

# **BIRMINGHAM CITY COUNCIL**

## **LICENSING SUB-COMMITTEE C**

**WEDNESDAY, 27 MAY 2020 AT 10:00 HOURS**  
**IN AS ON-LINE MEETING, [VENUE ADDRESS]**

*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](http://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 - 8**

**4      MINUTES**

To confirm and sign the Minutes of the meeting held on 6 May 2020.

**9 - 40**

**5      GAMBLING ACT 2005 PREMISES LICENCE - GRANT MERKUR SLOTS, 220 HIGH STREET, ERDINGTON, BIRMINGHAM, B23 6SJ**

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

**6      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

<b>LICENSING SUB-COMMITTEE C 6 MAY 2020</b>
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## **MINUTES OF A MEETING OF THE LICENSING SUB-COMMITTEE C HELD ON WEDNESDAY 6 MAY 2020 AT 1500 HOURS AS AN ON-LINE MEETING.**

**PRESENT:** - Councillor Mike Leddy in the Chair;

Councillors Mary Locke and Nicky Brennan.

### **ALSO PRESENT**

David Kennedy – Licensing Section  
Bhapinder Nhandra – Licensing Section  
Joanne Swampillai – Legal Services  
Katy Townshend – Committee Services  
Phil Wright – Committee Services

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

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### **NOTICE OF RECORDING/WEBCAST**

- 1/060520 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](http://www.civico.net/birmingham)) and that members of the press/public would record and take photographs except where there are confidential or exempt items.

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2/060520 **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.

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### **APOLOGIES AND NOTIFICATION OF NOMINEE MEMBERS**

- 3/060520 Apologies were submitted on behalf of Councillors Neil Eustace and Martin Straker-Welds and Councillors Nicky Brennan and Mary Locke were the nominee Members respectively.

**THE BRICKLAYERS ARMS, 218 ICKNIELD PORT ROAD, BIRMINGHAM B16 0EA – LICENSING ACT 2003 AS AMENDED BY THE VIOLENT CRIME REDUCTION ACT 2006 – APPLICATION FOR EXPEDITED REVIEW OF PREMISES LICENCE: CONSIDERATION OF INTERIM STEPS.**

A certificate issued by West Midlands Police under Section 53A of the Licensing Act 2003, an application for Review of Licence, a copy of Premises Licence and Location maps were submitted:-

(See document No. 1)

**On Behalf of the Applicant**

PC Abdool Rohomon – West Midlands Police (WMP)  
Chris Jones – West Midlands Police (WMP)

**On behalf of the Premises Licence Holder**

Malcolm Ireland – Napthens of Blackburn Solicitors

The Chairman introduced the Members and officers present and prior to the commencement of proceedings the Chair asked if there were any preliminary points for the Sub-Committee to consider. No one indicated that they had any preliminary points.

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

Afterwards, the Chairman invited PC Rohomon to outline the Expedited Review application. At which stage PC Rohomon made the following points: -

- a) He would be highlighting what had happened and would also be referring to information that WMP had received previously in relation to the premises. PC Rohomon also stressed the importance of licensed premises following the Covid-19 guidelines and continuing to stay closed.
- b) On 2 May 2020 at 1500hrs WMP received a phone call via the 101 system. The caller indicated that The Bricklayers Arms were in fact open, despite the Covid-19 national lockdown, and that people were entering through a back gate in order to access the premises. Following the phone call, officers were despatched to the premises. Upon arrival, officers did discover a side gate, which was open. The officers went through the gate into the premises and found people inside. One person in particular had to be ushered out and was 'worse for wear' and not at all sober. Even more concerning, was when WMP were obtaining his details, he was a 64-year-old man. PC Rohomon concluded that it was an extremely worrying situation, given that the man was 64 years old, approaching the at-risk age category.

- c) When officers entered the premises they found the premises was 'fit and ready' and clearly open for licensable activity. They discovered the gaming machines and television to be on and working and could smell smoke from cigarettes. Further, the officers also discovered glassware and beer cans around the premises.
- d) There were several people inside the premises and WMP were in the process of getting statements from them.
- e) That it was not the first time the premises had come to the attention of WMP. WMP had received several calls previously, however they had not been able to gain entry to the premises when officers had been despatched. WMP received a 999 call on 30 March 2020, the caller was concerned that she had been asked to go to The Bricklayers Arms even though licensed premises should have been closed.
- f) PC Rohomon clarified that the nation was in the middle of a Pandemic as a result of the Covid-19 outbreak and the Government had imposed lockdown measures to protect people. He stated that the premises opening during this lockdown was simply putting lives at risk; people were losing their lives as a result of Covid-19.
- g) The man who was ushered out of the premises stated he was not a family member and had only gone there to have a few cans of lager. PC Rohomon confirmed that his explanation was not deemed essential travel and nor was it a legitimate excuse. The premises was putting not only themselves at risk but also the wider public.
- h) That public nuisance was deemed serious crime; however, this was an unusual case.
- i) WMP had visited several premises during the lockdown period, of which the majority were stripped of their alcohol and clearly not operational. In complete contrast, this premises was well stocked with spirits and people were coming and going through a back gate.
- j) That they had requested CCTV from the premises but were yet to receive it.

The Chairman invited the Members of the Sub Committee to ask any questions and PC Rohomon gave the following answers:-

- a) The initial record from officers at the premises indicated that there were 3 people inside the premises at the time of the inspection by WMP.
- b) That WMP had received at least two phone calls regarding the premises being open during lockdown. PC Rohomon confirmed he was trying to point out that the premises had been caught only once, however there were at least three other records of the premises being open.

