
- 5.15 If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.
- 5.16 In relation to casinos, the Commission has issued a code of practice on access to casino premises by children and young persons, as provided for by s.176 of the Act. The code of practice is available as part of the [Licence Conditions and Codes of Practice](#) (LCCP) In accordance with s.176 of the Act, adherence to the code will be a condition of the premises licence. Further information can be found in Parts 9 and 17 of this Guidance.
- 5.17 The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define 'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.
- 5.18 Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority's statement of policy. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

S.153 principles

- 5.19 S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:
- a. in accordance with any relevant code of practice under s.24 (ie the LCCP)
 - b. in accordance with any relevant guidance issued by the Commission under s.25 (ie this Guidance)
 - c. reasonably consistent with the licensing objectives (subject to a and b above), and
 - d. in accordance with the licensing authority's statement of licensing policy (subject to a to c above).
- 5.20 Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this Guidance, any relevant Commission code of practice, its own statement of policy, and the licensing objectives.
- 5.21 In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this Guidance, and its own statement of policy or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission's codes and this Guidance take precedence.

- 5.22 In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should **not** have regard to:
- s.153 makes it clear that in deciding whether or not to grant a licence, a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application
 - s.210 (1) of the Act states that 'in making a decision in respect of an application...a licensing authority should not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with law relating to planning or building'.
- 5.23 A licensing authority is therefore afforded significant scope to exercise its powers under s.153 on the grounds that it does not encroach on the two principles set out above.
- 5.24 The requirements in s.153 are subject to the licensing authority's power under s.166 to resolve not to issue casino premises licences. This means that a resolution not to issue a casino premises licence applies regardless of the matters set out in s.153.

Codes of Practice

- 5.25 The LCCP sets out the Commission's general licence conditions and associated codes of practice provisions under the Act. The codes of practice are set out within Part II of the LCCP.
- 5.26 To assist licensing authorities in determining premises applications and inspecting premises, [all the codes of practice](#) are also available as a single document. The codes specify a number of requirements, many of which relate to social responsibility issues and these may be of particular interest where a licensing authority has concern about matters such as protection of the young and vulnerable. It should be noted that the codes also apply to situations in which the gambling being offered is not normally the responsibility of an operating licence holder. Examples include the *Code of practice for equal chance gaming* and the *Code for gaming machines in clubs and premises with an alcohol licence*.

Good practice in regulation

- 5.27 Under the Legislative and Regulatory Reform Act 2006, any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation⁶ in the exercise of the function. These provide that regulatory activities should be carried out in a way which is transparent, accountable, proportionate, and consistent and should be targeted only at cases in which action is needed. The Commission has regard to these principles in relation to its responsibilities and also has regard to the requirements of the Regulators' Code⁷. The purpose of the Code is to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on business.
- 5.28 The statutory principles of good regulation and the Regulators' Code also apply to local authorities, who are under a statutory duty to have regard to them when fulfilling their regulatory functions under the Act⁸.

⁶ Legislative and Regulatory Reform Act 2006, section 21

⁷ Regulators' Code (previously the Regulators' Compliance Code), Department of Business, Innovation and Skills, 2014, issued under section 23 of the Legislative and Regulatory Reform Act 2006

⁸ The Legislative and Regulatory Reform (Regulatory Functions) Order 2007, was amended by the Legislative and Regulatory Reform (Regulatory Functions) (Amendment) Order 2009, which, amongst other things, extended the application of the 2007 Order to local authorities in Wales and Scotland exercising regulatory functions under the Gambling Act 2005 - see Parts 3 and 7

- 5.29 Guidance produced by the Better Regulation Delivery Office seeks to assist local authorities in interpreting the requirements of the Regulators' Code, for example in developing their Compliance and Enforcement Policy⁹, and in delivering risk-based regulation in relation to age restrictions¹⁰.

Human Rights Act 1998

- 5.30 The Secretary of State has certified that the Act is compatible with the European Convention on Human Rights. In considering applications, and taking enforcement action under the Act, licensing authorities should bear in mind that they are subject to the Human Rights Act 1998 and in particular:
- Article 1, Protocol 1 – peaceful enjoyment of possessions. A licence is considered a possession in law and people should not be deprived of their possessions except in the public interest
 - Article 6 – right to a fair hearing
 - Article 8 – respect for private and family life. In particular, removal or restriction of a licence may affect a person's private life
 - Article 10 – right to freedom of expression.

Other considerations

- 5.31 Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 5.32 In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.
- 5.33 Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in Part 9.
- 5.34 Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

⁹ *Template: Compliance and Enforcement Policy*, Better Regulation Delivery Office. This template policy was developed by the Local Better Regulation Office, with local authorities, to assist local authorities in developing a policy that is in line with the requirements of the Regulators' Compliance Code, or to review their existing policy. It is available on the BRDO website at <http://www.bis.gov.uk/brdo/resources/risk-based-regulation/compliance-policy>

¹⁰ *Age restricted products and services framework / updated April 2014* sets out an agreed set of shared responsibilities and reasonable expectations for young people, their parents and carers, businesses, employees and regulators with regards to access to age restricted products and services. The document forms the foundations of the *Age restricted products and services: a code of practice for regulatory delivery / updated April 2014*

- 7.50** A licence application, and any licence subsequently issued, is not valid if the relevant notifications have not been made.

Application for Premises Variation (s.187): 'material change'

- 7.51** Previous guidance from the Department for Culture, Media and Sport (DCMS) and the Commission has been that an application for a variation will only be required where there are material changes to the layout of the premises. What constitutes a material change will be a matter for local determination but it is expected that a common sense approach will be adopted. When considering an application for variations, the licensing authority will have regard to the principles to be applied as set out in s.153 of the Act.

Representations

- 7.52** In dealing with an application, licensing authorities are obliged to consider representations from two categories of person, referred to in the Act as 'responsible authorities' and 'interested parties'. Representations from other parties are inadmissible. Further information on these categories can be found in Part 8 of this Guidance.
- 7.53** Having determined that the representation is admissible, the licensing authority must consider its relevance. Only representations that relate to the licensing objectives, or that raise issues under the licensing authority's statement of policy, or the Commission's Guidance or Codes of Practice, are likely to be relevant.
- 7.54** The licensing authority will also need to consider if representations are 'frivolous' or 'vexatious'. This is a question of fact and licensing authorities are advised to seek help from their legal advisers in interpreting these phrases although relevant considerations may include:
- who is making the representation, and whether there is a history of making representations that are not relevant
 - whether it raises a 'relevant' issue
 - whether it raises issues specifically to do with the premises that are the subject of the application.
- 7.55** The Commission does not routinely make representations on premises licence applications. However, the fact that the Commission has not made a representation on a particular premises licence application should not be taken as indicating the Commission's approval of that application. Exceptionally, where an application for a premises licence, or the operation of a current premises licence, raises matters of wider or national significance, the Commission will consider making representations or requesting a review.

Making a decision

- 7.56** As explained earlier, the licensing authority's primary obligation under s.153(1) is to permit the use of premises in so far as it thinks that to do so is:
- a. in accordance with any relevant code of practice issued by the Commission
 - b. in accordance with any relevant guidance issued by the Commission
 - c. reasonably consistent with the licensing objectives (subject to a. and b. above), and
 - d. in accordance with the licensing authority's statement of licensing policy (statement of policy) (subject to a. to c. above).

- 7.57** Further information and guidance as to the meaning and effect of s.153 is set out at paragraph 5.19 above.

- 9.28** Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this Guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 9.29** Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.
- 9.30** Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.
- 9.31** Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:
- relevant to the need to make the proposed building suitable as a gambling facility
 - directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
 - fairly and reasonably related to the scale and type of premises
 - reasonable in all other respects.

Conditions that may not be attached to premises licences by licensing authorities

- 9.32** The Act sets out certain matters that may not be the subject of conditions:
- s.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition
 - s.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation
 - s.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)
 - s.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.

Hansard Extract

On 9 November 2004 (Standing Committee B) there was a debate in the House of Commons over whether to amend the Licensing Objectives to include 'the prevention of public nuisance.) Below are the relevant paragraphs from Hansard.

The amendment was withdrawn. The following are material extracts from Hansard:

Column Number: 012

Mr Foster - Amendment to include prevention of public nuisance in Licensing Objectives:

Why is it important that we deal with that in the objectives? The answer is simple. As the Bill stands, the local authority is unable to take account of effects that may occur not in a new casino or on gambling premises, but further afield, outside those premises. It is crucial that local authorities have the opportunity to do so. Indeed, the Local Government Association said when it wrote to all Members about the Second Reading debate that the prevention of public nuisance should be a licensing objective:

"The licensing objectives set out in Clause 1 of the Bill do not address potential problems of nuisance arising in the street outside gambling premises. This is particularly likely late at night and when alcohol has been consumed. While the Environmental Protection Act 1990 places a duty on local authorities to deal with statutory nuisances arising from the premises itself, and to investigate residents' complaints, it is not possible to use this legislation to deal with street nuisance, even where the problem is directly attributable to a particular venue."

Use of the Environmental Protection Act for such matters is therefore not possible. The LGA goes on to say:

"This omission will seriously hamper the ability of councils to ensure effective management of the environment around gambling premises and provides residents with little scope to make representations should street nuisance occur. The LGA believes that a new licensing objective of the prevention of public nuisance should be added to Clause 1."

Column Number: 037

The Minister for Sport and Tourism *Mr Richard Caborn, addressing the amendment*

Some gambling premises (casinos and bingo clubs) are allowed to serve alcohol to their customers, and the Bill will not stop that happening. Their entitlement does not spring from gambling laws: as one or two of my hon. Friends have said, it comes from the licensing law itself. Casinos and bingo clubs in England and Wales get their entitlement from the Licensing Act 1964. However, by the time the Bill is on the statute book, the Licensing Act 2003 will have come into force. The equivalent licensing laws govern casinos and bingo clubs in Scotland. The 2003 Act includes the prevention of public nuisance as a licensing objective, understandably so given the unfortunate connection between excess alcohol intake and bad behaviour. That was referred to by a number of hon. Members this morning.

The relevant risks associated with licensing of pubs, bars and other premises on which alcohol is sold include noise and antisocial conduct, particularly at night. That has been referred to in connection with Guildford. Accordingly, it will be open to licensing authorities, when considering applications for casinos and bingo halls to be licensed premises under the 2003 Act, to take account of the public-nuisance risk just as they do when considering any other application. If any casino were to put its alcohol licence at risk by allowing public nuisance, it would almost certainly put its continued existence and its licence at risk. Therefore, it is unnecessary in the case of casinos and bingo clubs to duplicate provisions that are already in licensing law.

There is no intention of allowing other gambling premises, such as betting shops and machine arcades, to sell alcohol, and there is no reason to apply to them a nuisance test over and above the

law on noise and other nuisance. There is no well-established association between betting and nuisance of the sort that unfortunately exists between alcohol and nuisance. We do not believe that there is any reason to single out betting shops for special treatment in contrast to grocery shops, newsagents or any other shop.

There are provisions in the general criminal and civil law on the control of public nuisance. If they are not thought to be adequate, I am not expressing a Government view on this, the solution is to strengthen the general law, not to adopt specific measures for gambling premises on the basis of no

Column Number: 038

evidence of need. In practice, all licensed gambling premises are more likely to conduct themselves responsibly than the general run of premises, if only because they will have to satisfy not just the local licensing authority concerning their present licence, but the powerful gambling commission in relation to their operating licence.

Amendment No. 1 would be regulatory overkill. The official Opposition, who continually badger us about red tape and over-regulation, should reflect on their amendments in the light of my explanation. Amendment No. 1 would only reinforce the apprehension in the gambling industry that local authorities will be over-zealous in regulating premises, and I do not believe that those fears are well grounded. It would impact significantly on the matters that could be taken into account by local authorities and would go beyond what is reasonable. I cannot advise the Committee to accept it.

<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/pm/41109s02.htm>

<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/am/41109s03.htm>

⁶ Standing Committee B, Thursday, 2nd December 2004 (Afternoon) Col 359.

Determination of application

[5.158]

In determining an application the licensing authority must hold a hearing¹ if:

- representations have been made by an interested party or responsible authority and have not been withdrawn;
- the authority intend to use their discretion under s 169(1) to attach a condition to a licence; or
- the authority intend to use their discretion under s 169 to exclude a default condition (ie a condition automatically attached to the licence under s 168 unless excluded by the authority in its discretion)².

A hearing may, however, be dispensed with if the applicant and any interested party or responsible authority who have made representations consents to this course³, or the authority think that the representations are vexatious or frivolous or will certainly not influence their determination of the application⁴. If the authority do propose to dispense with a hearing on these latter grounds they must as soon as is reasonably practicable notify the person who made the representations⁵, presumably to enable him to seek a remedy by way of judicial review if so advised.

Where the applicant for the premises licence is an applicant for an operating licence⁶ the authority cannot determine the application until the relevant operating licence has been issued⁷.

On considering an application for a premises licence (whether at a hearing or not) the licensing authority must either grant it or reject it⁸. In making that determination the licensing authority will be subject to the provisions of s 153 which sets out the principles to be applied by the authority in exercising all their functions under Part 8 GA 2005 (ie including, but not limited to, the grant or refusal of an application for a premises licence). Section 153(1) provides as follows:

"In exercising their functions under this Part a licensing authority shall aim to permit the use of premises for gambling in so far as the authority think it—

- (a) in accordance with any relevant code of practice under s 24,
- (b) in accordance with any relevant guidance issued by the Commission under s 25,
- (c) reasonably consistent with the licensing objectives (subject to paras (a) and (b)), and
- (d) in accordance with the statement published by the authority under s 349 (subject to paras (a) to (c))."

The subsection starts by imposing a general duty on the authority to 'aim to permit the use of premises for gambling' and then sets out a series of four factors which may, in any individual case, qualify or override the general duty. The first point to note is that the provision imposes a duty on the licensing authority: it must, subject to the qualifying factors, aim to permit the use of premises for gambling. What is the scope of this duty? It is suggested that there are two elements: first, it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb 'to aim' is defined by the *OED*⁹ as meaning: '5. To calculate one's course with a view to arriving (at a point); to direct one's course, to make it one's object to attain. Hence fig To have it as an object, to endeavour earnestly'. The *Shorter OED*¹⁰ defines it as: '3. Direct one's course, make it one's object to attain, intend, try'. A person who 'aims' to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling. The most obvious way in which the authority will be able to exercise their powers in this way will be by an imaginative use of their power to frame and impose conditions (see para 5.159 below) so as to overcome objections to the application which might, in the absence of suitable conditions, lead to the application being rejected. No doubt the authority could also, in a case where a licence application gave rise to issues which could not be addressed by suitably drafted conditions, seek to consider with the applicant whether amendments to the application might overcome the objections and enable it to be granted. However, it is also necessary to recognise that the language of s 153(1) stops short of being mandatory; 'aim to permit' provides a strong steer to look favourably on an application, but no more.

As to the list of qualifying factors, these are set out in s 153(1)(a)–(d). Section 153(1)(a) qualifies the duty to aim to permit use of premises for gambling to the extent that such use must be in accordance with any relevant code of practice issued by the Gambling Commission under s 24. That section requires the Gambling Commission to issue codes of practice about the manner in which facilities for gambling are to be provided (whether by the holder of a licence or by another person). In issuing a code of practice the Gambling Commission will be subject to a duty under s 22 to promote the licensing objectives. Accordingly any code of practice should be consistent with those objectives. Section 153(1)(b) qualifies the licensing authority's duty to aim to permit the use of premises for gambling to the extent that such use must be in accordance with any relevant guidance issued by the Gambling

Commission under s 25. This section requires the Gambling Commission to issue guidance to local authorities¹¹ as to the manner in which they are to exercise their functions under the Act and the principles that they should apply in exercising those functions. Again the effect of s 22 is that in issuing such guidance the Commission will be under a duty to promote the licensing objectives, so again such guidance should be consistent with those objectives. The effect of all this is that any code of practice and any guidance to local authorities ought to promote the licensing objectives and no inconsistencies between the two should arise. On that basis codes of practice and guidance are placed (by s 153(1)(a) and (b)) as enjoying equal importance at the top of the hierarchy of factors set out in s 153(1)(a)-(d).

Next comes s 153(1)(c): this provides that the duty of the licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be reasonably consistent with the licensing objectives, but it goes on to provide that this condition is 'subject to paras (a) and (b)'. In principle there should, of course, be no conflict between (a) and (b) (which will both reflect the Gambling Commission's duty to promote the licensing objectives) and (c) (which will reflect the licensing authority's view of what the licensing objectives require). However the effect of the legislation appears to be that should there be any conflict between the two then the guidance set out in codes of practice or guidance emanating from the Gambling Commission will 'trump' any factors which the licensing authority themselves would otherwise have taken into account as relevant to the licensing objectives under s 153(1)(c).

Finally, s 153(1)(d) provides that the duty of a licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be in accordance with the authority's own statement issued under s 349. In preparing that statement the authority are not themselves expressly required to have regard to the licensing objectives, but they are obliged to have regard to guidance issued by the Gambling Commission under s 25 and such guidance deals, amongst other things, with the formulation by the authority of their licensing policy (see para AM5.6655). Since the s 25 guidance must itself promote the licensing objectives the effect should be that the authority's licensing policy will itself be consistent with those objectives so that it should not conflict with any code of practice or guidance issued by the Commission nor with the licensing objectives themselves. However, s 153(1)(d) provides that consideration of the licensing authority's own policy is 'subject to paras (a) to (c)' which appears to mean that in the case of an inconsistency a relevant Commission code of practice, relevant guidance or the licensing objectives themselves would 'trump' the authority's licensing policy.

In determining the application the authority may not have regard to the expected demand for the facilities which it is proposed to provide¹², nor may they have regard to the question whether or not the proposal is likely to be granted planning permission or building regulation approval¹³. Where the authority have resolved under s 166 not to issue casino premises licences an application for such a licence will, of course, necessarily fail and be rejected¹⁴.

Where the application is granted the authority must as soon as reasonably practicable give notice of the grant in the form prescribed to the applicant, the Commission, any person who made representations, the chief officer of police for any area in which the premises are wholly or partly situated and HMRC¹⁵ and must issue the licence to the applicant and must give him a summary of the terms and conditions in the prescribed form. If they have attached a condition to the licence under s 169(1)(a) or have excluded a default condition¹⁶ they must give their reasons¹⁷. If representations were made by an interested party or a responsible authority they must give their response to the representations¹⁸.

Where the application is rejected the authority must as soon as reasonably practicable give notice of the rejection in the form prescribed to the applicant and to the same parties as are entitled to be notified of a grant¹⁸. The notice must give the authority's reasons for rejecting the application¹⁹.

¹ As to procedure at hearings in relation to applications see SI 2007/173.

² GA 2005, s 162. See further para 5.159 below.

³ GA 2005, s 162.

⁴ GA 2005, s 162(3).

⁵ GA 2005, s 162(4).

⁶ Ie under GA 2005, s 159(3)(b).

⁷ GA 2005, s 163(2).

⁸ GA 2005, s 163(1).

⁹ *The Oxford English Dictionary* (2nd edn, 1989).

¹⁰ (5th Edn, OUP).



Department
for Business
Innovation & Skills

Better
Regulation
Delivery Office

Regulators' Code

April 2014

Foreword



In the Autumn Statement 2012 Government announced that it would introduce a package of measures to improve the way regulation is delivered at the frontline such as the Focus on Enforcement review of appeals, the proposed Growth Duty for non-economic regulators and the Accountability for Regulator Impact measure.

This Government is committed to reducing regulatory burdens and supporting compliant business growth through the development of an open and constructive relationship between regulators and those they regulate. The Regulators' Code provides a flexible, principles based framework for regulatory delivery that supports and enables regulators to design their service and enforcement policies in a manner that best suits the needs of businesses and other regulated entities.

Our expectation is that by clarifying the provisions contained in the previous Regulators' Compliance Code, in a shorter and accessible format, regulators and those they regulate will have a clear understanding of the services that can be expected and will feel able to challenge if these are not being fulfilled.

Regulators within scope of the Regulators' Code are diverse but they share a common primary purpose – to regulate for the protection of the vulnerable, the environment, social or other objective. This Code does not detract from these core purposes but seeks to promote proportionate, consistent and targeted regulatory activity through the development of transparent and effective dialogue and understanding between regulators and those they regulate.

I believe the Regulators' Code will support a positive shift in how regulation is delivered by setting clear expectations and promising open dialogue. Ultimately this will give businesses greater confidence to invest and grow.

A handwritten signature in black ink that reads "Michael Fallon". The signature is written in a cursive style with a horizontal line underneath the name.

Michael Fallon
Minister of State for Business and Enterprise
Department for Business, Innovation and Skills

Regulators' Code

This Code was laid before Parliament in accordance with section 23 of the Legislative and Regulatory Reform Act 2006 ("the Act"). Regulators whose functions are specified by order under section 24(2) of the Act **must** have regard to the Code when developing policies and operational procedures that guide their regulatory activities. Regulators must equally have regard to the Code when setting standards or giving guidance which will guide the regulatory activities of other regulators. If a regulator concludes, on the basis of material evidence, that a specific provision of the Code is either not applicable or is outweighed by another relevant consideration, the regulator is not bound to follow that provision, but should record that decision and the reasons for it.

1. Regulators should carry out their activities in a way that supports those they regulate to comply and grow

1.1 Regulators should avoid imposing unnecessary regulatory burdens through their regulatory activities¹ and should assess whether similar social, environmental and economic outcomes could be achieved by less burdensome means. Regulators should choose proportionate approaches to those they regulate, based on relevant factors including, for example, business size and capacity.

1.2 When designing and reviewing policies, operational procedures and practices, regulators should consider how they might support or enable economic growth for compliant businesses and other regulated entities², for example, by considering how they can best:

- understand and minimise negative economic impacts of their regulatory activities;
- minimising the costs of compliance for those they regulate;
- improve confidence in compliance for those they regulate, by providing greater certainty; and
- encourage and promote compliance.

1.3 Regulators should ensure that their officers have the necessary knowledge and skills to support those they regulate, including having an understanding of those they regulate that enables them to choose proportionate and effective approaches.

1.4 Regulators should ensure that their officers understand the statutory principles of good regulation³ and of this Code, and how the regulator delivers its activities in accordance with them.

2. Regulators should provide simple and straightforward ways to engage with those they regulate and hear their views

2.1 Regulators should have mechanisms in place to engage those they regulate, citizens and others to offer views and contribute to the development of their policies and service standards. Before changing policies, practices or service standards, regulators should consider the impact on business and engage with business representatives.

¹ The term 'regulatory activities' refers to the whole range of regulatory options and interventions available to regulators.

² The terms 'business or businesses' is used throughout this document to refer to businesses and other regulated entities.

³ The statutory principles of good regulation can be viewed in Part 2 (21) on page 12: http://www.legislation.gov.uk/ukpga/2006/51/pdfs/ukpga_20060051_en.pdf.

- 2.2 In responding to non-compliance that they identify, regulators should clearly explain what the non-compliant item or activity is, the advice being given, actions required or decisions taken, and the reasons for these. Regulators should provide an opportunity for dialogue in relation to the advice, requirements or decisions, with a view to ensuring that they are acting in a way that is proportionate and consistent.

This paragraph does not apply where the regulator can demonstrate that immediate enforcement action is required to prevent or respond to a serious breach or where providing such an opportunity would be likely to defeat the purpose of the proposed enforcement action.

- 2.3 Regulators should provide an impartial and clearly explained route to appeal against a regulatory decision or a failure to act in accordance with this Code. Individual officers of the regulator who took the decision or action against which the appeal is being made should not be involved in considering the appeal. This route to appeal should be publicised to those who are regulated.
- 2.4 Regulators should provide a timely explanation in writing of any right to representation or right to appeal. This explanation should be in plain language and include practical information on the process involved.
- 2.5 Regulators should make available to those they regulate, clearly explained complaints procedures, allowing them to easily make a complaint about the conduct of the regulator.
- 2.6 Regulators should have a range of mechanisms to enable and regularly invite, receive and take on board customer feedback, including, for example, through customer satisfaction surveys of those they regulate⁴.

3. Regulators should base their regulatory activities on risk

- 3.1 Regulators should take an evidence based approach to determining the priority risks in their area of responsibility, and should allocate resources where they would be most effective in addressing those priority risks.
- 3.2 Regulators should consider risk at every stage of their decision-making processes, including choosing the most appropriate type of intervention or way of working with those regulated; targeting checks on compliance; and when taking enforcement action.
- 3.3 Regulators designing a risk assessment framework⁵, for their own use or for use by others, should have mechanisms in place to consult on the design with those affected, and to review it regularly.
- 3.4 Regulators, in making their assessment of risk, should recognise the compliance record of those they regulate, including using earned recognition approaches and should consider all available and relevant data on compliance, including evidence of relevant external verification.
- 3.5 Regulators should review the effectiveness of their chosen regulatory activities in delivering the desired outcomes and make any necessary adjustments accordingly.

⁴ The Government will discuss with national regulators a common approach to surveys to support benchmarking of their performance.

⁵ The term 'risk assessment framework' encompasses any model, scheme, methodology or risk rating approach that is used to inform risk-based targeting of regulatory activities in relation to individual businesses or other regulated entities.

4. Regulators should share information about compliance and risk

- 4.1 Regulators should collectively follow the principle of "collect once, use many times" when requesting information from those they regulate.
- 4.2 When the law allows, regulators should agree secure mechanisms to share information with each other about businesses and other bodies they regulate, to help target resources and activities and minimise duplication.

5. Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply

- 5.1 Regulators should provide advice and guidance that is focused on assisting those they regulate to understand and meet their responsibilities. When providing advice and guidance, legal requirements should be distinguished from suggested good practice and the impact of the advice or guidance should be considered so that it does not impose unnecessary burdens in itself.
- 5.2 Regulators should publish guidance, and information in a clear, accessible, concise format, using media appropriate to the target audience and written in plain language for the audience.
- 5.3 Regulators should have mechanisms in place to consult those they regulate in relation to the guidance they produce to ensure that it meets their needs.
- 5.4 Regulators should seek to create an environment in which those they regulate have confidence in the advice they receive and feel able to seek advice without fear of triggering enforcement action.
- 5.5 In responding to requests for advice, a regulator's primary concerns should be to provide the advice necessary to support compliance, and to ensure that the advice can be relied on.
- 5.6 Regulators should have mechanisms to work collaboratively to assist those regulated by more than one regulator. Regulators should consider advice provided by other regulators and, where there is disagreement about the advice provided, this should be discussed with the other regulator to reach agreement.

6. Regulators should ensure that their approach to their regulatory activities is transparent

- 6.1 Regulators should publish a set of clear service standards, setting out what those they regulate should expect from them.
- 6.2 Regulators' published service standards should include clear information on:
 - a) how they communicate with those they regulate and how they can be contacted;
 - b) their approach to providing information, guidance and advice;
 - c) their approach to checks on compliance⁶, including details of the risk assessment framework used to target those checks as well as protocols for their conduct, clearly setting out what those they regulate should expect;

⁶ Including inspections, audit, monitoring and sampling visits, and test purchases.

- d) their enforcement policy, explaining how they respond to non-compliance;
 - e) their fees and charges, if any. This information should clearly explain the basis on which these are calculated, and should include an explanation of whether compliance will affect fees and charges; and
 - f) how to comment or complain about the service provided and routes to appeal.
- 6.3 Information published to meet the provisions of this Code should be easily accessible, including being available at a single point⁷ on the regulator's website that is clearly signposted, and it should be kept up to date.
- 6.4 Regulators should have mechanisms in place to ensure that their officers act in accordance with their published service standards, including their enforcement policy.
- 6.5 Regulators should publish, on a regular basis, details of their performance against their service standards, including feedback received from those they regulate, such as customer satisfaction surveys, and data relating to complaints about them and appeals against their decisions.

⁷ This requirement may be satisfied by providing a single web page that includes links to information published elsewhere.

Monitoring the effectiveness of the Regulators' Code

The Government is committed to making sure the Regulators' Code is effective. To make sure that the Code is being used effectively, we want businesses, regulated bodies and citizens to challenge regulators who they believe are not acting in accordance with their published policies and standards. It is in the wider public interest that regulators are transparent and proportionate in their approaches to regulation.

The Government will monitor published policies and standards of regulators subject to the Regulators' Code, and will challenge regulators where there is evidence that policies and standards are not in line with the Code or are not followed.

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This publication is also available on our website at:
<https://www.gov.uk/government/publications/regulators-code>

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Licence conditions and codes of practice

October 2020

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General introduction

- 1 This document sets out the Gambling Commission's general licence conditions and associated code of practice provisions (LCCP) under the Gambling Act 2005 (the Act).
- 2 The LCCP document sets out:
 - Part I: (in orange)** the suite of general conditions attached to operating licences
 - Part II: (in blue)** the principal code of practice, distinguishing between 'social responsibility' provisions and 'ordinary' provisions (the social responsibility provisions are in shaded boxes within the text)
 - Part III: (in purple)** the suite of general conditions attached to personal licences.
- 3 An [index](#) to the provisions is provided at the end of this document, and if using an electronic version of this document, links are provided from both the contents and index pages to aid navigation.
- 4 Copies of LCCP can be obtained from the Commission's website:
www.gamblingcommission.gov.uk or by writing to:
Gambling Commission
Victoria Square House
Victoria Square
Birmingham B1 4BP
T 0121 230 6666
F 0121 230 6720
E info@gamblingcommission.gov.uk
- 5 The Commission also produces sector-specific extracts of LCCP and these will be made available on the website. Further information about the history of LCCP (such as the results of completed consultations) and potential future amendments to LCCP can also be found on the website.
- 6 This version of LCCP comes into force on 31 October 2020 for all operators and personal licence holders.
- 7 Relevant requirements of the conditions and code provisions have been notified in draft to the European Commission in accordance with Directive (EU) 2015/1535.

Part 1: Suite of general condition to operating licences under Section 75 of the Gambling Act 2005 (the Act)

1 Qualified persons and personal licences

1.1 Qualified persons

Licence condition 1.1.1

Qualified persons – qualifying position

All operating licences, except ancillary remote licences, issued to small-scale operators

- 1 In this condition the terms 'small-scale operator', 'qualifying position' and 'qualified person' have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
- 2 Schedule X¹ lists those individuals notified to the Commission as qualified persons.
- 3 If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act for amendment of the details of the licence set out in Schedule X¹.
- 4 An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
- 5 In this condition 'qualified person' has the same meaning as in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

¹ The schedules mentioned here will be attached to individual licences.

Licence condition 1.1.2

Qualified persons – tracks

All non-remote general betting operating licences issued to small-scale operators

- 1 Schedule Y¹ to this licence lists those of the licensee's employees whose details have been provided to the Commission as authorised by the licensee to accept bets on the licensee's behalf on a track otherwise than under the supervision of a qualified person present on the same track.
- 2 Should the licensee wish to add an individual to the list or remove the name of an individual from the list the licensee must make application to the Commission under section 104(1)(b) of the Act for amendment of that detail of the licence. Any employee the licensee wishes to add to the list may act unsupervised pending amendment of the licence provided a valid amendment application has been lodged with the Commission.
- 3 In this condition 'qualified person' has the same meaning as in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

¹ The schedules mentioned here will be attached to individual licences.

1.2 Personal licences

Licence condition 1.2.1

Specified management offices – personal management licences

All casino, bingo, general and pool betting, betting intermediary, gaming machine general, gaming machine technical, gambling software and lottery managers licences, except ancillary remote licences

- 1 Subject to 6 and 7 below, licensees must ensure:
 - a that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter 'a personal management licence'); and
 - b that at least one person occupies at least one of those offices
- 2 The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:
 - a the overall management and direction of the licensee's business or affairs
 - b the licensee's finance function as head of that function
 - c the licensee's gambling regulatory compliance function as head of that function
 - d the licensee's marketing function as head of that function
 - e the licensee's information technology function as head of that function in so far as it relates to gambling-related information technology and software
 - f oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area
 - g in the case of casino and bingo licences only, oversight of the day to day management of a single set of premises licensed under Part 8 of the Act.
- 3 The person responsible for the licensee's gambling regulatory compliance function as head of that function shall not, except with the Commission's express approval, occupy any other specified management office.
- 4 Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder's personal management licence.
- 5 Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual's work and any requirements of the Commission in respect of such matters applicable during the period of the review.
- 6 Paragraphs 1 to 5 above shall not apply to a licensee for so long as the licensee is a 'small-scale operator' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 ('the Regulations').
- 7 During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs 1 to 6 above shall apply subject to the proviso that the phrase 'each individual' in paragraph 1a shall not include any individual who was a 'qualified person' (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

Licence condition 1.2.2

Specified management offices – casino personal functional licences

All non-remote casino operating licences, except ancillary remote licences

- 1** In addition to paragraphs **1** to **6** in licence condition **1.2.1**, licensees must ensure that if any of the following operational functions:
 - a** dealer in respect of casino games
 - b** cashier
 - c** inspector
 - d** security staff employed to watch gaming
 - e** supervisor of gaming activities

is performed in connection with the licensed activities, it is performed by an individual who holds a personal licence authorising performance of the function (hereafter 'a personal functional licence'). Licensees must take all reasonable steps to ensure that anything done in the performance of those functions is done in accordance with the terms and conditions of the personal functional licence.

Licence condition 1.2.3

Specified management offices – lottery personal management licences

All lottery operating licences issued to non-commercial societies and local authorities

- 1** Subject to 5 below, licensees must ensure that the individual who occupies the management office specified in 2 below in or in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter 'a personal management licence').
- 2** The specified management office is that director's post in the case of a licensee which is a company, that partner in the case of a licensee which is a partnership, or that office in a licensee which is an unincorporated association or local authority, the occupier of which has overall management responsibility for the promotion of the lottery.
- 3** Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder's personal management licence.
- 4** Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual's work and any requirements of the Commission in respect of such matters applicable during the period of the review.
- 5** Paragraphs 1 to 4 above shall not apply to a licensee for so long as the licensee is a 'small-scale operator' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

2 Technical standards, equipment specification, remote gambling equipment and gambling software

2.1 Key equipment

Licence condition 2.1.1

Access to (and provision of data from) key equipment

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences

- ¹ Licensees must, on request, permit an enforcement officer to inspect any of their remote gambling equipment and/or provide to the Commission copies of data held on such equipment in such format and manner as the Commission may request.

