

# **BIRMINGHAM CITY COUNCIL**

## **LICENSING SUB-COMMITTEE A**

**MONDAY, 13 JANUARY 2025 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 Chair to advise/meeting to note that this meeting will be webcast for live or subsequent broadcast via the Council's Public-I microsite ([please click this link](#)) 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 they must declare all relevant pecuniary and other registerable interests arising from any business to be discussed at this meeting.

If a disclosable pecuniary interest is declared a Member must not participate in any discussion or vote on the matter and must not remain in the room unless they have been granted a dispensation.

If other registerable interests are declared a Member may speak on the matter only if members of the public are allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless they have been granted a dispensation.

If it is a 'sensitive interest', Members do not have to disclose the nature of the interest, just that they have an interest.

Information on the Local Government Association's Model Councillor Code of Conduct is set out via <http://bit.ly/3WtGQnN>. This includes, at Appendix 1, an interests flowchart which provides a simple guide to declaring interests at meetings.

3 **APOLOGIES AND NOTIFICATION OF NOMINEE MEMBERS**

**3 - 240**

4 **GAMBLING ACT 2005 PREMISES LICENCE - GRANT SHIPLEY'S, 90 –  
92 ERDINGTON HIGH STREET, ERDINGTON, BIRMINGHAM, B23 6RS**

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

5 **OTHER URGENT BUSINESS**

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

## BIRMINGHAM CITY COUNCIL

## PUBLIC REPORT

<b>Report to:</b>	<b>Licensing Sub Committee A</b>
<b>Report of:</b>	<b>Director of Regulation &amp; Enforcement</b>
<b>Date of Meeting:</b>	<b>Monday 13<sup>th</sup> January 2025</b>
<b>Subject:</b>	<b>Gambling Act 2005 Premises Licence - Grant</b>
<b>Premises</b>	<b>Shipley's, 90 – 92 Erdington High Street, Erdington, Birmingham, B23 6RS</b>
<b>Ward affected:</b>	<b>Erdington</b>
<b>Contact Officer</b>	<b>David Kennedy, Principal Licensing Officer, <a href="mailto:licensing@birmingham.gov.uk">licensing@birmingham.gov.uk</a></b>

**1. Purpose of report:**

To consider the relevant representations that have made in respect of an application for a Bingo Premises.

**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> November 2024 in respect of Shipley's, 90 – 92 Erdington High Street, Erdington, Birmingham, B23 6RS.

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:**

Shipley Estates Limited submitted an application for a Bingo Premises Licence on 8<sup>th</sup> November 2024 for Shipley's, 90 – 92 Erdington High Street, Erdington, Birmingham, B23 6RS.

Representations have been received from Interested Parties, which are attached at Appendices 1 – 14.

The application, including the Local Risk Assessment, is attached as Appendix 15.

Site Location Plan Appendix 16.

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:**

Representations as detailed in Appendices 1 – 14  
Application Form and Local Risk Assessment, Appendix 15  
Site Location Plan, Appendix 16

## **7. Options available**

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



From: Councillor Robert Alden  
Sent: 05 December 2024 13:42  
To: Licensing  
Cc: Councillor Gareth Moore  
Subject: Licensing Objection - 90-92 High Street former Costa Coffee

Dear Licensing,

We have been made aware of a Gambling Application to move the existing Adult Gaming Centre at 243 High Street into the unit at 90-92 High Street. This unit is the former Costa Coffee unit.

The application is to transfer the license from the 243 premises and also to expand the use to also have a Bingo Premise Licence as well.

We are very concerned about this application and its impact locally and so oppose the application to convert the former Costa unit into a gambling unit, by relocating a store from further down the High St.

While this is not an increase in the number of units, across the whole High Street, this is replacing a smaller shop with a larger one and so will likely increase the amount of betting machines operating and importantly will also lead to a concentration of gambling shop units in the same location. There is already a betting shop next door and another 4 doors up, very close to this location and therefore the clustering of gambling units close to each other in the pedestrian part of the High Street could increase ASB and crime.

The Gambling Act 2005 has three clear objectives:

- keeping gambling crime free
- making sure that gambling is fair and open
- protecting children and vulnerable adults

Looking at this application and the recent history of Erdington with the Anti-Social behaviour and crime that has taken place nearby a range of gambling establishments the clustering of 3 nearby each other on the pedestrian area of the High Street nearby a range of family aimed shops and the markets will lead to significant risk of gambling associated crime in the location, and will lead to placing many more children nearby the establishment in its new location than go past its current location.

The pedestrian area is home to Erdington Library a mere 5 or 6 units away, which has a dedicated children's library and hosts a range of family activities. It is also the part of the High Street often older children hang around in to socialise after school. These would be exposed to this new unit if given permission, given the double frontage of the place it would be very difficult not to notice it.

This end of the High Street is also leads directly onto terraced roads which house large numbers of families who would regularly be exposed to the new unit if given permission.

The wider Erdington area is we understand home to a number of exempt accommodation units housing recovering gambling addicts and placing one such establishment in such a large and prominent location will increase the risk that those residents could slip back into addiction.

Shops report there is significant levels of shop lifting locally and the application does not give any details about how the applicant would prevent the proceeds of the sale of those goods then being gambled on the premises.

Due to the above and this increase in size of the unit, clustering impact on this part of the High Street and the loss of one of the larger retail units left in Erdington High Street, we urge the Council to reject the application.

Yours sincerely

Cllrs Robert Alden (resident nearby on Orchard Road) and Gareth Moore Erdington's Ward Councillors

Cllr Robert Alden

Erdington Ward

From:  
Sent: 26 November 2024 15:37  
To: Licensing  
Subject: Gambling application 90-92 Erdington High Street

94, Orchard Road Erdington B24 9JD

Dear Sir or Madam,

I strongly object to the application for a gambling arcade at 90/92 Erdington High Street. There is already a betting shop next door and another one only four doors up. I feel that a cluster of gambling units so close to one another on a pedestrian part of the High Street could certainly increase ASB and crime, indeed BBC Midlands Today did an article on Erdington High Street last evening where the shoplifting and drug taking was discussed.

I am also concerned that this premises is also very close to Erdington Library, which is well used by young people and adults alike and any more ASB in the area would not be fair on children and the vulnerable particularly. This as you obviously know is one of the objectives in the Gambling Act.

The Gambling Act itself has clear objectives and one of these is keeping gambling crime free, I do not think that this would be the case in this part of Erdington, which at the moment is fairly pleasant to be in, unlike the other end of the High Street.

Yours sincerely,

**From:**

**Sent:** 26 November 2024 20:28

**To:** Licensing

**Subject:** Appeal against Shirley's opening a larger gambling site on Erdington High Street

I am writing to strongly oppose the request by Shipley's to open a larger gambling property in whst was previously Costa Coffee.

As a home owner on Edwards Road I find it more and more terrifying to enter the high street and this would be bringing the trouble even closer.

Shipleys are guaranteed massive profits but at the expense of families that want to live safely in their own community. I'm sure the owners would not be happy to live in Erdington.

This has to stop.

**From:**

**Sent:** 27 November 2024 08:57

**To:** Licensing

**Subject:** Gambling Application: 90-92 High Street, Erdington

I am writing to formally object to the gambling application for converting the former coffee shop located at 90-92 Erdington High Street into a gambling arcade.

The High Street already has a significant number of gambling and betting establishments, which has contributed to noticeable anti-social behaviour issues in the area. The introduction of another gambling arcade would exacerbate these problems, further deteriorating the quality of life for local residents and negatively impacting the community.

Key points of concern include:

1. **\*\*Increase in Anti-Social Behaviour\*\***: The presence of multiple gambling establishments has already led to a rise in anti-social activities, including loitering and public disturbances. Adding another such venue would likely intensify these issues.
2. **\*\*Community Well-being\*\***: The High Street should offer a diverse range of businesses that cater to the needs and well-being of all residents. A gambling arcade does not align with the community's needs and could potentially harm vulnerable individuals.
3. **\*\*Economic Impact\*\***: The current economic climate requires supporting businesses that bring positive contributions to the community. Converting a coffee shop, which serves as a social hub, into a gambling arcade could result in decreased foot traffic and a negative impact on other local businesses.
4. **\*\*Public Opinion\*\***: There is a significant concern among residents regarding the proliferation of gambling venues. This sentiment should be considered in the planning process, prioritising the wishes and welfare of the local community. For the reasons outlined above, I urge the council to reject this planning application and consider the long-term impact on the community's safety and well-being.

If you need anything else from me, or further details please let me know.

Thank you.

Concerned resident of Erdington

**From:**

**Sent:** 27 November 2024 10:44

**To:** Licensing

**Subject:** Gambling application: 243 High Street, Erdington to 90-92 High Street Erdington

We are concerned and object to the application for this gambling application, currently at 243 High Street, Erdington to 90-92 High Street, Erdington (formerly Costa Coffee).