At this stage the Chair invited Mr Malcolm Ireland, on behalf of the PLH to make his representation and as such, Mr Ireland made the following points: -

- a) That the PLH was not directly involved with the day to day running of the premises and they only had limited exchanges with the tenant.
- b) The PLH was a responsible operator and they did not make any objection to WMP taking action.
- c) They had not yet had chance to investigate the matter and did not have any objection to an interim suspension in order to give them time to find out what had been happening.

Following the representation from Mr Ireland, both parties were invited to make a closing submission.

In summing up PC Rohomon made the following points: -

- That due to the severity of the incident, WMP were requesting a suspension. PC Rohomon confirmed he had already spoken to Mr Ireland about the suspension.

In summing up Mr Ireland made the following points: -

- That he had communicated what he needed to.
- His client was a responsible operator and they needed time to investigate what had occurred.
- They would work with WMP in order to take appropriate action.

At this stage the meeting was adjourned in order for the Sub Committee to make a decision and all parties left the 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: -

4/060520

**RESOLVED:-**

That having considered the application made and certificate issued by West Midlands Police under Section 53A of the Licensing Act 2003 for an expedited review of the premises licence held by Admiral Taverns Limited in respect of The Bricklayers Arms, 218 Icknield Port Road, Birmingham B16 0EA, this Sub-Committee determines:

- that the licence be suspended pending a review of the licence, such a review to be held within 28 days of receiving the Chief Officer of Police's application

and

- that Jennifer Elizabeth Henry be removed as the Designated Premises Supervisor

Before the meeting began the Sub-Committee was aware of the *Health Protection (Coronavirus, Restrictions) (England) Regulations 2020* - in particular regulation 4 of these Regulations, requiring premises and businesses to close, and also Schedule 2, which confirms that the Regulations apply to pubs and bars. These Regulations have been in force since 26<sup>th</sup> March 2020.

Members heard the submissions of West Midlands Police, namely that on Saturday 2<sup>nd</sup> May 2020, the premises was discovered to be open and trading, in defiance of the national lockdown which had been imposed by HM Government during March 2020. Patrons were entering through the back door in order to buy and drink alcohol, play gaming machines, watch the television – all the usual activities which would have gone on in The Bricklayers Arms were it not for the national lockdown.

The Police explained that the premises' decision to open was an overt risk to the health of individuals, families and local communities, at a time when the country is experiencing a national emergency. The Covid 19 virus is a pandemic which has required all licensed premises to act responsibly and in accordance with the law, in order to save lives. It was therefore a flagrant public nuisance for any licensed premises to breach the lockdown to open to the public and conduct licensable activities.

The Sub-Committee determined that the causes of the serious crime appeared to originate from unsatisfactory internal management procedures at the premises. There was a suggestion from the Police that their records of 999 calls indicated that, in addition to the trading discovered on Saturday 2<sup>nd</sup> May, there may have been other instances of the premises being open and trading, with patrons simply using the back door to enter. In order to prevent further serious crime, the Police asked that the licence be suspended pending the full review of the licence.

The premises licence holder's legal representative then addressed the Sub-Committee. The Members found his submissions very helpful. The premises licence holder did not object to the suspension, took the allegations seriously and intended to take a responsible attitude by cooperating with Police.

Having heard the premises' submission, the Sub-Committee determined that it was both necessary and reasonable to impose the interim step of suspension to address the immediate problems with the premises, namely the likelihood of further serious crime.

The Sub-Committee considered whether it could impose other interim steps, including modification of licence conditions, or exclusion of the sale of alcohol or other licensable activities. Obviously, these were not appropriate in the context of the national lockdown.

However the Sub-Committee determined that the removal of the designated premises supervisor was a very important safety feature given that it was this individual who was responsible for the day to day running of the premises, ie the decision to defy the lockdown in order to trade as usual. Therefore the risks could

only be addressed by the suspension of the Licence but also removal of the DPS, pending the full Review hearing.

In reaching this decision, the Sub-Committee has given due consideration to the City Council's Statement of Licensing Policy, the Guidance issued by the Home Office in relation to expedited and summary licence reviews, and the submissions made by the Police and by the premises licence holder's representative at the hearing.

All parties are advised that the premises licence holder may make representations against the interim steps taken by the Licensing Authority. On receipt of such representations, the Licensing Authority must hold a hearing within 48 hours.

All parties are advised that there is no right of appeal to a Magistrates' Court against the Licensing Authority's decision at this stage.

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**Please note, the meeting ended at 1125.**

<b>Report to:</b>	<b>Licensing Sub Committee</b>
<b>Report of:</b>	<b>Interim Assistant Director of Regulation &amp; Enforcement</b>
<b>Date of Meeting:</b>	<b>Wednesday 27<sup>th</sup> May 2020</b>
<b>Subject:</b>	<b>Gambling Act 2005 Premises Licence - Grant</b>
<b>Premises</b>	<b>Merkur Slots, 220 High Street, Erdington, Birmingham, B23 6SJ</b>
<b>Ward affected:</b>	<b>Erdington</b>
<b>Contact Officer</b>	<b>Shaid Yasser, Senior Licensing Officer, <a href="mailto:licensing@birmingham.gov.uk">licensing@birmingham.gov.uk</a></b>

**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 8<sup>th</sup> April 2020 in respect of Merkur Slots, 220 High Street, Erdington, Birmingham, B23 6SJ.

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 8<sup>th</sup> April 2020 for Merkur Slots, 220 High Street, Erdington, Birmingham, B23 6SJ.

Representations have been received from Interested Parties and these are attached as Appendices 1 – 8.

Birmingham City Council Licensing Enforcement visited the premises and confirmed that they have no objections to the application. Their confirmation is attached at Appendix 9.

Comments have been received by the Planning Department and this is attached at Appendix 10.

The application is attached as Appendix 11.

The applicant has submitted supporting documents, which are attached as separate appendices to this report

Site Location Plan Appendix 12.