2.2 Gambling software

Licence condition 2.2.1

Gambling software

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences

- ¹ All gambling software¹ used by the licensee must have been manufactured by the holder of a gambling software operating licence. All such gambling software must also be supplied to the licensee by a holder of a gambling software operating licence. Such software must only be installed or adapted by the holder of such a licence.

¹As defined in section 41(2)&(3) of the Act

2.3 Technical standards and equipment specifications

Licence condition 2.3.1

Technical standards

All non-remote gaming machine technical and gambling software licences and remote operating licences, including remote gaming machine technical, remote gambling software and betting ancillary remote licences, but not remote betting intermediary (trading rooms only) licences

- 1 Licensees must comply with the Commission's technical standards and with requirements set by the Commission relating to the timing and procedures for testing.

Licence condition 2.3.2

Bingo equipment specifications

Non-remote bingo operating licences and bingo ancillary remote licences

- 1 Licensees must comply with the Commission's specification for bingo equipment.

Licence condition 2.3.3

Casino equipment specifications

Non-remote casino operating licences and casino ancillary remote licences

- 1 Licensees must comply with the Commission's specifications for casino equipment.

3 Peer to peer gaming, other networks and hosting

3.1 Peer to peer gaming, other networks and hosting

Licence condition 3.1.1

Peer to peer gaming

Remote casino licences (except ancillary remote and casino (game host) licences)

All licensees who provide facilities for peer to peer gaming in circumstances in which they do not contract directly with all of the players using those facilities ('network operators') must have, put into effect and monitor the effectiveness of, policies and procedures designed to ensure that:

- 1 every player using the facilities in Great Britain ('a domestic player') is doing so pursuant to a contract entered into between that player and the network operator, or that player and another holder of a Gambling Commission remote casino operating licence;
- 2 every player who is not a domestic player but who participates in a game of chance in which a domestic player also participates is doing so pursuant to a contract between that player and the network operator, or that player and another holder of a Gambling Commission remote casino operating licence, or a gambling operator not licensed by the Gambling Commission through which participants use the facilities outside Great Britain and which:
 - a holds all licences or permissions (if any) required in relation to its provisions of facilities for peer to peer gaming by the laws of the state or states in which it is domiciled or incorporated;
 - b has been approved by the network operator, after conducting due diligence enquires into those individuals who appear to the network operator to have a material financial interest in it, as suitable to provide those facilities; and in particular,
 - c has in place policies and procedures in respect of the identification of customers which in the network operator's reasonable opinion satisfy requirements as to the customer due diligence broadly equivalent to those set out in Directive 2005/60/EC ('the Third Money Laundering Directive') or any subsequent replacement for re-enactment thereof;
- 3 the arrangements between the network operator and any remote casino licence holder through which domestic players access their facilities, and with gambling operators not licensed by the Gambling Commission through which players use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving players from more than one jurisdiction is to be handled;
- 4 the network operator's arrangements for the sharing of information both with any remote casino licence holder through which domestic players access their facilities and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
 - a prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act.
 - b investigation of suspected cheating,
 - c combating of problem gambling, and
 - d investigation of customer complaints.

Licence condition 3.1.2

Other networks

All remote casino, bingo, and betting licences (except ancillary remote and host licences)

- 1** Subject to 2 below, all licensees who provide facilities for gambling, other than peer to peer gaming, in circumstances in which they do not contract directly with all of the participants using those facilities ('network operators') must have, put into effect and monitor the effectiveness of policies and procedures designed to ensure that:
 - a** every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the network operator, or that player and another holder of a Gambling Commission remote operating licence of the same kind as that held by the network operator ('a relevant licence');
 - b** the arrangements between the network operator and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
 - c** the network operator's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
 - i** prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act,
 - ii** investigation of suspected cheating,
 - iii** combating of problem gambling, and
 - iv** investigation of customer complaints.
- 2** Paragraph 1 above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (eg the National Bingo Game).

Licence condition 3.1.3

Hosting

All casino (game host), bingo (game host), general betting (host) (real events) and general betting (host) (virtual events) licences

- 1** Subject to **2** below, all licensees who provide facilities for gambling in circumstances in which they do not contract directly with any of the participants using those facilities ('hosts') must ensure that:
 - a** every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the holder of a Gambling Commission remote casino, bingo, general betting (real events) or general betting (virtual events) operating licence ('a relevant licence');
 - b** the arrangements between the host and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
 - c** the host's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
 - i** prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act,
 - ii** investigation of suspected cheating,
 - iii** combating of problem gambling, and
 - iv** investigation of customer complaints.
- 2** Paragraph **1** above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (eg the National Bingo Game).

4 Protection of customer funds

4.1 Segregation of funds

Licence condition 4.1.1

Segregation of funds

All remote operating licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

- 1 Licensees who hold customer funds must ensure that these are held in a separate client bank account or accounts.
- 2 In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling,
 - b winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer, and
 - c any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

4.2 Disclosure to customers

Licence condition 4.2.1

Disclosure to customers

All operating licences, except gaming machine technical, gambling software, host, ancillary remote bingo, and ancillary remote casino licences

- 1 Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
- 2 Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
- 3 In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
 - b winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and
 - c any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

5 Payment

5.1 Cash and cash equivalents, payment methods and services

Licence condition 5.1.1

Cash and cash equivalents

All operating licences except gaming machine technical, gambling software and host licences

- 1** Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (eg bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
- 2** Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

Licence condition 5.1.2

Payment methods services

All remote casino, bingo and betting operating licences, except ancillary, host and remote betting intermediary (trading room only) licences

- 1** Licensees must only accept payment from customers using their gambling facilities in Great Britain by a method which involves the provision of payment services as defined in Schedule 1 Part 1 of the Payment Services Regulations 2009 (SI 2009 No 209) if the provider of those services is a 'payment service provider' within the definition of that term in regulation 2 of those Regulations.

6 Provision of credit by licensees and the use of credit cards

6.1 Provision of credit by licensees and the use of credit cards

Licence condition 6.1.1

Provision of credit

All gaming machine general operating licences for adult gaming centres and family entertainment centres

- 1 Licensees must neither:
 - a provide credit themselves in connection with gambling; nor
 - b participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

Licence condition 6.1.2

Use of credit cards

All non-remote general betting, pool betting and betting intermediary licences, and all remote licences (including ancillary remote betting and ancillary remote lottery licences) except gaming machine technical, gambling software and host licences

- 1 Licensees must not accept payment for gambling by credit card. This includes payments to the licensee made by credit card through a money service business.

7 General 'fair and open provisions'

7.1 Fair and transparent terms and practices

Licence condition 7.1.1

Fair and transparent terms and practices

All operating licences except gaming machine technical and gambling software licences

- 1 Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015. Licensees must comply with those terms.
- 2 The contractual terms on which gambling is offered and any consumer notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
- 3 Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes to terms before they come into effect.
- 4 Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008, at any stage of their interactions with consumers.

8 Display of licensed status

8.1 Display of licensed status

Licence condition 8.1.1

Display of licensed status

All remote casino, bingo and betting licences other than ancillary, host, remote betting intermediary (trading room only), remote general betting (limited) and remote general betting (standard) (remote platform) licences

- 1** Licensees providing facilities for remote gambling must display on every screen from which customers are able to access gambling facilities provided in reliance on this licence:
 - a** a statement that they are licensed and regulated by the Gambling Commission;
 - b** their account number; and
 - c** a link (which will be supplied by the Commission) to their current licensed status as recorded on the Commission's website.
- 2** Such statement, account number and link must be in the format, provided by the means, and contain the information from time to time specified by the Commission in its technical standards applicable to the kind of facilities for gambling provided in accordance with this licence or otherwise notified to licensees for the purposes of this condition.
- 3** Licensees may also display on screens accessible from Great Britain information about licences or other permissions they hold from regulators in, or by virtue of the laws of, jurisdictions outside Great Britain provided it is made plain on those screens that the licensee provides facilities for gambling to persons in Great Britain in reliance on their Gambling Commission licence(s).

Licence condition 8.1.2

Display of licensed status – B2B operators

All gaming machine technical, gambling software and host licences

- 1** Licensees offering the supply of gaming machines or gambling software on websites must:
 - a** display the following information on the first page of the website which offers gaming machines or gambling software in reliance on the licence:
 - i** a statement that they are licensed and regulated by the Gambling Commission;
 - ii** their account number; and
 - iii** a link (which will be supplied by the Commission) to their current licensed status as recorded on the Commission's website.
 - b** display at least the information at **a** above on each page of the website which offers gaming machines or gambling software in reliance on the licence; and
 - c** where they offer on pages of, or by means of a link from, their website, the supply of gaming machines or gambling software which are not provided in reliance on their licence, clearly distinguish those products which are regulated by the Commission from those which are not.
- 2** Such statement, account number and link must be in the format, provided by the means, and contain the information from time to time specified by the Commission in the technical standards applicable to the kind of facilities for gambling provided in accordance with this licence or otherwise notified for the purposes of this condition.

Licence condition 8.1.3

Display of licensed status – societies and local authorities

All lottery operating licences issued to non-commercial societies, local authorities and external lottery managers

- 1** Licensees offering the supply of lotteries on websites or mobile applications must display on every screen from which customers are able to access lottery products provided in reliance of this licence:
 - a** a statement that they are licensed and regulated by the Gambling Commission;
 - b** their account number; and
 - c** a link (which will be supplied by the Commission) to their current licensed status as recorded on the Commission's website
- 2** Such statement, account number and link must be in the format, provided by the means, and contain the information from time to time specified by the Commission.

9 Types and rules of casino and other games

9.1 Casino and bingo games

Licence condition 9.1.1

Rules of casino games

All non-remote casino operating licences

- 1** Licensees must not offer or permit to be played casino games that appear on any list of games prohibited by the Commission.

Licence condition 9.1.2

Prohibited bingo prize games

All non-remote bingo operating licences

- 1** Licensees must not offer or permit to be played prize gaming games that appear on any list of games prohibited by the Commission.

10 Tipping of casino employees

10.1 Tipping of casino employees

Licence condition 10.1.1

Tipping – personal licence holders

All non-remote casino operating licences

- 1** Licensees must only permit tipping of staff holding personal licences where a tronc system is operated; that is to say, where all tips are pooled and distributed amongst the employees concerned. A separate tronc may be operated for each of a number of categories of licensed staff.

11 Lotteries

11.1 Lotteries – societies and local authorities

Licence condition 11.1.1

Lotteries – societies and local authorities

All lottery operating licences issued to non-commercial societies or local authorities

- 1 Licensees must ensure that at least 20% of the proceeds of any lottery promoted in reliance on the licence are applied to a purpose for which the promoting non-commercial society is conducted or the promoting local authority has power to incur expenditure.
- 2 For the purposes of this condition:
 - a the proceeds of any lottery promoted in reliance on this licence must not exceed £5,000,000 and subject to 11.1.1 2b, the aggregate of the proceeds of lotteries promoted wholly or partly in a calendar year in reliance on the licence must not exceed £50,000,000.
 - b In 2020 the aggregate of the proceeds of lotteries promoted wholly or partly in a calendar year may not exceed £31,331,475.
- 3 The rules of any lottery promoted in reliance on this licence must be such as to ensure:
 - a that it is not possible for the purchaser of a ticket in the lottery to win by virtue of that ticket (whether in money, money's worth, or partly the one and partly the other and including any winnings arising from a rollover) more than:
 - i £25,000
 - ii if more, 10% of the proceeds of the lottery.
 - b that membership of the class among whom prizes are allocated does not depend on making any payment (apart from payment of the price of a ticket).
- 4 A lottery promoted in reliance on this licence must not be linked to any other lottery, free draw or prize competition.
- 5 For the purposes of this condition:
 - a two or more lotteries are linked if any of them is so structured that a person who wins a prize in that lottery will also win a prize in some or all others, unless the maximum amount which a person can win is no more than £500,000 in aggregate. In determining whether two or more lotteries are linked it is immaterial how many of them are promoted in reliance on this licence.
 - b a lottery is linked to a free draw or prize competition if:
 - i a person's participation in, or his being allocated a prize in, the lottery is a means of establishing his eligibility to enter the draw or competition and
 - ii the arrangements for the lottery and/or the draw or competition are such that a person may win more than £500,000 in aggregate as a result of his participation in the lottery and the draw or competition.
- 6 If a lottery, whilst not a linked lottery, has the feature that by selecting the same numbers in the lottery and in one or more other lottery or lotteries the participant in those lotteries may win prizes which, in aggregate, exceed £500,000, no advertisement for, nor other marketing of, the lottery may make any reference to that feature.
- 7 Licensees must ensure that each person who purchases a ticket in a lottery promoted on behalf of a non-commercial society in reliance on this licence receives a document which:
 - a identifies the promoting society;
 - b states the name and address of a member of the society who is designated, by

- persons acting on behalf of the society, as having responsibility within the society for the promotion of the lottery; and
- c** either states the date of the draw (or each draw) in the lottery, or enables the date of the draw (or each draw) in the lottery to be determined.
- 8** Licensees must display 'licensed by the Gambling Commission' and details of the Gambling Commission website on lottery tickets.
- 9** The price payable for purchasing each ticket in a lottery promoted in reliance on this licence:
- a** must be the same;
 - b** must be shown on the ticket or in a document received by the purchaser; and
 - c** must be paid to the promoter of the lottery before any person is given a ticket or any right in respect of membership of the class among whom prizes are to be allocated.
- 10** For the purposes of these conditions, reference to a person receiving a document includes a reference to a message being sent or displayed to him electronically in a manner which enables him, without incurring significant expense or delay, to:
- a** retain the message electronically; or
 - b** print it.
- 11** Licensees must lodge with the Commission a description of, and a copy of the rules of, any lottery intended to be promoted in reliance on this licence, and any amendment to the rules of a lottery previously notified to the Commission, at least 28 days before any tickets in such lottery, or amended lottery, are put on sale.¹
- 12** Lottery tickets must not be sold to a person in any street. For these purposes 'street' includes any bridge, road, lane, footway, subway, square, court, alley or passage (including passages through enclosed premises such as shopping malls) whether a thoroughfare or not. But, by way of exception, tickets may be sold in a street from a static structure such as a kiosk or display stand. Tickets may also be sold door to door. Licensees must ensure that they have any necessary local authority permissions, such as a street trading licence.
- 13** Accurate accounting records must be kept in relation to all lotteries promoted in reliance on this licence showing:
- a** the total proceeds of each lottery;
 - b** the amount allocated to prizes in each lottery;
 - c** the amount of proceeds allocated to expenses, and details of those expenses, for each lottery;
 - d** the amount applied directly to the purposes of the society or purposes for which the local authority has power to incur expenditure as the case may be; and
 - e** the number of sold and unsold tickets in each lottery.
- 14** Such records must be made available to the Commission for inspection on request and retained for at least three years from the date of any lottery to which they relate.
- 15** In addition, in respect of each lottery promoted in reliance on this licence, a lottery submission must be sent to the Commission within three months of the date of determination of the lottery or, in the case of an 'instant lottery', within three months of the last date on which tickets in the lottery were on sale providing the information set out in paragraph **13** above. Every such submission must contain or be accompanied by a declaration that the information given in it is correct and must be shown to have been approved before submission by:
- a** the holder of a personal management licence
 - b** a 'qualified person' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 or
 - c** except where the licensee is a local authority, the designated person named on the lottery tickets as having responsibility for the promotion of the lottery.
- 16** Where a society or local authority instructs an External Lottery Manager to make the submission on their behalf, they must ensure that the details on the submission are verified and approved by one of the people named above from the relevant society or local authority.

- 17** For any calendar year in which the cumulative proceeds of lotteries promoted in reliance on this licence exceed £1,000,000 the licensee must provide the Commission with written confirmation from a qualifying auditor confirming that the proceeds of those lotteries have been fully accounted for in their annual audited accounts. Such confirmation must be provided within ten months of the date to which the accounts are made up.¹
- 18** A qualifying auditor means a person who is eligible for appointment as a statutory auditor under section 1212 Companies Act 2006 or any statutory modification or re-enactment thereof but, in the case of a lottery promoted by or on behalf of a non-commercial society, is not:
- a** a member of the society
 - b** a partner, officer or employee of such a member or
 - c** a partnership of which a person falling within **a** or **b** is a partner.

¹These matters are to be reported to us online via our 'eServices' digital service on our website www.gamblingcommission.gov.uk.

11.2 Lotteries – managers

Licence condition 11.2.1

Lotteries - managers

All lottery operating licences issued to external lottery managers

- 1** Licensees must ensure that at least 20% of the proceeds of any lottery promoted in reliance on the licence are paid to the promoting non-commercial society or local authority to apply to a purpose for which the promoting society is conducted or the local authority has power to incur expenditure.
- 2** For the purposes of this condition:
 - a** the proceeds of any lottery promoted in reliance on this licence may not exceed £5,000,000 and subject to 11.2.1 **2b**, the aggregate of the proceeds of lotteries promoted wholly or partly in a calendar year on behalf of the same non-commercial society or local authority in reliance on the licence may not exceed £50,000,000.
 - b** In 2020 the aggregate of the proceeds of lotteries promoted wholly or partly in a calendar year on behalf of the same non-commercial society or local authority in reliance on the licence may not exceed £31,311,475.
- 3** The rules of any lottery promoted in reliance on this licence must be such as to ensure:
 - a** that it is not possible for the purchaser of a ticket in the lottery to win by virtue of that ticket (whether in money, money's worth, or partly the one and partly the other and including any winnings arising from a rollover) more than:
 - i** £25,000
 - ii** if more, 10% of the proceeds of the lottery
 - b** that membership of the class among whom prizes are allocated does not depend on making any payment (apart from payment of the price of a ticket).
- 4** A lottery promoted in reliance on this licence must not be linked to any other lottery, free draw or prize competition.
- 5** For the purposes of this condition:
 - a** two or more lotteries are linked if any of them is so structured that a person who wins a prize in that lottery will also win a prize in some or all others, unless the maximum amount which a person can win is no more than £500,000 in aggregate. In determining whether two or more lotteries are linked it is immaterial how many of them are promoted in reliance on this licence.

- b** a lottery is linked to a free draw or prize competition if:
 - i** a person's participation in, or his being allocated a prize in, the lottery is a means of establishing his eligibility to enter the draw or competition and
 - ii** the arrangements for the lottery and/or the draw or competition are such that a person may win more than £500,000 in aggregate as a result of his participation in the lottery and the draw or competition.
- 6** If a lottery, whilst not a linked lottery, has the feature that by selecting the same numbers in the lottery and in one or more other lottery or lotteries the participant in those lotteries may win prizes which, in aggregate, exceed £500,000, no advertisement for, nor other marketing of, the lottery may make any reference to that feature.
- 7** Licensees must ensure that each person who purchases a ticket in a lottery promoted in reliance on this licence on behalf of a non-commercial society, receives a document which:
 - a** identifies the promoting society
 - b** states the name and address of a member of the society who is designated, by persons acting on behalf of the society, as having responsibility within the society for the promotion of the lottery
 - c** either states the date of the draw (or each draw) in the lottery, or enables the date of the draw (or each draw) in the lottery to be determined.
- 8** Licensees must display 'licensed by the Gambling Commission' and details of the Gambling Commission website on lottery tickets.
- 9** The price payable for purchasing each ticket in a lottery promoted in reliance on this licence:
 - a** must be the same
 - b** must be shown on the ticket or in a document received by the purchaser
 - c** must be paid to the promoter of the lottery before any person is given a ticket or any right in respect of membership of the class among whom prizes are to be allocated.
- 10** For the purposes of these conditions, reference to a person receiving a document includes a reference to a message being sent or displayed to him electronically in a manner which enables him, without incurring significant expense or delay, to:
 - a** retain the message electronically or
 - b** print it.
- 11** Licensees must lodge with the Commission a description of, and a copy of the rules of, any lottery intended to be promoted in reliance on this licence, and any amendment to the rules of a lottery previously notified to the Commission, at least 28 days before any tickets in such lottery, or amended lottery, are put on sale.¹
- 12** Lottery tickets must not be sold to a person in any street. For these purposes 'street' includes any bridge, road, lane, footway, subway, square, court, alley or passage (including passages through enclosed premises such as shopping malls) whether a thoroughfare or not. But, by way of exception, tickets may be sold in a street from a static structure such as a kiosk or display stand. Tickets may also be sold door to door. Licensees must ensure that they have any necessary local authority permissions, such as a street trading licence.
- 13** Licensees must have arrangements in place to ensure separation between lottery proceeds they hold on behalf of non-commercial societies or local authorities and their own trading income and that such lottery proceeds are legally protected by means of separate bank accounts having trustee status or equivalent legal protection for each society or local authority in the event of the licensee's insolvency, in which event the proceeds will be paid to the society or local authority.
- 14** Licensees must ensure that following the determination of a lottery all lottery proceeds are properly allocated between prizes, expenses and profits and have procedures in place designed to ensure that lottery profits belonging to non-commercial societies or local authorities whose lotteries they manage in reliance on this licence are accounted for in a timely manner to the society or local authority.

¹These matters are to be reported to us online via our 'eServices' digital service on our website www.gamblingcommission.gov.uk.

12 Anti-money laundering

12.1 Prevention of money laundering and terrorist financing

Licence condition 12.1.1

Anti-money laundering

Prevention of money laundering and terrorist financing

All operating licences except gaming machine technical and gambling software licences

- 1** Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
- 2** Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
- 3** Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

Licence condition 12.1.2

Anti-money laundering

Measures for operators based in foreign jurisdictions

All remote casino operating licences where any of the licensee's remote gambling equipment is located outside Great Britain

- 1** Licensees must comply with Parts 2 and 3 of the Money Laundering Regulations 2007 (UK Statutory Instrument No. 2157 of 2007) as amended by the Money Laundering (Amendment) Regulations 2007 (UK Statutory Instrument No. 3299 of 2007), or the equivalent requirements of any UK Statutory Instrument by which those regulations are amended or superseded insofar as they relate to casinos (the MLR) whether or not the MLR otherwise apply to their business.

13 Pool betting

13.1 Pool betting

Licence condition 13.1.1

Pool betting

All pool betting operating licences, except those restricted to football pools

- 1 Licensees and any person they so authorise under 93(2) of the Gambling Act 2005 to offer pool betting on a track in connection with a horserace or dog race in reliance on an occasional use notice, must produce and retain a record of the transactions relevant to each pool that they offer. The record must be capable of identifying individual bets into the pool and relating these to subsequent payment of winnings where applicable. Licensees must make this information available to the Commission on request.

Licence condition 13.1.2

Pool betting – football pools

All pool betting operating licences which authorise football pools

- 1 Licensees and any person they so authorise under 93(3) of the Gambling Act 2005 in respect of football pool betting, must produce and retain a record of the transactions relevant to each pool that they offer. The record must be capable of identifying individual bets into the pool and relating these to the subsequent payment of winnings where applicable. Licensees must make this information available to the Commission on request.

Licence condition 13.1.3

Pool betting – annual accounts

All pool betting operating licences

- 1 Licensees must produce annual accounts which should be certified by a qualified independent accountant. Licensees must make copies available to the Commission on request.

14 Access to premises

14.1 Access to premises

Licence condition 14.1.1

Access to premises

All operating licences

- 1 Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

15 Information requirements

15.1 Reporting suspicion of offences

Licence condition 15.1.1

Reporting suspicion of offences etc - non-betting licences

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences

- 1 Licensees must as soon as reasonably practicable, in such a form or manner as the Commission may from time to time specify, provide the Commission with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.¹

¹These matters are to be reported to us online via our 'eServices' digital service on our website www.gamblingcommission.gov.uk.

Licence condition 15.1.2

Reporting suspicion of offences etc - betting licences

All betting operating licences including betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences

- 1 Licensees must as soon as reasonably practicable provide the Commission with any information,¹ in such a form or manner as the Commission may from time to time specify, from whatever source that they:
 - a know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition
 - b suspect may lead the Commission to consider making an order to void a bet under section 336 of the Gambling Act 2005.
- 2 Licensees who accept bets, or facilitate the making or acceptance of bets between others, on the outcome of horse races or other sporting events governed by one of the sport governing bodies included in Part 3 of Schedule 6 to the Gambling Act 2005, must as soon as reasonably practicable provide the sport governing body with relevant and necessary information, from whatever source, that they know or suspect may relate to a breach of betting rules applied by that governing body.
- 3 'Betting rules' includes any rule about bets the making or acceptance of which would be a regulated activity within the meaning of section 22 of the Financial Services and Markets Act 2000 ('spread betting').

¹ Information relating to sports betting integrity should be sent directly to the [Sports Betting Intelligence Unit \(SBIU\)](#).

Licence condition 15.1.3

Reporting of systematic or organised money lending

All non-remote casino, non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences

- 1** Licensees must as soon as reasonably practicable, in such form or manner as the Commission may from time to time specify, provide the Commission with any information relating to cases where they encounter systematic, organised or substantial money lending between customers on their premises, in accordance with the ordinary code provisions on money lending between customers.¹

¹These matters are to be reported to us online via our 'eServices' digital service on our website www.gamblingcommission.gov.uk

15.2 Reporting key events and other reportable events

Licence condition 15.2.1

Reporting key events

All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence¹.

Operator status

- 1** Any of the following applying to a licensee, any person holding a key position for a licensee, a group company or a shareholder or member (holding 3% or more of the issued share capital of the licensee or its holding company):
 - presenting of a petition for winding up
 - making of a winding up order
 - entering into administration or receivership
 - bankruptcy (applying to individuals only)
 - sequestration (applicable in Scotland), or
 - an individual voluntary arrangement.

Relevant persons and positions

- 2** In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.
- 3** The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.
- 4** The appointment of a person to, or a person ceasing to occupy, a 'key position' (including leaving one position to take up another). A 'key position' in relation to a licensee is:
 - a** in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
 - b** in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c** a position where the holder of which has overall responsibility for the licensee's anti-money laundering and/or terrorist financing compliance, and/or for the reporting of known or suspected money laundering or terrorist financing activity.
 - d** any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to

hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)

Financial events

- 5 Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
- 6 Any breach of a covenant given to a bank or other lender.
- 7 Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
- 8 Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

Legal or regulatory proceedings or reports

- 9 The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain).
- 10 Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities of a person in a 'key position', where such an investigation could result in the imposition of a sanction or penalty which could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
- 11 Any criminal investigation by a law enforcement agency in any jurisdiction in which the licensee, or a person in a 'key position' related to the licensee, is involved and where the Commission might have cause to question whether the licensee's measures to keep crime out of gambling had failed.
- 12 The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor, or a professional, statutory or other regulatory or government body, in whatever jurisdiction) about the provision of facilities for gambling: a summary of the nature of the concerns must be provided.
- 13 The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
- 14 The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
- 15 The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique

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reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

Gambling facilities

- 16** Any security breach to the licensee's environment that adversely affects the confidentiality of customer data; or prevents the licensee's customers, staff, or legitimate users from accessing their accounts for longer than 12 hours.
- 17** Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
- 18** In the case of remote gambling, the commencement or cessation of trading on website domains (*including mobile sites or mobile device applications*) or broadcast media through which the licensee provides gambling facilities (including domains covered by 'white label' arrangements).

In this condition:

'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof

- a** in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
- b** a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

¹ Key events are to be reported to us online via the 'eServices' digital service on our website www.gamblingcommission.gov.uk.

Licence condition 15.2.2

Other reportable events

All operating licences

- 1 Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable of the occurrence of any of the following events¹:
 - a any material change in the licensee's arrangements for the protection of customer funds in accordance with licence condition 4 (where applicable).
 - b any change in the identity of the Alternative Dispute Resolution entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
 - c their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised, or their becoming aware of a sustained or meaningful generation of the 3% or 10% of group Gross Gambling Yield being exceeded by the group in that jurisdiction.
 - d any actual or potential breaches by the licensee of the requirements imposed by or under Parts 7 or 8 of the Proceeds of Crime Act 2002, or Part III of the Terrorism Act 2000, or any UK law by which those statutes are amended or superseded.

In this condition:

- a 'group company' has the same meaning as in condition 15.2.1; and
- b without prejudice to section 327 of the Gambling Act 2005, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

¹ Other reportable events are to be reported to us online via the 'eServices' digital service on our website www.gamblingcommission.gov.uk

Licence condition 15.2.3

Other reportable events – money laundering, terrorist financing, etc All non-remote and remote casino operating licences

- 1** Licensees must notify the Commission in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable of any actual or potential breaches by the licensee of the provisions of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on Payer) Regulations 2017, or any UK Statutory Instrument by which those regulations are amended or superseded.
- 2** Licensees must, within 14 days of the appointment, notify the Commission of the identity of the individual appointed as:
 - a** the officer responsible for the licensee's compliance with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on Payer) Regulations 2017 (regulation 21(1)(a)),
 - b** the nominated officer (regulation 21(3)),and any subsequent appointment to either of those positions.
- 3** Licensees must, within 14 days of the departure or removal of any individual appointed to the positions mentioned in 2 above, notify the Commission of such departure or removal.

Other reportable events are to be reported to us online via the 'eServices' digital service on our website www.gamblingcommission.gov.uk

15.3 General and regulatory returns

Licence condition 15.3.1

General and regulatory returns All operating licences

- 1** On request, licensees must provide the Commission with such information as the Commission may require, in such a form or manner as the Commission may from time-to-time specify, about the use made of facilities provided in accordance with this licence and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on.
- 2** In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit an accurate Regulatory Return to the Commission containing such information as the Commission may from time to time specify¹.

¹Regulatory returns are to be submitted to us online via the 'eServices' digital service on our website www.gamblingcommission.gov.uk

16 Responsible placement of digital adverts

16 Responsible placement of digital adverts

16.1 Responsible placement of digital adverts

Licence condition 16.1.1

Responsible placement of digital adverts

All licences

1 Licences must:

- a Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
- b take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
- c ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

17 Customer identity verification

17.1 Customer identity verification

Licence condition 17.1.1

Customer identity verification

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except any lottery licence the holder of which only provides facilities for participation in low frequency¹ or subscription lotteries, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo.

- 1 Licensees must obtain and verify information in order to establish the identity of a customer before that customer is permitted to gamble. Information must include, but is not restricted to, the customer's name, address and date of birth.
- 2 A request made by a customer to withdraw funds from their account must not result in a requirement for additional information to be supplied as a condition of withdrawal if the licensee could have reasonably requested that information earlier. This requirement does not prevent a licensee from seeking information on the customer which they must obtain at that time due to any other legal obligation.
- 3 Before permitting a customer to deposit funds, licensees should inform customers what types of identity documents or other information the licensee may need the customer to provide, the circumstances in which such information might be required, and the form and manner in which such information should be provided.
- 4 Licensees must take reasonable steps to ensure that the information they hold on a customer's identity remains accurate.

¹ A 'low frequency lottery' is one of a series of separate lotteries promoted on behalf of the same non-commercial society or local authority, or as part of the same multiple society lottery scheme, in respect of which there is a period of at least two days between each lottery draw.

Part II: Code of practice

Introduction

This is the Commission's principal code of practice, issued under section 24 of the Gambling Act 2005.

There are two types of code provisions in this document:

- social responsibility code provisions: compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution; these provisions are set out in shaded boxes
- ordinary code provisions: these do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner. Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty; these code provisions are in the unshaded boxes in this section.

Code provisions

1 General

1.1 Cooperation and responsibility for third parties

Ordinary Code Provision 1.1.1

Cooperation with the Commission

All licences

- 1 As made plain in its *Statement of principles for licensing and regulation*, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

Social responsibility code provision 1.1.2

Responsibility for third parties – all licences

All licences

- 1 Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
- 2 Licensees must ensure that the terms on which they contract with such third parties:
 - a require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

Social responsibility code provision 1.1.3

Responsibility for third parties - remote

All remote licences

- 1 Remote licensees must ensure in particular:
 - a that third parties who provide user interfaces enabling customers to access their remote gambling facilities:
 - i include a term that any such user interface complies with the Commission's technical standards for remote gambling systems; and
 - ii enable them, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of that term.

2 Financial requirements

2.1 Anti-money laundering

Ordinary code provision 2.1.1

Anti-money laundering - casino

All remote and non-remote casino licences

- 1 In order to help prevent activities related to money laundering and terrorist financing, licensees should act in accordance with the Commission's guidance on anti-money laundering, *The Prevention of Money Laundering and Combating the Financing of Terrorism - Guidance for remote and non-remote casinos*.

Ordinary code provision 2.1.2

Anti-money laundering – other than casino

All licences except casino licences

- 1 As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators)*.