We need more retail businesses not gambling shops. The Co-op is to close soon which will be another blow to the shopping area. We do not want establishments that bring increases in crime and Anti-Social behaviour.

Orchard Road, Erdington, Birmingham, B24

**From:**  
**Sent:** 27 November 2024 15:01  
**To:** Licensing  
**Subject:** 90-92 high street

To whom it concerns

I wish to add comment on the application for a gambling arcade to move to 90-92 high street , Erdington.

I am resident of the area.

There are already too many gambling and betting shops in that part of the high street. I frequently witness antisocial behaviour on that part of the High Street already and adding a gambling arcade will just add risk to that increasing.

It is not appropriate and puts vulnerable adults at risk by increasing the options and temptations available in one area. There is already a betting shop right next door.

Erdington high street is loosing shops and cafes and we need more premises like these to increase footfall in the area and make it a more welcoming place, moving a gambling arcade is not the answer.

Many thanks for consideration of my comments.

Edwards Road Resident

**From:**

**Sent:** 30 November 2024 20:09

**To:** Licensing

**Subject:** Shipleys Bingo License application for 90-92 High Street, Erdington

To whom it may concern,

My family and I live in the neighborhood, a short walk away from 90-92 High Street, and we are against having another gambling provider particularly as it's so close to several others.

Having another gambling provider makes the High Street less family friendly, encourages crime and antisocial behaviour.

There are already many issues with antisocial behaviour near to where these gambling providers are located. My children and I do not feel safe walking past these gambling shops as do many other families that I know who live in the area.

Gambling is not a positive thing and our high streets should be at the heart of everything that we do to create positive changes for our children and our community. Our local schools work hard to safeguard children and young people and having gambling establishments in a family area just exacerbates the situation.

Gambling should not be encouraged, and I do hope the application is refused.

Yours faithfully



From:  
Sent: 02 December 2024 23:00  
To: Licensing  
Subject: Objection to Licence Application (Shipley's Erdington)

Dear Sir or Madam,

I am writing to raise my objection to the granting of a licence of a Bingo Premises License at 90-92 High Street, Erdington which has been filed by Shipley Estates Limited.

Over the last few years, Erdington High Street has sadly developed a reputation for drug dealing and anti-social behaviour (in part due to the unmanaged proliferation of HMO's in the area). I fear that the placement of a large gambling premises as proposed will undermine the work of local councillors, residents associations and the police to make Erdington High Street (and the surrounding area) a safer, more welcoming and crime free environment.

There is already a betting shop next door to the site linked to this application and another just a few doors up from the proposed site and while it is appreciated that the existing Shipleys site would close if the application was approved, this would nonetheless lead to a clustering of gambling premises in very close proximity to each other and potentially fuel an increase the level of anti-social behaviour and crime.

There is also a distinct possibility that granting licence for this premises could result in existing ASB issues which are currently occurring toward the opposite end of the High Street (by Six Ways Island and near where the current Shipley's is located) simply moving up the road to what is the more family friendly pedestrianised end of the High Street (there is currently a board and card game shop, a video game retailer, a school uniform retailer, Wilton Market, a cafe and other retail units that regularly attract parents and children while out shopping).

Home Office data has highlighted Erdington as being one of the worst areas in the city for antisocial behaviour and this application will NOT do anything to alleviate this or help contribute positively to the profile of the area and make Erdington High Street a more family friendly and inviting place to visit. As such I ask that you refuse to grant the licence that has been applied for.

Kind regards

**From:**  
**Sent:** 04 December 2024 14:28  
**To:** Licensing  
**Subject:** Gambling arcade application

**RE. GAMBLING APPLICATION FOR GAMBLING ARCADE**  
**To move to 90-92 High Street, Erdington (former Costa unit)**

I am very concerned about this application, and urge you to reject it.

I believe that the proposed location is wholly inappropriate. It will create a cluster of betting and gambling establishments within a short distance of each other. This is very worrying and has the potential to change the character of this section of the high street, to its detriment. Currently, the proposed unit is by a pleasant, pedestrianised area of the high street, near to local cafes. The area is well used as a meeting place, and for social, family friendly gatherings (such as the Christmas lights switch on).

I am very worried that a large gambling arcade here will be attractive to young people, encouraging them to partake in gambling. It could also become an after-school meeting point, leading to potential issues. It could be a magnet for anti-social behaviour, making young people and local residents very vulnerable.

An increase in access to gambling can also create social issues. Gambling can be highly addictive, and can lead to issues around debt as well as having a negative impact on mental health. Many businesses, community groups and local residents in Erdington are keen to promote social cohesion, and increase opportunities to engage in positive activities. The creation of more, and larger, gambling establishments does the opposite of this. Places such as this only serve to perpetuate a negative image of Erdington, and exacerbate some of the issues we currently encounter on the high street, such as shoplifting, drug dealing and alcohol consumption.

I object to this application in the strongest terms, and again urge you to not allow it to go ahead.

Thank you.

York Road  
Erdington  
Birmingham B23

**From:**  
**Sent:** 04 December 2024 19:54  
**To:** Licensing  
**Subject:** Re: 90-92 High Street, Erdington

Dear Sir/Madam,

I am writing to object to the application to move the Adult Gaming Centre from 243 to 90-92 High Street Erdington.

The re-purposing of the former Costa unit will further reduce the retail stock within the High Street. This is an increasing concern with several businesses (e.g. Boots, Walter Smith and the Co-op) closing their Erdington shops in the last two years.

It will also significantly expand Shipley's presence on the High Street. They currently have two single fronted premises, Nos. 90-92 being the smaller of the two. The former Costa unit is double fronted and will therefore increase the number of terminals etc which they can install and thus their footfall. At the same time, their parallel request for a Bingo Premises Licence seems to be a means to allow under 18s onto these premises as long as they only use gaming (i.e. slot) machines. The Gambling Act 2005 has the objective to protect children and vulnerable adults. This seems directly to conflict with Shipley's request. Moreover there are already many vulnerable adults in the Erdington area. Money is very tight. Begging is commonplace on the High Street. How can this expansion improve the situation? There are eight gaming or gambling outlets on the High Street all told. Indeed, there are two bookmakers (Boyle Sports and William Hill) very close to 90-92, the latter being next door. This new cluster of outlets will clearly draw more people down to the pedestrianised end of the street.

Erdington High Street already has a very bad reputation (as reported throughout November by both local and national press) for anti-social behaviour and criminality. This application will only add to this if approved. The 2005 Act also has the objective to keep gambling crime free. Shipley's application will likely have the opposite effect. It must be rejected.

Yours faithfully,

P.S. My address is        Orchard Road Erdington B24        . This is within easy walking distance of the end of the High Street directly affected by this application.

From:  
Sent: 05 December 2024 17:09  
To: Licensing  
Subject: 90-92 High St Erdington

We have just become aware of the application to transfer the gambling licence from 243 High St to the above.

We wish to object to this as this part of the High St is becoming a gambling centre with two bookmakers in the immediate vicinity and a total of 7 such operations on the High St. If any change is needed it is surely to reduce the number of such licences.

This would replace a cafe with yet another gambling establishment, ruining what remains of the community retail facilities. Such businesses are accompanied by anti social behaviour.

Does nobody care what is happening to Erdington High St which is becoming lost to betting and gaming operations and all the social degeneration that accompanies it?

Orphanage Rd  
Erdington

**From:**  
**Sent:** 05 December 2024 17:38  
**To:** Licensing  
**Subject:** Objection to Shipley's Gaming Erdington

Hello,

I wanted to raise my objection to Shipley's Gaming relocation.

The area is already filled with addicts and the most vulnerable.

I have sat with very fragile people in Erdington who have been betting in Erdington and had to escape for safety and their lives have been turned upside down.

Young, vulnerable women and young men need support not further chances to ruin their lives.

Kind Regards

**From:**  
**Sent:** 05 December 2024 18:52  
**To:** Licensing  
**Subject:** Shipley Gaming.

Dear Sir/Madam

I am writing to protest in strongest terms the proposal from Shipley Gaming to relocate to the old Costa Coffee on Erdington High Street.

This application will see the increase of anti social behaviour which already blights the area. It will also see the introduction of more unlimited gaming machines due to bigger property. Erdington is an area of high unemployment and poverty and this would encourage more money lost by people who can ill afford to loose it

Yours

**From:**

**Sent:** 05 December 2024 21:55

**To:** Licensing

**Subject:** Oppose - gambling move application Erdington High Street

Dear council,

I am very disappointed to hear that a gambling application is in consideration for the former Costa Coffee site at Erdington High Street. I am a local resident and I believe this will increase crime and ASB behaviour in the area.

Recent development near to the proposed application is retirement homes. I am certain the elderly and vulnerable adults therefore in the long run will have increased fear due to increased gambling of the multiple other gambling shops in very close proximity.

With all of this, I am concerned it will impact the local businesses such the Wilton Market and the Acorns Charity shop, which I believe is one of the largest stores in the UK.