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 – 8  
Birmingham City Council Licensing Enforcement no objection confirmation, Appendix 9  
Comments made by Planning, Appendix 10  
Application Form, Appendix 11  
Site Location Plan, Appendix 12

## **7. Options available**

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

Question	Response
<i>Title:</i>	
<i>First name:</i>	
<i>Last name:</i>	
<i>Email address:</i>	
<i>Telephone number:</i>	
<i>House / flat number or name:</i>	
<i>Road:</i>	Harrison Road
<i>Area:</i>	
<i>Town / city:</i>	BIRMINGHAM
<i>Postcode:</i>	B24
<i>Ward:</i>	Erdington
<i>I prefer to be contacted by:</i>	Email
<i>Organisation name:</i>	Cashino Gaming Ltd/ Merkur Lots
<i>Complaint type:</i>	Gambling
<i>Incident category:</i>	Request For Information
<i>Trading name:</i>	Cashino Gaming Ltd
<i>Premises address:</i>	220 High Street, Erdington. B23 6SJ
<i>Date of incident:</i>	13/04/2020
<i>Time of incident:</i>	

**Question****Response**

Please note that a licensing application is currently under consideration for the above trading company and as a concerned resident on the nearby Harrison road, and as a neighbourhood watch co-ordinator I would like to make a representation against this application on behalf of and by the order of the residents of Harrison road. There are already over 6 gambling related venues within a 300 yard circumference and moreover a lot of these establishments encourage anti-social behaviour, and therefore another licensing venue will exacerbate the issue instead of resolving the problems.

I would urge the decision making body to look at the reported incidences of crime and anti-social behaviour in and around the gambling premises of this area. Surely approval of licenses have to take into account community impact?

*Incident details:* Erdington is already an underlying area of concern and poverty with an over representation of anti social behaviour, gambling and alcohol additions as well as petty crime. The increase in these premises serves only to drain the area of much needed revenue instead of increasing its potential.

Furthermore, I am curious why nearby Wylde Green and Sutton Coldfield have fewer gambling license approval rates even though they are either equivalent in size or cover a larger footfall. I would look forward to a FOI request on the number of gambling license refusals in Sutton Coldfield in comparison to Erdington.

Most importantly I would like it to be noted that there is already a betting shop across the road from this with slot machines, another one less than 30 yards from this shop and a further two at-least just over a hundred yards away. The one less than two hundred yards away is already an exclusive slot machine style gambling premises. Another one is therefore clearly not needed.

Question	Response
<i>Title:</i>	
<i>First name:</i>	
<i>Last name:</i>	
<i>House / flat number or name:</i>	
<i>Road:</i>	Harrison Road
<i>Area:</i>	Erdington
<i>Town / city:</i>	Birmingham
<i>Postcode:</i>	B24
<i>Ward:</i>	Erdington
<i>Email address:</i>	
<i>Telephone number:</i>	
<i>I prefer to be contacted by:- Tell us how we can Email contact you.:</i>	
<i>Organisation name:</i>	n/a
<i>What type of licence are you enquiring about?:</i>	Gambling
<i>Would you like an licence application form No sending to you?:</i>	
<i>Trading name:</i>	Merkur Slots
<i>Address for the premises:</i>	220 Erdington High Street Erdington Birmingham B23 6SJ
<i>Provide more details about your enquiry:</i>	

**Question****Response**

As a resident living in close proximity to Erdington High St, I am concerned that a licensing application has been made for yet another gambling establishment. There is already a high concentration of this type of establishment. Currently there are three casino/ amusement premises in close proximity of each other:

Admiral Casino Unit 3 B23 6RG

Shipleys Amusement 167 A High St B23 6SY

Shipleys Amusement 243 High St B23 6SS

Additionally there are five betting establishments, also in close proximity of one another

Ladbrooks 225-227 High St

Betfred 163-165 High St

Jennings Bet 210A

William Hill 17-21 Barnabas Road

William Hill 86-88 High St

It is a well understood fact that gambling establishments target areas of deprivation, this is clearly the case in Erdington, which is one of the poorest areas in Birmingham. These establishments exacerbate poverty and also create anti-social behaviour in this area, which in turn is causing crime and addiction rates to soar. Erdington is a prime example of an over concentration of this type of business on a deprived high street. It is a high street in much need of diversity rather than another gambling shop.

MA RETAIL BIRMINGHAM LTD.  
215 HIGH STREET  
ERDINGTON  
B23 6SS

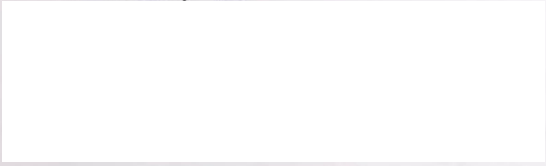
Proposed Bingo Arcade 220 High Street Erdington

We occupy premises in Erdington High Street.

It is well known that there are many people at risk in the area. This end of Erdington experiences problems caused by young men gathering in the area during the day and evening.

We presently experience anti-social behaviour from the customers of gambling premises in the vicinity and object to a further gambling establishment which will add to this problem causing a problem to children and others who spend time on the street in this part of Erdington

Yours faithfully



Dear Sirs

**Bingo Premises Application proposal at 220 High St Erdington**

Having a business in this area we are concerned about the application for another gambling arcade so close to a number of other gambling premise which already cause issues in the locality.

There has been a general decline at this end of the High Street in the last few years caused mainly by the number of gambling establishments including 2 amusement arcades and the 3 bookies - Ladbrokes, Betfred, Jennings.

This area has gone downhill and there are many deprived and vulnerable people in the area. Some gather on the street in the day and at night around the betting offices and arcades.

This would add to existing problems of anti-social behaviour in the area.

We ask Birmingham council to reject the application so the problems in the area do not make it worse for traders and to protect the many vulnerable folk who now live in this part of Erdington.