3 Protection of children and other vulnerable persons

3.1 Combating problem gambling

Social responsibility code provision 3.1.1

Combating problem gambling

All licences

- 1 Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.
- 2 Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

3.2 Access to gambling by children and young persons

Social responsibility code provision 3.2.1

Access to gambling by children and young persons – casinos SR code

All non-remote casino licences

- 1 Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2 Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 3 Licensees must designate one or more supervisors for each casino entrance.
- 4 A supervisor's responsibilities include ensuring compliance with this section of the code.
- 5 A supervisor must implement the following procedures:
 - a checking the age of customers who appear to be, or are suspected of being, underage
 - b refusing entry to anyone unable to produce an acceptable form of identification, ie one which:
 - i contains a photograph from which the individual can be identified
 - ii states the individual's date of birth
 - iii is valid
 - iv is legible and shows no signs of tampering or reproduction
 - c taking action when there are unlawful attempts to enter the premises, including removing anyone who appears to be underage and cannot produce an acceptable form of identification.
- 6 Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.
- 7 In premises restricted to adults, service must be refused in any circumstances where any adult is accompanied by a child or young person.
- 8 Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and the legal requirements on returning stakes and not paying prizes to underage customers.
- 9 Licensees must conduct test purchasing or take part in collective test purchasing programmes as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Ordinary code provision 3.2.2

Access to gambling by children and young persons – casinos ordinary code

All non-remote casino licences

- 1 There should be a sufficient number of supervisors at casino entrances to enable a considered judgement to be made about the age of everyone attempting to enter the casino and to take the appropriate action (for example checking identification) whilst at the same time not allowing others to enter unsupervised. The nature of this task means that it cannot be properly accomplished only by using CCTV; it will require a physical presence. Heavily used entrances may require more than one designated supervisor.
- 2 Supervisors may be assisted by other door keepers provided the supervisor retains the responsibility for compliance with this section of the code and deals personally with any case where there is any doubt or dispute as to someone's eligibility to enter.
- 3 The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including provisional licence) with photocard; or a passport.
- 4 Licensees should put into effect procedures that require their staff to check the age of any customer who appears to them to be under 21.
- 5 Licensees should consider permanent exclusion from premises of any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.
- 6 Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission¹ and the police, and making available information on problem gambling.
- 7 In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

¹These matters are to be reported to us online via our 'eServices' digital service on our website www.gamblingcommission.gov.uk

Social responsibility code provision 3.2.3

Access to gambling by children and young persons – AGC SR code

All adult gaming centre licences

- 1** Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2** This must include procedures for:
 - a** checking the age of apparently underage customers
 - b** removing anyone who appears to be under age and cannot produce an acceptable form of identification
 - c** taking action when there are attempts by under-18s to enter the premises.
- 3** Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 4** Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.
- 5** In premises restricted to adults, service must be refused in any circumstances where any adult is accompanied by a child or young person.
- 6** Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and the legal requirements on returning stakes and not paying prizes to underage customers.
- 7** Licensees must only accept identification which:
 - a** contains a photograph from which the individual can be identified
 - b** states the individual's date of birth
 - c** is valid
 - d** is legible and has no visible signs of tampering or reproduction.
- 8** Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Ordinary code provision 3.2.4

Access to gambling by children and young persons – AGC ordinary code

All adult gaming centre licences

- 1** The Commission considers acceptable forms of identification to include any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2** Licensees should put into effect procedures that require their staff to check the age of any customer who appears to them to be under 21.
- 3** Licensees should consider permanent exclusion from premises for any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.
- 4** Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission¹ and the police, and making available information on problem gambling.
- 5** Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
- 6** In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

¹These matters are to be reported to us online via our 'eServices' digital service on our website www.gamblingcommission.gov.uk

Social responsibility code provision 3.2.5

Access to gambling by children and young persons – bingo and FEC SR code

All non-remote bingo and family entertainment centre licences

- 1** Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2** This must include procedures for:
 - a** checking the age of apparently underage customers
 - b** refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c** taking action when there are unlawful attempts to enter the adult-only areas.
- 3** Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 4** Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
- 5** Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a** all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b** the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c** procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
- 6** Licensees must only accept identification which:
 - a** contains a photograph from which the individual can be identified
 - b** states the individual's date of birth
 - c** is valid
 - d** is legible and has no visible signs of tampering or reproduction.
- 7** Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Ordinary code provision 3.2.6

Access to gambling by children and young persons – bingo and FEC ordinary code

All non-remote bingo and family entertainment centre licences

- 1 The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2 Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
- 3 Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
- 4 Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission¹ and the police, and making available information on problem gambling to the child or young person concerned.
- 5 Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
- 6 Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
- 7 In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

¹These matters are to be reported to us online via our 'eServices' digital service on our website www.gamblingcommission.gov.uk

Social responsibility code provision 3.2.7

Access to gambling by children and young persons – betting SR code

Paragraphs 1, 2 and 4-7: all non-remote betting and remote betting intermediary (trading rooms only) licences

Paragraph 3: all non-remote betting licences (except general betting (limited) licences) and remote betting intermediary (trading rooms only) licences

Paragraph 8: non-remote pool betting licences

Paragraph 9: non-remote general betting (standard) licences in fee category C or above

- 1 Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2 This must include procedures for:
 - a checking the age of apparently underage customers
 - b removing from adult-only licensed premises anyone who appears to be underage and cannot produce an acceptable form of identification
 - c taking action when there are attempts by under-18s to enter adult-only premises
 - d refusing entry to any adult-only area of a track to anyone unable to produce an acceptable form of identification
 - e taking action when there are unlawful attempts to enter the adult-only areas.
- 3 Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises
- 4 Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or, except in the case of football pools, young people, for example by reflecting or being associated with youth culture.
- 5 In premises restricted to adults, service must be refused in any circumstances where any adult is accompanied by a child or young person.
- 6 Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and the legal requirements on returning stakes and not paying prizes to underage customers.
- 7 Licensees must only accept identification which:
 - a contains a photograph from which the individual can be identified
 - b states the individual's date of birth
 - c is valid
 - d is legible and has no visible signs of tampering or reproduction.
- 8 In the case of non-remote pool betting licensees, where pool entries or payments are collected door to door by the licensee or the licensee's authorised agent the licensee's procedures must include procedures for:
 - a checking the age of apparently underage entrants to the pool; and
 - b taking action when there are unlawful attempts to enter the pool.
- 9 Licensees must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Ordinary code provision 3.2.8

Access to gambling by children and young persons – betting ordinary code Paragraphs 1 to 5 inclusive: all non-remote betting and remote betting intermediary (trading rooms only) licences

Paragraph 6: all non-remote betting licences (except non-remote general betting (standard) licences in fee category C or above) and remote betting intermediary (trading rooms only) licences

- 1 The Commission considers acceptable forms of identification to include any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2 Licensees should put into effect procedures that require their staff to check the age of any customer who appears to them to be under 21.
- 3 Licensees should consider permanent exclusion from premises for any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.
- 4 Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission¹ and the police, and making available information on problem gambling.
- 5 In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.
- 6 Licensees should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.

¹These matters are to be reported to us online via our 'eServices' digital service on our website www.gamblingcommission.gov.uk

Social responsibility code provision 3.2.9

Access to gambling by children and young persons – lottery SR code

All non-remote lottery licences

- 1 Licensees must have and put into effect policies and procedures designed to minimise the risk of lottery tickets being sold to children (that is, persons under 16). This must include procedures for:
 - a checking the age of apparently underage purchasers of lottery tickets
 - b taking action when there are unlawful attempts to purchase tickets.
- 2 Licensees must take all reasonable steps to ensure that all those engaged in the promotion of lotteries in reliance on the licence understand their responsibilities for preventing underage gambling, returning stakes and not paying prizes to underage customers.

Ordinary code provision 3.2.10

Access to gambling by children and young persons – lottery ordinary code

All non-remote lottery licences

- 1 Licensees should require a person who appears to be under the age of 16 to be asked to produce proof of identity and age before purchasing a ticket.

Social responsibility code provision 3.2.11

Access to gambling by children and young persons – remote SR code

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except lottery licences, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo licences

- 1** Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these.
- 2** Such procedures must include:
 - a** Verifying the age of a customer before the customer is able to:
 - i** deposit any funds into their account;
 - ii** access any free-to-play versions of gambling games that the licensee may make available; or
 - iii** gamble with the licensee using either their own money or any free bet or bonus.
 - b** warning potential customers that underage gambling is an offence;
 - c** regularly reviewing their age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves;
 - d** ensuring that relevant staff are properly trained in the use of their age verification procedures; in particular customer services staff must be appropriately trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of legal age; and
 - e** enabling their gambling websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites.

Ordinary code provision 3.2.12

Access to gambling by children and young persons – remote ordinary code

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

- 1** Licensees should, and should request their contracted partners to, draw attention to parental responsibility as part of the purchasing process of facilities such as mobile phones and interactive television.

Social responsibility code provision 3.2.13

Access to gambling by children and young persons – remote lottery SR code

All remote lottery licences

- 1 Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these.
- 2 Such procedures must include:
 - a warning potential customers that underage gambling is an offence;
 - b requiring customers to affirm that they are of legal age;
 - c regularly reviewing their age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves;
 - d ensuring that relevant staff are properly trained in the use of their age verification procedures; in particular anyone who sells lottery tickets including canvassers and customer services staff must be appropriately trained in the use of secondary forms of identification when initial verifications procedures fail to prove that an individual is of legal age;
 - e enabling their gambling websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites;
 - f the following age verification procedures:
 - i in the case of both subscription lotteries and low frequency lotteries¹, and provided it is clear in the terms and conditions that those under the age of 16 are not permitted to participate and that the prizes will not be paid out to those found to be under 16, customers must be required to verify their age before being able to make any subscription or purchase entry into the lottery. (The licensee is expected to conduct a programme of random checks of users who self-verify for compliance with age restrictions);
 - ii in every other case, licensees must verify the age of a customer before the customer is able to:
 - o access any free-to-play versions of lotteries (for example instant win or digital scratchcard lotteries) that the licensee may make available; or
 - o in any case, participate in a lottery.

¹A 'low frequency lottery' is one of a series of separate lotteries promoted on behalf of the same non-commercial society or local authority, or as part of the same multiple society lottery scheme, in respect of which there is a period of at least two days between each lottery draw

Ordinary code provision 3.2.14

Access to gambling by children and young persons – remote lottery ordinary code

All remote society lottery licences

- 1 Where operators consider the lottery will be more likely to attract underage play – eg where the prize is of particular appeal to children (those under the age of 16) such as concert tickets, games consoles, large prizes - operators should ensure that age verification measures are appropriate to the risk of attempted underage play. In these circumstances it is unlikely that self-verification alone will be sufficient.

3.3 Gambling management tools and responsible gambling management information

Social responsibility code provision 3.3.1

Responsible gambling information

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences

- 1 Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
- 2 The information must cover:
 - a any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
 - b timers or other forms of reminders or 'reality checks' where available
 - c self-exclusion options
 - d information about the availability of further help or advice.
- 3 The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
- 4 For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

Ordinary code provision 3.3.2

Responsible gambling information – foreign languages

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

- 1 Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
 - a the information on how to gamble responsibly and access to help referred to above
 - b the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
 - c the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

Social responsibility code provision 3.3.3
Betting B2 - time and monetary thresholds
All non-remote betting licences

- 1 Licensees must ensure that any B2 machines that they make available for use require customers to make an active choice whether to set time and monetary thresholds for customer and staff alerts. Such thresholds must comply with any relevant requirements set out in the Commission's machine technical standards.

Social responsibility code provision 3.3.4
Remote time-out facility

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting licences, remote betting (remote platform), gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading room only) licences

- 1 Licensees must offer a 'time out' facility for customers for the following durations:
 - a 24 hours
 - b one week
 - c one month or
 - d such other period as the customer may reasonably request, up to a maximum of 6 weeks.

3.4 Customer interaction

Social responsibility code provision 3.4.1

Customer interaction

All licences, except non-remote lottery, gaming machine technical, gambling software and host licences

- 1** Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a** identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b** interacting with customers who may be at risk of or experiencing harms associated with gambling.
 - c** understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
- 2** Licensees must take into account the Commission's guidance on customer interaction.

Social responsibility code provision 3.4.2

Customer interaction – lotteries

All lottery licences

- 1** Licensees who are non-commercial societies or external lottery managers must:
 - a** set an upper limit on the value of lottery tickets which may be sold to a person, whether as part of a single transaction or over a period of time, without customer interaction;
 - b** maintain records of all instances of customer interaction pursuant to (a) above and, in each case, whether purchase of tickets beyond the limits set was then permitted; and
 - c** ensure such records are made available to the Commission for inspection on request and retained for at least three years from the date of any lottery to which they relate.

3.5 Self-exclusion

Social responsibility code provision 3.5.1

Self-exclusion – non-remote and trading rooms SR code

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences

- 1 Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
- 2 Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
- 3 Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
- 4 This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
- 5 Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
- 6 Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c staff training to ensure that staff are able to administer effectively the systems; and
 - d the removal of those persons found in the gambling area or attempting to gamble from the premises.
- 7 Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.
- 8 Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

Ordinary code provision 3.5.2

Self-exclusion – non-remote ordinary code

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences

- 1 Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
- 2 Individuals should be able to self-exclude without having to enter gambling premises.
- 3 Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
- 4 Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
- 5 Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
- 6 Customers should be given the opportunity to discuss self-exclusion in private, where possible.
- 7 Licensees should take steps to ensure that:
 - a the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
 - d at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
- 8 The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
- 9 Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
- 10 Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.

- 11 Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
- 12 In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

Social responsibility code 3.5.3

Self-exclusion – remote SR code

All remote licences except: gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, betting intermediary (trading room only) and remote betting (standard) (remote platform) licences

Paragraph 8 does not apply to ancillary remote betting licences, remote general betting (limited), or any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries

- 1 Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
- 2 Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
- 3 Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
- 4 This covers any marketing material relating to gambling. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
- 5 Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
- 6 Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b a record of the card numbers to be excluded;
 - c staff training to ensure that staff are able to administer effectively the systems; and
 - d the removal of access from those persons found to have gambled or who have attempted to gamble on the facilities.
- 7 Licensees must when administering the self-exclusion signpost the individual to counselling and support services.
- 8 Customers must be given the opportunity to self-exclude by contacting customer services and in addition by entering an automated process using remote communication. In order to avoid inadvertent self-exclusion it is acceptable for an automated process to include an additional step that requires the customer to confirm that they wish to self-exclude. The licensee must ensure that all staff who are involved in direct customer service are aware of the self-exclusion system in place, and are able to direct that individual to an immediate point of contact with whom/which to complete that process.

Ordinary code provision 3.5.4

Self-exclusion – remote ordinary code

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, remote betting intermediary (trading rooms only) and remote betting (standard) (remote platform) licences

- 1 Self-exclusion procedures should require individuals to take positive action in order to self-exclude:
 - a over the **internet**; this can be a box that must be ticked in order to indicate that they understand the system
 - b by **telephone**; this can be a direct question asking whether they understand the system.
- 2 Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
- 3 Licensees should encourage the customer to consider extending their self-exclusion to other remote gambling operators currently used by the customer.
- 4 Within the licensee's information about self-exclusion policies, the licensee should provide a statement to explain that software is available to prevent an individual computer from accessing gambling internet sites. The licensee should provide a link to a site where further information is available.
- 5 Licensees should take all reasonable steps to ensure that:
 - a the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months;
 - b any self-exclusion may, on request, be extended for one or more further periods of at least 6 months;
 - c the self-exclusion arrangements give customers the option of selecting a self-exclusion period of up to at least five years;
 - d a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
 - e at the end of the period chosen by the customer, self-exclusion remains in place, for a minimum of 7 years, unless the customer takes positive action to gamble again;
 - f where a customer chooses not to renew, and makes a positive request to begin gambling again, during the 7 year period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed to access gambling facilities. Contact must be made via phone or in person; re-registering online is not sufficient; and
 - g notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
- 6 The licensee should retain the records relating to a self-exclusion agreement for as long as is needed to enable the self-exclusion procedures set out in paragraph 5 above to be implemented.
- 7 Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
- 8 In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

Social responsibility code provision 3.5.5

Self-exclusion – remote multi-operator SR code

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting, remote general betting (remote platform), remote betting intermediary (trading room only), remote general betting (limited), gaming machine technical, gambling software, host, ancillary remote bingo, and ancillary remote casino licences

- 1 Licensees must participate in the national multi-operator self-exclusion scheme.

Social responsibility code provision 3.5.6

Self-exclusion – multi-operator non-remote SR code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1 Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

Ordinary code provision 3.5.7

Self-exclusion – multi-operator non-remote ordinary code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1 Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).

Social responsibility code provision 3.5.8
Self-exclusion – non-remote lottery SR code
All non-remote lottery licences

- 1 Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
- 2 Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
- 3 Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
- 4 This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
- 5 Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
- 6 Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b a facility for someone self-excluding to provide a signature; and
 - c staff training to ensure that staff are able to administer effectively the systems.
- 7 Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

3.6 Employment of children and young persons

Ordinary code provision 3.6.1

Employment of children and young people – lottery and pool betting

All lottery licences and pool betting licences restricted to football pools

- 1 Licensees who employ young persons (16 and 17 year olds) to sell tickets, collect payments or pay out winnings should have and put into effect policies and procedures designed to ensure that all staff, including staff who are young persons themselves, are made aware that the law prohibits underage gambling, and that tickets may only be sold to persons aged 16 or over.

Ordinary code provision 3.6.2

Employment of children and young people – bingo

All non-remote bingo licences

- 1 Licensees who employ children under (under-16-year-olds) and young persons (those aged 16 or 17) should be aware that it is an offence:
 - a to employ them to provide facilities for playing bingo;
 - b for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine; and
 - c to employ a child to perform any function on premises where, and at time when, facilities are being provided for playing bingo.
- 2 As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3 Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a children and young persons are never asked to perform tasks within 1a or 1b, above
 - b all staff, including those who are children and young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4 Licensees should consider adopting a policy that:
 - a children are not employed to work on bingo licensed premises at any time when the premises are open for business
 - b neither children nor young persons are in any event asked to work in areas where gaming machines are situated.

Ordinary code provision 3.6.3

Employment of children and young people – casino

All non-remote casino licences

- 1 Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
 - a to employ them to provide facilities for gambling;
 - b if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
 - c to employ them to carry out any other function on casino licensed premises while any gambling activity is being carried on in reliance on the premises licence (except that they can be employed on a part of regional casino premises when that part of the premises is not being used for the provision of facilities for gambling).
- 2 As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3 Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a children and young persons are never asked to perform tasks within 1a or 1b above
 - b all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4 Licensees should consider adopting a policy that:
 - a children and young persons are not employed to work on casino licensed premises (other than in an area of a regional casino where gambling does not take place) at any time when the premises are open for business
 - b gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

Ordinary code provision 3.6.4

Employment of children and young people – betting

All non-remote general, pool betting, and remote betting intermediary (trading rooms only) licences

- 1 Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
 - a to employ children to provide facilities for gambling in connection with football pools;
 - b otherwise to employ children and young persons to provide facilities for gambling;
 - c if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
 - d to employ them to carry out any other function on betting licensed premises while any gambling activity is being carried on in reliance on the premises licence.
- 2 As to 1c, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3 Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a children are never asked to perform tasks within 1a above
 - b children and young persons are never asked to perform tasks within 1b above
 - c all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4 Licensees should consider adopting a policy that:
 - a children and young persons are not employed to work on betting licensed premises at any time when the premises are open for business
 - b gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

Ordinary code provision 3.6.5

Employment of children and young people – AGCs

All adult gaming centre licences

- 1 Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
 - a to employ them to provide facilities for gambling;
 - b if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
 - c to employ them to carry out any other function on adult gaming centre licensed premises while any gambling activity is being carried on in reliance on the premises licence.
- 2 As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3 Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a children and young persons are never asked to perform tasks within 1a or 1b, above
 - b all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4 Licensees should consider adopting a policy that:
 - a children and young persons are not employed to work on adult gaming centre licensed premises at any time when the premises are open for business
 - b gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

Ordinary code provision 3.6.6

Employment of children and young people – FECs

All family entertainment centre licences

- 1** Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
 - a** to employ them to provide facilities for gambling; and
 - b** if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time.
- 2** As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3** Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a** children and young persons are never asked to perform tasks within 1a or 1b, above; and
 - b** all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4** Licensees should consider adopting a policy that:
 - a** children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place; and
 - b** gaming machines sited in adult-only areas are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

Ordinary code provision 3.6.7

Employment of children and young people – remote

All remote licences, except remote lottery, remote pool betting, remote gaming machine technical, remote gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

- 1** Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence to employ them to provide facilities for gambling.

Ordinary code provision 3.6.8

Employment of children and young people – remote pool betting

All remote pool betting licences

- 1** Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
 - a** to employ children to provide facilities for gambling on connection with football pools; and
 - b** otherwise to employ children and young people to provide facilities for gambling.

3.7 Provision of credit

Social responsibility code provision 3.7.1

Provision of credit

All non-remote general betting licences (except where betting is offered under a 2005 Act casino premises licence), pool betting licences and all remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote casino, ancillary remote bingo and remote betting intermediary (trading rooms only) licences

- 1 Licensees who choose to offer credit to members of the public who are not themselves gambling operators must also:
 - a have procedures for checking and scoring applications for credit from such customers, for setting, and for the increase of, credit limits
 - b explain these procedures to customers
 - c set a maximum credit limit for each customer and not permit customers to exceed that limit without further application
 - d apply a 24-hour delay between receiving a request for an increase in a credit limit and granting it in those cases where the limit exceeds that which the operator previously set
 - e not require a minimum spend within a set time period
 - f take all reasonable steps to ensure that offers of credit are not sent to vulnerable persons, including those who have self-excluded from gambling
 - g ensure that information about an offer of credit includes a risk warning of what may happen in the event of default.

3.8 Money lending between customers

Ordinary code provision 3.8.1

Money-lending - casinos

All non-remote casino licences

- 1 Licensees should take steps to prevent systematic or organised money lending between customers on their premises.
- 2 While the nature of those steps will depend to some extent on the layout and size of the premises, they should cover matters such as:
 - a systems for monitoring for such activity;
 - b instructions to staff concerning what they should do if they spot what they believe to be significant money lending and to managers about the ways in which they should handle and act on any such lending; and
 - c excluding from the premises, either temporarily or permanently as appropriate, any person whom the evidence suggests has become involved in organised or systematic money lending.
- 3 There should be appropriate arrangements in place to cover any cases where it appears that the lending may be commercial in nature or may involve money laundering. In the latter case, the requirements in respect of reporting suspicious transactions must be followed. In all cases where the operator encounters systematic or organised money lending, a report should be made to the Commission.¹

¹These matters are to be reported to us online via our 'eServices' digital service on our website www.gamblingcommission.gov.uk

Ordinary code provision 3.8.2

Money-lending – other than casinos

All non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences

- 1 Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

3.9 Identification of individual customers

Social responsibility code 3.9.1

Identification of individual customers - remote

All remote licences (including ancillary remote betting licences)

except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

- 1 Licensees must have and put into effect policies and procedures designed to identify separate accounts which are held by the same individual.
- 2 Where licensees allow customers to hold more than one account with them, the licensee must have and put into effect procedures which enable them to relate each of a customer's such accounts to each of the others and ensure that:
 - a if a customer opts to self-exclude they are effectively excluded from all gambling with the licensee unless they make it clear that their request relates only to some forms of gambling or gambling using only some of the accounts they hold with the licensee;
 - b all of a customer's accounts are monitored and decisions that trigger customer interaction are based on the observed behaviour and transactions across all the accounts;
 - c where credit is offered or allowed the maximum credit limit is applied on an aggregate basis across all accounts; and
 - d individual financial limits can be implemented across all of a customer's accounts.
- 3 Licensees which are companies or other bodies corporate must take all reasonable steps to comply with the above provision as if reference to a customer holding more than one account with them included a reference to a customer holding one or more accounts with them and one or more accounts with a group company.
- 4 A company is a 'group company' in relation to a licensee if it is the holding company of, subsidiary of, or shares a common holding company with, the licensee. For these purposes 'holding company' and 'subsidiary' have the meanings ascribed to them by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof.

4 'Fair and open' provisions

4.1 Fair terms

Social responsibility code provision 4.1.1

Fair terms

All licences, except gaming machine technical and gambling software licences

- 1 Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

4.2 Display of rules and supervision of games

Social responsibility code provision 4.2.1

Display of rules - casino

All non-remote casino licences

- 1 In complying with any condition on a casino premises licence requiring the display of rules about gaming, licensees must ensure that the following are included:
 - a the rules of each type of casino game available to be played
 - b a player's guide to the house edge
 - c a player's guide to the rules of any equal chance games which are made available.

Social responsibility code provision 4.2.2

Display of rules - bingo

All non-remote bingo licences

- 1 In complying with any condition on a bingo premises licence or a 2005 Act large casino premises licence requiring the display of rules about gaming, licensees must ensure that the following are included:
 - a rules about each variant of bingo made available; and
 - b rules about any prize gaming made available.

Social responsibility code provision 4.2.3

Display of rules – remote SR code

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

- 1 Licensees must make the following available to customers:
 - a a player's guide to each gambling opportunity (bet, game or lottery) made available by the operator; and
 - b such additional information relating to the available gambling as the Commission shall from time to time publish to licensees: the current requirements are set out in the Commission's *Remote gambling and software technical standards*.

Ordinary code provision 4.2.4

Display of rules - remote ordinary code

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

- 1** Where practicable, the player's guide and additional information referred to in the social responsibility code **4.2.3** should be made available through the medium in which the remote gambling is to be conducted. Where that is not practicable, licensees should either:
 - a** send a copy of the guide and required additional information by post, fax or email; or
 - b** make these available to the customer in another medium to which he has access.

Social responsibility code provision 4.2.5

Supervision of games

All non-remote casino licences

- 1** Licensees must have and put into effect policies and procedures designed to ensure that proper supervision of gaming at tables is carried out by supervisors, pit bosses and croupiers in order to ensure the integrity of the gaming is not compromised. Such policies and procedures must take into account, but need not be limited by, any mandatory premises licence conditions relating to the layout of premises.

Social responsibility code provision 4.2.6

Display of rules – betting

All general betting and betting intermediary licences, except remote betting intermediary (trading rooms only) licences

- 1** Licensees must set out within the full rules that they make available, the core elements for the acceptance and settlement of bets. These rules must cover:
 - a** the circumstances under which the operator will void a bet;
 - b** treatment of errors, late bets and related contingencies;
 - c** availability of odds for any ante-post, early show or starting price betting, and treatment of place, forecast bets etc;
 - d** treatment of withdrawals, non-runners, and reformed markets;
 - e** maximum payout limiting liability for a specific betting product or generally;
 - f** any charges made to customers for the use of betting services or products, and how these are calculated (including deductions from winnings for commission, or in respect of withdrawn horses etc);
 - g** means or medium by which the outcome of an event will be determined;
 - h** the rules for the event itself to be specified (eg horserace bets only to be accepted; where the racing is subject to British Horseracing Authority rules);
 - i** where bets are accepted on 'pari-mutuel' terms; and
 - j** any special arrangements for settling bets on 'coupled' horses.
- 2** Where special rules have been agreed in relation to a particular bet these must not be overridden by any conflicting rules or subsequent rule changes.
- 3** Licensees must issue a betting slip or an electronic acknowledgement (other than in the case of telephone betting) for each transaction which includes information as to the operator's name and contact details, and words equivalent to 'Bets are accepted in accordance with the operator's rules'.

Social responsibility code 4.2.7

Display of rules – on-course betting¹

All non-remote general betting licences

- 1** When providing facilities for betting on-course, licensees must display on their 'joints' in an intelligible format:
 - a** any rules that differ from the relevant racecourse rules on betting, such as Tattersalls' 'Rules on Betting'¹;
 - b** any types of unorthodox bets accepted (such as forecast betting, betting without the favourite, distance betting etc);
 - c** whether win-only or each way bets are accepted;
 - d** any concessions or bonuses offered;
 - e** all of the runners and the odds available to the public;
 - f** the operator's trading name;
 - g** the minimum bet accepted; and
 - h** any applicable maximum payout.
- 2** Licensees operating within the ring at horserace tracks² must issue customers with a betting slip or ticket for each transaction accepted. Betting slips or tickets must include the following information:
 - a** operator's name and contact details;
 - b** race day name or code, date and race number;
 - c** name and/or number of the selection;
 - d** the stake, odds and potential return or whether the bet will be settled according to Starting Price; and
 - e** the type of bet.
- 3** Any special rules which have been agreed in relation to a particular bet must not be overridden by any conflicting rules or subsequent rule changes.

¹ The references to Tattersalls' 'Rules on Betting' reflect the current position and may need to be amended in future

² Licensees operating under the provision of an occasional use notice (eg point-to-points) must ensure ledger systems are capable of providing the information listed here.

Ordinary code provision 4.2.8

Betting integrity

All betting operating licences, including betting intermediary, ancillary remote betting and remote betting intermediary (trading rooms only) licences

- 1** Where licensees offer to accept bets, or facilitate the making or acceptance of bets between others, on the outcome of a sport regulated by a sport governing body for the time being included in Part 3 of Schedule 6 of the Act, they should take all reasonable steps to familiarise themselves with the rules applied by that body on betting, in particular betting by registered participants.
- 2** Licensees should ensure that a condition of their accepting bets is that for a bet to be valid, customers placing such bets must not be in breach of any rules on betting or misuse of inside information relevant to a sports governing body, other professional body of which they are a member, or their employers. Where a breach of these rules is identified, licensees should then take steps to void the bet.

Social responsibility code provision 4.2.9

Display of rules – pool betting

All pool betting licences

- 1** Licensees or any person they authorise to offer pool betting on their behalf under authority of section 93 of the Act must publish their rules relevant to the following:
 - a** the deduction levels for overheads, taxes, profits etc, expressed as a percentage, from each available pool;
 - b** the rounding of winning dividends to a whole unit;
 - c** the procedure for when there is no winner of the pool, and the circumstances in which the pool is carried over; and
 - d** the period of time in which a winning bet may be claimed from the pool operator.

Social responsibility code provision 4.2.10

Pool betting

All non-remote pool betting licences

- 1** Licensees or any person they authorise to offer pool betting on their behalf under authority of section 93 of the Act, must only accept bets through equipment capable of communicating bets to a central recording system.
- 2** The equipment must supply the person placing the bet with a betting slip or ticket containing the following information:
 - a** the date on which the bet is made;
 - b** the amount of the stake;
 - c** the identity of the track, the number or time of the race and the pool in respect of which the bet is made;
 - d** the selection or selections or combination of selections as indicated; and
 - e** means of identifying the equipment recording the bet.
- 3** The central recording system must collect all bets made to each of the operator's pools and all information required to calculate the winnings of each pool and be capable of storing this information for subsequent retrieval if required by the Commission.
- 4** Licensees and any person they authorise to offer pool betting on their behalf under authority of section 93 of the Act must:
 - a** provide a public display system within sight of all of the operator's terminals capable of accepting pool bets situated on-course. The system must display the potential dividend returns in respect of win and place outcomes from each pool operated, and in at least one place the units staked on all types of combination bets offered. This information is to be updated whilst the pool market is open. Following conclusion of the event to which the pool relates, the total amount payable as winning dividends must be displayed as soon as practicable; and
 - b** display prominently the minimum stake that will be accepted as a bet.

4.3 Additional consumer information

Social responsibility code provision 4.3.1

Publication of percentage of lottery proceeds returned to the purposes of the society or local authority

All lottery operating licences issued to non-commercial societies and local authorities

- 1 Each year, licensees must publish details on the percentage of the total proceeds of lotteries promoted in the previous calendar year in reliance on this licence applied to purposes for which the society is conducted, or purposes for which the local authority has power to incur expenditure. This should be through either their annual report, lottery page of their society website or any other means appropriate to the size and scale of the organisation.

Social responsibility code provision 4.3.2

Marketing of all lotteries conducted under a single brand (branded lotteries)

All lottery operating licences issued to non-commercial societies, local authorities and external lottery managers

- 1 Where a number of society lotteries are promoted under one brand (also known as a branded lottery¹), whether with an ELM or not, licensees must ensure that it is clear to consumers (or potential consumers), which society lotteries are being promoted.
- 2 The requirement in (1) must be made clear to consumers within any marketing communications, advertisements, promotions or any information surrounding the draw, winners and beneficiaries; and through any ticket documentation.

¹ a scheme whereby multiple societies promote lotteries under a common brand name or image, either on rotation with other societies or as a regular occurrence for that single society.

Social responsibility code provision 4.3.3

Lotteries – Information to consumers

All lottery operating licences issued to non-commercial societies, local authorities and external lottery managers

- 1 Licensees must ensure that clear, transparent, and easily accessible information is made available to consumers to enable them to make an informed choice prior to participating in a lottery. This must include but is not restricted to details of how proceeds are used, the likelihood of winning a prize and how prizes are allocated.
- 2 Licensees must take into account the Commission's guidance on information to lottery players.

5 Marketing

5.1 Rewards and bonuses

Social responsibility code provision 5.1.1

Rewards and bonuses – SR code

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

- 1** If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
 - a** the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
 - b** neither the receipt nor the value or amount of the benefit is:
 - i** dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - ii** altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
 - c** if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
 - d** if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.
- 2** If a licensee makes available incentives or reward schemes for customers, designated by the licensee as 'high value', 'VIP' or equivalent, they must be offered in a manner which is consistent with the licensing objectives.

Licensees must take into account the Commission's guidance on high value customer incentives.

Ordinary code provision 5.1.2

Proportionate rewards

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

- 1** Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

Social responsibility code provision 5.1.3

Alcoholic drinks

All non-remote bingo and casino licences

- 1** If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
- 2** Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

Social responsibility code provision 5.1.4

Promotion by agents

All non-remote casino licences

- 1 Where a licensee employs agents to promote its business (wherever that business is conducted), it must ensure that its agreement with any agent makes clear that the agent must not encourage players to play longer or wager more than the player might otherwise do. In particular, payments should not be directly dependent upon, nor directly calculated by reference to, the length of time for which, or frequency with which, the customer gambles. If the payment to the agent increases with the amount the customer spends it must do so at a rate no greater than that at which the amount spent increases.

Ordinary code provision 5.1.5

Mailing of lottery tickets

All lottery licences

- 1 With a view to minimising the risk of fraud, licensees who are non-commercial societies or external lottery managers should adopt one or more of the following measures:
 - a prohibit the unsolicited mailing of tickets to non-members of the promoting society
 - b limit the value of tickets sent to any one address which is not that of a member of the promoting society to £20
 - c maintain records of tickets distributed and not returned.

Social responsibility code provision 5.1.6

Compliance with advertising codes

All licences, except lottery licences

- 1 All marketing of gambling products and services must be undertaken in a socially responsible manner.
- 2 In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
- 3 The restriction on allowing people who are, or seem to be, under 25 years old (ie: those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

Social responsibility code provision 5.1.7

Compliance with advertising codes (lotteries)

All lottery licences

- 1 All marketing of gambling products and services must be undertaken in a socially responsible manner.
- 2 In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.

Ordinary code provision 5.1.8
Compliance with industry advertising codes
All licences

- 1 Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

Social responsibility code provision 5.1.9
Other marketing requirements
All licences

- 1 Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
- 2 Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
- 3 The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

Ordinary code provision 5.1.10
Online marketing in proximity to information on responsible gambling
All licences

- 1 Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

Social Responsibility code provision 5.1.11
Direct electronic marketing consent
All licences

- 1 Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

6 Complaints and disputes

6.1 Complaints and disputes

Social responsibility code provision 6.1.1

Complaints and disputes

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences

- 1** Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
- 2** Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
- 3** The services of any such ADR entity must be free of charge to the customer.
- 4** Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
- 5** Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
- 6** Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
- 7** Licensees should keep records of customer complaints and disputes and make them available to the Commission on request.

In this Code, 'ADR entity' means

- a** a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 and,
- b** whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry -- standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

7 Gambling licensees' staff

7.1 Gambling licensees' staff

Social responsibility code provision 7.1.1

Gambling staff – casinos

All non-remote casino licences

- 1 Licensees must have and put into effect policies and procedures to manage relationships between staff and customers, based on the principle that in carrying out their duties staff must not engage in any conduct which is, or could be, likely to prejudice the licensing objectives.