I always do my best to support the local businesses on the High Street by shopping there and my concern of gambling sites near each other will increase the crime and would make me think twice in venturing out to the High Street.

I feel very strongly against the move of the gambling site to the application site proposed and hope the council reject the proposal.

Kind regards

Local Erdington Resident.

**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 ☐      Large Casino ☐      Small Casino ☐  
 Bingo ☒      Adult Gaming Centre ☐      Family Entertainment Centre ☐  
 Betting (Track) ☐      Betting (Other) ☐

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".]*



**Section B**

**Application on behalf of an organisation**

6. Name of applicant business or organisation:

**Shipley Estates Limited**

7. The applicant's registered or principal address:

**National House  
Etchell Road  
Tamworth  
Staffordshire  
B78 3HF**

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

**000796-N-103432**

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):

**Shipleys**

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

**90-92 High Street  
Erdington  
Birmingham  
B23 6RS**

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.

N/A

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.

	<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):

Upon successful grant of this application, and once the premises are ready to commence trading, the Current Adult Gaming Centre Premises Licence (Licence Number 340/1) held at the existing site will be surrendered.

We will provide written confirmation of this to this licensing authority and until such a time, the existing Adult Gaming Centre Premises Licence held at Shipleys, 243 High Street, Erdington, Birmingham, B23 5SS (Licence Number: 340/1) is to remain in effect.

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:

#### Adult Gaming Centre Premises Licences

Golden Coin, 242 Hawthorn Road, Kingstanding, Birmingham, B44 8PP  
Shipleys, 243 High Street, Erdington, Birmingham, B23 5SS

#### Bingo Premises Licences

Shipleys, 167 High Street, Erdington, B23 5SS

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

Shipley Estates Limited have full authority to provide licensed gaming 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 applied 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.

The applicant has comprehensive measures to ensure that all gambling remains socially responsible, which includes detailed staff training on matters such as the protection of the vulnerable, including homeless individuals and young persons.

The applicant is an experienced licenced operator providing a estate of licenced gambling premises.

The purpose of this application is to facilitate the relocation of the gambling provisions currently offered at the following premises:

Shipleys, 243 High Street, Erdington, Birmingham, B23 5SS

Upon successful grant of this application, and once the premises are ready to commence trading, the Current Adult Gaming Centre Premises Licence (Licence Number 340/1) held at the existing site will be surrendered. At no point will the premises trade simultaneously and there will be no increase in the gambling provisions in Birmingham.

#### 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:

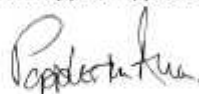
- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- We understand that if the above requirements are not complied with the application may be rejected
- We understand that it is now necessary to advertise the application and give the appropriate notice to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



#### 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: 7 November 2024

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:

Elizabeth Varley

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:

Poppleston Allen  
37 Stoney Street  
The Lace Market  
Nottingham  
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:





## Local Area Risk Assessment Report

**Premises**

Premises Name:	SHIPLEYS
Premises Address:	90-92 High Street, Erdington, Birmingham, B23 6RS
Premises Licence Number:	T.B.C

**Company**

Operating Company	Shipley Estates Limited
Directors	William Shipley / Harry Shipley

**Risk Assessor**

Name of Assessor:	Mark Wilson
Position in company:	Operations Manager
Date of assessment:	2 <sup>nd</sup> November 2024
Date for next review/assessment:	Annually

**Requirement**

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.

Effective as of 6<sup>th</sup> April 2016

**Social Responsibility code provision 10.1.1**

As a socially responsible operator, Shipley Estates has conducted this Local Area Risk Assessment Report in conjunction with legislative requirements that are effective as of 6<sup>th</sup> April 2016. The purpose of this Risk Assessment is to assess the local risks to the licensing objectives posed by the provision of gambling facilities at the proposed licensed premises named above. Policies, procedures, and control measures to mitigate any risks which may be imposed are considered, taking into account relevant matters identified in the licensing authority's statement of licensing policy.

This Local Area Risk Assessment Report will be reviewed (and updated as necessary) taking into account;

- Any significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
- When there are significant changes at a licensee's premises that may affect their mitigation of local risks;

When applying for a variation of a premises licence; and in any case, undertake a local risk assessment when applying for a new premises licence.

MW/LARA/MAR-24

1

## Local Area Risk Assessment Report

**Local Area Profile**

The proposed Bingo Licensed venue is to be located in the High Street of Erdington. There is a medium footfall in this catchment area of Erdington located within a primary zone of the main high street. The premises have good access for those with cars and plenty of parking facilitates the level of traffic (both vehicular and pedestrianised). The nearest transport link for trains is approximately a one mile walk and the public transport links (buses) do not enter this section of Erdington but are on the main adjacent road and there are no night clubs, schools or colleges in the immediate vicinity.

There is a wide range of retail outlets in the close vicinity including licensed betting offices with William Hill (next door to proposed premises) and Boyle Sports at the end of the street. There are many convenience stores, including Superdrug, Co-op supermarket and a small local market (Wilton Market) along with an array of fast-food outlets and cafés.

Medical facilities can be found via Northcroft Hospital located 1 mile by car (4 minutes) or by walking which would take approx. (17 minutes). A pharmacy can be found at 30-32 High Street Erdington which is approx. 4 minutes' walk from the proposed premises.

With regard to monitoring vulnerable people, there are several pawn brokers ('H&T pawn brokers', 'Direct Jewellers' and right opposite the proposed premises is 'Goodbar Jewellers', all of whom buy and sell gold/jewellery and that are trading in the immediate vicinity. Our current compliance and social Awareness training modules take into account players that are spending more regularly, spending excessive amounts and that play higher staked games. Any customers found to be using services offered by either pawn brokers and then found to be gambling would require the need to hold specific meetings with those customers in relation to their gambling to ensure no harm from gambling is present.

There are no schools within the direct local vicinity of the proposed premises nor in the town centre and the operator already has strict policy and procedures in place in other venues they operate to manage, and prevent, under-age gambling.

The premises are more or less of a square shape and occupies 2,000 square feet, with a forty feet prominent frontage, having one main door to gain entry. The entrance area will be designed with an integral vanity screen giving access one to a secondary glass security door upon entry. This will offer both privacy and additional security and act as an obstruction of line of sight to the main high street. No auxiliary activities or facilities are proposed to be offered other than Bingo and gambling machines of Category B3, C and D.

There are some local public houses in the local vicinity with the 'The Swan' on the opposing side of the road. There are no known local problems with crime or anti-social behaviour linked to gambling.

Our regulatory return data does not reflect any specific problems associated with consumer complaints, the need to call police for assistance or attempts by children and young persons to enter the premises

MW/LARA/MAR-24

2

This Local Area Risk Assessment will take into account three key areas:

Gambling Act 2005 – The Licensing Objectives

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

MW/LARA/MAR-24

3

(i) – Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

Risk Event	Risk Category	Level of Risk (L / M/ H)	Local Impact (L / M/ H)	Risk Management	Review Date
Risk gambling provision is a source of crime or disorder (relative to premises type)	Crime and/or disorder occurring undetected within licensed premises	Low	Low to business  Low to public frequenting premises	1. Employees receive Social Responsibility training at induction and receive regular refresher training (annually). 2. Training provided with regard to the identification of crime and disorder and appropriate recording processes and reporting lines. 3. Interaction training provided. 4. Social Responsibility and incident report forms available to all staff. 5. LIVE support via Staff Guard security services. 6. HD CCTV monitoring 24/7.	Nov 2024
	Failure to identify attempts to launder money on the premises (e.g., dye-stained notes) and to follow correct reporting procedure.	Low	Low to business  Low to public frequenting premises	1. Effective monitoring of customers' behaviour by good lines of sight from static staff. 2. Well positioned HD CCTV cameras. 3. See Anti Money Laundering Risk Assessment (AML RA).	Nov 2024
	Poor security increasing vulnerability to crime.	Low	Low to business  Low to public frequenting premises	1. Static Panic Alarms. 2. Intruder alarm installed and regularly serviced. 3. Effective HD CCTV coverage with data storage for 30 days. 4. Time lock banking safe installed. 5. Electronic safes provided for staff. 6. Staff Guard Panic Button Security Services available 24/7. 7. Electronically controlled glass foyer door to assist site security.	Nov 2024
	Awareness of heightened local crime in the local area.	Low	Low to business  Low to public frequenting premise	In-line with national urban levels. No heightened risk. <a href="https://www.police.uk">https://www.police.uk</a> <a href="https://ukcrimestats.com">https://ukcrimestats.com</a> <a href="https://www.gov.uk/government/collections/crime-statistics">https://www.gov.uk/government/collections/crime-statistics</a>	Nov 2024