4/05/2020

Director: Printerwise  
210 High Street  
Erdington  
B23 6SJ



217 High St, Erdington, Birmingham B23 6SS

**New Bingo Premises suggested at 220 High Street Erdington**

We own and trade from 217 High Street Erdington almost opposite this site. Over the years I have noticed the general decline in this part of the centre and put that down partly to the number of gambling premises nearby including the Admiral and Shipleys arcades, Ladbrokes, Betfred and Jennings bookies.

This is now a deprived area where many vulnerable people have been housed who spend the day and evening gathering on the street around the gambling premises.

The proposal would add to these problems by making it more of a honeypot attracting these vulnerable people and the anti-social behaviour some get involved in. It should be refused to protect those people and to prevent more of the drinking and drug taking and other anti-social activity we now see which is caused by these existing gambling premises.

Licensing

Birmingham Council

1-3 Ashted Lock Way

BIRMINGHAM B7 4AZ

**From:**  
**Sent:** 04 May 2020 15:48  
**To:** Licensing  
**Subject:** Gambling Act 2005 – Application at 220 High Street Erdington B23 6SJ

## **RADAR PROPERTIES**

**PO Box 13484  
Lapworth  
Solihull  
B93 3BS**

Birmingham City Council Our Ref: RNJ/JW  
Licensing Section  
1-3 Ashted Lock Way  
BIRMINGHAM  
B7 4AZ 30<sup>th</sup> April 2020

Dear Sirs,

### **Gambling Act 2005 – Application at 220 High Street Erdington B23 6SJ**

Our company own the retail premises situate at 165/167a High Street Erdington occupied by GP Retail Limited – Greengrocers, and A Rasoni Hairdresser, situate opposite and close to the application site. We are an interested party in the term of the Gambling Act since the proposal will have a detrimental effect on our tenant's businesses, which in turn will affect our investment in these premises, since the proposed application will be harmful to the interests of our tenants (and other occupiers in the area) damaging business vitality and confidence. That vitality, confidence and retailer interest is already being undermined by the number of other gambling premises in this short section of the High Street including Jennings, Ladbrokes and Betfred betting offices and Shipleys and Admiral arcades.

Our company's objections are as follows:-

The effect on these premises will continue to cause large number of vacancies in the centre, particularly this part of it of the High Street.

It would fail to protect the vulnerable who are in this area in substantial numbers as is apparent from the number of charity shops nearby, including very large 'branches' of Shelter and the British Heart Foundation.

Erdington Constituency is the 3<sup>rd</sup> most deprived in the city. The extent of deprivation is acute. It is, with the adjacent Hodge Hill and Ladywood constituencies, the bottom three most deprived in the city. All three are among the 10% most deprived areas in the country.

The Birmingham City Council's recent survey of residents and shoppers records that 29.6% felt unsafe in the day time, rising to 85.1% at night time.

It would add to the decline of the centre identified by the council This decline has been associated by the council with an increase in anti-social behaviour including begging, gang activity, drug taking and street drinking taking place on the High Street. It reports that many residents have communicated that crime and anti-social behaviour in the town centre puts them off spending more time there. These are increasingly a feature of this part of Erdington as a result of the growth of the kinds of premises mentioned above and the displacement of regular shops.

In the terms of the guidance the proposal would fail to protect children and other vulnerable persons from being harmed or exploited by gambling.

We as Directors invite you to decline this application.

Yours faithfully

Our ref: IS/LA

Birmingham City Council  
Licensing Section  
1-3 Ashted Lock Way  
Birmingham  
B7 4AZ

Email:

4th May 2020

Dear Sirs

***Re: Gambling Act 2005 – Licence Application at 220 High Street Erdington B23 6SJ***

Johnson Fellows act as managing agents to Radar Properties Ltd, who are the owners of 165-167a High Street, Erdington. The occupiers include GP Retail Limited (Greengrocer) and Masoud Bahaddin Mohammed (Hairdresser).

We are an interested party in this application due to our Client's ownership. We believe that it will have a detrimental effect on their tenant's business, lead to the continued decline of the High Street and affect the investment value of their property.

We believe that the proposed application will be damaging to the local business vitality and confidence, which is being undermined by the number of other gambling premises in this short section of the High Street including Jennings, Ladbrokes, Betfred, Shipleys and Admiral.

The likely impact will be an increase in anti-social behaviour and the further displacement of traditional retailers.

On our client's behalf we invite you to decline this application.

Yours faithfully

***For and on behalf of Johnson Fellows***

April 27, 2020

My address is as overleaf.

Dear Sir/Madam,

I write to object to the application by Casino Gaming Ltd, to take on the premises MEKUR SLOTS at 220 High Street, Erdington, B23 6ST (objections to be raised, per Notice by May 5.).

I live at 160 paces / mins from the site. There are precisely 120 business/retail sites (including Walk-In Centre) on Erdington High Street.

There will be a total of 10 betting office/slot machine sites on the High Street, if the application is granted.

That is over 8%. If banks are excluded, that rises to 9%.

Erdington is classed as a deprived area (6 lowest, economically in this Region). Other businesses are more urgently needed. To provide extra means for residents to gamble is not good. Sitter Coldfield, the next town over, & richer has a far lower betting shop concentration, not without reason.



**From:** Sharon Watts  
**Sent:** 15 April 2020 12:32  
**To:** Licensing  
**Cc:**  
**Subject:** Bingo Application Merkur Slots, 220 High Street, Erdington, B23 6SJ

Hello

I refer to the above application. I have been out to the premises and the notice is displayed. I cannot confirm if the plans are accurate due to having no access to the property. I have reviewed the local risk assessment and do not have any objection to the licence being granted.