Social responsibility code provision 7.1.2

Responsible gambling information for staff

All licences, including betting ancillary remote licences, but not other ancillary remote licences

- 1 Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

Ordinary code provision 7.1.3

Gambling staff and irregular betting

All betting operating licences

- 1 Licensees should have employment policies that:
 - require employees to report any indicators of irregular and/or suspicious betting to their employer; and
 - prohibit their employees from using information related to irregular and/or suspicious betting for the purpose of placing their own wagers, either with their employer or with other operators.

8 Information requirements

8.1 Information requirements

Ordinary code provision 8.1.1

Information requirements – ordinary code

All licences

- 1 As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
- 2 Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence²:
 - a any material change in the licensee's structure or the operation of its business
 - b any material change in managerial responsibilities or governance arrangements
 - c any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website www.gamblingcommission.gov.uk.

² Events which **must** be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

Ordinary code provision 8.1.2

Provision of information in respect of cheating

All betting operating licences including betting intermediary, ancillary remote betting and remote betting intermediary (trading room only)

- 1 In considering their obligations under licence condition **15.1.2** licensees should in particular keep in mind the scope of the offence of cheating. The Commission would expect to be notified¹ of any information a licensee has which causes them to know or suspect that there has been interference or attempted interference with:
 - a an event which has taken or is taking place in Great Britain on which bets have been or are likely to be or to have been placed (whether in Great Britain or elsewhere); or
 - b an event which has taken or is taking place outside Great Britain on which bets have been or are likely to be or to have been placed in Great Britain.

¹ Information relating to sports betting integrity should be sent directly to the [Sports Betting Intelligence Unit \(SBIU\)](#).

9 Gaming machines in gambling premises

9.1 Gaming machines in gambling premises

Social responsibility code provision 9.1.1

Gaming machines in gambling premises – betting

All non-remote general betting operating licences, except where betting is offered under a 2005 Act casino premises licence

- 1 Gaming machines may be made available for use in licensed betting premises only where there are also substantive facilities for non-remote betting, provided in reliance on this licence, available in the premises.
- 2 Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
- 3 Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing betting facilities.

Social responsibility code provision 9.1.2

Gaming machines in gambling premises – bingo

All non-remote bingo operating licences

- 1 Gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises.
- 2 Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
- 3 Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.

Social responsibility code provision 9.1.3

Gaming machines in gambling premises – casino

All non-remote casino operating licences, except 2005 Act operating licences

- 1 Gaming machines may be made available for use in licensed casino premises only where there are also substantive facilities for non-remote casino games and/or games of equal chance, provided in reliance on this licence, available in the premises.
- 2 Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
- 3 Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing facilities for casino games and/or games of equal chance.

10 Assessing local risk

10.1 Assessing local risk

Social responsibility code provision 10.1.1

Assessing local risk

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

- 1** Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy¹.
- 2** Licensees must review (and update as necessary) their local risk assessments:
 - a** to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b** when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c** when applying for a variation of a premises licence; and
 - d** in any case, undertake a local risk assessment when applying for a new premises licence.

¹This is the statement of licensing policy under the Gambling Act 2005.

Ordinary code provision 10.1.2

Sharing local risk assessments

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

- 1** Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

Part III

Suite of general conditions to be attached to personal licences under Section 75 of the Gambling Act 2005

Personal licence conditions

All personal licence holders

- 1** Personal licence holders must take all reasonable steps to ensure that the way in which they carry out their responsibilities in relation to licensed activities does not place the holder of the operating or any relevant premises licence in breach of their licence conditions.
- 2** Personal licence holders must keep themselves informed of developments in gambling legislation, codes of practice and any Commission guidance (whether issued on the Commission's website or communicated directly to licence holders) relevant to their role. Holders of personal functional licences must keep their technical competence in respect of their licensed activities up to date.
- 3** Personal licence holders must themselves notify the Commission of the occurrence of any of the following key events within ten working days after the licensee becomes aware of the event's occurrence¹:
 - a** their subjection to any criminal investigation which is listed under Schedule 7 Relevant Offences of the Gambling Act 2005;
 - b** their conviction of any offence listed under Schedule 7 – Relevant Offences of the Gambling Act 2005;
 - c** any current or pending investigation by a professional, statutory, regulatory or government body in Great Britain or abroad;
 - d** the imposition of any sanction or penalty against them following an investigation by any professional, statutory, regulatory or government body in Great Britain or abroad;
 - e** the imposition of a disciplinary sanction against them, including dismissal, for gross misconduct;
 - f** their resignation from a position for which a personal licence is required following commencement of disciplinary proceedings in respect of gross misconduct;
 - g** their disqualification from acting as a company director;
 - h** the presentation of a petition for their bankruptcy or sequestration or their entering into an individual voluntary agreement;
 - i** a change in their name or address.

¹ These matters are to be reported to us online via the 'Manage and maintain your licence' service on our website www.gamblingcommission.gov.uk

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Social Responsibility and Interaction

WORKBOOK

Agenda

Topic	Length
Social Responsibility in the gambling industry	20 min
Gambling in Great Britain	10 min
Understanding why problem gambling occurs	20 min
BREAK	
Case study	
The impact of problem gambling in Bingo clubs	20 min
Identifying problem gambling in Bingo	25 min
LUNCH	
Prevention measures	20 min
Screening, brief advice, and brief intervention	15 min
Understanding FRAMES	20 min
Applying FRAMES	25 min
BREAK	
Dealing with difficult conversations	20 min
Applying the right intervention	5 min
Signposting to GamCare services	10 min
Self-care	15 min
Summary	10 min

N.B: These timings are an estimate, discussion time can vary, and time taken on each section is learner led

Social Responsibility

Social responsibility in gambling is about protecting players and others from gambling-related harm.

Gambling regulation covers three main objectives¹:

- 1) Crime should be kept out of gambling
- 2) It should be conducted in a fair and open way
- 3) Children and other vulnerable people should be protected from harm or exploitation from gambling

When those in the gambling industry interact with customers and with one another about gambling in a proactive and responsible way, the benefits to the organisation include:

- Improved company culture
- Positive reputation
- Staff gain additional skills and abilities

These factors all lead to an increase in customer loyalty and retention. According to recent Gambling Commission data², the reputation of a company being fair and trustworthy is the top choice when selecting an operator. With over 100,000 people working in the gambling industry, social responsibility plays a huge part in addressing the issues around problem gambling.

Notes

What are your 'light bulb moments' from this session?



¹ <http://www.gamblingcommission.gov.uk/for-gambling-businesses/Compliance/General-compliance/Social-responsibility>.

² <http://live-gamblecom.cloud.contensis.com/PDF/survey-data/Gambling-participation-in-2017-behaviour-awareness-and-attitudes.pdf>

Gambling and Bingo in Great Britain

Around 46% of people in the UK (aged 16+) have gambled in the past four weeks. The most popular gambling activities are the National Lottery and scratch cards, but online gambling is becoming increasingly popular each year, as 18% gambled online in the past four weeks.

Participation in Bingo is about 5% of the adult population (Nat Cen 2016).

Licensed retail Bingo employs 12% of all gambling sector employees and is home to over 47,000 Electronic Bingo Terminals and 21,000 gaming machines. (RS annual survey 2018).

The most common reasons for people to participate in Bingo is to socialise, and because it is fun and safe. (Ipsos MORI 2016). 92% of Bingo customers visit with friends or meet someone at the club.

The Licensed Bingo Industry represents 5% of Gambling Industry Gross Gaming Yield and 5% of all gambling premises.

Problem gambling rates in Bingo are estimated to be 2.5% of regular players (more than once a fortnight), and they are more likely to play Bingo on a handheld and/or play gaming machines. PG rates in Bingo are generally much lower than most other gambling sectors except the Lottery (Nat Cen 2016).

Notes

What are your 'light bulb moments' from this session?



Why Problem Gambling Occurs: Reasons and Risk Factors

Problem gambling occurs for several reasons.

It can be scientifically explained by the build-up of dopamine releases from excessive gambling. This makes the gambler learn to experience the pleasure that comes from a dopamine release. They can also experience withdrawal symptoms if they don't get their 'hit'.

Problem gambling can also be explained by common beliefs that occur in some people, making them less self-aware about their gambling and more prone to risky gambling behaviours. Common beliefs change the player's perception of their likelihood of winning and cause them to make irrational decisions about their gambling.

In addition to this, there are certain risk factors that make an individual more prone to becoming a problem gambler. These include situational factors, such as problem gambling amongst peers or substance misuse issues, and includes historical factors such as inconsistent parental discipline and lower socioeconomic background.

Notes

What are your 'light bulb moments' from this session?



Case Studies

1. A member of the public has contacted your bingo club, he says that he is the partner of a customer who had self-excluded, but was allowed into the club and went in to the arcade on Friday night and played for three hours until 1AM on Saturday. He says that she has been self-excluded for the last 4 months but was still allowed in.

"Can you please tell me why you prey on vulnerability and just ignore your self-exclusion policy? She was playing the Spartacus machines and lost a lot of money. This is disgusting and I want our money back, I am sorry, but I won't give up until something is done about it because self-exclusion means that she shouldn't be allowed in."

What would you do in this case?

2. A Bingo player is also a local authority carer. As part of her duties she takes a minibus of pensioners to a Bingo club once a week. She has developed a gambling problem spending too much on the handheld terminals and decides to self-exclude from Bingo. However, she continues to drive the bus to the Bingo club once a week which means she is exposed to the Bingo environment. She informs the club of her self-exclusion, and she asks to sit at the back of the club and observe whilst having a cuppa.

"I had a bit too much of those handheld machines you see; the self-exclusion was all about that really. I haven't got an issue going into the Bingo hall, and since I'm here every week, it makes sense for me to just sit at the back so I can keep an eye on the group. I know I have a self-exclusion, but it doesn't matter if I do no gambling, does it? I don't want to just sit in the bus for hours!"

What conversation needs to be had with her and what if any action needs to be taken?

3. Player returns from 12-month self-exclusion, reinstatement interview completed with manager. Player is looking forward to playing again with friends and family. They had issues in the past with obsessive machine gameplay and losing track of time and consequently money spent.

Within three weeks of return, the player's visit patterns are starting to increase, and the player is starting to visit on their own. They are not socialising with other players and it seems their appearance is deteriorating with few breaks from gaming machine play taken during their visits.

What action should we take?

Notes

The Impact of Problem Gambling

Problem gambling has huge negative impacts which affect the gambler and others in their lives. The impacts to the gambler can be:

- Financial – including loss of savings, borrowing money, and even stealing from family members
- Mental – including mood disorders, anxiety and neurotic symptoms, suicidal ideation
- Physical – including substance misuse, irritability, somatic pain, and violent behaviour

The impact on affected others is wide-ranging and includes isolation, shame, loss of trust, and financial problems. Gambling addiction can also impact children in damaging ways.

Notes

What are your 'light bulb moments' from this session?



EXERCISE – Video Clip

How are the people's lives impacted by problem gambling?

Identifying Problem Gambling

There are several ways to identify problem gambling in an individual. These include alerts, which those in the gambling industry might be able to spot, such as bonus chasing, frequent deposit limit changes, or complaints about the fairness of the game.

In addition to this, there are nine signs identified in the Diagnostic and Statistical Manual of Mental Disorders (DSM-V)³ that enable us to judge the severity of an individual's gambling. These are:

1. **Tolerance:** Needs to gamble with increasing amounts of money in order to achieve the desired excitement.
2. **Withdrawal:** Is restless or irritable when attempting to cut down or stop gambling.
3. **Loss of control:** Has made repeated unsuccessful efforts to control, cut back, or stop gambling
4. **Preoccupation:** Is often thinking about past gambling or planning to gamble
5. **Escape:** Often gambles when feeling distressed
6. **Chasing:** After losing money gambling, often returns another day to get even
7. **Lying:** Lies to conceal the extent of involvement with gambling
8. **Risked relationships:** Has jeopardized or lost a significant relationship, educational, or career opportunity because of gambling.
9. **Financial:** Relies on others to provide money to relieve desperate financial situations caused by gambling

The DSM-V guidelines suggest that current severity is explained as *mild* if only 4-5 of the above criteria are met, *moderate* if 6-7 are met, and *severe* if 8-9 are met.

The guidelines suggest that problematic gambling behaviour is indicated by the individual exhibiting four or more of the DSM-V indicators within a 12-month period.

Notes

What are your 'light bulb moments' from this session?



Other Screening Tools

Alongside the DSM-V, there are several other screening tools, one such being the Problem Gambling Severity Index. This is a popular tool that many operators incorporate into their online self-assessments. It addresses all the necessary components to define a gambling problem. However, it has been criticised for not providing adequate scope and that it may not be suitable for the detection of gambling related harm, even if it is an effective way of defining a problem.

	Not at all	Rarely	Sometimes	Often
1. Have you bet more than you could really afford to lose?				
2. Still thinking about the last 12 months, have you needed to gamble with larger amounts to get the same feeling of excitement?				
3. When you gambled, did you go back another day to try to win back the money you lost?				
4. Have you borrowed money or sold anything to get money to gamble?				
5. Have you felt you might have a problem with gambling?				
6. Has gambling caused you any health problems, including stress or anxiety?				
7. Have people criticised your betting or told you that you had a gambling problem, regardless of whether or not you thought it was true?				
8. Has your gambling caused any financial problems for you or your household?				
9. Have you felt guilty about the way you gamble or what happens when you gamble?				

Non-problem gambler - Score: 0

- Non-problem gamblers gamble with no negative consequences.

Low-risk gambler - Score: 1-2

- Low-risk gamblers experience a low level of problems with few or no identified negative consequences. For example, they may very occasionally spend over their limit or feel guilty about their gambling.

Moderate-risk gambler - Score: 3-7

- Moderate-risk gamblers experience a moderate level of problems leading to some negative consequences. For example, they may sometimes spend more than they can afford, lose track of time or feel guilty about their gambling.

Problem gambler - Score: 8 or above

- Problem gamblers gamble with negative consequences and a possible loss of control. For example, they may often spend over their limit, gamble to win back money and feel stressed about their gambling.

Case Study (non-Bingo) – Tracey, 38

I have a gambling addiction. It took me a long while, and a lot of money and stress, before I realised it. But that's the truth of the matter. I can look you in the eye today and tell you that I'm a compulsive gambler.

My addiction started in my early twenties. I first gambled on Cheltenham races at 18 whilst at work with colleagues and won. Then I signed up with an online casino out of boredom one day and deposited a tenner, lost that and didn't really play again. A couple of months later I started dabbling with more online slots. Every day more and more. It was fun, a buzz, especially on the rare occasion that I would score.

By my mid-twenties, most of my friends were settling down and having kids. They didn't have as much time to play online or go to the races for that matter, but I wasn't interested in slowing down. My weekend gambling was what got me through the week. It was all I could think of to get me through the boredom of work and everyday life.

But it wasn't enough. As well as being a regular at the local casino, I created a few more accounts online. I thought the more you have the more offers and free bets come in. I began playing the Black Jack tables and roulette on Saturday nights. Often to try and win back my losses from the slots, horses, dogs – whatever I'd bet on earlier that day.

Soon enough though, I'd be visiting the casino three, four, five nights a week at the height of my gambling problem. When the races or the casino were shut, I was gambling online. Now I was doing it all; online poker, in-game betting, bingo, any lucky fun games, slots. I got such a buzz from the wins, no matter how big or small. When I was up, I'd never walk away with my winnings. Never. They'd go straight back, in search of a bigger rush.

So, I called GamCare. They arranged for me to go into rehab. I'd have regular therapy sessions to help me to change how I was behaving and manage my impulses to gamble. It was tough. Not the sessions so much but stopping. Occupying myself in other ways.

It was a long slog, but I stuck with my treatment programme and I've managed to stay off gambling completely. My life and my family are too important to me now to ever change back to my old ways. If I could offer advice to anyone, it would be to get help now. It is the only way and you won't regret it.

My wife Sarah and I would get into blazing rows about how our money was just running through our fingers. I wasn't just squandering my own wages, but I was dipping into our joint account and lying about it too. We were barely able to pay for food, let alone the bills and rent. The trouble is, the worse things got the more I turned to gambling to escape reality. I'd carry on regardless, gambling bigger stakes each time to try and dig us out of a hole and feel good about myself again. Neither of which ever happened.

The tipping point was when Sarah told me that she wanted us to have a child. When Jasmine was born, I got a real wake up call. I knew full well that, without help, I would gamble away our money. Money that we needed.

EXERCISE – Case Study BINGO

Read the case study and circle where you spot the following signs. Shout 'BINGO!' when you've found eight or nine.

Chasing

Withdrawal

Loss of control

Preoccupation

Tolerance

Financial

Lying

Risked relationships

Escape

Prevention Measures

There are several prevention measures and possible interventions to reduce the prevalence of problem gambling and its associated harm. Prevention measures implemented by the gambling industry include the provision of responsible gambling information, self-exclusion, and deposit limits for players.

GamCare also offers several ways in which you can support those that are experiencing gambling-related harm, for example our self-assessment tool, which can be found online at:

<https://www.gamcare.org.uk/get-advice/self-assessment-tool>

This tool was created for GamCare by Sustainable Interaction. If you are interested in developing something similar for your site, we are happy to put you in contact.

We also have a number of tools for customers to support themselves, such as goal planners, a gambling diary, workbooks, and much more.

<https://www.gamcare.org.uk/get-advice/self-help-resources>

Notes

What are your 'light bulb moments' from this session?



Screening, Brief Advice and Brief Interventions

In order to apply the appropriate intervention with a gambler, it can be useful to use a short screening tool to identify whether their gambling behaviour is social, moderate, or severe.

One theoretical screening tool asks the following questions, covering the past 12 months:

- Have you bet more than you could really **afford to lose**?
- Have people **criticised your betting** or told you that you had a gambling problem (regardless of whether you thought it was true)?
- Have you **felt guilty** about the way you gamble or what happens when you gamble?
- Have you ever been affected by someone else's gambling?

Never	Rarely	Sometimes	Always
0	1	2	3

If a gambler scores 1 or more, it is clinically advised to conduct an intervention, which could involve Brief Advice or a Brief Intervention.

Brief Advice involves a short conversation (less than 5 minutes) in which you provide resources on further support or direction to the GamCare website where the customer can access further information.

A Brief Intervention involves an extended conversation that is personalised to the customer, generally using the FRAMES approach.

The approach you take depends on the situation and the receptiveness of the gambler.

Notes

What are your 'light bulb moments' from this session?



Core Skills (listening and reflecting to promote change at the pace the person wants to change)

There are four core skills for managing interventions, described as the OARS.

- **O**pen questions – to encourage individual to talk about what is on their mind
- **A**ffirmations – statements about anything positive that the practitioner notices about the individual to build self-confidence and self-efficacy
- **R**eflections – understanding what the individual is thinking and feeling then saying it back to them to convey empathy and understanding
- **S**ummaries – long reflections of more than one individual statement that can help guide the individual towards positive change

Notes

What are your 'light bulb moments' from this session?



EXERCISE

Fill in the exercises below to help with your application of the core OARS skills for Motivational Interviewing. There is one question for each of the OARS skills:

- **Open questions**
- **Affirmations**
- **Reflections**
- **Summaries**

Open questions activity: Starting with How..., In what ways..., What..., When..?

Turn these closed questions into open questions:

Closed Questions	Open Questions
Are you suffering from your gambling?	
How many times a week do you gamble?	
Don't you want to stop gambling?	

Affirmations activity: Positive and meaningful statements that will help a person feel more confident.

Give three examples of affirmations you could give to an individual who is telling you about their gambling journey.

This image shows a completely blank white rectangular area enclosed within a thin black frame. There are no markings, text, or illustrations present on the page.

Reflections activity: Starting with: It sounds like..., I hear you saying that..., If I hear correctly..., You seem to be saying...

Write down a reflection for each of the following statements that the individual makes.

Individual statement	Reflection
I don't think I have a gambling problem.	
I've been gambling so long I think it's just part of my lifestyle rather than a problem I need to deal with.	
Well, I don't like the problems its causing with my partner.	

Summaries activity: Give the key ideas, retelling the story with the main points.

Read the statements from your individual below and respond with a summary that packages up the parts of their story that will help them be motivated to make a change.



Summary

Understanding FRAMES

It is recommended that Brief Interventions are conducted using the FRAMES model. Applying FRAMES provides a safe, non-judgemental space to help the gambler take responsibility for their gambling and to seek advice and support to help them reduce the harm from their gambling. Using FRAMES, the practitioner should try to incorporate the following components:

- Feedback about personal risk or level of current harm
- Responsibility for choices and change sits with the person. It is not the role of the professional to confront or persuade. Respect the person's autonomy.
- Advice about the costs and consequences of their behaviour
- Menu of options or strategies to support positive change; help with goals and action planning if appropriate to the person.
- Empathy for the person: listen and reflect; maintain rapport; use an empathic communication style.
- Self-efficacy - convey optimism and strengthen the person's self-belief in their ability to change.

Notes

What are your 'light bulb moments' from this session?



The Artful Critique

It is vitally important when giving feedback (if it is to be successful in behavioural change) to avoid making personal attacks. When someone feels their character is being attacked this can create a sense of bitterness, resentment, and even complete disengagement – known as stonewalling – a complete shut down and destruction of motivation and energy.

In the workplace a study of 108 managers in the Journal of Applied Psychology from a variety of different fields displayed inept criticism as above mistrust, personality struggles and disputes over power and pay as a reason for conflict at work.

Be specific:

Pick a specific incident, one that illustrates a key problem that needs changing or a pattern of deficiency, such as the inability to follow through with certain decisions. It is demoralising for people to hear that they are doing things wrong or poorly if they don't have specifics to work with. Focus on specifics – both positive and negative – specificity is just as important for praise as it is for criticism ... you must be able to learn from it.

Offer a solution:

The critique, like all useful feedback, should point to a way to fix a problem. Otherwise it can be frustrating, demoralising and demotivating. The critique can open new doors and offer novel insights, or simply sensitise them to deficiencies that need attention.

Be present:

Critiques, like praise, are most effective when done privately and directly. It should not be impersonal and there must be space for the person to ask for clarification and have an opportunity to respond and reflect.

Be sensitive:

This is a call for empathy, for being attuned to what you say and how you say it, and how it impacts the person at the receiving end is vital for the effectiveness of the criticism. When empathy is not displayed, feedback can be callous or even hurtful.

EXERCISE

Feedback: Have a look at the examples on the next page. How would you feed back to these individuals on their behaviour according to the 'situation-behaviour-impact' tool?

Situation:

Behaviour:

Impact:

Responsibility: List three questions you could ask to demonstrate acknowledgement that the responsibility for change sits with the gambler themselves:

- 1.
- 2.
- 3.

Advice: Summarise a package of advice that might be useful when supporting these individuals.

-
-
-

Menu of Options: Give an example of how you might phrase the advice you offer.

“

”

Empathy: List some ways to demonstrate empathy, acceptance and compassion during a brief intervention.

Self-efficacy: Offer two motivational affirmations to convey optimism about the gambler's ability to change.

- 1.
- 2.

EXERCISE

Pick 2 cases and note down how you can apply FRAMES elements to give feedback.

Case One:

Jane is 23. She has recently started meeting friends at a newly refurbished local bingo club before a night out on the town; her and her friends use the fruit machines. Jane enjoys using the fruit machines as it makes her feel connected to her friends. However, she has lost up to £200 in a single night using the machines, and her girlfriends want to know where the money has come from. She thought by spending more money, she would eventually get it back. She is slow to open up about the issue of money at first and seems anxious that she could get into trouble at home and with her friends.

Case Two:

Doreen is 40 and a huge Bingo fan. She plays whenever she can but also enjoys a cigarette or two and has recently started to use Bingo apps to play bingo at home especially when her best friend became ill and she had no one to go to a Bingo club with. She hadn't intended to use them beyond the free offers, but usage escalated as she lost money. Lots of her work friends use the apps as well. She once used a friend's debit card to pay. She's doing okay for money just now, but she says she frequently looks at the websites, and finds it hard to resist offers.

Case Three:

Joyce is 65 and after becoming retired last year, has been playing Bingo and started to play Lottery/scratch cards to pass the time. She says that it is nice to keep busy as she misses work, so now she's playing Bingo at the club five or six days a week and this is preventing her from time with her newly arrived grandchildren. Joyce is looking to find ways to reduce her bingo gambling and spend more time with her family.

EXAMPLES:

Exploring Ambivalence

- "What are some of the things you like about gambling?"
- "What are some of the things you dislike about gambling?"
- "What are some of the reasons why you would want things to stay just the way they are?"

Open-ended Questions

- "What are some of the reasons for making a change?"
- "How can I help you?"
- "What has happened?"
- "What do you feel is wrong?"
- "What do you have in mind?"
- "How do you see this happening?"
- "What is it that you'd like to see accomplished?"
- "What are your expectations/requirements for this product/service?"
- "What do you see as the next action steps?"

Eliciting Change Questions

- "What would you like to see different about your current situation?"
- "What makes you think you need to change?"
- "What will happen if you don't change?"
- "What will be different if you do change?"
- "What concerns do you have?"
- "What would be the good things about changing your gambling behavior?"
- "What would you like your gambling to look like if some changes are made?"
- "Is there someone that is concerned about your gambling?"

Permission to Offer Advice

- "I have some information that could be of use to you..."
- "Do you mind if we discuss some player protection tools that I have in mind that could help you?"
- "How would you feel if we spent a few minutes discussing about..."
- "Would it be okay if I recommended something that I think would be of use to you?"
- "How about we discuss what your concerns are and then I can put forward some options for you?"
- "How does that sound to you?"
- "What other issues are important to you? Would you like to share them with me?"

Affirmations

- "I hope the information I provided did help you in a way today."
- "I hope our conversation has been useful to you."
- "I trust that the player protection tools we discussed about will enable to have more control over your gambling the way you wish to."
- "You sound determined and confident to change the situation; I wish you all the best with it."
- "I wish you all the best in what you are looking for, have a great day."

Applying FRAMES

When applying FRAMES, it's important to incorporate all its elements in the natural flow of the conversation. This might involve:

- Giving the gambler specific feedback about a DSM sign you've noticed
- Reinforcing that it is the gambler's responsibility and choice to make a change, but that you will support them by providing advice and resources
- Preparing yourself with player protection tool options and GamCare leaflets, and presenting these as a choice for the gambler to make
- Listening reflectively to the gambler about their experience and being kind and respectful in response to their perspective
- Letting the gambler know that you are impressed by their commitment to change and sharing your hope that they will be able to

Notes

What are your 'light bulb moments' from this session?



Dealing with Challenging Conversations

During your conversations about gambling you may come across some difficult situations. These might include suicidal people, family members of gamblers, gamblers who make regular and repeated complaints, and problem gamblers who've relapsed. It's important to know the appropriate action when dealing with these situations

Action in the face of challenging conversations

- ❖ *Family member of a gambler:* Honour the confidentiality, be helpful with information about how they can help themselves, talk to them about GamCare's services for affected others.
- ❖ *Regular repeat caller/complainer:* Determine whether a brief intervention is appropriate or refer to GamCare services.
- ❖ *Relapsing problem gambler:* If they have player protection tools in place and they still feel there is a problem, discuss with them further options of how to protect themselves and refer to services.
- ❖ *Suicidal person:* Keep them talking, call the police, and try and get as much information about the person as you can.

DON'T FORGET TO DEBRIEF AFTER, TAKE A BREAK, TALK TO SOMEONE

Action in the face of challenging conversations

Action in the face of a suicidal caller.

- *Be yourself as if you are genuinely concerned; your tone and manner will show it.*
- *Listen with empathy, let them unload the despair, anger, or hopelessness. Be patient, be calm, be accepting.*
- *Length of time is important as it gives relief, shows that someone cares and a feeling of being understood.*
- *Do not go through it alone (ask for help, debrief after with colleagues, ask for support local counselling, call GamCare).*

What should be Avoided:

- *Arguing, problem solving, giving quick advice, making judgement or making them feel that they have to justify their suicidal thoughts.*

Notes

CLEO: Dealing with Challenging Situations

Clarify

Be approachable and make sure that you understand exactly what has made the customer unhappy.

You need to understand why the customer feels the way that they do. Use open ended questions to determine the facts.

Look for non-verbal cues: are they invading your personal space? Do they have clenched fists or are they making rapid movements with their hands or arms? Are they pointing, poking, or making other threatening gestures? Are they restless, rolling their eyes, or fidgeting? Are they making unblinking eye contact? Are they very quiet and not responding (calm before the storm)?

Focus on what is being said by the customer using their own words: use summaries and reflective listening techniques.

Listen

Use active listening techniques, as above, don't interrupt or make the customer feel more aggravated by trivialising their situation.

Use the 80:20 rule, listen 80% of the time and keep your talking to a minimum. Ask open ended questions, be attentive, clarify and ask for more information, use reflective listening techniques, paraphrase and summarise, be attuned to and reflect their feelings.

Empathise

As we have seen, when someone feels that their emotions are being understood, it will alleviate many potential challenges in communication. Also, the simple act of saying sorry can make a big difference – but make sure that it is sincere, so your body language and expressions match what you are saying. Through **clarification** and **listening** actively, you will go a long way in demonstrating empathy.

Overcome

This is our opportunity to solve the customers complaint and make them happy again, ask them what outcome they would like. Have a genuine conversation about what is possible, remember most of the time a customer simply wants to be heard and respected.

It is important to stay calm in these situations, remain engaged and don't lose your temper, avoid raising your voice and make sure you mask feelings of frustration. You may be able to use distraction techniques such as offer a seat or glass of water; you can suggest to them to write down their complaint and explain to them the menu of options available to them. Control your body language, too – don't appear confrontational having your hands on your hips, crossing your arms, or standing too close. Don't belittle the customer by rolling your eyes or tapping your feet.

Have you got any other ideas on how to diffuse challenging customers?

Applying the right intervention

Sometimes a brief intervention is not the right approach, or it is not enough to support someone dealing with gambling-related harm.

For example, if there is:

- High level of gambling related harm
- Loss of job, family, or identity
- When the person is not responding to advice, information, or Brief Interventions
- When the person is struggling with the effects of **gambling** issues of their own, or of **someone** close to them

In these situations, it is often better to refer or signpost to other services. Always follow the 5 Rs:

- ☒ **R**ecognise
- ☒ **R**espond
- ☒ **R**eport
- ☒ **R**ecord
- ☒ **R**e-refer

Notes

What are your 'light bulb moments' from this session?



Signposting – GamCare Services

GamCare

GamCare is the leading national provider of information, advice, support and free treatment for anyone affected by problem gambling. Our expert services are confidential and non-judgemental.



The National Gambling HelpLine

The National Gambling HelpLine is free to call **on 0808 8020 133** or people can chat to an Adviser on our NetLine (www.gamcare.org.uk/frontline-services/netline). We provide live, confidential, one-to-one information, advice and emotional support, plus we can signpost to further sources of specialist help, including our treatment services across the UK.

Our HelpLine and NetLine services are available 24 hours a day, 365 days a year. Advisers are specifically trained and can discuss what options are available, and they can offer coping strategies to those who want to change their gambling behaviour.

GamCare Forum

Our online Forum and Chat Rooms (www.gamcare.org.uk/forum) are available to anyone who wants to share their experiences. Threads include an area for new members, for supporting a problem gambler, recovery diaries, and information about Gamblers Anonymous and Gam-Anon meetings.

Treatment Services

We also offer individual face-to-face and online treatment – see www.gamcare.org.uk/support-and-treatment/free-treatment for more information.

Services for Young People

BigDeal is GamCare's information website for young people who want to know more about gambling or who are affected by problem gambling – see www.bigdeal.org.uk

Other gambling support services

- The **Gamblers Anonymous** treatment model is based on the 12-step recovery system with steps designed to promote abstinence and facilitate the process of recovery.
- **Gam-ANON** holds meetings for carers/loved ones/affected others
- **Gordon Moody Association** is a residential support service based in Dudley and Beckenham, with an initial two-week assessment followed by 12 weeks of residential treatment.
- The **National Problem Gambling Clinic** is a London-based support service that aims to advance existing models of treatment and develop new models of psychological therapies for gamblers.
- **StepChange Debt Charity** provides debt counselling, realistic advice and a Debt Management Plan with no fees attached

Self-care and professional boundaries

Caring for yourself is just as important as caring for others. Put your oxygen mask on first!

Professional boundaries are guidelines for maintaining a positive helpful relationship with others. They require clear understanding of the limits and responsibilities of your role and are separate from any other work-related behaviour. They offer a sense of professional identity and self-definition that has consistency and cohesion over time.

Knowing one's emotions

The ability to monitor feelings is crucial to psychological insight and understanding the self. People with a greater understanding of their feelings can pilot better their lives, have a more secure sense of how they perceive things and situations. This is a keystone of emotional intelligence.

Managing emotions

Having the capacity to soothe yourself, shake off anxiety, gloom or irritability is very important for building resilience and it is a skill that can be improved. Take control of the emotions and accept them, see how they serve you and whether they benefit your purposes, immediate or longer term – if they do not serve you, don't hold on to them – allow yourself to observe emotions as they come to you and try to better understand their origin and purpose.

Motivating oneself

Find the energetic forces that drive you and honour them. People who have this skill tend to be more effective at everything they undertake. Albert Bandura Stanford Psychologist: "People's beliefs about their abilities have a profound effect on these abilities. Ability is not a fixed property; there is a huge variability in how you perform. People who have a sense of self-efficacy bounce back from failures; they approach things in terms of how to handle them rather than worry about what can go wrong."

Recognising emotions in others

Compassion and being empathic will help you be more attuned to signs that indicate what others need or want. Interpersonal intelligence is the ability to understand other people, what motivates them, how to work with them, what is important to them. If you have the ability you can form an accurate understanding of self and others and learn how to operate more effectively in life.

Handling relationships

The art of handling relationships will give a big benefit in social competence, meaning better leadership skills and interpersonal effectiveness. It will help you to interact smoothly with others. Making mistakes is normal, the reflection that comes after it is what is necessary, try to never make character attacks and keep criticisms constructive, keeping it situational rather than particularly personal.

Emotional intelligence includes self-awareness and impulse control; these are qualities that mark people who excel, relationships that flourish, and are a hallmark of success.

EXERCISE to take home

Think what boundaries you can put in place for yourself. Consider Physical, Emotional, Psychological, Spiritual, Professional boundaries.