MW/LARA/MAR-24

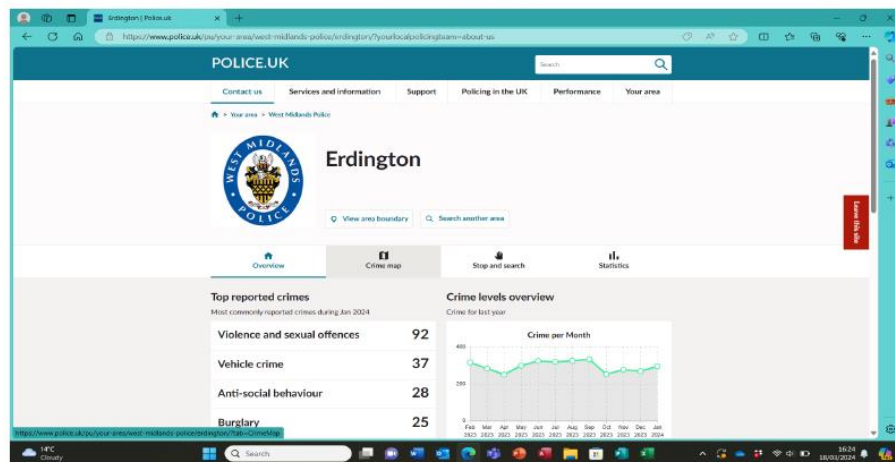
4



## (i) - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime (Cont.)

## LARA Report – Crime Statistics – Erdington

## Breakdown of Crime



MW/LARA/MAR-24

5

## (ii) - Ensuring that gambling is conducted in a fair and open way

Risk Event	Risk Category	Level of Risk (L / M / H)	Local Impact (L / M / H)	Risk Management	Review Date
Risk of not complying to legislation in terms of Open and Fair gambling activities and failure to provide full information to players.	Risk that sufficient information is not available ensuring that individuals participating in gambling activities are in a position to make informed decisions	Low	Low on business Low on customer	1. Clear terms and conditions provided within premises. 2. All club rules and policies made available by way of Compliance Manual Flip Chart (Front of House Folder). 3. Internal POS highlighting keeping control of gambling. 4. Machines in-store that offer setting limits on time or money being spent when playing. 5. Promotional offers are clear and precise. All relevant details on game play, percentage return and stake to play are detailed within the premises.	Nov 2024
	Protection of customer funds and implementation of clear policies for dispute resolution	Low	Low on business Low on customer	1. Customer information readily available within licensed premises detailing dispute resolution processes.	Nov 2024
	Failure to deal with customer complaints and disputes in relation to gambling.	Low	Low on business Low on customer	1. Employees receive Social Responsibility training at induction and receive regular refresher training (annually). 2. Staff given knowledge and are trained in the company's four stage complaints and disputes procedure policy. 3. Complaints and disputes policy leaflets readily available for customers. 4. Staff given knowledge and trained in completing Customer Dispute Forms and to send into Head Office. 5. Machine maintenance is carried out by competent persons. 6. Gaming Machines only acquired from licensed suppliers.	Nov 2024

MW/LARA/MAR-24

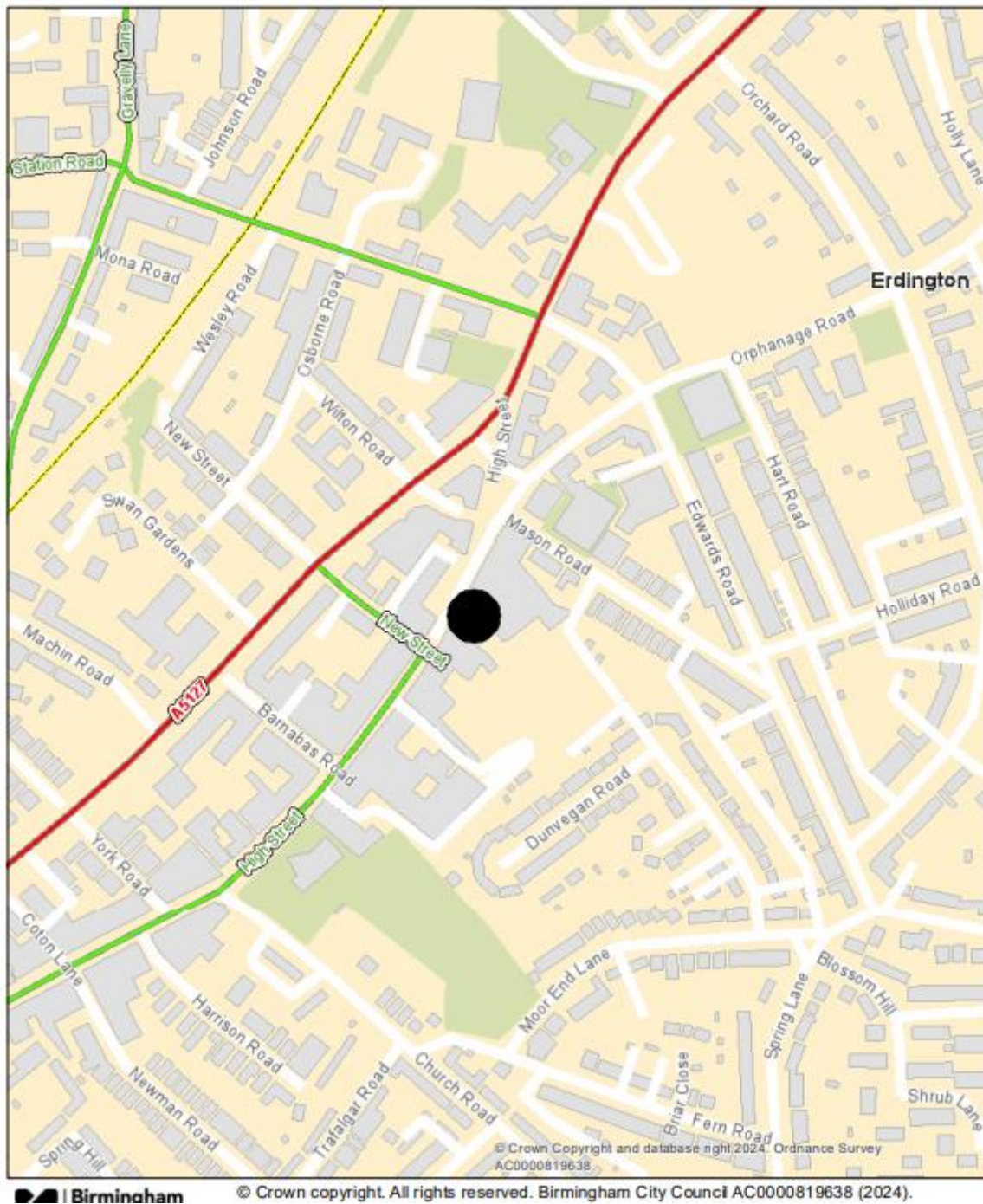
6

## (iii) - Protecting children and other vulnerable people from being harmed or exploited by gambling (cont.)

Risk Event	Risk Category	Level of Risk (L / M / H)	Local Impact (L / M / H)	Risk Management	Review Date
Failure to administer the self-exclusion policy and thus failing to provide help for those who request assistance in preventing them from gaining access to gambling services.	Failure to recognise signs associated with problem gambling.	Moderate	Moderate on business Low on customers	1. Employees receive Social Responsibility training at induction and receive regular refresher training (annually). 2. Staff trained to recognise signs of players displaying 'tell-tale' signs of problem related gambling behaviour.	Nov 2024
	Failure to provide information to players on responsible gambling.	Low	Low on business Low on customers	1. Staff trained on how to provide help to any player wishing to obtain information on problem gambling (including completion of Customer Interactions using IHL Smart Tablet) 2. Let's Keep It Fun leaflets are available at all entry points and public/customer toilets. 3. Safer Gambling QR code is available wherever Keep it Fun leaflets are stored and is placed on marketing POS.	Nov 2024
	Failure to properly administer the self-exclusion process and maintain thereafter, it's effectiveness, including breaches and reinstatements	Low	Low on business Low on persons wishing to self-exclude	1. Staff trained in company's self-exclusion policy. 2. Staff trained to complete self-exclusion process using IHL smart Tablet (a paper version is available as a back-up, in the event that IHL server is unavailable). 3. Company to participate in National self-exclusion database, via app-based software (external provider). 4. All incident records are reviewed by a member of the management team on a weekly basis. 6. Estate-wide incident data collected for review and regulatory return.	Nov 2024
Risk of persons self-excluded entering premises, unknown to staff	Risk of problem gamblers utilising gambling services and gaming machines	Moderate	Low on business Low on self-excluded persons	1. Employees trained in self-exclusion policy. 2. Social responsibility records available for all staff and reviewed by management on a regular basis. 4. (Premises specific) The provision of gambling services may require interaction with a member of staff. 5. Nationwide self-exclusion policy (via external app software).	Nov 2024

MW/LARA/MAR-24

7







**Shipleys, 90-92 High Street, Erdington, Birmingham, B23 6RS****Licensing Sub-Committee A - Hearing 13 January 2025****Bundle Index**