Kind regards

Sharon Watts  
Licensing Enforcement Officer  
Birmingham City Council

**From:** Vajid Mahmood  
**Sent:** 12 May 2020 02:32  
**To:** Licensing  
**Subject:** RE: RE: Licensing Enquiry - 2020/001054/ENQ

Hello Arvinder,

Apologies for the delay in responding, this enquiry relates to site address 220 High Street, Erdington, Birmingham B23 6SL and the planning application seeks full planning permission for the change of use from a former Pawnbrokers shop (Sui Generis) use to an Adult Gaming Centre (AGC) (Sui Generis) use to allow Cashino Gaming LTD (trading as 'Merkur Slots') to occupy the unit. Please note that permission has not been granted as of yet as it is still being considered, the determination date for the application is 09/06/2020.

Kind Regards,

Vajid

**From:** Arvinder Layal **On Behalf Of** Licensing  
**Sent:** Thursday, May 07, 2020 3:00 PM  
**To:** Vajid Mahmood  
**Subject:** RE: RE: Licensing Enquiry - 2020/001054/ENQ

Afternoon Vajid

Thank you for your e-mail.

Would it be possible for you to give more details for the application this e-mail message relates to eg. An address or name of the premises.

Kind Regards

Arvinder Layal  
Licensing Officer

Licensing | Regulation & Enforcement Department  
Neighbourhoods Directorate  
Birmingham City Council

"Locally accountable and responsive fair regulation for all - achieving a safe, healthy, clean, green and fair trading city for residents, business and visitors"

**From:** Vajid Mahmood  
**Sent:** 07 May 2020 12:26  
**To:** Licensing Online  
**Subject:** RE: Licensing Enquiry - 2020/001054/ENQ

Hello Licensing,

Currently there is a planning application submitted for the change of use from pawnbrokers shop to an adult gaming centre under planning reference 2020/02817/PA and the decision is still pending.

However from looking through the existing planning history for this site there are no restriction on allowing the premises a license to operate as a Bingo premises given the primary shopping area location. I therefore have no objections to make for the proposed Bingo licensing enquiry.

Kind Regards,

**Vajid Mahmood**  
Senior Planning Officer  
East Team  
Birmingham City Council  
1 Lancaster Circus

## NOTICE OF APPLICATION FOR A PREMISES LICENCE UNDER THE GAMBLING ACT 2005

Notice is hereby given that: **Cashino Gaming Limited**

of the following address:

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

is applying for a **Bingo Premises Licence** under section 159 of the Gambling Act 2005.

The application relates to the following premises:

**Merkur Slots  
220 High Street  
Erdington  
B23 6SJ**

The application has been made to: **Birmingham City Council**

Information about the application is available from the licensing authority, including the arrangements for viewing the details of the application.

Any of the following persons may make representations in writing to the licensing authority about the application:

- A person who lives sufficiently close to the premises to be likely to be affected by the authorised activities
- A person who has business interests that might be affected by the authorised activities
- A person who represents someone in any of the above two categories.

Any representations must be made by the following date: **6 May 2020**

**It is an offence under section 342 of the Gambling Act 2005 if a person, without reasonable excuse, gives to a licensing authority for a purpose connected with that Act information which is false or misleading.**

**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 <input checked="" type="checkbox"/>	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 ☒ 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".]*

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**

*[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]*

15(b). If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence. **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: **No**

**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**

**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):

**220 High Street**

**Erdington**

Postcode: **B23 6SJ**

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 premises, high street location**

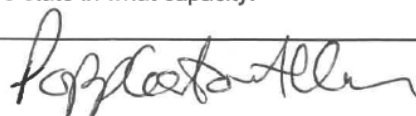
14(a) Are the premises situated in more than one licensing authority area? **No**

application may be rejected • We understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities	<input checked="checked" type="checkbox"/>
---	--

### 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: 6<sup>th</sup> April 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:

**Richard Bradley**

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:

**Richard Bradley**

**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:

### Part 5 – Miscellaneous

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

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:

Address:	Postcode:	Permission:	Licence Number:
73 Bull Street, Birmingham	B4 6AD	BINGO	319
13 Watford Road, Cotteridge	B30 1JB	BINGO	306/2
53 New Street, Birmingham	B2 4EG	BINGO	377/1
157 Weoley Castle Road, Weoley Castle	B29 5QH	BINGO	325/3
121 The Parade, Sutton Coldfield	B72 1PU	AGC	324/2
Unit 19, Fox & Goose Shopping Centre	B8 2EP	AGC	175/4

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 Plus and Bingo Express terminals.**

**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 our 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.**

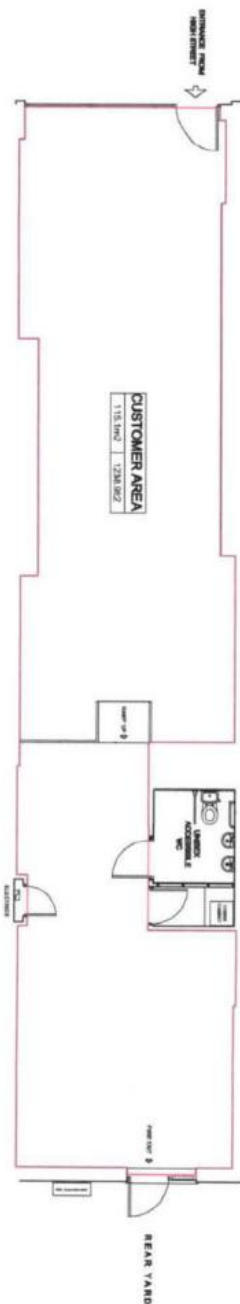
### Part 6 – Declarations and Checklist (Please tick)

We confirm that, to the best of our knowledge, the information contained in this application is true. 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. ☒

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

Checklist:

- Payment of the appropriate fee is enclosed ☒
- A plan of the premises is enclosed ☒
- We understand that if the above requirements are not complied with the ☒



Ground Floor Plan 1:50

# GAMBLING ACT 2005 LICENSING PLAN

Anything shown on this plan, which is not required by The Gambling Act 2005 (or the Licensing (Gambling Standards) Regulations 2007) is for illustrative purposes only, and does not form part of the premises licence

Area in which facilities will be provided for gaming



Location Plan 1:1250

Indicates the location of the premises in relation to the surrounding area.