My Action Plan

Three things I will do to promote responsible gambling in my workplace:

1:

2:

3:



COMPLIANCE & SOCIAL RESPONSIBILITY



CASHINO COMPLIANCE FOLDER TABLE OF CONTENTS		
1. INTRODUCTION	UPDATED	VERSION
1.1 SOCIAL RESPONSIBILITY - STATEMENT OF INTENT	January 2019	V1.2
1.2 THE 3 LICENSING OBJECTIVES	January 2020	V1.2
1.3 GAMBLING COMMISSION – LICENCE CONDITIONS AND CODES OF PRACTICE (LCCP)	January 2020	N/A
1.4 POWERS OF THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS	June 2016	V1.0
2. CRIME & DISORDER		
2.1 MONEY LAUNDERING AND CASH HANDLING	January 2019	V1.0
2.2 KEEPING ALCOHOL OUT	June 2016	V1.0
2.3 DEALING WITH AGGRESSIVE CUSTOMERS	June 2017	V1.1
3. FAIR AND OPEN		
3.1 COMPLAINTS PROCEDURE & COMPLAINTS LEAFLET	January 2020	V1.3
3.2 MARKETING AND PROMOTIONAL GUIDELINES	January 2019	V1.2
4. CHILDREN AND OTHER VULNERABLE PEOPLE		
4.1 ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS	June 2017	V1.1
4.2 EMPLOYMENT OF CHILDREN AND YOUNG PERSONS	June 2017	V1.1
4.3 CUSTOMER INTERACTION & GAMBLING COMMISSION GUIDANCE	January 2020	V1.3
4.4 SELF EXCLUSION	July 2020	V1.2
4.5 SELF EXCLUSION FLOWCHART	June 2017	V1.1
4.6 SELF EXCLUSION REVIEW FORM	July 2016	V1.0
5. RECORDING REQUIREMENTS		
5.1 MONTHLY LOG CHECK SUMMARY & PAPER PREMISES LOGS	April 2019	V1.6
6. TRAINING		
6.1 COMPLIANCE TRAINING LOG G	April 2019	V1.6

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SOCIAL RESPONSIBILITY POLICY

1. STATEMENT OF INTENT

The responsibility for an individual's gambling is their own. The responsibility to exercise a duty of care is that of the operator. Cashino Gaming recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

WHAT IS SOCIAL RESPONSIBILITY?

Social responsibility is about going above and beyond what is called for by the law. Ideally, proactively identifying signs of problem behaviours is better than reacting to a problem. We apply our social responsibility through three levels:



Social responsibility is being responsible to people, for the actions of people, and for actions that affect people. Cashino Gaming has clear policies, procedures and codes of practice which outline and support the development of the way in which staff intervene where there is a suspected problem and the Company then monitors and supports the development of the awareness and knowledge of its staff in dealing with such interventions.

The idea of being responsible to customers has actually long been embedded in the ethics of business, treating a customer with respect, attention and genuinely caring about what the customer wants and needs. As a Company we understand our responsibility to help people.

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on three licensing objectives. These are to:

- Keep crime out of gambling
- Ensure that gambling is conducted in a fair and open way; and
- Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling.



It is our responsibility to ensure that we comply with these licensing objectives at all times.

COMPANY

Our Statement of Intent is published and available to all our employees.

To support the licensing objectives and in addition to our Social Responsibility Policy we also have: -

- Sensible gambling procedures including Self Exclusion
- 'Think 25' policy

EMPLOYEES

The Company ensures that all employees are inducted responsibly into our organisation through: -

- Induction checklist
- Employee Handbook
- Reviews and sign off at 4,8,12 weeks

The above documentation includes comprehensive coverage of the following: -

- Social Responsibility Policy
- Sensible gambling procedures
- 'Think 25' policy

Ongoing training is available to all our employees and we provide a Customer Care training programme, that specifically trains our staff about problem gambling and how to interact with customers who may be affected (including arrangements for self exclusion), whilst also covering the following areas:

- Customer care
- Conflict management
- Social responsibility

In addition employees will receive refresher training every 6 months.



CUSTOMER

Information is clearly provided to the customer to enable them to understand the machine/game they are playing and the percentage returns that apply on all games.

The customer is made aware of and given advice on problem gambling through appropriate advertising, notices, information and Staying In Control leaflets on site. Further information including sources of help and support is available via the following organisations: -

▪ Citizen's advice	https://www.citizensadvice.org.uk
▪ Gamble Aware/GamCare	https://www.begambleaware.org
▪ GamesAid	https://www.gamesaid.org
▪ Gam-Anon	https://www.gam-anon.org
▪ Gamblers Anonymous	https://www.gamblersanonymous.org.uk
▪ Gordon Moody Association	https://www.gordonmoody.org.uk
▪ Action for Children Charity	https://www.actionforchildren.org.uk
▪ National Debtline	https://www.nationaldebtline.org

The implementation of the following policies and procedures and through Customer Care Training ensures that this is consistent throughout the Company: -

- Social Responsibility Policy
- Sensible gambling Procedure
- 'Think 25' policy

.....
Stefan Bruns
Chief Executive Officer
January 2019



THE 3 LICENSING OBJECTIVES

1. Keeping crime out of gambling

Whilst crime is considered 'low/medium risk' in our business, we have to be mindful of the fact crime still exists and our venues could be considered as a target for money laundering gained from the proceeds of crime and terrorist financing, i.e. drug money, TITO technology to conceal 'fake notes', life style and spending habits.

2. Ensuring gambling is conducted fairly and openly

We have to ensure the terms we offer with regards to our business practices are fair and transparent to our customers and as Licensees we must comply with the Consumer Rights Act 2015. This means ensuring our machines and marketing are promoted in a fair and open way.

3. Protecting children and vulnerable people from being harmed or exploited by gambling

We have a duty of care to ensure children and young persons do not enter our premises, which are strictly for OVER 18's only. As a company we operate a 'Think 25' policy and ID checks are carried out if we suspect a person is under 18. Ensuring we protect people who may be 'at risk' from gambling and protecting them from harm, customer interaction and helpful advice is vital to ensure we promote our business in a socially responsible way.

GAMBLING COMMISSION

Conditions and codes of practice applicable to Non-remote bingo licences

Including sector-specific extract of
LCCP January 2020

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General introduction

- 1 This document sets out the Gambling Commission's general licence conditions and associated code of practice provisions (LCCP) under the Gambling Act 2005 (the Act) which are applicable to the specified sector(s).
- 2 The LCCP document sets out:

Part I: (in black)	statutory conditions attached by virtue of the Act
Part II: (in orange)	the suite of general conditions attached to operating licences
Part III: (in blue)	the principal code of practice, distinguishing between 'social responsibility' provisions and 'ordinary' provisions (the social responsibility provisions are in shaded boxes within the text).
- 3 An [index](#) to the provisions is provided at the end of this document, and if using an electronic version of this document, links are provided from both the contents and index pages to aid navigation.
- 4 Copies of LCCP can be obtained from the Commission's website: www.gamblingcommission.gov.uk or by writing to:

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP
T 0121 230 6666
F 0121 230 6720
E info@gamblingcommission.gov.uk
- 5 The Commission also produces sector-specific extracts of LCCP and these will be made available on the website. Further information about the history of LCCP (such as the results of completed consultations) and potential future amendments to LCCP can also be found on the website.
- 6 This extract of LCCP comes into force on 1 January 2020.
- 7 Relevant requirements of the conditions and code provisions were notified in draft to the European Commission in accordance with Directive (EU) 2015/1535.

Part I: Statutory conditions attached by virtue of the Act

Social Responsibility

This licence is subject to a condition that the licensee ensures compliance with any relevant social responsibility provision of a code of practice issued by the Commission. The social responsibility provisions that are relevant to the activities authorised by this licence are set out in the section entitled Codes of Practice (Part III).

(Sections 24 and 82(1) Gambling Act 2005)

Return of stakes to children

The following condition applies to all remote operating licences except remote pool betting operating licences restricted to football only

This licence is subject to a condition that if the licensee (or anyone employed by the licensee to perform an operational function within the meaning of Section 80 of the Act) becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, the licensee:

- (a) must return any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person as soon as is reasonably practicable; and
- (b) may not give a prize to the child or young person.

This condition does not apply to use of a Category D gaming machine.

(Section 83(1))

Credit

This licence is subject to a condition that the licensee may not:

- give credit in connection with gambling; or
- participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

But this condition shall not prevent the licensee from permitting the installation and use on their licensed premises of a machine enabling cash to be obtained on credit from a person (the "credit provider") provided that:

- the licensee has no other commercial connection with the credit provider in relation to gambling;
- the licensee neither makes nor receives any payment or reward (whether by way of commission, rent or otherwise) in connection with the machine; and
- any conditions about the nature, location or use of the machine which may be attached to this licence by the Commission or by virtue of regulations by the Secretary of State are complied with.

(Section 81(2))

Codes and conditions applicable to non-remote bingo

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Part 1: Suite of general condition to operating licences under Section 75 of the Gambling Act 2005 (the Act)

1 Qualified persons and personal licences

1.1 Qualified persons

Licence condition 1.1.1

Qualified persons – qualifying position

All operating licences, except ancillary remote licences, issued to small-scale operators

- 1 In this condition the terms 'small-scale operator', 'qualifying position' and 'qualified person' have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
- 2 Schedule X¹ lists those individuals notified to the Commission as qualified persons.
- 3 If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act for amendment of the details of the licence set out in Schedule X¹.
- 4 An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
- 5 In this condition 'qualified person' has the same meaning as in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

¹ The schedules mentioned here will be attached to individual licences.

1.2 Personal licences

Licence condition 1.2.1

Specified management offices – personal management licences

All casino, bingo, general and pool betting, betting intermediary, gaming machine general, gaming machine technical, gambling software and lottery managers licences, except ancillary remote licences

- 1 Subject to 6 and 7 below, licensees must ensure:
 - a that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter 'a personal management licence'); and
 - b that at least one person occupies at least one of those offices
- 2 The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:
 - a the overall management and direction of the licensee's business or affairs
 - b the licensee's finance function as head of that function
 - c the licensee's gambling regulatory compliance function as head of that function
 - d the licensee's marketing function as head of that function
 - e the licensee's information technology function as head of that function in so far as it relates to gambling-related information technology and software
 - f oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area
 - g in the case of casino and bingo licences only, oversight of the day to day management of a single set of premises licensed under Part 8 of the Act.
- 3 The person responsible for the licensee's gambling regulatory compliance function as head of that function shall not, except with the Commission's express approval, occupy any other specified management office.
- 4 Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder's personal management licence.
- 5 Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual's work and any requirements of the Commission in respect of such matters applicable during the period of the review.
- 6 Paragraphs 1 to 5 above shall not apply to a licensee for so long as the licensee is a 'small-scale operator' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 ('the Regulations').
- 7 During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs 1 to 6 above shall apply subject to the proviso that the phrase 'each individual' in paragraph 1a shall not include any individual who was a 'qualified person' (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

2 Technical standards, equipment specification, remote gambling equipment and gambling software

2.3 Technical standards and equipment specifications

Licence condition 2.3.3

Casino equipment specifications

Non-remote casino operating licences and casino ancillary remote licences

- 1** Licensees must comply with the Commission's specifications for casino equipment.

4 Protection of customer funds

4.2 Disclosure to customers

Licence condition 4.2.1

Disclosure to customers

All operating licences, except gaming machine technical, gambling software, host, ancillary, remote bingo, and ancillary remote casino licences

- 1** Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
- 2** Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
- 3** In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a** cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
 - b** winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and
 - c** any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

5 Payment

5.1 Cash and cash equivalents, payment methods and services

Licence condition 5.1.1

Cash and cash equivalents

All operating licences except gaming machine technical, gambling software and host licences

- 1 Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (eg bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
- 2 Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

7 General 'fair and open provisions'

7.1 Fair and transparent terms and practices

Licence condition 7.1.1

Fair and transparent terms and practices

All operating licences except gaming machine technical and gambling software licences

- 1 Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015. Licensees must comply with those terms.
- 2 The contractual terms on which gambling is offered and any consumer notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
- 3 Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes to terms before they come into effect.
- 4 Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008, at any stage of their interactions with consumers.

9 Types and rules of casino and other games

9.1 Casino and bingo games

Licence condition 9.1.2

Prohibited bingo prize games

All non-remote bingo operating licences

- 1 Licensees must not offer or permit to be played prize gaming games that appear on any list of games prohibited by the Commission.

12 Anti-money laundering

12.1 Prevention of money laundering and terrorist financing

Licence condition 12.1.1

Anti-money laundering

Prevention of money laundering and terrorist financing

All operating licences except gaming machine technical and gambling software licences

- 1 Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
- 2 Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
- 3 Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

14 Access to premises

14.1 Access to premises

Licence condition 14.1.1

Access to premises

All operating licences

- 1 Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

15 Information requirements

15.1 Reporting suspicion of offences

Licence condition 15.1.1

Reporting suspicion of offences etc - non-betting licences

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences

- 1 Licensees must as soon as reasonably practicable provide the Commission or ensure that the Commission is provided with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.

15.2 Reporting key events and other reportable events

Licence condition 15.2.1

Reporting key events

All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, or ensure the Commission is notified, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence¹.

Operator status

- 1 In the case of licensees which are companies, a petition being presented for their winding up or the winding up of any group company of theirs, or they or any group company being placed in administration or receivership or their directors proposing to creditors a composition in satisfaction of its debts or a scheme of arrangement of its affairs.
- 2 In the case of licensees which are bodies corporate, but not companies, any event substantially equivalent to those listed at 1 above.
- 3 In the case of a licensee who is an individual (or a partner in a partnership licensee) their being presented with a petition for their bankruptcy or sequestration or their entering into an individual voluntary arrangement.

Relevant persons and positions

- 4 In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.
- 5 Any investment in a licensee which is not by way of subscription for shares.
- 6 The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.
- 7 The entering into an arrangement whereby a third party provides services to, or grants any licence concession or permission to, the licensee other than for full value: full details of the arrangements must be supplied.
- 8 The appointment of a person to, or a person ceasing to occupy, a 'key position': a 'key position' in relation to a licensee is:
 - a in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
 - b in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c a position the holder of which is responsible for the licensee's anti-money laundering procedures, including suspicious activity reporting
 - d any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)
- 9 Any change to the structure or organisation of the licensee's business which affects a 'key position' or the responsibilities of its holder.

Codes and conditions applicable to non-remote bingo

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Financial events

- 10 Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
- 11 Any breach of a covenant given to a bank or other lender.
- 12 Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
- 13 Any court judgments (in whatever jurisdiction) against the licensee or, where the licensee is a body corporate, a group company, remaining unpaid 14 days after the date of judgment.
- 14 Where the licensee is required to have their accounts independently audited, any qualification to an auditors' report; and any unplanned change of auditor including a change prompted by a dispute or resulting from auditors being unable or unwilling to sign an unqualified audit report.
- 15 Any change in the licensee's arrangements for the protection of customer funds in accordance with the general licence condition 4 relating to the protection of customer funds (where applicable).
- 16 Where the licensee holds customer funds in a separate bank account, any deficit on reconciliation of such bank account.
- 17 Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

Legal or regulatory proceedings or reports

- 18 The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
- 19a Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities in relation to the licensed entity of a personal licence holder or a person occupying a qualifying position employed by them, where such an investigation could result in the imposition of a sanction or penalty which, if imposed, could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
- 19b Any criminal investigation by a law enforcement agency in any jurisdiction in relation to which:
 - the licensee is involved (including, but not limited to investigations of crimes allegedly committed against the licensee or involving the gambling facilities provided under the licence), AND
 - the circumstances are such that the Commission might reasonably be expected to question whether the licensee's measures to keep crime out of gambling had failed.Notification of the event must occur as soon as practicable after the licensee becomes aware of any such investigation in which the licensee is involved and measures may have failed.
- 20 The receipt of any report from a professional, statutory or other regulatory or government body (in whatever jurisdiction) of the outcome of a compliance assessment in relation to the gambling activity of the licensee or, where the licensee is a body corporate, of any group company in which at least one person who holds a key position in or in respect of the licensee holds a key position: a copy of the report should be provided where available to the licensee.

- 21 The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor) about the provision of facilities for gambling which are expressed (in whatever terms) as requiring attention as a high priority: a summary of the nature of the concerns must be provided.
- 22 The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
- 23 The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
- 24 The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

Gambling facilities

- 25a Any breach in the licensee's information security that adversely affects the confidentiality of customer data or prevents customers from accessing their accounts for longer than 24 hours.
- 25b Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
- 26 Any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
- 27 The reference of a dispute to an ADR entity other than one in respect of which contact details were given in accordance with the social responsibility code provision on complaints and disputes; the reason for selection of that ADR entity should be given.
- 28 In the case of remote gambling, the commencement or cessation of trading on website domains (*including mobile sites or mobile device applications*) or broadcast media through which the licensee provides gambling facilities.

In this condition:

'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof

- a in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
- b a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

¹ Key events can be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk. Alternatively, for operators unable to access this system, you can report a key event by email to: key.events@gamblingcommission.gov.uk. Alternatively, for operators unable to access this system, you can report a key event by email to: key.events@gamblingcommission.gov.uk

Licence condition 15.2.2

Other reportable events

All operating licences

- 1 Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, or ensure that the Commission is so notified, as soon as reasonably practicable of the occurrence of any of the following events¹:
 - a the conclusion of a dispute referred to an ADR entity and in such case providing the Commission with a copy of the decision or note of the outcome².
 - b any outcome adverse to the licensee of any proceedings taken against the licensee (in whatever jurisdiction) by a customer in relation to a gambling transaction; but excluding proceedings allocated to the County Court small claims track or equivalent in jurisdictions outside England and Wales.
 - c their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised or their becoming aware of a sustained or meaningful generation of the 3% / 10% threshold being exceeded by the group.

In this condition:

- a 'group company' has the same meaning as in condition 15.2.1; and
- b without prejudice to section 327 of the Act, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

¹ Events required to be notified to the Commission by 15.2.1 or 15.2.2 may be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk or by email to: key.events@gamblingcommission.gov.uk

² In respect of the referral of disputes to an ADR entity the licensee's attention is drawn to social responsibility code provision 6.

15.3 General and regulatory returns

Licence condition 15.3.1

General and regulatory returns

All operating licences

- 1 On request, licensees must provide the Commission with such information as the Commission may require about the use made of facilities provided in accordance with this licence, and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on, including in particular information about:
 - a the numbers of people making use of the facilities and the frequency of such use
 - b the range of gambling activities provided by the licensee and the numbers of staff employed in connection with them
 - c the licensee's policies in relation to, and experiences of, problem gambling.
- 2 In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit a Regulatory Return to the Commission containing such information as the Commission may from time to time require¹.

¹ Regulatory returns can be submitted securely online at the Commission's website through our eServices system available at www.gamblingcommission.gov.uk

16 Responsible placement of digital adverts

16.1 Responsible placement of digital adverts

Licence condition 16.1.1

Responsible placement of digital adverts

All licences

1 Licences must:

- a** Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
- b** take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
- c** ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

Part III: Code of practice

Introduction

This is the Commission's principal code of practice, issued under section 24 of the Gambling Act 2005.

There are two types of code provisions in this document:

- social responsibility code provisions: compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution; these provisions are set out in shaded boxes
- ordinary code provisions: these do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner. Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty; these code provisions are in the unshaded boxes in this section.

Code provisions

1 General

1.1 Cooperation and responsibility for third parties

Ordinary Code Provision 1.1.1

Cooperation with the Commission

All licences

- 1 As made plain in its *Statement of principles for licensing and regulation*, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

Social responsibility code provision 1.1.2

Responsibility for third parties – all

licences All licences

- 1 Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
- 2 Licensees must ensure that the terms on which they contract with such third parties:
 - a require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

2 Financial requirements

2.1 Anti-money laundering

Ordinary code provision 2.1.2

Anti-money laundering – other than casino

All licences except casino licences

- 1 As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators)*.

3 Protection of children and other vulnerable persons

3.1 Combating problem gambling

Social responsibility code provision 3.1.1

Combating problem gambling

All licences

- 1 Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.
- 2 Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

3.2 Access to gambling by children and young persons

Social responsibility code provision 3.2.6

Access to gambling by children and young persons – bingo and FEC SR code

All non-remote bingo and family entertainment centre licences

- 1 Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2 This must include procedures for:
 - a checking the age of apparently underage customers
 - b refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c taking action when there are unlawful attempts to enter the adult-only areas.
- 3 Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 4 Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
- 5 Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
- 6 Licensees must only accept identification which:
 - a contains a photograph from which the individual can be identified
 - b states the individual's date of birth
 - c is valid
 - d is legible and has no visible signs of tampering or reproduction.
- 7 Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission.

Ordinary code provision 3.2.6

Access to gambling by children and young persons – bingo and FEC ordinary code

All non-remote bingo and family entertainment centre licences

- 1 The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2 Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
- 3 Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
- 4 Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission and the police, and making available information on problem gambling to the child or young person concerned.
- 5 Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
- 6 Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
- 7 In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

3.3 Gambling management tools and responsible gambling management information

Social responsibility code provision 3.3.1

Responsible gambling information

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences

- 1 Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
- 2 The information must cover:
 - a any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend;
 - b timers or other forms of reminders or 'reality checks' where available
 - c self-exclusion options
 - d information about the availability of further help or advice.
- 3 The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
- 4 For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

Ordinary code provision 3.3.2

Responsible gambling information – foreign languages

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

- 1 Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
 - a the information on how to gamble responsibly and access to help referred to above
 - b the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
 - c the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

3.4 Customer interaction

Social responsibility code provision 3.4.1

Customer Interaction

All licences, except non-remote lottery, gaming machine technical, gambling software and host licences

- 1 Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b interacting with customers who may be at risk of or experiencing harms associated with gambling.
 - c understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
- 2 Licensees must take into account the Commission's guidance on customer interaction.

3.5 Self-exclusion

Social responsibility code provision 3.5.1

Self-exclusion – non-remote and trading rooms SR code

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences

- 1 Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
- 2 Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
- 3 Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
- 4 This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
- 5 Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
- 6 Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c staff training to ensure that staff are able to administer effectively the systems; and
 - d the removal of those persons found in the gambling area or attempting to gamble from the premises.
- 7 Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.
- 8 Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

Ordinary code provision 3.5.2

Self-exclusion – non-remote ordinary code

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences

- 1 Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
- 2 Individuals should be able to self-exclude without having to enter gambling premises.
- 3 Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
- 4 Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
- 5 Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
- 6 Customers should be given the opportunity to discuss self-exclusion in private, where possible.
- 7 Licensees should take steps to ensure that:
 - a the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
 - d at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
- 8 The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
- 9 Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
- 10 Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.

- 11 Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
- 12 In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

Social responsibility code provision 3.5.6

Self-exclusion – multi-operator non-remote SR code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1 Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

Ordinary code provision 3.5.7

Self-exclusion – multi-operator non-remote ordinary code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1 Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).

3.6 Employment of children and young persons

Ordinary code provision 3.6.2

Employment of children and young people – bingo

All non-remote bingo licences

- 1 Licensees who employ children under (under-16-year-olds) and young persons (those aged 16 or 17) should be aware that it is an offence:
 - a to employ them to provide facilities for playing bingo;
 - b for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine; and
 - c to employ a child to perform any function on premises where, and at time when, facilities are being provided for playing bingo.
- 2 As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3 Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a children and young persons are never asked to perform tasks within 1a or 1b, above
 - b all staff, including those who are children and young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4 Licensees should consider adopting a policy that:
 - a children are not employed to work on bingo licensed premises at any time when the premises are open for business
 - b neither children nor young persons are in any event asked to work in areas where gaming machines are situated.

3.8 Money lending between customers

Ordinary code provision 3.8.2

Money-lending – other than casinos

All non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences

- 1 Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

4 'Fair and open' provisions

4.1 Fair terms

Social responsibility code provision 4.1.1

Fair terms

All licences, except gaming machine technical and gambling software licences

- 1 Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

4.2 Display of rules and supervision of games

Social responsibility code provision 4.2.2

Display of rules - bingo

All non-remote bingo licences

- 1 In complying with any condition on a bingo premises licence or a 2005 Act large casino premises licence requiring the display of rules about gaming, licensees must ensure that the following are included:
 - a rules about each variant of bingo made available, and
 - b rules about any prize gaming made available.

5 Marketing

5.1 Rewards and bonuses

Social responsibility code provision 5.1.1

Rewards and bonuses - SR code

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

- 1 If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
 - a the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
 - b neither the receipt nor the value or amount of the benefit is:
 - i dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - ii altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
 - c if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
 - d if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.

Social responsibility code provision 5.1.3

Alcoholic drinks

All non-remote bingo and casino licences

- 1 If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
- 2 Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

Social responsibility code provision 5.1.3

Alcoholic drinks

All non-remote bingo and casino licences

- 3 If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
- 4 Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

Social responsibility code provision 5.1.6

Compliance with advertising codes

All licences, except lottery licences

- 1 All marketing of gambling products and services must be undertaken in a socially responsible manner.
- 2 In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
- 3 The restriction on allowing people who are, or seem to be, under 25 years old (ie: those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

Ordinary code provision 5.1.8

Compliance with industry advertising codes

All licences

- 1 Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

Social responsibility code provision 5.1.9

Other marketing requirements

All licences

- 1 Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
- 2 Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
- 3 The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

Ordinary code provision 5.1.10

Online marketing in proximity to information on responsible gambling

All licences

- 1 Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

Social Responsibility code provision 5.1.11

Direct electronic marketing consent

All licences

- 1 Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

6 Complaints and disputes

6.1 Complaints and disputes

Social responsibility code provision 6.1.1

Complaints and disputes

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences

- 1 Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
- 2 Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
- 3 The services of any such ADR entity must be free of charge to the customer.
- 4 Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
- 5 Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
- 6 Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
- 7 Licensees should keep records of customer complaints and disputes in such manner as the Commission may from time to time specify in advice or guidance. They must provide information to the Commission about customer complaints, disputes, the outcomes of disputes referred to ADR, and court proceedings adverse to the licensee, also in such manner as the Commission may from time to time specify.

In this Code, 'ADR entity' means:

- a a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015, and
- b whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

7 Gambling licensees' staff

7.1 Gambling licensees' staff

Social responsibility code provision 7.1.2

Responsible gambling information for staff

All licences, including betting ancillary remote licences, but not other ancillary remote licences

- 1 Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

8 Information requirements

8.1 Information requirements

Ordinary code provision 8.1.1

Information requirements – ordinary code

All licences

- 1 As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
- 2 Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence²:
 - a any material change in the licensee's structure or the operation of its business
 - b any material change in managerial responsibilities or governance arrangements
 - c any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

¹ These matters can be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk

Alternatively, for operators unable to access this system, you can these events by email to:

key.events@gamblingcommission.gov.uk

² Events which *must* be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

9 Gaming machines in gambling premises

9.1 Gaming machines in gambling premises

Social responsibility code provision 9.1.2

Gaming machines in gambling premises – bingo

All non-remote bingo operating licences

- 1 Gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises.
- 2 Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
- 3 Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.

10 Assessing local risk

10.1 Assessing local risk

Social responsibility code provision 10.1.1

Assessing local risk

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting Intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

- 1 Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy¹.
- 2 Licensees must review (and update as necessary) their local risk assessments:
 - a to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c when applying for a variation of a premises licence; and
 - d in any case, undertake a local risk assessment when applying for a new premises licence.

¹This is the statement of licensing policy under the Gambling Act 2005.

Ordinary code provision 10.1.2

Sharing local risk assessments

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

- 1 Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

making gambling fairer and safer

www.gamblingcommission.gov.uk

POWERS OF THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS & OTHER OFFICERS

STATEMENT

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

The Company acknowledges its obligation to ensure that staff co-operate with the Gambling Commission's Enforcement Officers in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises.

- The Company must provide the Gambling Commission with any information that they suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a license condition or a code of practice provision having the effect of a license condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating License.
- The Company must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as: -
 - the numbers of people making use of the facilities and the frequency of such use.
 - the range of gambling activities provided by the licensee and the number of staff employed in connection with them.
 - the licensee's policies in relation to, and experience of, problem gambling.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

RIGHTS OF GAMBLING COMMISSION ENFORCEMENT OFFICERS

- A constable, enforcement officer or authorised person under the Act may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed.
- A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed.
- Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating license or premises license is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating license.
- Entry may also be made to assess the likely effects of activity when application has been made for a premises license.
- The powers of the constable, enforcement officer or authorised person can include inspection of any part of the premises or any machine, anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions.
- The power of inspection must be exercised only at a reasonable time.
- The enforcement officer or authorised person must provide evidence of his identify and authority.
- A constable, enforcement officer or authorised person may use reasonable force to enter a premise.
- It is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

Please refer to the training section where you will find the Compliance Training document to be used for training purposes. Our online UPSKILL Training platform hosts Essential of Compliance & Social Responsibility workbook and online quiz to be completed every 6 months by all employees.

PROCEDURE

Visits by Gambling Commission Enforcement Officers may be pre-arranged or unannounced, however: -

In all circumstances the employee must ask for identification from the visitor to establish that they are a Gambling Commission Enforcement Officer.

The Duty Manager must attend the Enforcement Officer without delay.

The visitor must also be requested to sign into the visitors log book.

Staff are to co-operate at all times with the Commission's Enforcement Officers in the proper performance of their compliance functions.

The Enforcement Officer may remove copies of documents as required.

Gambling Commission Sample ID



EVIDENCE OF IDENTITY & AUTHORITY

Graham Burgin is designated, by the Gambling Commission, as an enforcement officer for the purposes of the Gambling Act 2005, and is authorised to exercise the relevant powers contained within this Act.

Jenny Williams

© 2005 by the Gambling Commission **Jenny Williams, Chief Executive**

Front Of Card

Contains the Following:

1. Officers Name
2. Photo ID
3. Serial Number
4. Date of Issue
5. Gambling Commission Contact Details

Back of Card

Contains the following:

1. Evidence of the Officers Identity
2. Signature of the Gambling Commission Chief Executive



MONEY LAUNDERING, CASH HANDLING AND SUSPICIOUS TRANSACTIONS

1. Introduction

This policy has been implemented in order to comply with the Money Laundering Regulations 2007 that requires processes to be adopted to avoid the possibility of money laundering.

New obligations in respect of money laundering were imposed by the Proceeds of Crime Act 2002 (the "POCA") and the Money Laundering Regulations 2007 ("the Regulations"). This legislation broadens the definition of money laundering and increases the range of activities caught by the statutory control framework. As of 31st October 2016 new money laundering regulations come into force. The regulations are applicable to the Licence Conditions & Codes of Practice (LCCP). Whilst our venues/sector is considered "Low Risk", this does not mean that there is "no risk" within our trading sectors.

As a result of this legislation Cashino Gaming is required to establish procedures to prevent the use of its services and resources for money laundering. Anti-Money Laundering is effective within our business by taking a "risk based" approach.

2. Money Laundering Definition

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. This definition of money laundering means that potentially any employee could contravene the Regulations if they were to become aware of or suspect the existence of criminal property and continue to be involved in a matter which relates to that property without reporting their concerns. In arcades, both Adult Gaming Centre (AGC) and Family Entertainment Centre (FEC), this is typically stained or dyed notes and foreign coins. We should also be mindful of significant increases in customer spending habits which may be an indicator of criminal spend. In practice this is the most likely area of potential money laundering within our venues.

3. Policy

Cashino Gaming is committed to ensuring that all necessary safeguards are in place with regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.

Cashino Gaming has appointed a designated Money Laundering Officer (MLO), Mrs. Amanda Kiernan.

Email: amandakiernan@praesepeplc.com



All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions. All venues need to report any suspicious cash transactions of any note denomination value, i.e. one stained/dyed note, and foreign coins to the value of £50 during one machine empty or cash collection. These incidents should be reported using the "(AML) ANTI MONEY LAUNDERING" app available on your IHL tablet. An automated alert will be sent to the Money Laundering Officer for the purpose of informing the relevant authorities.

4. Disclosure Procedure

Where it is suspected by a member of staff that money laundering activity is taking/has taken place, a disclosure must be made to the Money Laundering Officer as soon as possible. Because of the importance attached to the process, notification should normally take place immediately by telephone or, where that is not possible, by any other expedient means, including automated alerts of the "(AML) ANTI MONEY LAUNDERING" report available on your IHL tablet. Where there is suspicion of any type of potential money laundering incident CCTV images (if available and relevant) should be retained securely.

All incidents should be reported to your line Manager.

The Money Laundering Officer will maintain records of all notifications received detailing the method of verification used to identify the suspected person.

5. Cash Handling

Operating policies and procedures are in place with regard to accounting practices and record keeping in respect of: -

- Monetary stakes introduced to machines (gross takings where available)
- Money introduced to refloat machines
- Token transactions
- Customer refunds due to machine malfunctions
- Money removed from machines (net takings where available). Where gross takings and net takings information is not available the operation will provide an explanation to the Commission
- Ticket In Ticket Out (TITO) vouchers from machines in arcades can be used for money laundering. Vouchers can be cashed in at a later date and criminals will use a range of outlets to disguise the origin of funds

Members of staff, where appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to the effect retaining a copy for their future reference. The original is retained on the employee's personnel file.



KEEPING ALCOHOL OUT

At Cashino Gaming we have clear rules and guidelines on the consumption and influence of alcohol.

INDIVIDUALS UNDER THE INFLUENCE OF ALCOHOL ON ENTRY

In all our sites individuals who are deemed to be under the influence of excessive alcohol should be prevented from entering any of our premises.

Procedure

When such a situation occurs the member of staff should politely refuse entry to the site on the grounds of being under the influence of alcohol and ask the individual to leave the premises.

Should the individual resist or refrain from leaving the premises in the first instance a Manager or Duty Manager should be called. They should also request that the individual leave the premises immediately. If an individual fails to leave the premises or becomes a nuisance that cannot be dealt with by the staff on duty the police should be called to assist.

All incidents should be recorded fully on the premises log.

ALCOHOL CONSUMPTION ON SITE

Dependent upon which type of site you are on depends on the rules that need to be applied.

Bingo Clubs

Customers may purchase alcoholic drinks on site within the licensing regulations of the premises; however customers must not bring alcohol onsite to be consumed.

AGC's

Under no circumstances should customers be served alcoholic drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed.

Betting

Under no circumstances should customers be served alcoholic drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed.

Customers should be approached to either leave the premises or stop drinking on site.