Document	Page Number
1. Application Form	1-6
2. Licensing Plan	7
3. Illustrative Plan (updated)	8
4. Local Area Risk Assessment	9-16
5. Display Notice	17
6. Shipleys Estates Limited – Operating Licence	18-21
7. Shipley's, 243 High Street, Erdington – AGC Licence	22-26
8. Shipley's, 167 High Street, Erdington – Bingo Premises Licence	27-34
9. Representations	35-49
10. Witness Statement – William Shipley	50-54
11. Witness Statement – Rod Stone	55-57
12. Operational Security and Noise Management Plan	58-61
13. Shipley's Group Compliance Manual	62-82
14. Gambling Commission Compliance Assessment Centre Report	83-87
15. Shipleys - AML Risk Assessment 2023	88-90
16. Think 25 Poster	91
17. Compliance Poster	92
18. Lets Keep It Fun Poster	93
19. Bingo Is Back Booklet	94-99
20. Shipleys Staff Compliance Training	100-141
21. Onestop Shopping Letter	142
22. Extracts of the Gambling Commission's Licence Conditions and Codes of Practice for Bingo Premises	143-191
23. Highlighted Extracts of the Gambling Commission's Guidance to Licensing Authorities	192-200
24. Extracts from Hansard Parliamentary Debate discussing the inclusion of the prevention of public nuisance as a Licensing Objective	201-202
25. Extracts of Paterson's Licensing Acts 2020 Part 8 Para 5.158 – Premises Licences	203-204
26. The Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007: Schedule 2 Part 1 – Conditions attaching to bingo premises licences	205-206

**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”.]*

## **Section B**

### **Application on behalf of an organisation**

6. Name of applicant business or organisation:

**Shipley Estates Limited**

7. The applicant's registered or principal address:

**National House  
Etchell Road  
Tamworth  
Staffordshire  
B78 3HF**

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

**000796-N-103432**

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):

**Shipleys**

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

**90-92 High Street  
Erdington  
Birmingham  
B23 6RS**

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.

N/A

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.

	<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):

**Upon successful grant of this application, and once the premises are ready to commence trading, the Current Adult Gaming Centre Premises Licence (Licence Number 340/1) held at the existing site will be surrendered.**

**We will provide written confirmation of this to this licensing authority and until such a time, the existing Adult Gaming Centre Premises Licence held at Shipleys, 243 High Street, Erdington, Birmingham, B23 5SS (Licence Number: 340/1) is to remain in effect.**

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:

### **Adult Gaming Centre Premises Licences**

**Golden Coin, 242 Hawthorn Road, Kingstanding, Birmingham, B44 8PP**

**Shipleys, 243 High Street, Erdington, Birmingham, B23 5SS**

### **Bingo Premises Licences**

**Shipleys, 167 High Street, Erdington, B23 5SS**

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

**Shipley Estates Limited have full authority to provide licensed gaming 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 applied 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.**

**The applicant has comprehensive measures to ensure that all gambling remains socially responsible, which includes detailed staff training on matters such as the protection of the vulnerable, including homeless individuals and young persons.**

The applicant is an experienced licenced operator providing a estate of licenced gambling premises.

The purpose of this application is to facilitate the relocation of the gambling provisions currently offered at the following premises:

Shipleys, 243 High Street, Erdington, Birmingham, B23 5SS

Upon successful grant of this application, and once the premises are ready to commence trading, the Current Adult Gaming Centre Premises Licence (Licence Number 340/1) held at the existing site will be surrendered. At no point will the premises trade simultaneously and there will be no increase in the gambling provisions in Birmingham.

#### 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:

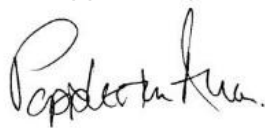
- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- We understand that if the above requirements are not complied with the application may be rejected
- We understand that it is now necessary to advertise the application and give the appropriate notice to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



#### 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: **7 November 2024**

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:

**Elizabeth Varley**

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:

**Poppleston Allen  
37 Stoney Street  
The Lace Market  
Nottingham  
NG1 1LS**

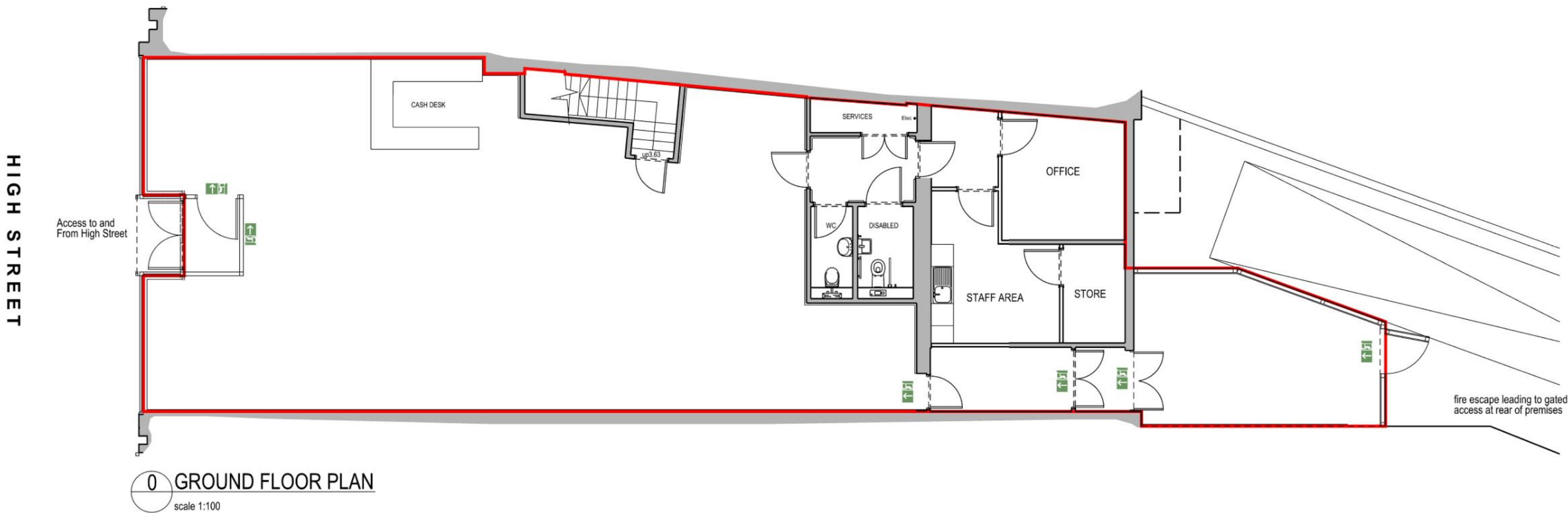
25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

© This drawing/disk and the works depicted are the copyright of Building Design Group Ltd and may not be reproduced or amended, except by written permission. No liability will be accepted for any amendments made by other persons.

Do not scale figured dimensions only are to be taken from this drawing

NOTES

Licensed area for gaming



0 GROUND FLOOR PLAN  
scale 1:100



REVISION		DATE	BY
B   D   G		Building Design Group Ltd Architecture   Urban Design   Master Planning   Interiors	
www.bdg.uk.com			
Tamworth   1st Floor suite, Bitterscote House, Bonehill Road, Tamworth. B78 3HQ t: +44 (0)1827 60465		<div>RIBA</div> <div>Chartered Practice</div>	
Birmingham   Grosvenor House, 11 Saint Paul's Square, Birmingham. B3 1RB t: +44 (0)121 272 3647			
CLIENT			
Shipleys Estates			
PROJECT			
90-92 High Street Erdington			
TITLE			
Proposed License Plan			
SCALE @A2	1:100	DATE	20/03/24
DRAWN	PDR	CHECKED	
DRAWING NO.	3473 / 19	STATUS	REVISION