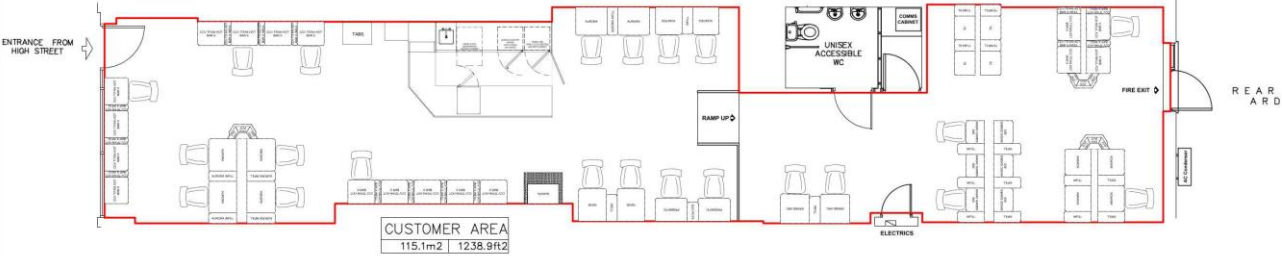
220 HIGH STREET  
ERDINGTON  
BIRMINGHAM  
B23 8SU

## LICENCE PLAN


Category	Area	Notes
Area	115.1m x 128.0m	1.000.000.000
Category	HS/ERD/02	1.000.000.000
Category	HS/ERD/02	1.000.000.000