EXCESSIVE CONSUMPTION

Procedure

For sites where alcohol may be purchased and a customer consumes to excess to the extent that their behaviour becomes inappropriate or disruptive they should in the first instance be prevented from consuming any more alcohol and should be requested to behave appropriately or be asked to leave the premises, usually by a duty manager.

Where the individual refuses to leave the premises then the police should be contacted for further assistance.



DEALING WITH AN AGGRESSIVE CUSTOMER

Both violence and aggression are used to show distress, to gain dominance, and sometimes to maintain stability. As such they can be termed 'normal' if not always socially acceptable.

WHAT CAUSES AGGRESSION AND VIOLENCE?

There are many reasons why someone may behave in an aggressive or violent manner towards an individual or object. Below are some of the reasons in different situations.

Platonic	Human beings tend to judge things they are familiar with as good and things not familiar as suspect.
Instinctive	The best defence is attack!
Learned Behaviour	Aggression is sometimes part of the behaviour we have learned from society.
Energy Source	Natural release of pent-up instinctual energy - a pressure relief valve. Many of the activities socially acceptable are high forms of controlled aggression. The career drive in some people may be explained as an attempt to express instinctual aggression drive, but in a way society accepts and rewards.
Frustration Response	When frustration in an individual reaches certain levels the only option open may be a display of aggression.

WHAT ARE SOME OF THE CAUSES OF VIOLENCE?

There are two aspects to consider:

Physical	Such as Brain Damage, Drug Abuse, Alcoholism, Sexual Abnormalities, Pain, Hunger, Sleep Deprivation, Environmental Changes (weather), Appearance, Illness, Defence of Territory of Possessions, Age
Psychological	Such as Fear, Frustration, Humiliation, Inappropriate Assertiveness, Pain, Vulnerability, Threats (Defence of self), Age, Illness (affective disorders, schizophrenia), Oppression.

IDENTIFYING AN AGGRESSIVE OR VIOLENT CUSTOMER

There are tell tale signs so the key thing is to observe customer discreetly whilst going about your duties. This way you will spot a change in demeanour or behaviour.

These are some of the signs that can help in predicting the likelihood of imminent violence:

- Muscles tensed?
- Facial expression?
- Balanced to move?
- Fingers or eyelids twitching?
- Pacing about?
- Withdrawn on approach?
- Voice - change of pitch/tone; insults; obscenities, threats?
- Sweating?
- Breathing - increase in respiration?
- Tears?
- Offensive weapon carried or available?

PROCEDURE

Quite simply whenever there is an incident you should: -

- H Hear the customer – listen to their complaint or issues.
- E Empathise – see to understand the problem.
- A Acknowledge – ‘I hear what you are saying’, ‘I’m sorry you feel that way’.
- T Take Action – progress with whatever action is relevant to the situation.

Here are some further techniques which can help when responding to a customer behaving aggressively or violently: -

- Be alert and consider if you need further assistance.
- Avoid eyeball to eyeball confrontation.
- Relieve the tension by adopting a calm approach.
- Speak and stand calmly but always remain balanced and ready to move - stay on person's weak side where possible.
- Consciously lower pitch and volume of voice.

- Speak clearly and slowly and don't stop talking because the other person doesn't answer.
- Try to get the person talking.
- Listen to what the person says and how it is said.
- Try to identify the source of concern and help if possible.
- Try to distract the person from the immediate cause of concern by changing the course of conversation - buy time to think, to plan, to obtain assistance.
- Understanding and kindness, simple human values which are often overlooked in today's society, can have a marked effect on the outcome of such cases.
- Do not argue! You really cannot win because the other person does not have to be logical. If you lose the argument and have to back off, your position is weakened. You may get so involved, if you do not carefully measure your own response, that you might, in the end, lose some of your own self-control.
- Do not give orders!
- Never make promises you cannot keep.
- Do not disagree where it is not necessary.
- Do not make threats that cannot be carried out or offer rewards for what started out as unlawful or improper conduct.
- Control your behaviour in body language, feelings and expression.
- In conversation with the person being confronted use expressions such as:
 - "I know you have a problem", "I know you are upset", "I believe you when you say something is wrong". Keep your voice at a calm, even pace.

These expressions will show that you have some affinity with the person and his/her position.

- Always consider if you need further assistance from a colleague, if the person becomes abusive in their language or behaviour they should be asked to leave immediately (remember to refund their stake money). If they refuse to leave then assistance from management or the police should be sought.



PREVENTING STAFF FROM BEING ABUSED

Under no circumstances should a member of staff put themselves at risk with an abusive customer. If the following of the guidelines above has failed in calming a customer or the customer refuses to leave the premises when asked a manager should be called. If the customer is still aggressive and still refuses to leave the premises then the police should be called.

At no time should a member of staff intervene physically in the removal of an individual from a site.

All incidents should be fully recorded on the incident reports log.



MARKETING AND PROMOTIONAL GUIDELINES

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

COMPLIANCE

All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

We adopt the general principles that our advertising is:

- legal, decent, honest and truthful.
- prepared with a sense of responsibility to consumers and to society.
- respectful to the principles of fair competition generally accepted in business.
- not intended to bring advertising into disrepute.

Specifically we ensure that:

- advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise.
- advertisements and promotions are socially responsible and do not encourage excessive gambling.
- care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable.
- advertisements are not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear. No medium is used to advertise gambling if more than 20% of its audience is under 18 years old.
- persons shown gambling are not, nor do they appear to be, under 25 years of age.
- there is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer.
- advertising and promotional material carries a reference for the need to keep gambling under control.
- it is never suggested or implied that gambling is a means of getting out of financial difficulty.



MARKETING AND PROMOTION

Any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or other advantage (including the discharge in whole or in part of any liability (the benefit)) the scheme is designed to operate, and be operated, in such a way that neither the receipt nor the value or amount of the benefit is: -

- a) dependent on or calculated by reference to the length of time for or the frequency with which the customer gambles or has at any time gambled.
- b) dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency.

If the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases. Incentives and rewards are proportional to the type and level of the customer's gambling.

Procedure

All Marketing and Promotions must be compliant.

All Marketing and Promotional activities must be approved by one of the following Managers relevant to the site.

For Bingo Sites

- Operations Director
- General Manager
- Marketing Manager

For AGC's

- Operations Director
- Marketing Manager

For Betting

- Operations Director
- Marketing Manager



ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. It is illegal for any person who is under 18 years of age to be permitted entry to any Licensed Premises.

PROCEDURE

- It is a matter of gross misconduct if a member of staff knowingly allows entry by any person who is under the age of 18 years to our Licensed Premises.
- Any person known to be under 18 years of age will be refused entry.
- 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 or when it comes to the attention of staff. Members of staff are trained to 'think 25'.
- If the person admits to being under the age of 18, they are refused entry.
- Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and has to be provided before entry is allowed. If at any time there is suspicion of forged documents these incidents will be recorded and reported.
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction. Acceptable forms of identification include those that carry the PASS logo (e.g. Citizen card, Validate and the Government's own Connexions card); a driving licence (including a provisional licence) with photograph, or a passport and military identification cards.
- Where there is still doubt and the person cannot produce proof of age, they are advised that they will not be permitted to enter until such time as they provide such proof.
- They will be shown, have explained to them, and be given a 'proof of age card' application form or offered an explanation on how to apply for a card.
- Should the person then refuse to leave, they are advised that the age restriction is a legal requirement.

- If they still will not leave, the Duty Manager is immediately contacted to take over the situation.
- Any attempts by under-18s to enter the premises or designated area(s) are brought to the attention of the Duty Manager immediately and recorded as an entry on a log retained on the premises. Details of entry to include date, time, identity of the individual if known - or detailed description if unknown – member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence. The Log is to be countersigned by the Duty Manager.
- Service is refused in all circumstances where any adult is accompanied by a child or young person.
- All gaming machines, other than category 'D' machines, are inscribed with a notice prohibiting play by persons under the age of 18 years.
- Stakes are returned to under-18s attempting to gamble in an adult-only environment, and under-18s are not allowed to retain any prize.
- Consideration will be given to permanently excluding from our Licensed Premises any adult who has previously and repeatedly attempted to gain entry when accompanied by a child or young person or, should entry have been gained, if the offence was committed knowingly or recklessly. Notwithstanding, that adult shall be required to stop gambling immediately and told to leave the premises.
- In instances where a child or young person repeatedly attempts to gamble on premises or in designated area(s) restricted to adults, or where repeated oral warnings have been issued, consideration will be given to reporting the matter immediately to the Gambling Commission and, where appropriate, police or local education welfare department.
- Consideration is to be given to reminding customers of their parental responsibilities and to assess whether there is a need to develop procedures for dealing with young or otherwise vulnerable children left unattended in the vicinity of our premises.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log.



EMPLOYMENT OF CHILDREN AND YOUNG PERSONS

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

COMPLIANCE

It is an offence for children (under-16s) and young persons (those aged 16 and 17) to be engaged, or permitted to be engaged in: -

- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on the Licensed Premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence. All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.

IT IS STRICT COMPANY POLICY THAT: -

- Children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place.
- Gaming machines sited in Licensed Premises are turned off if children and/or young persons are working on the premises outside the hours when the premises are open for business.
- Due diligence is given to verifying the age of all new members of staff where there is reason to doubt authenticity of birth dates supplied.



CUSTOMER INTERACTION

REMEMBER reporting an Interaction is NOT the same as reporting an Incident.
An Interaction is a Gambling related issue with a customer.

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice listed under the Social responsibility code provision 3.4.1.

The Company makes use of all relevant sources of information to ensure effective customer interactions in particular, to identify at-risk customers who may not be displaying obvious signs of problem gambling.

If members of staff have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager should be informed at the earliest available opportunity.

The Duty Manager is required to observe the individual and make a judgment as to whether it is appropriate to suggest to the customer that they might want to be provided with information regarding where they can seek professional advice about the nature of their gambling activity, or to discuss other options.

New Customer interaction – formal guidance was introduced by the Gambling Commission 31st October 2019. A copy is available to read in this section of your Compliance folder. Customer interaction consists of the following 3 parts;

PROCEDURE

PART 1: Identify and observation – behavior or activity you have spotted or something the customer tells you.

PART 2: Interact and take action - contact to prompt the customer to think about their gambling, for you to find out more, and an opportunity for you to offer information or support.

PART 3: Evaluate and record the outcome – what you or the customer did next. In some cases, you may need to monitor the customer's gambling to spot any change which may prompt further action.

The above 3 parts include the following;

- Behaviours may include intense mood swings, aggression, hysteria, remorse, excessive ATM use, time and money spent, damage to property, violence or the threat of violence to staff or other customers.

- The Duty Manager may give consideration to refusing service or barring the customer from the premises and, in extreme situations, contacting police for assistance. Whenever police are called to the premises for assistance in handling any incident, a log entry will be made whether police attend or not. [SmartINCIDENT app on IHL tablet]
- Staff are aware of where customers can be directed for confidential advice should they be approached by them for help. This includes the Staying in Control information leaflet which includes GamCare Helpline details.
- Members of staff are trained to deal with the process of self-exclusion if they consider a customer is at risk and/or where a customer requests self-exclusion information, this will be fully explained for consideration.
- All venue staff should be aware of those customers that are frequent visitors or deemed to be "high value" players. Monitoring and interaction will take place with every customer during every visit. It is this interaction that may lead the Duty Manager to intervene or take appropriate action, possibly via the Machine Administration Reconciliation System (MARS), which is able to monitor the spend of particular customer on specific machines, who may be deemed "high value", and therefore potentially more at risk. Appropriate action would then be taken on a player by player basis.
- If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts the staff or other customers in potential danger, the Duty Manager will implement the Company's procedures for dealing with antisocial situations.
- Notwithstanding any other action that may have to be taken immediately to prevent an incident from worsening, the Duty Manager will log all such reports which may result in customer interaction on an appropriate future occasion. The interaction will be conducted between the Duty Manager and the customer in a confidential and meaningful manner.
- Members of staff are trained as part of their 3 month induction process in the understanding of, and the strict adherence to this policy and accompanying logs.



SELF EXCLUSION

POLICY

Whilst most customers are able to enjoy and control their gambling, Cashino Gaming recognises its duty of care to those who cannot. Accordingly we provide a self – exclusion facility for those customers to request their exclusion for a fixed period of time, which is for a minimum of not less than 6 months, nor more than 12 months, with the customer, on request, having the option to extend one or more periods for a further 6 months each.

New regulations were implemented by the Gambling Commission and as from 6th April 2016, all gaming operators have to be part of a multi operator self-exclusion scheme, referred to as MOSES.

IF A CUSTOMER WISHES TO SELF-EXCLUDE IMMEDIATELY, WITHOUT MEETING WITH THE AREA MANAGER/DUTY MANAGER/SUPERVISOR OR WITHOUT A FURTHER VISIT TO OUR PREMISES, THEN THEIR DECISION MUST BE RESPECTED. THE DUTY MANAGER OR SUPERVISOR SHOULD ASSIST THE CUSTOMER IN THE COMPLETION OF A SELF EXCLUSION REQUEST IMMEDIATELY, SO THAT THE CUSTOMER NEED NOT MAKE A FURTHER VISIT TO THE GAMING PREMISES. PLEASE NOTE: YOU WILL NEED A WIFI CONNECTION IN ORDER TO ACCESS THE IHL HUB AND THE SmartEXCLUSION PAGE ON THE TABLET.

PROCEDURE – using the SmartEXCLUSION tablet

When a customer has requested that they be refused entry to our premises, the customer and the Area Manager/Duty Manager/Supervisor will formally acknowledge and document their request on the SmartEXCLUSION tablet, available at all Cashino venues. For further information please refer to the “SmartEXCLUSION User Guide” available at the venue.

Self-exclusion is sector specific:-

- **AGC LICENSED PREMISES** - 0.25km – 1km exclusion zone.
- **BINGO LICENSED PREMISES** – Traditional Bingo Clubs eg Beacon, Mecca and Gala plus High Street Bingo’s – National exclusion zone
- Please Note: the staff member dealing with the self exclusion process should make the customer aware that if they self-exclude from a Cashino Venue with a Bingo Licence, they will be self excluded from ALL High Street Bingo’s and Traditional Bingo clubs in the UK.
- Therefore you need to know what type of Premises Licence you hold at your venue. It will either be ADULT GAMING CENTRE PREMISES LICENCE (AGC) or BINGO PREMISES LICENCE. The tablet is set up to select your sector type by default, either AGC or BINGO. You will need to explain to ALL CUSTOMERS who wish to self-exclude, that it is sector specific and that they need to visit other establishments in your local area if they frequent premises operating Bingo, AGC, Licensed Betting Shops and Casinos licenses in order for them to self-exclude from **ALL gambling premises.**



The customer will be asked to assist us in applying the exclusion by allowing you to take an up-to-date photograph. The SmartEXCLUSION tablet has a built in web cam for this purpose. You will be prompted by the on-screen instructions when to take a photo of the customer during the self-exclusion process. **A photo is a mandatory requirement. The photo should be taken of head and shoulders only.**

The Area Manager/Duty Manager/Supervisor will confirm the customer's exclusion for a minimum period of not less than six months, nor more than 12 months.

The exclusion will apply to all Adult Gaming Centre (AGC) venues within a radius of 0.25km – 1 km, if your venue holds an AGC license and ALL Bingo licensed premises – Traditional and High Street if your premises hold a Bingo License.


It must be made clear to the customer that they may not revoke the self-exclusion during this time.

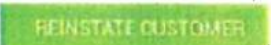
Once the customer has entered their electronic signature on the tablet and the self-exclusion is confirmed, the information will be retained on the tablet at the venue and electronic notification sent out to other similar licensed premises, nationally for Bingo licensed premises and within a 0.25km – 1km radius for AGC licensed premises.

A photo gallery is available to view for ease of identifying customers who have self-excluded in the local area and includes your venue within the selected radius. Milton Keynes Head Office will automatically be notified of all self-exclusions.


Please note on the photo gallery,

- Exclusions which are live have no coloured border.
- Exclusions which are in the 6 month 'cooling off' period have a **RED** border. These photos will remain on the tablet for 6 months. If the customer does not return to gambling within the 6 months period, photo will automatically disappear and be archived.
- Exclusions in the 24 hour 'cooling off period have a **BLUE** border. This will be visible for customers who have reinstated and wish to resume gambling and will disappear after the 24 hour period.

If a customer tries to enter gaming premises during a self-exclusion period, this is classed as a breach and details should be recorded on the tablet by selecting the customer photo and selecting the Report Breach button 

When the self-exclusion period ends, a customer has the option to return to gambling. The customer should return to the venue where they originally self-excluded from to complete the re-instatement process on the tablet. This button will be visible on the tablet only after the end date of the self-exclusion period .



If a customer wishes to extend their self-exclusion period for a further 6 months, they may do so by selecting the  button on the tablet.

PLEASE NOTE: For staff training purposes follow the instructions on the tablet and enter the following details on New Exclusion – Contact Details page:

First Name: dummy

Last Name: test

You **do not** need to take a photo of a person, just point the camera to the floor and take the photo. All test entries will automatically get archived once a week from the database.

As of 6th April 2016 you no longer need to add any self-exclusions completed on the tablet to 'LOG E – Self Exclusion' as the new SmartEXCLUSION tablet acts as the electronic log.
(See details below for old style paper Self Exclusions).

PROCEDURE – using the old paper Self Exclusion Request Forms which have yet to expire

PLEASE NOTE: You will need to retain any previous paper copies of SELF EXCLUSION REQUEST FORMS on file, until such time they have expired and the 'END DATE' is reached. This could be up to 2020. Do not throw them away as they are proof that a customer self-excluded prior to 6th APRIL 2016, when the regulations changed. You will also need to retain the paper copy of the SELF EXCLUSION REVIEW FORM. This form will need to be completed if a customer wishes to return to our premises and resume gambling. You will only need to use this form for paper copies of self-exclusions which are not on the tablet.

PLEASE NOTE: For old style paper self-exclusions you have in your Compliance folder, which are still active, (see 'end date'), the Duty Manager or any other authorised person and the customer will review the request and record the process on a self-exclusion review form and attach this to the original self-exclusion request form. If the customer wishes to extend their self-exclusion, this will need to be completed on the tablet as a new entry for a minimum period of 6 months.

You will need to record on LOG E, any actions for old style paper Self Exclusion Request Forms you still have on file i.e. customer breach, customer review/resume gambling and 24 hour cooling off period.

If the customer does wish to continue gambling after the expiry of an exclusion period then a 24 hour cooling off period must be taken before gambling is resumed.

Paper self-exclusion request forms should be destroyed 6 months after the end date due to the data protection act.

PLEASE NOTE: Self-exclusion social responsibility code provision 3.5.1 is a condition of our Licence Conditions and Codes of Practice – (LCCP)



SELF EXCLUSION PROCEDURE FLOWCHART

CUSTOMER:

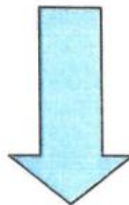
Requests to be excluded.

AREA MANAGER/DUTY MANAGER/SUPERVISOR:

Goes through the implications, for a minimum period of not less than six months, nor more than 12 months, with the customer, upon request, having the option to extend one or more periods for at least a further six months each. Advises the customer of the GamCare Self-Assessment test (on tablet) before self-excluding.

CUSTOMER AND
AREA MANAGER/DUTY MANAGER/SUPERVISOR:

Completes the customer exclusion request using the SmartEXCLUSION tablet and follows the on screen instructions.



CUSTOMER:

Must allow a photograph to be taken using the built in webcam using the SmartEXCLUSION tablet.

AREA MANAGER/DUTY MANAGER/SUPERVISOR:

Explains to customer the exclusion is sector specific and applies to other similar operating premises in the locality within the default 0.25km – 1 km radius.

CUSTOMER:

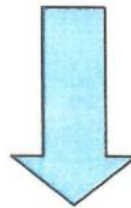
Once customer has electronically signed and Duty Manager confirmed the self-exclusion on the SmartEXCLUSION tablet, the customer must now leave the site.



MANAGER:

Checks the SmartEXCLUSION tablet and photo gallery includes the customer in question. Informs Team Members and any regular relief staff. Make new starters aware if they start during the exclusion period.

MANAGER/DUTY STAFF



Must record a breach on the Smart EXCLUSION tablet when a customer who has elected to self-exclude themselves tries to enter the premises.

AFTER THE END OF THE EXCLUSION PERIOD:

Customers will be offered support and advice should they wish to resume gambling. They should return to the venue where they originally self-excluded from to complete the re-instatement process. If this is the case a 24 hour cooling off period is put in place. Information will also be provided on how to extend the self-exclusion period should they wish to do so.

See above instructions for old style paper self-exclusion request forms which have expired and reached the end date and the process to follow.

Full operating instructions for your SmartEXCLUSION tablet are available at all venues. Please refer to the SmartEXCLUSION User Guide available at your venue.



SELF EXCLUSION REVIEW FORM

Please note: this form should only be used for old style paper self-exclusions on file. You do not need to use this form for self-exclusions on the SmartEXCLUSION tablet.

Company:

Site Name:

Site Address:

Post Code:

Customer Name:

Customer Date of Birth:

Customer Address:

Post Code:

Self-Exclusion agreement start date:End Date:.....

Customer's Decision:
.....

Request to resume access and gambling following the self-exclusion period.

I confirm that I voluntarily no longer wish to be self-excluded from this site and other venues in the locality to which the agreement applies; that all options have been explained to me by the Company.

Signature: (Customer) Date:.....Time.....

Signature: (Appointed Manager) Date:.....Time.....

I have experienced a "cooling off" period of 24 hours and can resume gambling as of:

Date:.....Time:.....

Please note: if the customer wishes to be reinstated on the Membership database, a copy of this form needs to be emailed to Tracey Chapman – (Memberships) at Cashino Head Office, Milton Keynes.

Email: traceychapman@praesepeplc.com

Please note: Log E needs to be updated with these details in your Compliance folder for old style paper self-exclusion forms only pre 6th April 2016.

Please retain this form on file for your records for a further 12 months from date signed.

Cashino Self-Exclusion Review Form - updated July 2016

SOCIAL RESPONSIBILITY & CODES OF PRACTICE

PREMISES LOGS

The Log Book contains the following:

NEW:	Venue Monthly Compliance Log Check Summary
LOG A:	Attempts By Children And Young Persons To Access Adult Areas – (recorded electronically using Age Verification app on tablet as of 9th July 2018)
LOG B: 1	Customer Interaction - Gambling Related "At Risk" Customers – (recorded electronically using the SmartINTERACTION app on tablet as of 8th April 2019)
LOG B: 2	Customer Incidents – Not Gambling Related – (recorded electronically using SmartINCIDENTS app on tablet as of 1st October 2018)
LOG C:	Customer Complaints and Disputes (paper Log)
LOG D:	Customer Incidents Requiring Police Assistance – (recorded electronically using SmartINCIDENT app on tablet as of 1st October 2018)
LOG E:	Self-Exclusion Log - to be used for <u>old paper Self Exclusions Forms</u> which are not on the tablet and retained in Compliance Folder
LOG F:	Incidents Relating To Aggressive Customers and Alcohol – (recorded electronically using SmartINCIDENT app on tablet as of 1st October 2018)
LOG G:	Staff Training Summary – paper log to be signed and dated every 6 months by all staff, when they complete "Essentials of Compliance" training module. Venue Managers to check the log is up to date at the end of the month and sign the Log Check Summary to verify the log is correct. (this will remain as a paper Log and will not be on the tablet)

NOTE: You can download and print these Premises Logs on Upskill > Knowledge Base > Categories > Casino Compliance Folder Content

(Casino Premises Logs – section 5 - Updated April 2019 – V1.6)



Venue Monthly: Compliance Log Check Summary

Venue Name		Month and Year
Log	Description	Total No.
A	Attempts by children and young persons to enter venue [Age Verification app on tablet as of 9th July 2018]	
B 1	Customer Interactions related to Problem Gambling [SmartINTERACTION app on tablet as of 8th April 2019]	
B 2	Customer Incidents not related to Problem Gambling [SmartINCIDENT app on tablet as of 1st October 2018]	
C	Customer Complaints and Disputes [paper log]	
D	Customer Incidents Requiring Police Assistance [SmartINCIDENT app on tablet as of 1st October 2018]	
E	Paper Self-Exclusions , Attempts to enter, Attempts to Gamble [complete for any paper self- exclusion forms you have on file] further information on log sheet	
F	Incidents Relating to Aggressive Customers and Alcohol [SmartINCIDENT app on tablet as of 1st October 2018]	
G	Summary of Staff Training : Essentials of Compliance Only (EOC) [paper log to be completed & signed by ALL STAFF for EOC training]	NA

Comments

NOTE: Please check at the end of each month training dates on Log G correspond with Upskill EOC dates

Document to be completed checked and signed monthly by Venue Manager or designated person at the end of each month.
Area Manager check and sign every 8 weeks.

Signed Venue Manager	Date
Signed Area Manager	Date
Signed Auditor/Compliance Manager	Date

Comments

Comments

(Regulatory reports to the Gambling Commission are for the period 1st April to 31st March each year)

SITE ADDRESS and NUMBER :

Month/Year:

LOG C : CUSTOMER COMPLAINTS AND DISPUTES

Date	Time	Details of Incident	Outcome/Action Taken – Complaint Resolved?	Duty Manager

SITE ADDRESS and NUMBER :

Month/Year:.....

LOG E : SELF-EXCLUSION LOG

Name	DOB	Photo Yes	Start Date	Attempts to Enter Date(s)	Attempts to Gamble Date(s)	Preventative Measures	End Date	'Cooling Off'	Resumed Gambling Y/N

1. This form needs to be completed only for old paper self-exclusion requests forms you still have on file which have yet to reach the "End" date. This could be up to 5th April 2020!
2. If a customer wishes to return to gambling, a Self Exclusion Review Form (copy in Compliance folder) needs to be completed and signed by you and the customer. You also need to complete the last 2 columns on this form.
3. This form needs to be completed if a customer who is self-excluded on old paper request form enters & attempts to gamble in the venue. This would be classed as a "BREACH". Name of Customer and date/time and measures you took need to be recorded



SITE ADDRESS and NUMBER :

LOG G : SUMMARY OF STAFF TRAINING – Page 1
TO BE COMPLETED SIGNED AND DATED BY ALL EMPLOYEES EVERY 6 MONTHS FOR UPSKILL – ESSENTIALS OF COMPLIANCE TRAINING (EOC) AND QUIZ

Management and staff have declared that they have read and understood the following training documents and are fully aware of Company policy and procedures relating to them:

1. Access to Gambling by Children and Young Persons 2. Access to Premises by the Gambling Commission's Enforcement Officers 3. Advertising Standards and Marketing 4. Fair and Open Practice and Alternative Dispute Resolution/IBAS 5. Information on how to Gamble Responsibly and Help for Gamblers with problems	6. Money laundering and Proceeds of Crime Act 2002 7. Self-Exclusion 8. Customer Interaction for "At Risk" customers 9. Incidents relating to Aggressive Customers and Alcohol 10. Employment of Children and Young Persons
--	---

Name	Position in Company	Training Date EOC Quiz	Staff Signature	Next Training Date Due in 6 months	Leaving Date	1	2	3	4	5	6	7	8	9	10
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓



SITE ADDRESS and NUMBER :

LOG G : SUMMARY OF STAFF TRAINING – Page 2
TO BE COMPLETED SIGNED AND DATED BY ALL EMPLOYEES EVERY 6 MONTHS FOR UPSKILL – ESSENTIALS OF COMPLIANCE TRAINING (EOC) AND QUIZ

Name	Position in Company	Training Date EOC Quiz	Staff Signature	Next Training Date Due in 6 months	Leaving Date	1	2	3	4	5	6	7	8	9	10
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓



6. Compliance



Compliance Policy

Why:

The responsibility for an individual's gambling is their own. The responsibility to exercise a duty of care is that of the operator. Cashino Gaming recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

Best Result:

All employees are fully aware of the importance of following policy and processes in regards to compliance and social responsibility. The business is run in line with the license conditions and codes of practice at all times and all employees work together to ensure the 3 licensing objectives are met.

Worst Result:

Employees are not aware of the policy and processes in regards to compliance. The company is not operated in line with the 3 licensing objectives and the license conditions and codes of practice. The business is put at risk of its license being lost.

The 3 licensing objectives:

- Keep crime out of gambling
- Ensure that gambling is conducted in a fair and open way
- Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling





What:

- Employees must complete compliance training before being able to work with customers in any venue
- It is the responsibility of the venue manager to ensure that all employees are correctly trained and up to date with compliance training
- It is the responsibility of employees to check that they have completed all relevant compliance training on their inform people/upskill account regularly
- Employees must always follow the policies and processes in regards to compliance which are found in the Compliance and Social Responsibility folder

:

- The policies and processes which form compliance and social responsibility apply at all times of operation.

:

- All employees have a responsibility to ensure that the business is operated in a way which is compliant at all times.

Related / supporting documents:

- The compliance and social responsibility folder.

Order of who to contact if in need of help / advice:

- Venue Manager
- Area Manager
- Compliance Manager



Staff Guard / P.A. Policy / Static Alarm

Why:

The security of employees is of the upmost importance; therefore personal alarm systems and the staff guard system have been installed to help deter aggressive incidents and give employees a way of contacting help when required.

Best Result:

The staff guard and MPA fobs are carried by employees at all times as per policy. This increases the security of our employees and guests. Employees become more comfortable in their roles knowing they have methods of contacting assistance in emergency situations.

Worst Result:

The staff guard and MPA fobs are not carried by employees which reduces the safety of employees and guests. During events when emergency assistance is needed, it is not acquired.

What:

- Employees should always carry a mobile panic alarm (MPA) or staff guard fob on their person while at work. (ideally both should be carried)
- Activation of staff guard should be prioritised over using the MPA in circumstances which do not require immediate police attention.
- Staff guard should be tested at least once per week (Note: it is recommended to test the system during times of higher customer numbers, as it makes the customers aware that staff have a communication link to a security service)
- **Employees should not be hesitant to use staff guard** – This is a service which we pay for, there are no issues with false alarms or over usage. Use as often as necessary.
- Employees should be more thoughtful about using the MPA system, and should only activate it in times of imminent physical threat or robbery, or anything which police would usually be called for. This is a system which is linked directly to police. Inappropriate use of this device may lead to the venue losing the right to use it altogether.
- Staff guard and the MPA system should only be used if it is safe to do so – never endanger colleagues or customers during a situation arising when it would not be safe to active either system.
- For Static alarms ensure that the reset key is available at all times.



- :
- The staff guard unit should be tested once per week.
 - The staff guard unit should be activated whenever staff are feeling uncomfortable or threatened.
 - The MPA system should be used only when immediate police assistance is required

- :
- The MPA unit and/or Staff guard fob should be carried by employees at all times.
 - All venue employees should have access to these devices
 - All venue employees should have received training on how to use these devices.

Related / supporting documents:

- N/A

Order of who to contact if in need of help / advice:

- Area Manager
- Commercial administrator
- For any technical issues regarding staff guard call: 01623 649013 (This is a 24hr line but it's best to call during normal business hours Out of hours, the number transfers straight to an engineer so he may be woken by the call Do not press the fob if you have maintenance issues – dial this number as directed)



How:

To Operate The Staff Guard Unit

1. Slide cover up on fob and press the red button – this dials Staff Guard.

2. A blue light will flash on the unit which shows that it's dialing.

3. The red light appears/will stay on continuously after a few seconds meaning the call has connected and someone is listening. They will not speak for the first 10 seconds.

IF YOU ARE IN IMMEDIATE DANGER SAY:

CALL THE MANAGER - This is our pass phrase that tells them to call for **IMMEDIATE POLICE ASSISTANCE**

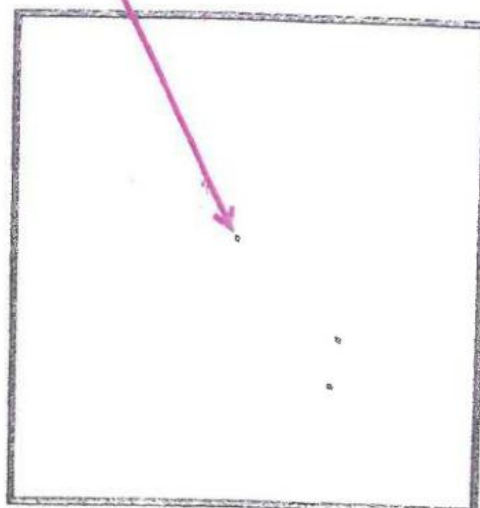
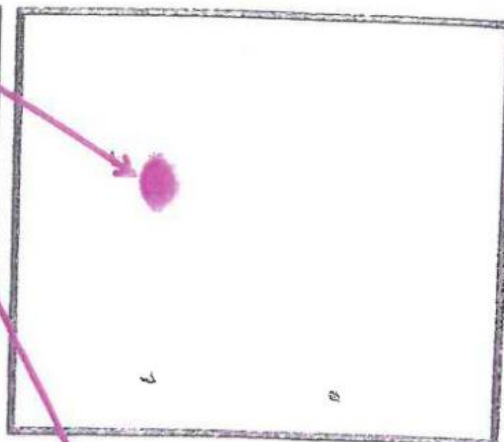
However, they will also call the police if they can hear that a crime is being committed, or anyone is in immediate threat.

If you say: "Stand By"

They will stay online and listen to whatever is happening so you can use this as a safety measure if you feel a situation could escalate. Again, they will call the appropriate authorities if required.

They will say "Standing by" every few minutes to assure/remind you that they are still there.

Say: "Stand down" once you no longer need





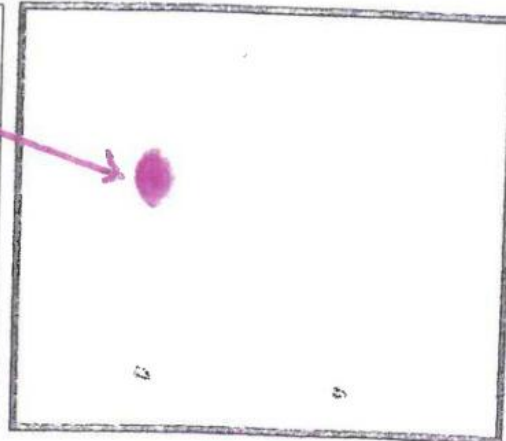
How To Make A Test Call:

Once per week a test call must be made:

1. Press the fob (red button) and wait for a response. Say, "Just a test call" and give the password when asked.

The password is your venue name and number.