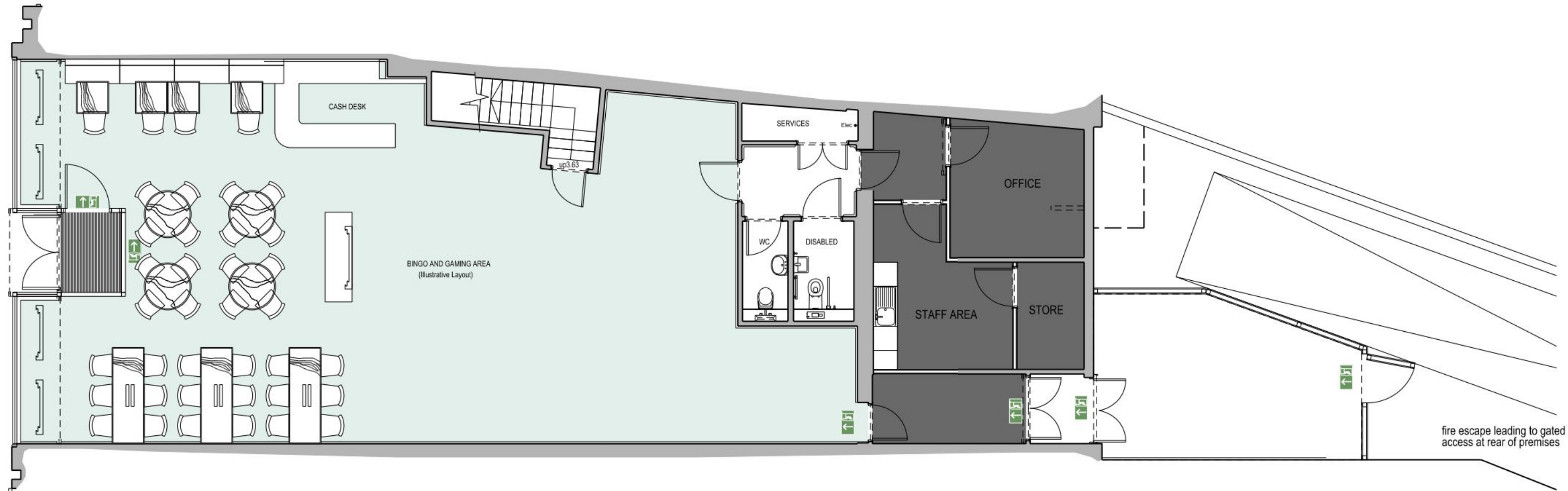
© This drawing/disk and the works depicted are the copyright of Building Design Group Ltd and may not be reproduced or amended, except by written permission. No liability will be accepted for any amendments made by other persons.

Do not scale figured dimensions only are to be taken from this drawing

NOTES



HIGH STREET



0 GROUND FLOOR PLAN  
scale 1:100

B	Layout Updated	19/12/24	PDR
A	Layout Updated	18/12/24	PDR
	REVISION	DATE	BY

B | D | G

Building Design Group Ltd

Architecture | Urban Design | Master Planning | Interiors

www.bdg.uk.com

Tamworth | 1st Floor suite, Bitterscote House, Bonehill Road,  
Tamworth, B78 3HQ t: +44 (0)1827 60465

Birmingham | Grosvenor House, 11 Saint Paul's Square,  
Birmingham, B3 1RB t: +44 (0)121 272 3647

RIBA

Chartered Practice

CLIENT  
Shipleys Estates

PROJECT  
90-92 High Street  
Erdington

TITLE  
Proposed Layout Plan

SCALE @A2 1:100 DATE 20/03/24

DRAWN PDR CHECKED

DRAWING NO.	3473 / 24	STATUS	REVISION
			B





## Local Area Risk Assessment Report



### Premises

Premises Name:	SHIPLEYS
Premises Address:	90-92 High Street, Erdington, Birmingham, B23 6RS
Premises Licence Number:	T.B.C

### Company

Operating Company	Shipley Estates Limited
Directors	William Shipley / Harry Shipley

### Risk Assessor

Name of Assessor:	Mark Wilson
Position in company:	Operations Manager
Date of assessment:	2 <sup>nd</sup> November 2024
Date for next review/assessment:	Annually



### Requirement

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.

### Effective as of 6<sup>th</sup> April 2016

#### Social Responsibility code provision 10.1.1

As a socially responsible operator, Shipley Estates has conducted this Local Area Risk Assessment Report in conjunction with legislative requirements that are effective as of 6<sup>th</sup> April 2016. The purpose of this Risk Assessment is to assess the local risks to the licensing objectives posed by the provision of gambling facilities at the proposed licensed premises named above. Policies, procedures, and control measures to mitigate any risks which may be imposed are considered, taking into account relevant matters identified in the licensing authority's statement of licensing policy.

This Local Area Risk Assessment Report will be reviewed (and updated as necessary) taking into account;

- Any significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
- When there are significant changes at a licensee's premises that may affect their mitigation of local risks;

When applying for a variation of a premises licence; and in any case, undertake a local risk assessment when applying for a new premises licence.

### Local Area Profile

The proposed Bingo Licensed venue is to be located in the High Street of Erdington. There is a medium footfall in this catchment area of Erdington located within a primary zone of the main high street. The premises have good access for those with cars and plenty of parking facilitates the level of traffic (both vehicular and pedestrianised). The nearest transport link for trains is approximately a one mile walk and the public transport links (buses) do not enter this section of Erdington but are on the main adjacent road and there are no night clubs, schools or colleges in the immediate vicinity.

There is a wide range of retail outlets in the close vicinity including licensed betting offices with William Hill (next door to proposed premises) and Boyle Sports at the end of the street. There are many convenience stores, including Superdrug, Co-op supermarket and a small local market (Wilton Market) along with an array of fast-food outlets and cafés.

Medical facilities can be found via Northcroft Hospital located 1 mile by car (4 minutes) or by walking which would take approx. (17 minutes). A pharmacy can be found at 30-32 High Street Erdington which is approx. 4 minutes' walk from the proposed premises.

With regard to monitoring vulnerable people, there are several pawn brokers ('H&T pawn brokers', 'Direct Jewellers' and right opposite the proposed premises is 'Goodbar Jewellers', all of whom buy and sell gold/jewellery and that are trading in the immediate vicinity. Our current compliance and social Awareness training modules take into account players that are spending more regularly, spending excessive amounts and that play higher staked games. Any customers found to be using services offered by either pawn brokers and then found to be gambling would require the need to hold specific meetings with those customers in relation to their gambling to ensure no harm from gambling is present.

The following schools are in our immediate local area: Osborne Primary School, Highclare Senior School, Abbey Catholic Primary School and New Horizon Academy. We are also aware of Erdington Library at Orphanage Rd, Birmingham B24 9HP. All staff are trained in the importance of compliance with the legal requirement to prevent under 18s from engaging in underaged gambling. Regardless of the proximity of schools, staff members are aware that children, including those unaccompanied by an adults may be prevalent during trading hours.

The premises are more or less of a square shape and occupies 2,000 square feet, with a forty feet prominent frontage, having one main door to gain entry. The entrance area will be designed with an integral vanity screen giving access one to a secondary glass security door upon entry. This will offer both privacy and additional security and act as an obstruction of line of sight to the main high street. No auxiliary activities or facilities are proposed to be offered other than Bingo and gambling machines of Category B3, C and D.

There are some local public houses in the local vicinity with the 'The Swan' on the opposing side of the road. There are no known local problems with crime or anti-social behaviour linked to gambling.

Our regulatory return data does not reflect any specific problems associated with consumer complaints, the need to call police for assistance or attempts by children and young persons to enter the premises