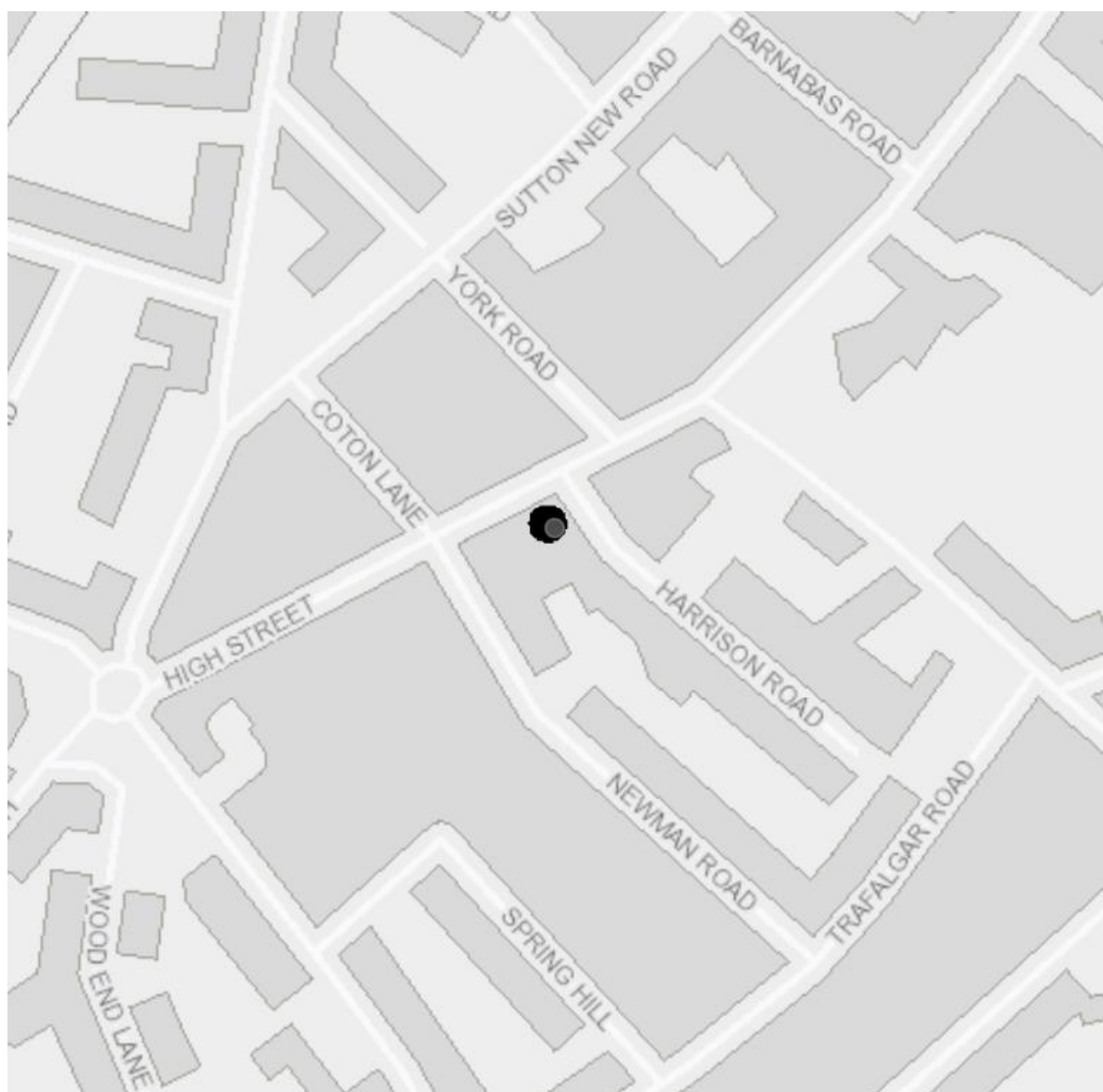
Licence Plan

FOR ILLUSTRATION  
PURPOSES ONLY



**Ground Floor Plan 1:50**

REVISIONS	FIT OUT TYPE Merkur Slots Erdington	REFERENCE DRAWINGS	
	PROJECT Merkur Slots 220 High Street Erdington Birmingham B23 6SJ	SCALE 1:50	 <b>MERKUR SLOTS</b> <small>COPYRIGHT IS RESERVED BY PRANSAPTE P.L.L. AND IS ISSUED ON THE CONDITION THAT IT IS NOT COPIED OR REPRODUCED BY ANY THIRD PARTY WITHOUT THE WRITTEN PERMISSION OF PRANSAPTE P.L.L. THIS DRAWING SHOULD NOT BE SCALED. THE CONTRACTOR SHOULD CHECK ALL DIMENSIONS ON SITE. ANY ERROR OR OMISSION SHOULD BE REPORTED TO PRANSAPTE P.L.L.</small>
	DESCRIPTION PROPOSED MACHINE PLAN	DRAWN BY	
		DATE 00/00/00	
		DRAWING No. ???-PR-05	REVISION









### 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 do not operate a single-manning policy between 8pm and 6am, 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.



- 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.



## LOCAL GAMBLING RISK ASSESSMENT

Premises Name:	Erdington				
Premises Address:	Merkur Slots, 220 High Street, Erdington, B23 6SJ				
Operator Premises Code:	913	Area Manager:	0	Area:	Area
Category of gambling premises licence:	Bingo	Staffguard System: Y/N	Yes	24 hours opening:	Yes
Premises Licence Number:	0				
Local Authority details:	Birmingham City Council				
Name of person completing assessment:	Gill Clulow	Position within Company:	Senior Auditor		
Date original Assessment completed:	24/01/2020				
Date of Assessment Review:					
Reason for Assessment Review:	New Premise Application				

### **REQUIREMENT TO COMPLY – social responsibility code provision 10.1.1 - with effect from 6<sup>th</sup> April 2016**

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

This risk assessment must be completed based upon the local risks to the licensing objectives posed **when applying for a new gambling premises licence and when applying for a variation of a premises licence.**

Licensees must review and update their local risk assessment when internal/external changes take place in each of their premises which may affect the mitigation of local risk, taking into account significant changes to local area circumstances, including those identified in a licensing authority's statement of licensing policy. Some authorities have included details of their local area profiles, which you can refer to for further information.

### **Ordinary code provision 10.1.2**

Licensees are required to 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.

### **LOCAL AREA PROFILE**

#### **Useful websites:**

<https://www.birmingham.gov.uk>  
<http://www.ukcrimestats.com>  
<http://www.gov.uk/government/collections/crime-statistics>  
<https://www.findmyschool.co.uk>  
<https://checkmypostcode.uk>  
<https://postcodearea.co.uk>  
<https://www.google.com/maps>  
<https://www.police.gov>

**Premises Design and Gambling Operation**

We have reviewed Birmingham Statement of Gambling principles Feb 2019 and reference relevant sections for Adult Gaming Centres, part 2 and section 5 Bingo.

The venue will be fitted with a HD CCTV system that is clearly advertised to customers with screens visible by employees when working in the service area. Floor layout will enable supervision of entrances and machines from the central service area. The premise and employees will be protected by a employee Guard security system and intruder alarms will be installed.

Premises Logs - Information pertaining to the Licence Conditions and Codes of Practice will be recorded electronically using the IHL SmartTablet with the data evaluated centrally via the back office.

The proposed venue will operate under a Bingo License, with a range of category B3, C and D machines and proprietary bingo equipment.

Premises frontage will be of a style which obscures the interior with appropriate advertising inline with Licence Conditions and Codes of Practice.

External windows will have digital marketing screens which will display safer gambling messages, Think 25, Bingo Played Here, opening times and promotional activity.

**Local Risk** The venue is in a high street location which is mainly retail in the suburb of Birmingham. Opposite the venue is Shipleys High Street Bingo and within a few minutes walk are another Shipleys and an Admiral AGC and a Betfred Bookmakers. there are 2 pawnbrokers on the street - H&T and cash Converters both within a 5 minute walk. Erdington is one of the most populas wards in Birmingham and is ranked in the middle for deprevation 36/69. Unemployment is 8.4% above the average of 9.3% in Birmingham. 69.3% of the population are White, 8.1% Black and 7.9% Asian (censue 2011). The railway station is 0.7miles away and there are multiple bus stops within 0.12 miles. 3 public houses are within a few minutes walk - The Swan in Wilton Market open 10am -11pm, Church Tavern 8am - 6pm and The Charlie Hall 8am - midnight. Homeless help centres are St Barnabas - opposite and Slade Road 1.35miles away. Foodbanks can be found 0.4 and 0.9 miles from the venue. The closest school is Stockland Green Seconadary 0.3 miles, other schools - primary and Secondary are all at least 1 miles from the venue.

**Local Crime Analysis (police.uk)**

We have reviewed the Police.UK hot-spot mapping for the area and we 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 local police over reducing our involvement in any incident. Crime in the area was 99.66/1000 which is lower than for similar areas at 128.17/1000. There are currently no publised policing priorities.

**Assessment of premises incident records (Past 12 Months)**

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

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

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

CV - Protecting children and other vulnerable people from being harmed or exploited by gambling.