2. They will confirm the test and end the call



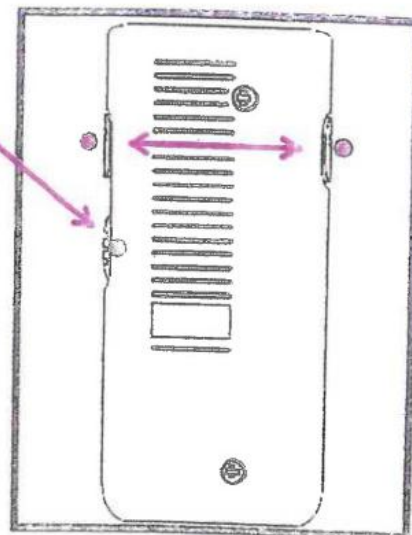
Mobile Panic Alarms (MPA)

Mobile Panic Alarms are designed to offer staff the security of a personal attack alarm at all times whilst they are at work. The MPAs should be worn by staff members and key holders should be issued with one to keep with them at all times. MPAs are not to be taken off site and should not be taken home.

1. Slide the black button downwards to unlock the orange buttons
2. Press the two orange side buttons together

The panic alarm does not work if you press only one button

The black button should be kept in the locked position to prevent false activations





How It Works

The MPA transmits a signal to a receiver on site. This signal is then transmitted INSTANTLY to an alarm control centre who inform the local Police. The Police will aim to attend site in less than 5 minutes when a MPA is activated as this is given priority over a normal 999 call.

CAUTION – The transmitter range will be affected by the condition of the MPA aerial, always ensure your MPAs are in good condition. If the MPA is defective or damaged, contact the Commercial Administrator to arrange a repair/replacement straight away.

When To Use It

MPA's should only be used when there is the threat of serious injury to staff or customers.

Example of when to use;

- ↓- Any physical violence is carried out towards a member of staff or customer;
- ↓- When the threat of physical violence is considered imminent; or
- ↓- The site is subject to a robbery.

At all other times ring the police directly. The number is displayed on the office notice board.

Problems

Any problems with the MPA should be addressed to your Line Manager or Area Manager who will inform the Commercial Administrator.



How To Test Your MPAs

1. Call your alarm supplier, a list of numbers is provided below.
2. Tell the alarm operative you want to test your MPAs, give them your site name (Cashtino Gaming), site address and site password.
3. The alarm operative will then tell you that they have disconnected the signaling, at which point you will be asked to activate each MPA in turn.
4. For example; you will press MPA 1 when instructed to by the alarm operative and they will tell you if a signal has been received, you will then move on to MPA 2 and the alarm operative will tell you if a signal has been received, you will then move on to MPA 3 etc. etc.
5. You will do this until all of your MPAs have been tested.
6. After each individual MPA test, the alarm operative will tell you if the signal has been received or not. If not, your MPA is faulty and will need to be repaired or replaced. In this instance, please report it to the Commercial Administrator straight away.
7. You will need to log that you have carried out an MPA test on your MPA Test Record Sheet, which should be maintained in your Premises Log in your Compliance Folder.

Alarm Provider	Contact
ASG	0121 358 1524
ADT	0344 800 1999 option 5
LSG	TO BE INSERTED
METRO	0115 983 3801
GEM	0844 879 1703
ABEL	0844 800 3022



What To Do After Your MPA Test / Activation

When the MPA testing exercise has been completed the alarm company will reactivate the signaling and the police response will be reinstated.

You will then need to reset your alarm control panel.

If you have a fob operated system, press your fob against your keypad, as if you are going to set the system for closure. The keypad will ask you if you want to set the system. Press 'yes'. The system will start to arm, so immediately hold your fob up to the keypad once again to unset the system. Your system will now be reset.

If you have a code operated system, input your code, as if you are going to set the system for closure. The keypad will ask you if you want to set the system. Press 'yes'. The system will start to arm, so immediately input your code, as if you are opening and this will unset the system. Your system will now be reset



CCTV Policy

Why:

CCTV is an essential tool to help prevent crime and capture those responsible for breaking the law. In a business where cash is being transferred continuously between customers, machines and employees, it is important for the safety of employees and customers that all areas of the venue area covered by CCTV at all times.

Best Result:

The CCTV system is only accessed by those with authority to do so. Camera angles are never changed without the correct authority. The security of the venue is increased

Worst Result:

The CCTV is accessed by those who should have no access, data is lost. Cameras are moved without authorization causing a loss of coverage of key areas. The security of the venue is compromised

What:

- The CCTV system should be switched on and recording at all times.
 - Any faults with the CCTV System should be communicated to your Area Manager immediately.
 - CCTV should always cover: The front and rear exits, All machines, The offices and The GeWeTe
 - The CCTV should be checked daily to ensure its working correctly and the time and date are all correct.
 - Information in regards to the CCTV should never be disclosed to any 3rd parties.
 - Placing and adjusting of the cameras should only be completed by the Area Manager or Operations Director (or another with authorisation from AM/OD)
 - Records should be kept to show who has access to the CCTV password and username.
 - Decorations should be not placed in areas which obscure the CCTV monitors
 - The CCTV should be in a security cabinet
 - The key to the Security Cabinet to be locked in the Key Cabinet
- :
- The CCTV should be checked daily to ensure correct function.



- The venue manager has responsibility for the CCTV system being checked and fully functional.

Order of who to contact if in need of help / advice:

- Area Manager.
- Commercial Administrator



Machine Fraud Policy

Why:

Machine fraud is a threat which is ever present. Employees should be aware of the ways in which fraud can take place and what to do in the event of spotting a “customer” defrauding a machine.

Best Result:

All employees are aware of the policy in regards to machine fraud and what to look out for. Machine fraud is reduced and the income for the business protected.

Worst Result:

Employees fail to identify fraud taking place resulting in loss of income. Further venues are targeted. The employees responsible may be subject to disciplinary processes.

What:

- The venue floor should never be left unattended.
- Employees should be thoughtful in regards to customers who they are not familiar with
- Employees should be given access to photos of known fraudsters by the manager
- Known fraudsters shall be asked to leave immediately upon entrance with no explanation needed to be given
- Following any machine being defrauded, at the earliest opportunity the duty manager must send an email to the security address with as much evidence and information as possible
- Employees are not to endanger themselves or customers at any time when dealing with a fraudster.

:

Fraud may be taking place when

- Machines are being played with large amounts of credit. Normally people do not play with large credit in the machine (be aware that some customers may have won a jackpot and have that credit sitting in their balance)
- Machines going empty regularly or a large succession of tickets being collected.
- Suspicious activity – Large amounts of customers coming into the venue and dispersing or trying to distract employees.
- Customers with their hands over the coin mech, display or pay out tray.
- Large amounts of coins (one pounds and ten pence coins) being separated into denominations in the payout tray.

- Customers leaving the venue with machines still having money left in the bank.

:

- All employees have a responsibility for protecting the business from machine fraud.
- The manager should provide employees with photos of known fraudsters
- The duty manager should inform the security email address following machine fraud taking place

Order of who to contact if in need of help / advice:

- Venue Manager
- Area Manager
- Income Protection.

How:

If you suspect that machine fraud is taking place either:

- Activate staff guard and ask the customer to leave the venue if you feel comfortable to do so

Or:

- Do not alert the suspect(s)
- Inform the duty manager who will telephone the police.
- Continue to watch the suspect(s) and try not to alert their attention that you have identified them

Following a fraud

1. Information should be gathered from the CCTV and stored on a memory stick.
2. This information should be provided by email to security@praespeplc.com as soon as possible to prevent another venue being targeted in the local area
3. The Area Manager should be contacted to inform them of the event.
4. Income protection should be informed.



Machine Ratio Check Policy

Why:

The quantity of B3 Machines which a venue is permitted to have is limited, in general to 20% of its total machines. Checks need to be completed to ensure that at all times every venue operates within its correct ratio.

Best Result:

The Machine Ratio Check policy is completed and the venue complies with legislation and operates within the legal ratio for B3 Machines

Worst Result:

The Machine Ratio Check policy is not completed and the venue operates more B3 machines than it is legally allowed.

What:

- MC105 should be completed
- Completed MC105 should be emailed to Incomeprotection@praesepeplc.com

When:

- After any Machine Move.
- When any Machine or Tablet is reported as out of order and not repaired on the next visit by the Service Engineer.

Who:

- The Duty Manager at the time of the move/removal.

Related / supporting documents:

- MC105 Machine Ratio Check Record.



Order of who to contact if in need of help / advice:

- Area Manager
- Income protection
- Gaming Machines.

How:

Complete the MC 105 Machine Ratio Check Record

MACHINE RATIO CHECK RECORD



Venue Name

Venue No

Date of Move

Week No

Name

Signature

AREA 1 - MAIN

Total number of B3 Machines
Total number of Cat C Machines
Total number of Cat D Machines
Total No of Cat C/D Tablets
Total No of Twin player Infills (count as 2 machines)
(do not include any Class 2)
Total 0 a

Total number of B3 allowed legal ratio - (a) divided by 5 4 b

Total number of B3 Machines (b) actual count c

Total number of actual B3 (c) must not exceed number allowed

AREA 2 - SUB DIVISION

Total number of B3 Machines
Total number of Cat C Machines
Total No of Cat C Tablets
Total No of Cat C/D Tablets
Total No of Twin player Infills (count as 2 machines)
(do not include any Class 2)
Total 0 a

Total number of B3 allowed legal ratio - (a) divided by 4 b

Total number of B3 Machines (b) actual count c

Total number of actual B3 (c) must not exceed number allowed

This form must be emailed to IncomeProtection@praesepeplc.com

If your B3 actual total exceeds the allowed legal ratio you must contact your Area Manager immediately and email this form to gamingmachines@praesepeplc.com

Confirm action taken:

Complete all relevant sections with correct number of machines if the venue has a 2nd licensed area

Walk around the venue and complete all the relevant sections with the correct number of machines in the main area

mail completed document

MC105-V1



Smoking / Vaping Policy

Why:

The smoke free laws passed on 1st July 2007 prevent smoking in work places and other public places. Therefore to remain compliant with the law smoking should only be permitted in designated areas for employees and customers alike.

Best Result:

All employees and customers observe the smoke free policy and only smoke in areas in which smoking is permitted. We are compliant with the law.

Worst Result:

Employees and customers do not observe the smoking policy, the customer experience is negatively affected and we are not compliant with the law. Employees found smoking inside the premises may face disciplinary action.

What:

- Smoking is strictly prohibited within venues
- Customers should not be allowed to smoke inside doorways or toilets
- Where possible there should always be a place to dispose of finished cigarettes
- Should the venue have no smoking area at the back of the venue, there should be steps taken to keep the front of the venue looking presentable at all times
- Vaping is allowed within our venues however these devices should not produce excess vapour
- Employees are not permitted to vape while on shift and therefore must take designated breaks to vape as smokers do. Employees must not vape in the venue.
- Employees who smoke / vape must cover their uniform while smoking and when possible smoke separately from customers
- No smoking signs should be clearly displayed

When:

- It is illegal for anyone to smoke inside the premises at any time.
- This policy is applicable at all times.





Notes :

- This policy relates to both employees and customers.
- All employees are responsible for ensuring that this policy is followed at all times.

Order of who to contact if in need of help / advice:

- Venue manager
- Area manager
- Customer service manager

SMOKEFREE

MERKUR CASHINO, 1076 WARWICK ROAD, ACOCKS GREEN, BIRMINGHAM, B27 6RD

LICENSING SUB-COMMITTEE HEARING

18TH JANUARY 2021

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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?

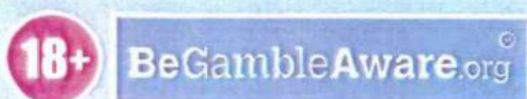


PLAY LONGER
WIN MORE



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)



PLAY
SENSIBLY

PLAY
ENJOYABLY

PLAY
AFFORDABLY

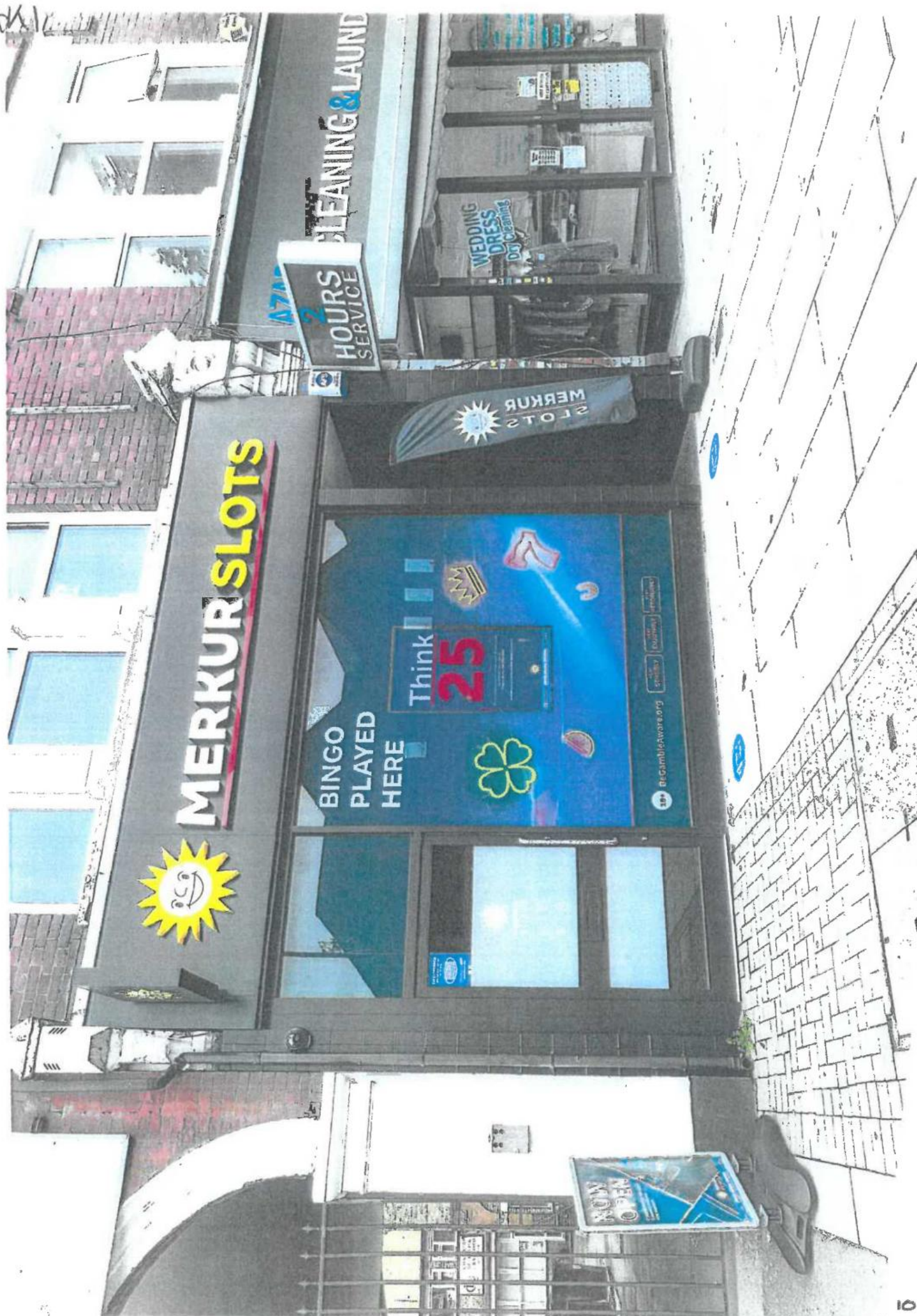
Think

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



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:

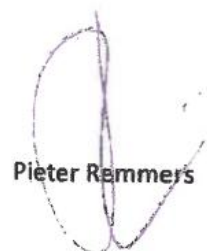
Praesepe Group
Merkur Slots, Merkur Cashino & Beacon Bingo

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

+

The Stages of Change (Lesson 4)

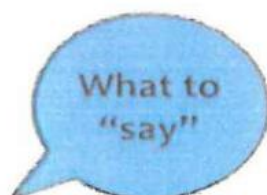
Gambling becomes a problem when people are not in control. Staying in control is vitally important and is the ethos we at Cashino & Beacon all work too.

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
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.

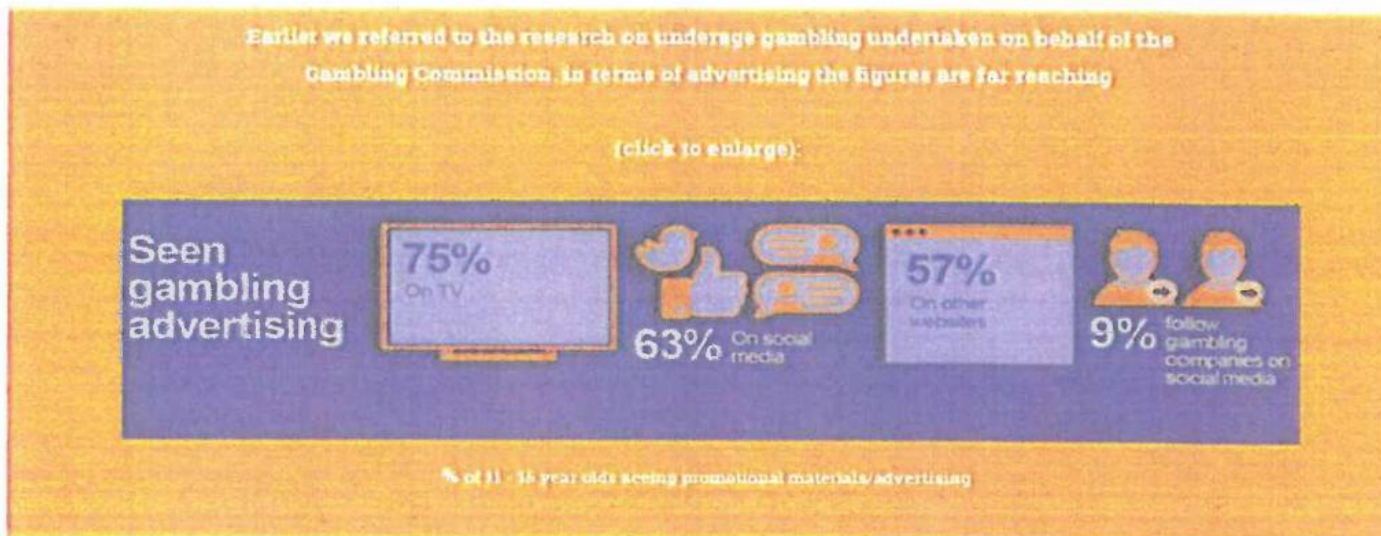
Things to avoid:

- Do not make threats you cannot carry through, such as threatening to remove the person.
- 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.
- Do not use humour unless you are sure it will help and you have a very good relationship with the customer
- Do not use sarcasm or humiliate the customer
- Do not put yourself at risk; use **staffguard** if you are alone and feel vulnerable

AK3

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



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

AKS

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



safeguarding

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.

Smoking is prohibited on these premises. Smoking is permitted on these premises (except public areas).

Alcoholic beverages or take-away food cannot be consumed on these premises.

The management reserves the right to alter or withdraw provisions without prior notice or due to circumstances beyond their control.

Please check your change before leaving the Cash Desk as retailers cannot be rectified later.

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BINGO RULES

Before the commencement of each game, the following information will be announced:

(a) Which game is in play, (b) Which house/boards/etc and (c) Which house/boards/etc and

During play, when the game is in play, the following information will be announced:

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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 campaigns.

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GAMBLING ACT 2005

The Three Licensing Objectives

1. Promoting gambling for the benefit of the community, being associated with crime or disorder of being used to support crime - we support our customers 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 audit rates and prize levels, and the Commission's training - our terms are fair and gaming terms are easily understood by customers.

3. Protecting children and other vulnerable persons from being harmed or exploited by gambling - we can prevent under age gambling and we contribute to the responsibility of Gambling Trust for the treatment of problem gambling.

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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

Spending outside your means can create problems for yourself and others

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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

18+

NO SMOKING

It is against the law to smoke on these premises

BeGambleAware.org

18+

CUSTOMER CARE

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

GamCare

THINK 25

If you are lucky enough to look under 25 years old we need to check your ID

25

PUBLIC LIABILITY

PREMISES LICENCE

BINGO PRICES AND CHARGES

BINGO ASSOCIATION

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 @GamCare

Funded by

GambleAware[®]

GamCare: A Charitable Company Registered in England No.3297914
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.

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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

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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),

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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

Signature *D J Butterworth*

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

Signature *D J Butterworth*

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

Signature *D J Butterworth*

EDMUND LOCARD

Licensing and Security Solutions

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>	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. 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.
<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

EDMUND LOCARD

Licensing and Security Solutions

<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.

Every contact leaves an impression

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.

BIRMINGHAM CITY COUNCIL**PUBLIC REPORT**

Report to:	Licensing Sub Committee A
Report of:	Interim Assistant Director of Regulation & Enforcement
Date of Meeting:	Monday 18th January 2021
Subject:	Licensing Act 2003 Premises Licence – Variation
Premises:	Couch, 1466 Pershore Road, Stirchley, Birmingham, B30 2NT
Ward affected:	Stirchley
Contact Officer:	Shaid Yasser, Senior Licensing Officer, licensing@birmingham.gov.uk

1. Purpose of report:

To consider relevant representations that have been made in respect of an application to vary the Premises Licence which seeks to extend the hours for the Sale of Alcohol (for consumption both on and off the premises), to operate from 12:00midday until 11:00pm (Monday to Sunday).

To add the provision of Regulated Entertainment consisting of recorded music, to operate both indoors and outdoors, from 12:00midday until 11:00pm (Monday to Sunday).

Premises to remain open to the public from 12:00midday until 11:00pm (Monday to Sunday).

2. Recommendation:

To consider the representations that have been made and to determine the application.

3. Brief Summary of Report:

Variation application received on 26th November 2020 in respect of Couch, 1466 Pershore Road, Stirchley, Birmingham, B30 2NT.

Representations have been received from Other Persons.

4. Compliance Issues:**4.1 Consistency with relevant Council Policies, Plans or Strategies:**

The report complies with the City Council's Statement of Licensing Policy and the Council's Corporate Plan to improve the standard of all licensed persons, premises and vehicles in the City.

<p>5. Relevant background/chronology of key events:</p> <p>Sujan Singh Swani applied on 26th November 2020 to vary the Premises Licence for Couch, 1466 Pershore Road, Stirchley, Birmingham, B30 2NT.</p> <p>Representations have been received from Other Persons. See Appendices 1 – 3.</p> <p>The application is attached at Appendix 4.</p> <p>The current Premises Licence is attached at Appendix 5.</p> <p>Site Location Plans at Appendix 6.</p> <p>When carrying out its licensing functions, a licensing authority must have regard to Birmingham City Council's Statement of Licensing Policy and the Guidance issued by the Secretary of State under s182 of the Licensing Act 2003. The Licensing Authority is also required to take such steps as it considers appropriate for the promotion of the licensing objectives, which are:-</p> <ul style="list-style-type: none"> a. The prevention of crime and disorder; b. Public safety; c. The prevention of public nuisance; and d. The protection of children from harm.
<p>6. List of background documents:</p> <p>Copies of the representations as detailed in Appendices 1-3.</p> <p>Application Form, Appendix 4.</p> <p>Current Premises Licence, Appendix 5.</p> <p>Site Location Plans, Appendix 6.</p>
<p>7. Options available</p> <p>To grant the variation application</p> <p>To refuse the whole or part of the application</p> <p>To modify the conditions of the Licence</p>

From:
Sent: 18 December 2020 13:38
To: Licensing
Subject: 1466 Pershore Road

Dear Sir/Madam

I am writing to you to petition against the above premises obtaining a licence for music and to also extend their opening times.

The premises is set in a residential area and there has already been a lot of noise pollution caused by the premises through music already being played at an unacceptable level and noise from the customers themselves.

Mine and my fiancé's bedroom is situated near enough above the beer garden and we have both suffered from sleeping problems caused by the premises and the lack of regard for any residents who have to be up at early hours in the morning, which both myself and my fiancé have to be for work.

Yours sincerely,

From:
Sent: 18 December 2020 16:24
To: Licensing
Subject: objection to application to vary a premises licence

Good afternoon,

I am writing to raise my objection to an application made on 27 November 2020 for the variation of a premises licence at 1466 pershore road, storchley, B30 2NT.

The application asks for a change to licensed and operating hours to cover 12pm to 11pm and for low volume music to be played in the beer garden.

Quite apart from the noise nuisance caused by the premises prior to the covid lockdown to the residents in this residential area, the business failed to stick to its agreed licensing hours also, frequently continuing to serve drinks to customers after hours in the beer garden, having lowered the front shutters so as to appear closed. Customers were then allowed to leave via the back gate and exit via ivy road.

Even without any license to play music the business has already done this. Along with the continued raucous noise from merry and loud customers in the beer garden, there have been numerous noise disturbances for surrounding residents, some families with young children.

Representations to the owners has failed to have any success and this application is a further slap in the face for the surrounding residents who will suffer further noise and inconsiderate behaviour from the business and its customers.

Thank you,

ivy road
Storchley
B30

From:
Sent: 18 December 2020 16:33
To: Licensing
Subject: objection to application to vary a premises licence

Good afternoon,

I am writing to raise my objection to an application made on 27 November 2020 for the variation of a premises licence at 1466 pershore road, storchley, B30 2NT.

This asks for a change to licensed and operating hours to cover 12pm to 11pm and for low volume music to be played in the beer garden.

Prior to the covid lockdown the business regularly caused noise nuisance to the residents in this residential area, and failed to stick to its agreed licensing hours also, frequently continuing to serve drinks to customers after hours in the beer garden, having lowered the front shutters so as to appear closed. Customers were then allowed to leave via the back gate and exit via ivy road.

Even without any license to play music the business has already done so, without license. Along with the continued raucous noise from merry and loud customers in the beer garden, there have been numerous noise disturbances for surrounding residents, some families with young children.

Representations to the owners has failed to have any success and this application causes further concern for the surrounding residents who will suffer further noise and inconsiderate behaviour from the business and its customers.

The peace and quiet during the covid shutdown has been wonderful.
Thank you,

ivy road
Storchley
B30



Birmingham
Application to vary a premises licence
Licensing Act 2003

For help contact
licensingonline@birmingham.gov.uk
 Telephone: 0121 303 9896

* required information

Section 1 of 18

You can save the form at any time and resume it later. You do not need to be logged in when you resume.

System reference

Not Currently In Use

This is the unique reference for this application generated by the system.

Your reference

COUCH003

You can put what you want here to help you track applications if you make lots of them. It is passed to the authority.

Are you an agent acting on behalf of the applicant?

☒ Yes

☐ No

Put "no" if you are applying on your own behalf or on behalf of a business you own or work for.

Applicant Details

* First name

Sujan

* Family name

Swani

* E-mail

Main telephone number

Include country code.

Other telephone number

☒ Indicate here if the applicant would prefer not to be contacted by telephone

Is the applicant:

☐ Applying as a business or organisation, including as a sole trader

☒ Applying as an individual

A sole trader is a business owned by one person without any special legal structure. Applying as an individual means the applicant is applying so the applicant can be employed, or for some other personal reason, such as following a hobby.

Continued from previous page...

Address

* Building number or name	<input type="text"/>
* Street	<input type="text"/>
District	<input type="text"/>
* City or town	<input type="text"/>
County or administrative area	<input type="text"/>
* Postcode	<input type="text"/>
* Country	<input type="text"/>

Agent Details

* First name	<input type="text" value="Jacob"/>	
* Family name	<input type="text" value="Clarke"/>	
* E-mail	<input type="text"/>	
Main telephone number	<input type="text"/>	Include country code.
Other telephone number	<input type="text"/>	
<input checked="" type="checkbox"/> Indicate here if you would prefer not to be contacted by telephone		

Are you:

- ☒ An agent that is a business or organisation, including a sole trader
☐ A private individual acting as an agent

A sole trader is a business owned by one person without any special legal structure.

Agent Business

Is your business registered in the UK with Companies House? ☒ Yes ☐ No

Note: completing the Applicant Business section is optional in this form.

Registration number	<input type="text" value="12089501"/>
Business name	<input type="text" value="Couch Bars Ltd"/>
VAT number	<input type="text" value="-"/> <input type="text" value="331515044"/>
Legal status	<input type="text" value="Private Limited Company"/>
Your position in the business	<input type="text" value="Director"/>
Home country	<input type="text" value="United Kingdom"/>

If your business is registered, use its registered name.

Put "none" if you are not registered for VAT.

The country where the headquarters of your business is located.

Continued from previous page...

Agent Registered Address

Address registered with Companies House.

Building number or name	<input type="text"/>
Street	<input type="text"/>
District	<input type="text"/>
City or town	<input type="text"/>
County or administrative area	<input type="text"/>
Postcode	<input type="text"/>
Country	<input type="text"/>

Section 2 of 18

APPLICATION DETAILS

This application cannot be used to vary the licence so as to extend the period for which the licence has effect or to vary substantially the premises to which it relates. If you wish to make that type of change to the premises licence, you should make a new premises licence application under section 17 of the Licensing Act 2003.

I/we, as named in section 1, being the premises licence holder, apply to vary a premises licence under section 34 of the Licensing Act 2003 for the premises described in section 2 below.

* Premises Licence Number

Are you able to provide a postal address, OS map reference or description of the premises?

☒ Address ☐ OS map reference ☐ Description

Postal Address Of Premises

Building number or name	<input type="text" value="1466"/>
Street	<input type="text" value="Persnore Road"/>
District	<input type="text" value="Stirchley"/>
City or town	<input type="text" value="Birmingham"/>
County or administrative area	<input type="text" value="West Midlands"/>
Postcode	<input type="text" value="B30 2NT"/>
Country	<input type="text" value="United Kingdom"/>

Premises Contact Details

Telephone number	<input type="text"/>
Non-domestic rateable value of premises (£)	<input type="text" value="4,000"/>

Section 3 of 18

VARIATION

Continued from previous page...

Do you want the proposed variation to have effect as soon as possible?

☒ Yes ☐ No

Do you want the proposed variation to have effect in relation to the introduction of the late night levy?

☐ Yes ☒ No

You do not have to pay a fee if the only purpose of the variation for which you are applying is to avoid becoming liable to the late night levy.

If your proposed variation would mean that 5,000 or more people are expected to attend the premises at any one time, state the number expected to attend

Describe Briefly The Nature Of The Proposed Variation

Describe the premises. For example the type of premises, its general situation and layout and any other information which could be relevant to the licensing objectives. Where your application includes off-supplies of alcohol and you intend to provide a place for consumption of these off-supplies, you must include a description of where the place will be and its proximity to the premises.

Couch is a Cocktail Bar in the Suburb of Starchley with a maximum capacity of 18 indoors and 20 in the garden (this was the capacity pre-lockdown). I am looking to extend the licensing hours. The current hours are Monday-Friday 5pm-11pm, Saturday 12pm-11pm, Sunday 12pm-6pm. I am looking to extend this to a blanket 12pm-11pm Monday to Sunday.

Section 4 of 18

PROVISION OF PLAYS

See guidance on regulated entertainment

Will the schedule to provide plays be subject to change if this application to vary is successful?

☐ Yes ☒ No

Section 5 of 18

PROVISION OF FILMS

See guidance on regulated entertainment

Will the schedule to provide films be subject to change if this application to vary is successful?

☐ Yes ☒ No

Section 6 of 18

PROVISION OF INDOOR SPORTING EVENTS

See guidance on regulated entertainment

Continued from previous page...

Will the schedule to provide indoor sporting events be subject to change if this application to vary is successful?

☐ Yes

☒ No

Section 7 of 18

PROVISION OF BOXING OR WRESTLING ENTERTAINMENTS

See guidance on regulated entertainment

Will the schedule to provide boxing or wrestling entertainments be subject to change if this application to vary is successful?

☐ Yes

☒ No

Section 8 of 18

PROVISION OF LIVE MUSIC

See guidance on regulated entertainment

Will the schedule to provide live music be subject to change if this application to vary is successful?

☐ Yes

☒ No

Section 9 of 18

PROVISION OF RECORDED MUSIC

See guidance on regulated entertainment

Will the schedule to provide recorded music be subject to change if this application to vary is successful?

☒ Yes

☐ No

Standard Days And Timings

MONDAY

Start

End

Start

End

Provide timings in 24 hour clock (e.g., 16:00) and only give details for the days of the week when you intend the premises to be used for the activity.

TUESDAY

Start

End

Start

End

WEDNESDAY

Start

End

Start

End

THURSDAY

Start

End

Start

End

Continued from previous page...

FRIDAY

Start End
Start End

SATURDAY

Start End
Start End

SUNDAY

Start End
Start End

Will the playing of recorded music take place indoors or outdoors or both?

☐ Indoors ☐ Outdoors ☒ Both

Where taking place in a building or other structure select as appropriate. indoors may include a tent.

State type of activity to be authorised, if not already stated, and give relevant further details, for example (but not exclusively) whether or not music will be amplified or unamplified.

Recorded music to be played through speakers indoors. Music also to be played through speakers in the beer garden, this particular speaker's volume will be kept quite low and completely turned off at 11pm.

State any seasonal variations for playing recorded music.

For example (but not exclusively) where the activity will occur on additional days during the summer months.

Non-standard timings. Where the premises will be used for the playing of recorded music at different times from those listed above, list below.

For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.

Only on New Year's Eve would we wish for music to be played for later than the applied timings. This would also only include indoors, as we wouldn't want to affect neighbours.

Section 10 of 18

PROVISION OF PERFORMANCES OF DANCE

See guidance on regulated entertainment

Will the schedule to provide performances of dance be subject to change if this application to vary is successful?

☐ Yes ☒ No

Section 11 of 18

Continued from previous page...

PROVISION OF ANYTHING OF A SIMILAR DESCRIPTION TO LIVE MUSIC, RECORDED MUSIC OR PERFORMANCES OF DANCE

See guidance on regulated entertainment

Will the schedule to provide anything similar to live music, recorded music or performances of dance be subject to change if this application to vary is successful?

☐ Yes

☒ No

Section 12 of 18

PROVISION OF LATE NIGHT REFRESHMENT

Will the schedule to provide late night refreshment be subject to change if this application to vary is successful?