**This Local Area Risk Assessment will take into account three key areas:**

Gambling Act 2005 – The Licensing Objectives

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



**(i) – Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime**

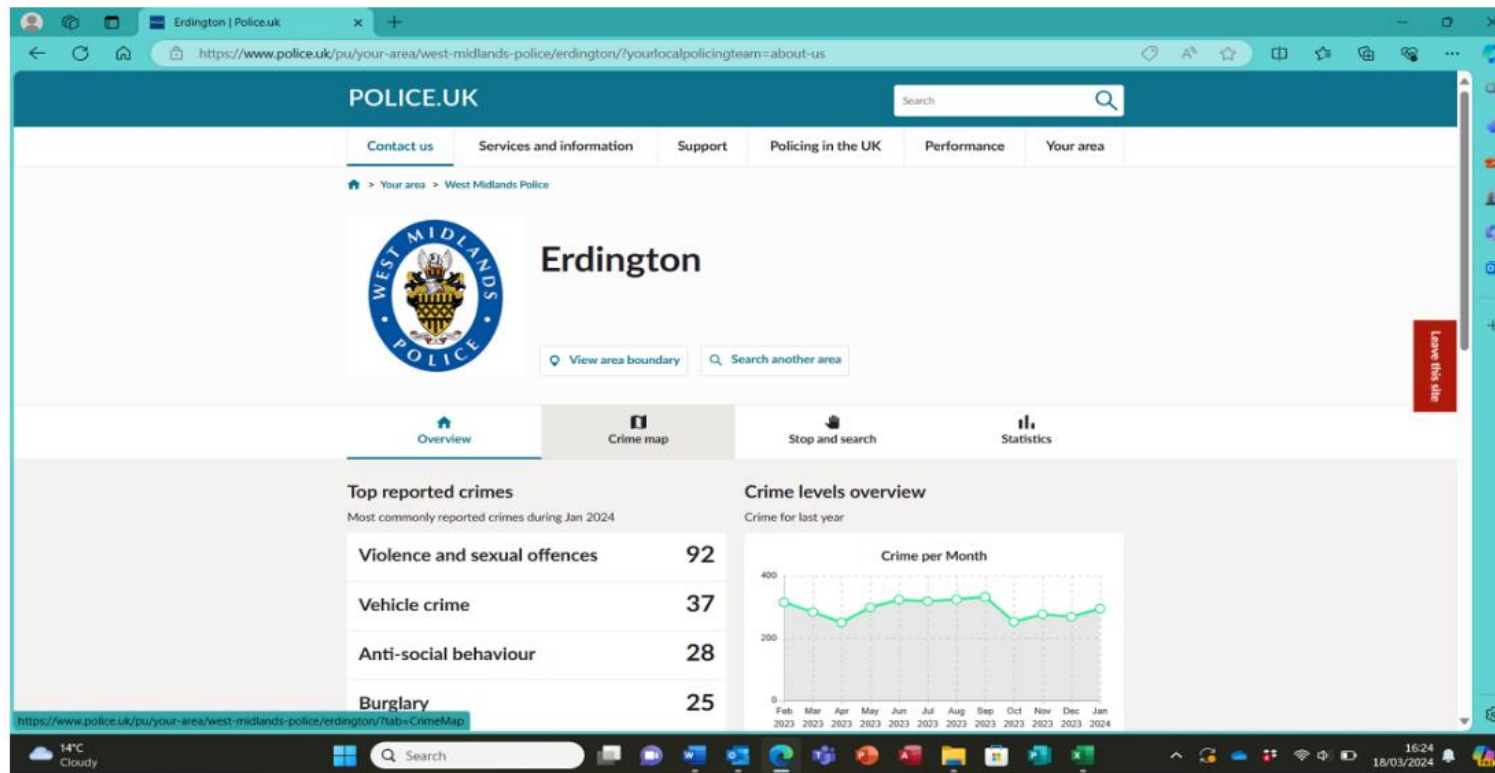
<b>Risk Event</b>	<b>Risk Category</b>	<b>Level of Risk (L / M/ H)</b>	<b>Local Impact (L / M/ H)</b>	<b>Risk Management</b>	<b>Review Date</b>
Risk gambling provision is a source of crime or disorder (relative to premises type)	Crime and/or disorder occurring undetected within licensed premises	Low	Low to business  Low to public frequenting premises	1. Employees receive Social Responsibility training at induction and receive regular refresher training (annually). 2. Training provided with regard to the identification of crime and disorder and appropriate recording processes and reporting lines. 3. Interaction training provided. 4. Social Responsibility and incident report forms available to all staff. 5. LIVE support via Staff Guard security services. 6. HD CCTV monitoring 24/7.	Nov 2024
	Failure to identify attempts to launder money on the premises (e.g., dye-stained notes) and to follow correct reporting procedure.	Low	Low to business  Low to public frequenting premises	1. Effective monitoring of customers' behaviour by good lines of sight from static staff. 2. Well positioned HD CCTV cameras. 3. See Anti Money Laundering Risk Assessment (AML RA).	Nov 2024
	Poor security increasing vulnerability to crime.	Low	Low to business  Low to public frequenting premises	1. Static Panic Alarms. 2. Intruder alarm installed and regularly serviced. 3. Effective HD CCTV coverage with data storage for 30 days. 4. Time lock banking safe installed. 5. Electronic safes provided for staff. 6. Staff Guard Panic Button Security Services available 24/7. 7. Electronically controlled glass foyer door to assist site security.	Nov 2024
	Awareness of heightened local crime in the local area.	Low	Low to business	In-line with national urban levels. No heightened risk. <a href="https://www.police.uk">https://www.police.uk</a> <a href="https://ukcrimestats.com">https://ukcrimestats.com</a>	Nov 2024

			Low to public frequenting premise	<a href="https://www.gov.uk/government/collections/crime-statistics">https://www.gov.uk/government/collections/crime-statistics</a>	
--	--	--	-----------------------------------	---	--

(i) - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime (Cont.)

LARA Report – Crime Statistics – Erdington

Breakdown of Crime



**(ii) - Ensuring that gambling is conducted in a fair and open way**

Risk Event	Risk Category	Level of Risk (L / M / H)	Local Impact (L / M / H)	Risk Management	Review Date
Risk of not complying to legislation in terms of Open and Fair gambling activities and failure to provide full information to players.	Risk that sufficient information is not available ensuring that individuals participating in gambling activities are in a position to make informed decisions	Low	Low on business  Low on customer	1. Clear terms and conditions provided within premises. 2. All club rules and policies made available by way of Compliance Manual Flip Chart (Front of House Folder). 3. Internal POS highlighting keeping control of gambling. 4. Machines in-store that offer setting limits on time or money being spent when playing. 5. Promotional offers are clear and precise. All relevant details on game play, percentage return and stake to play are detailed within the premises.	Nov 2024
	Protection of customer funds and implementation of clear policies for dispute resolution	Low	Low on business  Low on customer	1. Customer information readily available within licensed premises detailing dispute resolution processes.	Nov 2024
	Failure to deal with customer complaints and disputes in relation to gambling.	Low	Low on business  Low on customer	1. Employees receive Social Responsibility training at induction and receive regular refresher training (annually). 2. Staff given knowledge and are trained in the company's four stage complaints and disputes procedure policy. 3. Complaints and disputes policy leaflets readily available for customers. 4. Staff given knowledge and trained in completing Customer Dispute Forms and to send into Head Office. 5. Machine maintenance is carried out by competent persons.	Nov 2024

				6. Gaming Machines only acquired from licensed suppliers.	
--	--	--	--	---	--

**(iii) - Protecting children and other vulnerable people from being harmed or exploited by gambling (cont.)**

Risk Event	Risk Category	Level of Risk (L / M / H)	Local Impact (L / M / H)	Risk Management	Review Date
Failure to administer the self-exclusion policy and thus failing to provide help for those who request assistance in preventing them from gaining access to gambling services.	Failure to recognise signs associated with problem gambling.	Moderate	Moderate on business  Low on customers	1. Employees receive Social Responsibility training at induction and receive regular refresher training (annually). 2. Staff trained to recognise signs of players displaying 'tell-tale' signs of problem related gambling behaviour.	Nov 2024
	Failure to provide information to players on responsible gambling.	Low	Low on business  Low on customers	1. Staff trained on how to provide help to any player wishing to obtain information on problem gambling (including completion of Customer Interactions using IHL Smart Tablet) 2. Let's Keep It Fun leaflets are available at all entry points and public/customer toilets. 3. Safer Gambling QR code is available wherever Keep it Fun leaflets are stored and is placed on marketing POS.	Nov 2024
	Failure to properly administer the self-exclusion process and maintain thereafter, it's effectiveness, including breaches and reinstatements	Low	Low on business  Low on persons wishing to self-exclude	1. Staff trained in company's self-exclusion policy. 2. Staff trained to complete self-exclusion process using IHL smart Tablet (a paper version is available as a back-up, in the event that IHL server is unavailable). 3. Company to participate in National self-exclusion database, via app-based software (external provider). 4. All incident records are reviewed by a member of the management team on a weekly basis. 6. Estate-wide incident data collected for review and regulatory return.	Nov 2024
Risk of persons self-excluded entering	Risk of problem gamblers utilising gambling services and gaming machines	Moderate	Low on business	1. Employees trained in self-exclusion policy. 2. Social responsibility records available for all staff and reviewed by management on a regular basis.	Nov 2024

## Local Area Risk Assessment Report



premises, unknown to staff			Low on self- excluded persons	4. (Premises specific) The provision of gambling services may require interaction with a member of staff. 5. Nationwide self-exclusion policy (via external app software).	
-------------------------------	--	--	-------------------------------------	---	--

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

Notice is hereby given that: **Shipley Estates Limited**

Of the following address: **National House  
Etchell Road  
Tamworth  
Staffordshire  
B78 3HF**

Are applying for a **Bingo Premises Licence** under section 159 of the Gambling Act 2005. The application relates to the following premises:

**Shipleys  
90-92 High Street  
Erdington  
Birmingham  
B23 6RS**

**The purpose of this application is to facilitate the relocation of the gambling provisions currently offered at the following premises:**

**Shipleys, 243 High Street, Erdington, Birmingham, B23 5SS**

**Upon successful grant of this application, and once the premises are ready to commence trading, the Current Adult Gaming Centre Premises Licence (Licence Number 340/1) held at the existing site will be surrendered. At no point will the premises trade simultaneously and there will be no increase in the gambling provisions in Birmingham.**

The application has been made to: **Birmingham City Council  
General Licensing Regulation & Enforcement  
P.O. Box 17831  
Birmingham  
B2 2HJ  
E: [licensing@birmingham.gov.uk](mailto:licensing@birmingham.gov.uk)**

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: **5 December 2024**

**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.**

## COMBINED OPERATING LICENCE

Number: 000-000796-N-103432-017

**This licence issued under Part 5 of the Gambling Act on 12 September 2007 is amended under section 104 of the Act .**

**The effective date of the amendment is <sup>1</sup> 8 August 2019**

---

### Part 1

This operating licence<sup>2</sup> is issued to:

**Shipley Estates Limited**  
trading as Shipleys  
of  
Shipley Estates Limited  
National House , Etchell Road  
TAMWORTH  
B78 3HF