LO	Local Risk Detail	Degree of Risk (Severity vs Likelihood)	Control Measures	Updated
CD	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.	Moderate	<b>Systems:</b> employees trained on the requirements to comply with the Money Laundering Regulations and the Company AML Policy. Customer Interaction used to identifying potential suspects, behaviour, spend patterns and the use of change machines.	Jan-20
			<b>Designs:</b> Open design with vision across the venue floor.	
			<b>Physical:</b> IHL Smart Tablet to record incidents with emails direct to the AMLO tablet. Shared security alerts and photos of suspects with operators nationally. CCTV systems available for additional monitoring of activity. MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.	
CD	Poor security control measures which may increase vulnerability to crime	Low	<b>Systems:</b> Security Alert system allows the sharing of information on criminal activity across all venues and relevant employees. Key management policy in place. Regular checks on Emergency exits and equipment. Extensive monitoring of employees and customer activity from Audit Department.	Jan-20
			<b>Designs:</b> Open design with vision across the venue floor	
			<b>Physical:</b> Staffguard security system. HD CCTV system installed with remote viewing available. Time lock safe installed. Monitored Intruder alarm system installed. Machine data monitoring in MARS.	
CD	To identify aggressive customers to prevent crime and disorder (will be dependent on customers who frequent premises)	Low	<b>Systems:</b> employee training on how to deal with aggressive customers and situations which may also require police assistance.	Jan-20
			<b>Designs:</b> Open design with vision across the venue floor.	
			<b>Physical:</b> Smart Incident app on the IHL Tablet used to record all incidents inc. crime reference number, supporting emails and back office report monitoring. Security Group email in operation inc. BACTA alerts.	
CD	Awareness of local crime issues in the local area	Low	<b>Systems:</b> Annual LARA review, policies and procedures for communication of change in local issues. Reference to <a href="http://www.police.uk">http://www.police.uk</a> , <a href="http://www.ukcrimestats.com">http://www.ukcrimestats.com</a> , <a href="http://www.gov.uk/government/collections/crime-statistics">http://www.gov.uk/government/collections/crime-statistics</a> .	Jan-20
			<b>Designs:</b>	
			<b>Physical:</b> Membership of local Town Radio schemes where available. Security group email alerts.	
CD	Failure to protect employee and customers from harm during the hours of late night opening	Low	<b>Systems:</b> Lone working and night working procedures in place. Use of locked Door policy. Full time Support Night Manager available throughout the night.	Jan-20
			<b>Designs:</b>	
			<b>Physical:</b> Night Time contact number, HD CCTV system, Staffguard Security System.	
FO	Failure to prevent customers complaints and disputes regarding gambling within our premises.	Low	<b>Systems:</b> Management and monitoring of reported faults via MARS. Machines maintained by trained persons. Machine standards audited on regular basis. Gaming rules prominently displayed at entrance to each venue. Employees have full understanding of machine gaming rules. Machine Standards Policy in place.	Jan-20
			<b>Designs:</b> Stakes, prize levels and % payouts are clearly displayed on all machines.	
			<b>Physical:</b> Gambling machines comply with technical standards and are acquired from licensed suppliers only.	

FO	Failure to resolve customers complaints and disputes regarding our gambling premises.	Low	<b>Systems:</b> Complaints management policy in place for written and telephoned complaints. Compliants portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Employees encouraged to use positive discretion to resolve customer issues in venue.	Jan-20
			<b>Designs:</b>	
			<b>Physical:</b> Code of Practice and Complaints and Disputes policy displayed at venue entrance. Complaints and Disputes policy leaflets available within the venue.	
CV	Ensuring Under 18's do not have access to licensed premises	Low	<b>Systems:</b> Proof of Age scheme in place with application forms available in the venue. 3rd party company - Check Policy employed for underage verification testing. Persons who are unable to provide proof of age are refused entry.	
			<b>Designs:</b> Think 25 policy and posters are displayed at entrance and within the premises, Think 25 badges form part of employee uniform. Entrance door signage and machines display 'No Under 18's'. Marketing and Promotions complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice.	
			<b>Physical:</b> Age verification app on the IHL tablet used to record all Age verification challenges. All entrances and venue floor are monitored by employees.	
CV	To identify signs associated with problem gambling and people who may be at risk of gambling related harm	Moderate	<b>Systems:</b> employees trained on customer interaction and how to identify and interact with players who exhibit signs of developing problem gambling, identifying players whose behaviour changes.	Jan-20
			<b>Designs:</b>	
			<b>Physical:</b> Playright App available in venues to assists players with managing their gambling. IHL tablet used to record all incidents of customer interaction with email alerts to Compliance Manager who has access to back office for additional monitoring.	
CV	Failure to provide information to customers on responsible gambling	Low	<b>Systems:</b> Employees are provided with the training to enable them to provide guidance on safer and responsible gambling.	Jan-20
			<b>Designs:</b> Stay in Control posters and leaflets promoted at venue entrance, within the venue and in washroom areas.	
			<b>Physical:</b> Socially Responsible messaging is implemented on B3 and digital Cat C machines. All machines display Gamble Responsibly stickers with helpline contact details.	
ALL	Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews	Low	<b>Systems:</b> Essentials of Compliance and Safe Guarding Vulnerable People Induction training and 6 monthly refresher training for all employees. This training includes administering the self exclusion process and interacting with players. Central monitoring of all exclusions, breeches, reinstated customers and customer interactions by Compliance Manager.	Jan-20
			<b>Designs:</b> Tablet availble for use of all employees.	
			<b>Physical:</b> Self exclusions logged on IHL Tablet Smart App. Information is shared across all operators. Members of Bingo Association Multi-operator Self Exclusion scheme.	
ALL	Training & Social Responsibility		<b>Systems:</b> Essentials of Compliance, Safeguarding and lone working trained on Inductions and refreshed 6 monthly for all employees. Compliance Manager attendance at Manager Meetings for refresher and update training. Review of all logs on IHL back office to identify and promptly target venues where changes are exhibiting.	Jan-20
			<b>Designs:</b> On-line training platform and two regional training centers.	
			<b>Physical:</b> Compliance and Social Responsibility Folder with all policies and procedures available to all employees. Venue Mangers review logs monthly. Area Managers Bi monthly and Compliance Audits twice yearly.	