☐ Yes

☒ No

Section 13 of 18

SUPPLY OF ALCOHOL

Will the schedule to supply alcohol be subject to change if this application to vary is successful?

☒ Yes

☐ No

Standard Days And Timings

MONDAY

Start

End

Start

End

Provide timings in 24 hour clock (e.g., 16:00) and only give details for the days of the week when you intend the premises to be used for the activity.

TUESDAY

Start

End

Start

End

WEDNESDAY

Start

End

Start

End

THURSDAY

Start

End

Start

End

FRIDAY

Start

End

Start

End

Continued from previous page...

SATURDAY

Start

End

Start

End

SUNDAY

Start

End

Start

End

Will the sale of alcohol be for consumption?

☐ On the premises ☐ Off the premises ☒ Both

If the sale of alcohol is for consumption on the premises select on, if the sale of alcohol is for consumption away from the premises select off. If the sale of alcohol is for consumption on the premises and away from the premises select both.

State any seasonal variations.

For example (but not exclusively) where the activity will occur on additional days during the summer months.

Non-standard timings. Where the premises will be used for the supply of alcohol at different times from those listed above, list below.

For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.

Section 14 of 18

ADULT ENTERTAINMENT

Highlight any adult entertainment or services, activities, or other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children.

Provide information about anything intended to occur at the premises or ancillary to the use of the premises which may give rise to concern in respect of children, regardless of whether you intend children to have access to the premises, for example (but not exclusively) nudity or semi-nudity, films for restricted age groups etc gambling machines etc.

Section 15 of 18

HOURS PREMISES ARE OPEN TO THE PUBLIC

Standard Days And Timings

Continued from previous page...

MONDAY

Start

End

Start

End

Provide timings in 24 hour clock (e.g., 16:00) and only give details for the days of the week when you intend the premises to be used for the activity.

TUESDAY

Start

End

Start

End

WEDNESDAY

Start

End

Start

End

THURSDAY

Start

End

Start

End

FRIDAY

Start

End

Start

End

SATURDAY

Start

End

Start

End

SUNDAY

Start

End

Start

End

State any seasonal variations.

For example (but not exclusively) where the activity will occur on additional days during the summer months.

Non standard timings. Where you intend to use the premises to be open to the members and guests at different times from those listed above, list below.

For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.

Only New Years Eve where we'd apply for a temporary license

Continued from previous page...

Identify those conditions currently imposed on the licence which you believe could be removed as a consequence of the proposed variation you are seeking.

--

☒ I have enclosed the premises licence

☐ I have enclosed the relevant part of the premises licence

Reasons why I have failed to enclose the premises licence or relevant part of premises licence.

--

Section 16 of 18

LICENSING OBJECTIVES

Describe the steps you intend to take to promote the four licensing objectives:

a) General – all four licensing objectives (b,c,d,e)

List here steps you will take to promote all four licensing objectives together.

3 of our 4 staff have personal licenses and are trained in responsible serving of alcohol, the fourth member of staff is completing his personal license over the next 4 weeks.
We use NCASS (national catering association) as our compliance consultants, we are all trained in daily compliance and have completed extra qualifications on the NCASS website to improve on our training for managing a hospitality business, including fire safety, first aid, food hygiene levels and equipment safety.
CCTV is installed to protect our business, customers and staff.
We will and only offer table service to everyone but the customers sat at the bar, who are served directly by the bar tender.
3 members of staff on at all times during opening hours, 4 members of staff on busier evenings.
Currently capacity is maximum 8 people inside and 16 people outside, once covid-19 rules are lifted, we will limit our capacity to 18 inside and 20 outside, to make sure every one has sufficient space.
Bag hooks under bars and tables to keep belongings safe.
15 minute intervals between arrivals and exits of customers, 2 tables maximum, no big groups entering and exiting at the same time.
1.5 hour sittings currently available for customers to prevent excessive drinking, 2 hours maximum and guests have a dedicated server so we can stay in control and prevent excessive drinking.
Shutter at the front and iron door on the rear to prevent any break ins during closed hours.

b) The prevention of crime and disorder

We always have 3 members of staff on minimum, 4 on Friday and Saturday, so there's always a member of staff overlooking the entry, garden and bar operation. We currently offer 1.5 hours per sitting to promote responsible drinking, especially during a pandemic. We will refuse service to anyone who appears to be inebriated and prevent excessive drinking.
We have cctv covering the back door and front door, main bar area if anything occurs.
Bag hooks provided under bar seats and inside tables to prevent any theft. Staff member always present in bar, inside tables and gardens to protect our customers and staff.
One member of staff is on a 'Stirchley traders' Whatsapp group so neighbouring business' can keep each other informed of any problems on the street nearby.

c) Public safety

We don't play music loud and keep it under speaking level so it doesn't affect any neighbour's, our guests are asked to

Continued from previous page...

respect neighbour's privacy and keep noise down to a reasonable level, the garden closes at 10pm currently and 11pm at the latest in the future to give the neighbour's no bother later in the evening. Customers sittings are staggered so no one is leaving at the same time, causing mass noises when leaving the bar, the 10pm curfew doesn't help this situation but we still get our tables to pay and leave in 15 minute intervals to avert this.

Having 3 members of staff minimum at all times to cater to customer's needs, make sure everyone is behaving respectfully of neighbours, we only offer table service so customers aren't walking around (even before and after covid-19 rules)

Lights are dimmed in the evening so there's no light pollution to neighbouring residents, music is set at a reasonable level so no noise pollution outside our venue.

We use a waste company with wheelie bins to the rear of the garden so no customers are in contact with our waste disposal, it is collected once a week, prior to bar opening hours and returned to the rear of the building prior to bar opening hours.

We use one keg a week and don't move any kegs or gas cylinder during service around customers, these are safely stored out of customer reach.

d) The prevention of public nuisance

We don't play music loud and keep it under speaking level so it doesn't affect any neighbour's, our guests are asked to respect neighbour's privacy and keep noise down to a reasonable level, the garden closes at 10pm currently and 11pm at the latest in the future to give the neighbour's no bother later in the evening. Customers sittings are staggered so no one is leaving at the same time, causing mass noises when leaving the bar, the 10pm curfew doesn't help this situation but we still get our tables to pay and leave in 15 minute intervals to avert this.

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We use one keg a week and don't move any kegs or gas cylinder during service around customers, these are safely stored out of customer reach.

e) The protection of children from harm

We are strictly over 18's only and don't allow any one under that age to enter the building under any circumstance. As we are a drink business with only bar snacks on offer.

Section 17 of 18

NOTES ON REGULATED ENTERTAINMENT

Continued from previous page...

In terms of specific **regulated entertainments** please note that:

- Plays: no licence is required for performances between 08:00 and 23:00 on any day, provided that the audience does not exceed 500.
- Films: no licence is required for 'not-for-profit' film exhibition held in community premises between 08:00 and 23:00 on any day provided that the audience does not exceed 500 and the organiser (a) gets consent to the screening from a person who is responsible for the premises; and (b) ensures that each such screening abides by age classification ratings.
- Indoor sporting events: no licence is required for performances between 08:00 and 23:00 on any day, provided that the audience does not exceed 1000.
- Boxing or Wrestling Entertainment: no licence is required for a contest, exhibition or display of Greco-Roman wrestling, or freestyle wrestling between 08:00 and 23:00 on any day, provided that the audience does not exceed 1000. Combined fighting sports – defined as a contest, exhibition or display which combines boxing or wrestling with one or more martial arts – are licensable as a boxing or wrestling entertainment rather than an indoor sporting event.
- Live music: no licence permission is required for:
 - o a performance of unamplified live music between 08:00 and 23:00 on any day, on any premises.
 - o a performance of amplified live music between 08:00 and 23:00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
 - o a performance of amplified live music between 08:00 and 23:00 on any day, in a workplace that is not licensed to sell alcohol on those premises, provided that the audience does not exceed 500.
 - o a performance of amplified live music between 08:00 and 23:00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
 - o a performance of amplified live music between 08:00 and 23:00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school or (iii) the health care provider for the hospital.
- Recorded Music: no licence permission is required for:
 - o any playing of recorded music between 08:00 and 23:00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
 - o any playing of recorded music between 08:00 and 23:00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
 - o any playing of recorded music between 08:00 and 23:00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school proprietor or (iii) the health care provider for the hospital.

Continued from previous page...

- Dance: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 500. However, a performance which amounts to adult entertainment remains licensable.
- Cross activity exemptions: no licence is required between 08.00 and 23.00 on any day, with no limit on audience size for:
 - o any entertainment taking place on the premises of the local authority where the entertainment is provided by or on behalf of the local authority;
 - o any entertainment taking place on the hospital premises of the health care provider where the entertainment is provided by or on behalf of the health care provider;
 - o any entertainment taking place on the premises of the school where the entertainment is provided by or on behalf of the school proprietor; and
 - o any entertainment (excluding films and a boxing or wrestling entertainment) taking place at a travelling circus, provided that (a) it takes place within a moveable structure that accommodates the audience, and (b) that the travelling circus has not been located on the same site for more than 28 consecutive days.

Section 18 of 18

PAYMENT DETAILS

This fee must be paid to the authority. If you complete the application online, you must pay it by debit or credit card.

Premises Licence Fees are determined by the non domestic rateable value of the premises.

To find out a premises non domestic rateable value go to the Valuation Office Agency site at <https://www.tax.service.gov.uk/business-rates-find/search>

Band A - No RV to £4300 - £100.00

Band B - £4301 to £33000 - £190.00

Band C - £33001 to £87000 - £315.00

Band D - £87001 to £125000 - £450.00*

Band E - £125001 and over - £635.00*

*If the premises rateable value is in Bands D or E and the premises is primarily used for the consumption of alcohol on the premises then you are required to pay a higher fee

Band D - £87001 to £125000 - £900.00

Band E - £125001 and over - £1,905.00

There is an exemption from the payment of fees in relation to the provision of regulated entertainment at church halls, chapel halls or premises of a similar nature, village halls, parish or community halls, or other premises of a similar nature. The costs associated with these licences will be met by central Government. If, however, the licence also authorises the use of the premises for the supply of alcohol or the provision of late night refreshment, a fee will be required.

Schools and sixth form colleges are exempt from the fees associated with the authorisation of regulated entertainment where the entertainment is provided by and at the school or college and for the purposes of the school or college.

If you operate a large event you are subject to ADDITIONAL fees based upon the number in attendance at any one time

Capacity 5000-9999 - £1,000.00

Capacity 10000 -14999 - £2,000.00

Capacity 15000-19999 - £4,000.00

Capacity 20000-29999 - £8,000.00

Capacity 30000-39999 - £16,000.00

Capacity 40000-49999 - £24,000.00

Capacity 50000-59999 - £32,000.00

Capacity 60000-69999 - £40,000.00

Capacity 70000-79999 - £48,000.00

Capacity 80000-89999 - £56,000.00

Capacity 90000 and over - £64,000.00

* Fee amount (£)

100.00

DECLARATION

Continued from previous page...

I/WE UNDERSTAND THAT IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE
* STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.

☒ Ticking this box indicates you have read and understood the above declaration

This section should be completed by the applicant, unless you answered "Yes" to the question "Are you an agent acting on behalf of the applicant?"

* Full name
* Capacity
* Date / /
dd mm yyyy

[Add another signatory](#)

Once you're finished you need to do the following:

1. Save this form to your computer by clicking file/save as...
2. Go back to <https://www.gov.uk/apply-for-a-licence/premises-licence/birmingham/change-1> to upload this file and continue with your application.

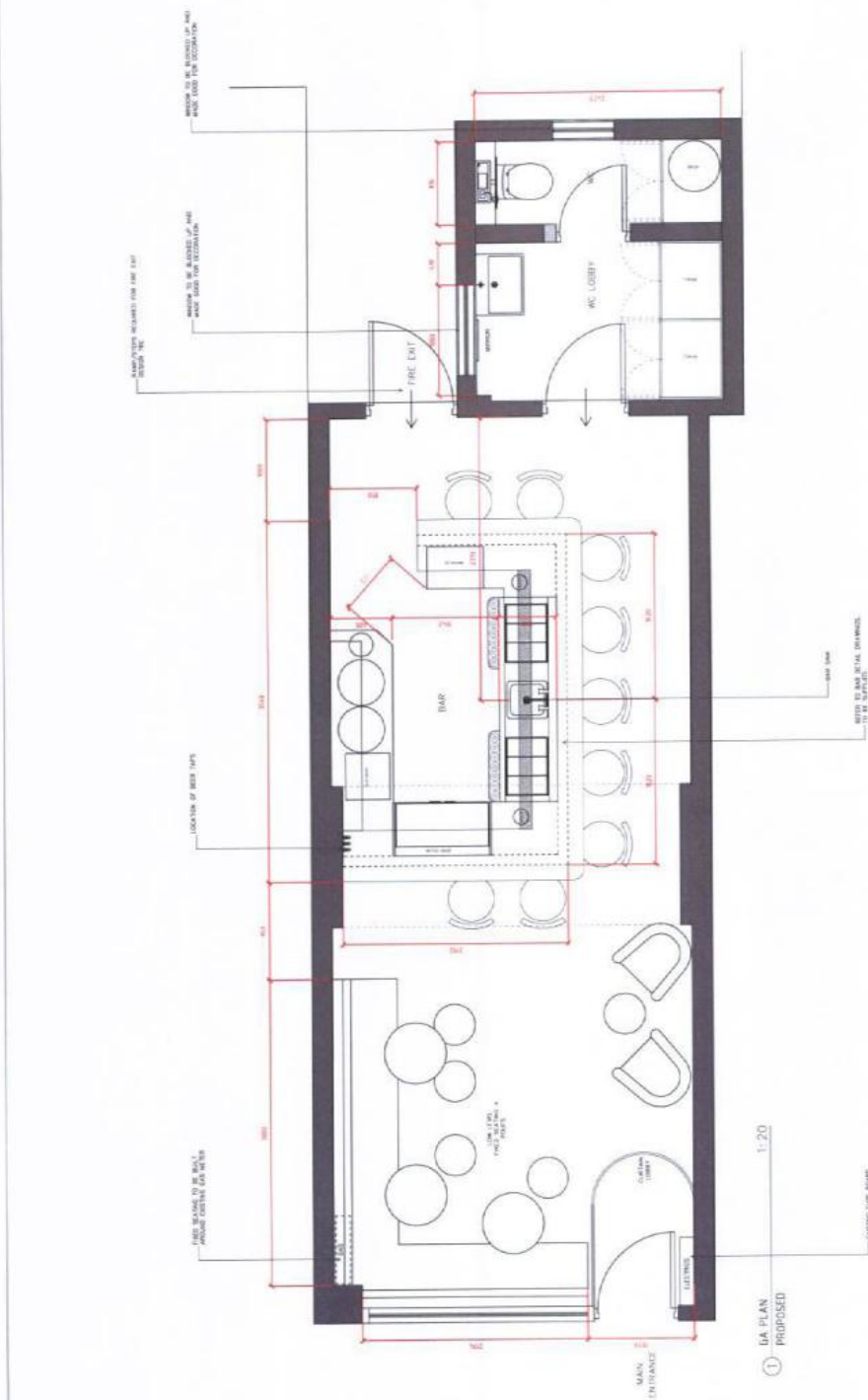
Don't forget to make sure you have all your supporting documentation to hand.

IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.

OFFICE USE ONLY

Applicant reference number
Fee paid
Payment provider reference
ELMS Payment Reference
Payment status
Payment authorisation code
Payment authorisation date
Date and time submitted
Approval deadline
Error message
Is Digitally signed ☐

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 Next >



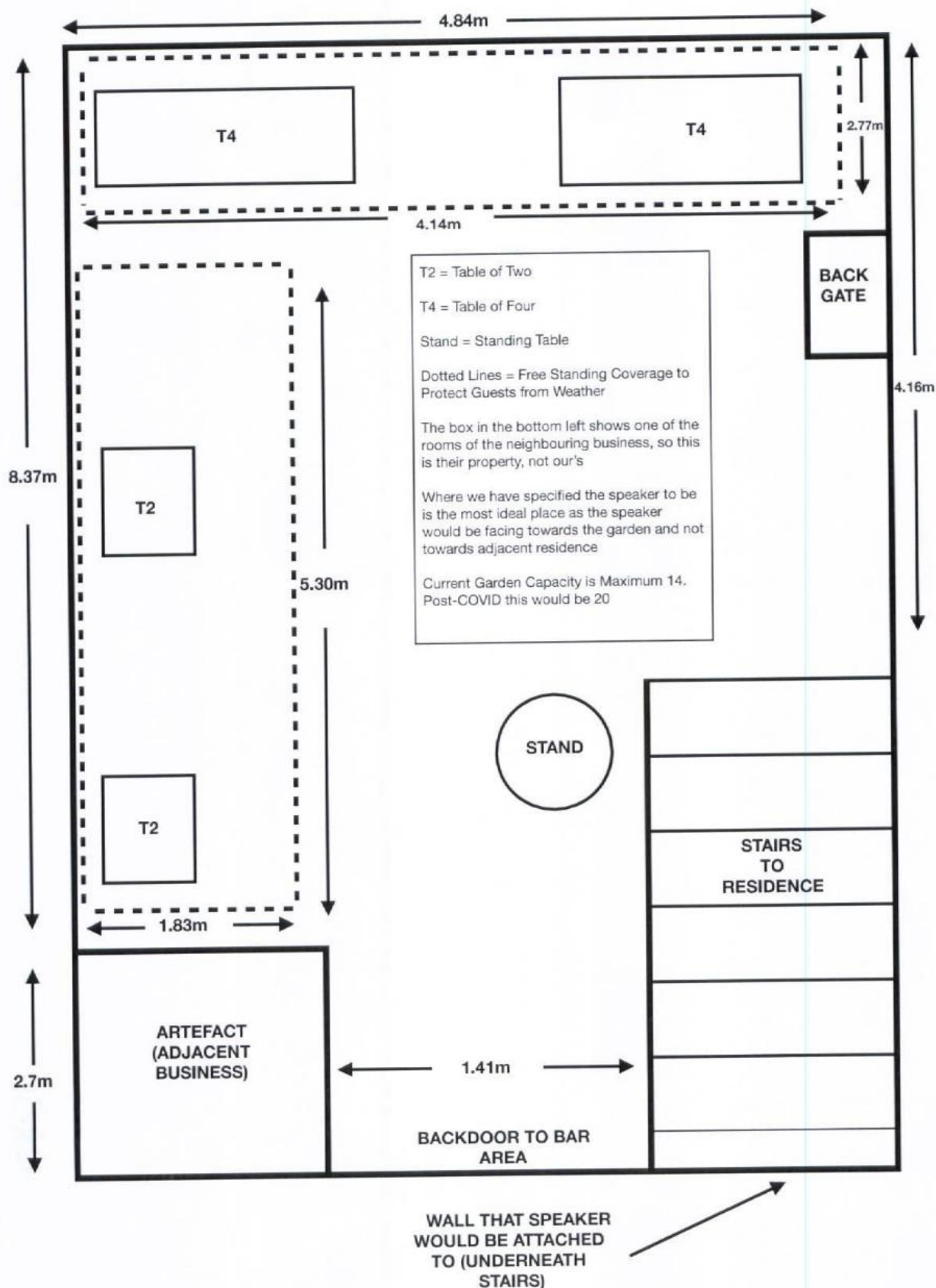
Design & Build

PROJECT: CASH, STICKLEY
 CLIENT: KATE ROUSE & JACOB CLARKE
 DRAWING TITLE: LA PLAN PROPOSED
 DRAWING NO: 1012
 DRAWN BY: JAR
 CHECKED BY: A
 DATE: 21.08.19
 STATUS: TENDER

NOTES

Rev Date Reason
 A 20.08.19 Changes to bar layout

at: 400/407 Green House, The Culford Factory, Digby Ave 400 407 537 info@jamesgreen.co.uk Document to be retained on site and not copied from this drawing.



LICENSING ACT 2003**PREMISES LICENCE**

Premises Licence Number:

4480 / 2

Part 1 - Premises details:

Postal address of premises, or if none, ordnance survey map reference or description	
Couch 1466 Pershore Road Stirchley	
Post town: Birmingham	Post Code: B30 2NT
Telephone Number:	

Where the licence is time limited the dates
N/A

Licensable activities authorised by the licence
M3 Sale of alcohol by retail (both on & off the premises)

The times the licence authorises the carrying out of licensable activities				
Monday-Friday	17:00	-	23:00	M3
Saturday	12:00	-	23:00	M3
Sunday	12:00	-	18:00	M3

The opening hours of the premises				
Monday-Friday	17:00	-	23:00	
Saturday	12:00	-	23:00	
Sunday	12:00	-	18:00	

Where the licence authorises supplies of alcohol whether these are on and/or off supplies
On and Off Supplies

Part 2

Name, (registered) address, telephone number and email (where relevant) of holder of premises licence Mr Sujan Singh Swani	
Post town:	Post Code:
Telephone Number: Not specified	
Email	

Registered number of holder for example company number or charity number (where applicable) N/A

Name, address, telephone number of designated premises supervisor where the premises licence authorises for the supply of alcohol Jacob Clarke	
Post town:	Post Code:
Telephone Number: Not Specified	

Personal licence number and issuing authority of personal licence held by designated premises supervisor where the premises licence authorises for the supply of alcohol	
Licence Number 9565	Issuing Authority BIRMINGHAM CITY COUNCIL

Dated 25/04/2019

Bhapinder Nandhra
Senior Licensing Officer
For Director of Regulation and Enforcement

Annex 1 – Mandatory Conditions

No supply of alcohol may be made under the premises licence (a) at a time when there is no designated premises supervisor in respect of the premises licence, or (b) at a time when the designated premises supervisor does not hold a personal licence or his personal licence is suspended.

Every retail sale or supply of alcohol made under this licence must be made or authorised by a person who holds a personal licence.

The responsible person must ensure that staff on relevant premises do not carry out, arrange or participate in any irresponsible promotions in relation to the premises. In this paragraph, an irresponsible promotion means any one or more of the following activities, or substantially similar activities, carried on for the purpose of encouraging the sale or supply of alcohol for consumption on the premises— (a) games or other activities which require or encourage, or are designed to require or encourage, individuals to— (i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or (ii) drink as much alcohol as possible (whether within a time limit or otherwise); (b) provision of unlimited or unspecified quantities of alcohol free or for a fixed or discounted fee to the public or to a group defined by a particular characteristic in a manner which carries a significant risk of undermining a licensing objective; (c) provision of free or discounted alcohol or any other thing as a prize to encourage or reward the purchase and consumption of alcohol over a period of 24 hours or less in a manner which carries a significant risk of undermining a licensing objective; (d) selling or supplying alcohol in association with promotional posters or flyers on, or in the vicinity of, the premises which can reasonably be considered to condone, encourage or glamorise anti-social behaviour or to refer to the effects of drunkenness in any favourable manner; (e) dispensing alcohol directly by one person into the mouth of another (other than where that other person is unable to drink without assistance by reason of disability).

The responsible person must ensure that free potable water is provided on request to customers where it is reasonably available.

The premises licence holder or club premises certificate holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol. The designated premises supervisor in relation to the premises licence must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy. The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either— (a) a holographic mark, or (b) an ultraviolet feature.

The responsible person must ensure that— (a) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed container) it is available to customers in the following measures— (i) beer or cider: ½ pint; (ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and (iii) still wine in a glass: 125 ml; (b) these measures are displayed in a menu, price list or other printed material which is available to customers on the premises; and (c) where a customer does not in relation to a sale of alcohol specify the quantity of alcohol to be sold, the customer is made aware that these measures are available.”

(1) A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price. (2) In this condition:— (a) “permitted price” is the price found by applying the formula $P = D + (D \times V)$, where— (i) P is the permitted price, (ii) D is the amount of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and (iii) V is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol; (b) “duty” is to be construed in accordance with the Alcoholic Liquor Duties Act 1979; (c) “relevant person” means, in relation to premises in respect of which there is in force a premises licence— (i) the holder of the premises licence, (ii) the designated premises supervisor (if any) in respect of such a licence, or (iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence; (d) “relevant person” means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and (e) “value added tax” means value added tax charged in accordance with the Value Added Tax Act 1994. (3) Where the permitted price would not be a whole number of pennies, the permitted price shall be taken to be the price rounded up to the nearest penny. (4) Where the permitted price on a day (“the first day”) would be different from the permitted price on the next day (“the second day”) as a result of a change to the rate of duty or value added tax, the permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day.

Annex 2 – Conditions consistent with operating schedule

2a) General conditions consistent with the operating schedule

No enforceable conditions identified from operating schedule.

2b) Conditions consistent with, and to promote the prevention of crime and disorder

The Designated Premises Supervisor or another qualified person will train any staff on the premises on the basic laws of selling alcohol and on compliance with the conditions on the premises licence.

CCTV to be installed at the premises to the specifications and locations of West Midlands Police (Licensing Department at Bourneville Police Station.) The system must be operational at all times when licensable activity is taking place. The system will have an image download capability and all recorded images must be kept for a minimum of 31 days. Full access to recordings will be given to any Responsible Authority immediately upon request.

The Premises Licence Holder will implement and operate a challenge 25 age verification policy to prevent the sale or supply of alcohol to persons under 18 years of age.

A copy of the written age verification policy must be signed by all members of staff to confirm they have read and understand the policy and the signed copy must be maintained at the premises and be available for inspection by any Responsible Authority on request.

A notice will be displayed at the premises and clearly visible to customers informing them that a Challenge 25 Policy is in operation at the premises.

The premises licence holder will maintain a refusals book (or refusal button on EPOS – (electronic point of sale) on the premises and ensure it is completed whenever a sale is refused to a person who cannot prove they are over the age of 18. The refusal book or record of till recorded refusals must be made available to any Responsible Authority on request.

An incident book will be kept on the premises to record all incidents that occur inside or immediately outside the premises, irrespective of whether any of the emergency services have been called. This book will be made available for inspection at any time by any Responsible Authority.

2c) Conditions consistent with, and to promote, public safety

No enforceable conditions identified from operating schedule.

2d) Conditions consistent with, and to promote the prevention of public nuisance

The Premises Licence Holder shall ensure that prominent clear and legible notices shall be displayed at the door requesting the customers to respect the needs of local residents and to leave the premises quickly and quietly.

2e) Conditions consistent with, and to promote the protection of children from harm

No enforceable conditions identified from operating schedule.

Annex 3 – Conditions attached after hearing by licensing authority

3a) General committee conditions

N/A

3b) Committee conditions to promote the prevention of crime and disorder

N/A

3c) Committee conditions to promote public safety

N/A

3d) Committee conditions to promote the prevention of public nuisance

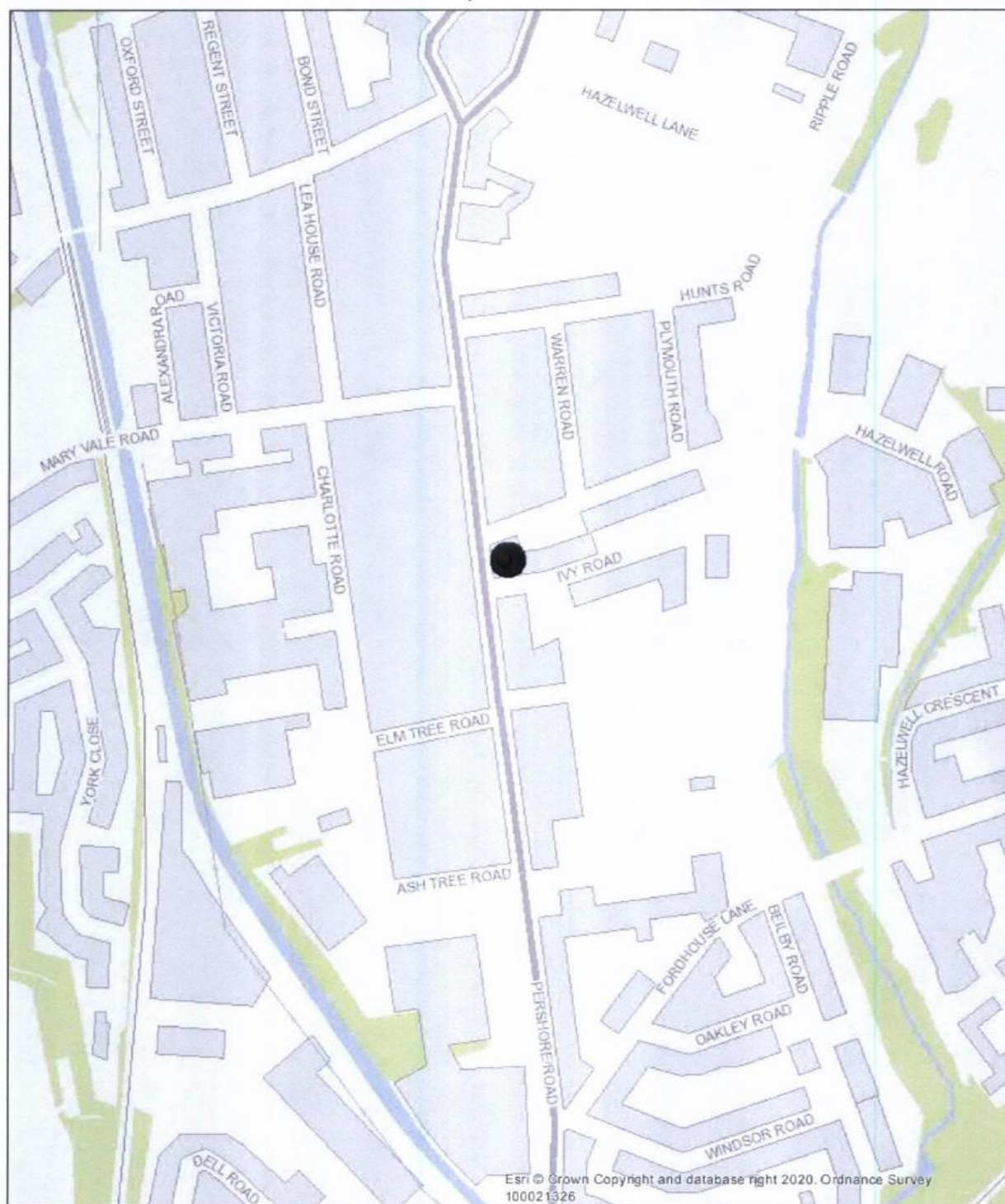
N/A

3e) Committee conditions to promote the protection of children from harm

N/A

Annex 4 – Plans

The plan of the premises with reference number **110541-4480/2** which is retained with the public register kept by Birmingham City Council and available free of charge for inspection by appointment only. Please call the Licensing Section on 0121 303 9896 to book an appointment.



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City Council

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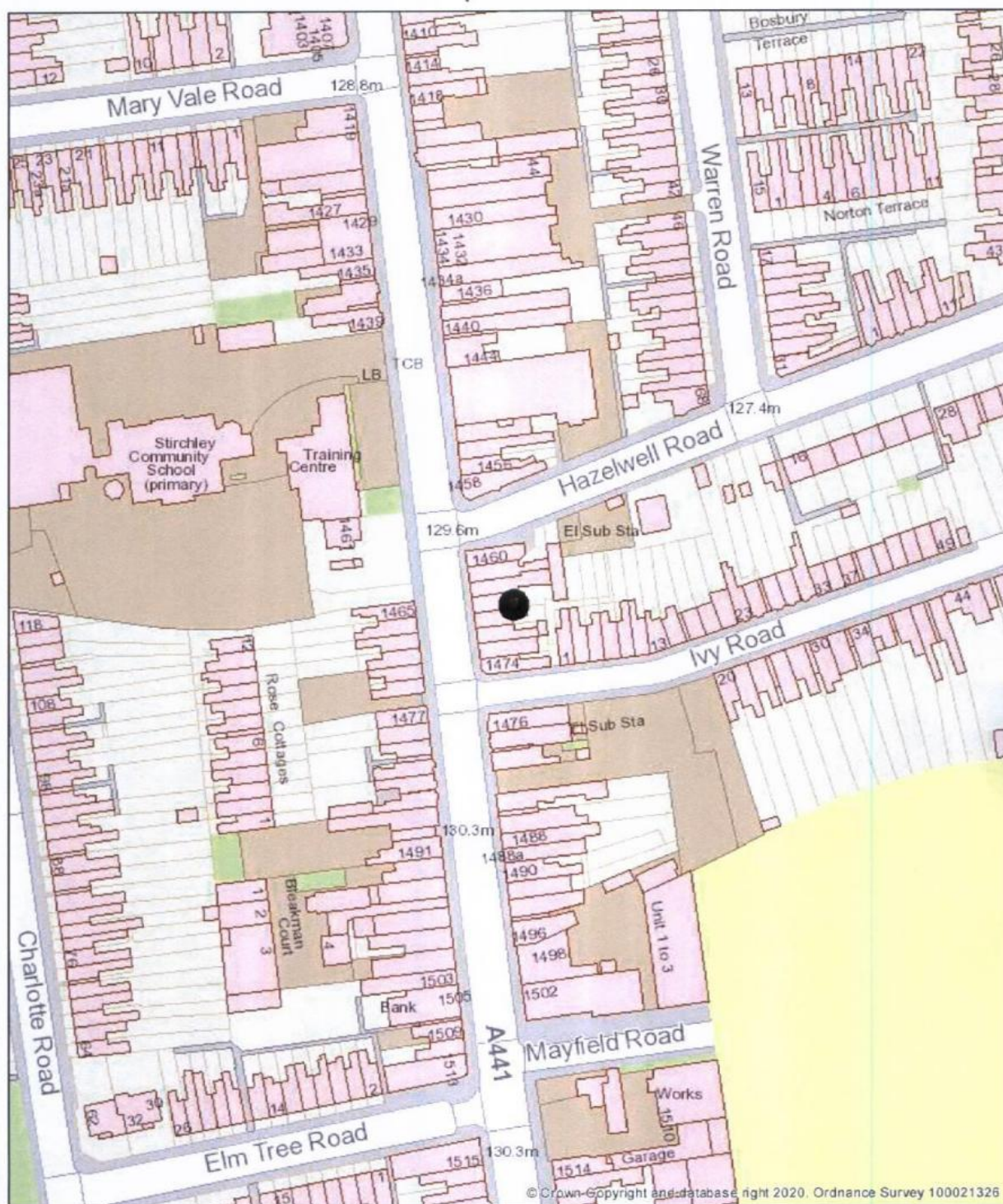
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