**This Licence authorises the Licensee to carry out the following activities:**

to provide facilities for playing bingo; to make gaming machines available for use in an adult gaming centre; to supply, install, adapt, maintain or repair (but not manufacture) a gaming machine or part of a gaming machine

Signed on behalf of the Gambling Commission



Programme Director

---

<sup>1</sup> Note: Licences may be surrendered, lapse, be forfeit or be revoked in accordance with sections 113, 114, 115, 118 or 119 of the Act. Under section 111 of the Act the Commission may determine that licences, or licences of a specified class, shall cease to have effect at the end of a specified period

<sup>2</sup> which is not a remote licence

**This Licence is subject to the following conditions:**

- The specific conditions attached to this licence by the Commission by virtue of section 77 of the Act, which are set out below
- the statutory conditions attached by virtue of the Act: these are set out in the enclosed documents
- the general conditions imposed by the Commission by virtue of section 75 of the Act, which are set out in the enclosed documents
- the general conditions imposed by the Secretary of State by virtue of section 78 of the Act which are set out in the enclosed documents

**Part 2 Commission Specific Conditions**

**Conditions specific to providing facilities for playing bingo**

This licence is subject to the condition that the annual gross gambling yield is less than £7,5000,000

**Conditions specific to making gaming machines available for use in an adult gaming centre**

This licence is subject to the condition that the annual gross gambling yield is less than £1,250,000

**Conditions specific to supplying, installing, adapting, maintaining or repairing (but not manufacturing) a gaming machine or a part of a gaming machine**

This licence is subject to the condition that the value of the licensee' s annual gross sales is less than £550,000.



## ANCILLARY REMOTE OPERATING LICENCE

Number: 000-000796-A-307453-008

**This licence issued under Part 5 of the Gambling Act on 13 January 2010 is amended under section 104 of the Act .**

**The effective date of the amendment is <sup>1</sup> 16 July 2019**

---

### Part 1

This operating licence<sup>2</sup> is issued to:

**Shipley Estates Limited**  
trading as Shipleys  
of  
Shipley Estates Limited  
National House , Etchell Road  
TAMWORTH  
B78 3HF

**This Licence authorises the Licensee to carry out the following activities:**

to provide facilities for playing bingo

Signed on behalf of the Gambling Commission



Programme Director

---

<sup>1</sup> Note: Licences may be surrendered, lapse, be forfeit or be revoked in accordance with sections 113, 114, 115, 118 or 119 of the Act. Under section 111 of the Act the Commission may determine that licences, or licences of a specified class, shall cease to have effect at the end of a specified period

<sup>2</sup> which is a remote licence

**This Licence is subject to the following conditions:**

- The specific conditions attached to this licence by the Commission by virtue of section 77 of the Act, which are set out below
- the statutory conditions attached by virtue of the Act: these are set out in the enclosed documents
- the general conditions imposed by the Commission by virtue of section 75 of the Act, which are set out in the enclosed documents
- the general conditions imposed by the Secretary of State by virtue of section 78 of the Act which are set out in the enclosed documents

**Part 2 Commission Specific Conditions**

This licence is subject to the conditions that:

- (a) the licensee must also hold a non-remote bingo operating licence: and
- (b) this licence only authorises the provision of facilities for the playing of bingo:
  - (i) by means of remote communication equipment; and
  - (ii) by people who are situated on the premises in respect of which a bingo premises licence has effect.



No: 340 / 1

## **ADULT GAMING CENTRE PREMISES LICENCE**

**This licence is issued under section 164 of the Gambling Act 2005 by**

**Birmingham City Council**

### **Part 1 – Details of person to whom licence is issued**

This premises licence is issued to:

Shipley Estates Ltd

of the following address:

National Leisure House, Etchells Road, Tamworth, B78 3HF

who holds an operating licence which has been given the following operating licence number by the Gambling Commission:

045-00796-N-103432-001

### **Part 2 – Details of the premises in respect of which the licence is issued**

Facilities for gambling may be provided in accordance with this licence on the following premises:

Shipleys, 243 High Street, Erdington, Birmingham, B23 5SS

**Part 3 – Premises licence details**

This licence came into effect on: 24/08/2011

This licence is of unlimited duration

The following conditions have been attached to the licence by the issuing authority under section 169(1)(a) of the Gambling Act 2005:

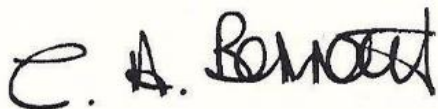
NOT APPLICABLE

The following conditions, which would otherwise attach to the licence by virtue of regulations made under section 168 of the Gambling Act 2005, have been excluded by the issuing authority under section 169(1)(b) of that Act:

NOT APPLICABLE

The plan of the premises with reference number 74276-340/1 which is retained with the public register kept by Birmingham City Council and available free of charge for inspection between the hours of 9am – 4pm Monday, Tuesday and Thursday, 10am – 4pm Wednesday and 9am – 3.30pm Friday (excluding Bank Holidays etc) at the Licensing Service, Crystal Court, Aston Cross Business Village, 50 Rocky Lane, Aston, Birmingham B6 5RQ.

**Signed on behalf of the issuing licensing authority**



**BIRMINGHAM CITY COUNCIL**



**No: 340 / 1**

**SUMMARY OF THE TERMS AND CONDITIONS OF  
A PREMISES LICENCE**

**This summary is issued under section 164 of the Gambling Act 2005 by  
Birmingham City Council**

This summary is issued to:

Shipley Estates Ltd

of the following address:

National Leisure House, Etchells Road, Tamworth, B78 3HF

A premises licence of the following type:

Adult Gaming Centre

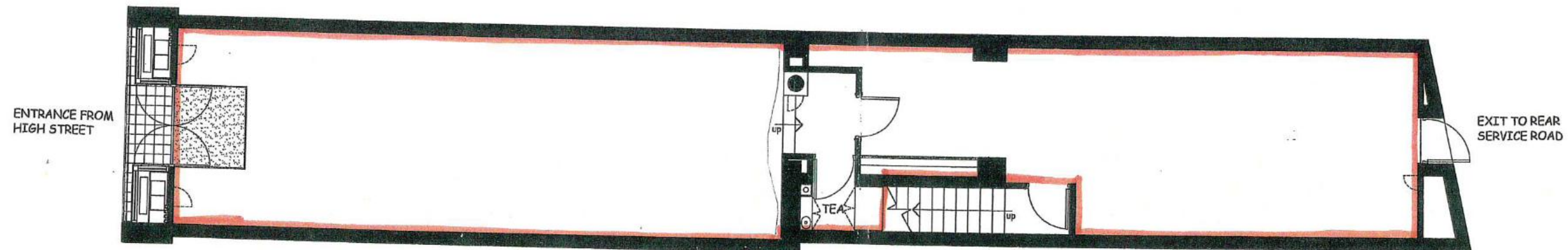
has been issued in respect of the following premises:

Shipleys, 243 High Street, Erdington, Birmingham, B23 5SS



**Summary of the Terms and Conditions of the Premises Licence**

1. The premises licence will run in perpetuity unless:
  - the Secretary of State prescribes a period after which the licence will expire under section 191 of the Gambling Act 2005;
  - the licence holder surrenders the licence under section 192 of the Gambling Act 2005;
  - the licence lapses under section 194 of the Gambling Act 2005;
  - the licence is revoked under section 193 or 202(1) of the Gambling Act 2005;
2. The premises licence applies only in relation to the premises specified in Part 2 of the licence and may not be varied so that it applies to any other premises (except in the case of a converted casino premises licence)
3. The premises licence authorises the premises to be used for:
  - making available up to 4 Category B gaming machines and any number of Category C or D gaming machines;
  - prize gaming in accordance with conditions set out in Part 13 of the Act.
4. The premises licence is subject to:
  - any conditions specified on the face of the licence as being attached under section 169(1)(a) of the Gambling Act 2005;
  - any other conditions attached to the licence by virtue of regulations made under sections 167 and 168 of the Gambling Act 2005 (other than any conditions under section 168 which have been excluded by the licensing authority); and
  - any conditions attached to the licence by virtue of specific provisions of the Gambling Act 2005.
5. In particular, it is a condition of the premises licence under section 185 of the Gambling Act 2005 that the holder keeps the licence on the premises and arranges for it to be made available on request to a constable, enforcement officer or local authority officer. The holder of the licence commits an offence if he fails to comply with this condition.



GROUND FLOOR PLAN  
Scale 1:100

243 HIGH STREET, ERDINGTON, BIRMINGHAM, B23 5SS



No: 375 / 2

## **BINGO PREMISES LICENCE**

**This licence is issued under section 164 of the Gambling Act 2005 by**

**Birmingham City Council**

### **Part 1 – Details of person to whom licence is issued**

This premises licence is issued to:

Shipley Estates Ltd

of the following address:

National Leisure House, Etchell Road, Tamworth, B78 3HF

who holds an operating licence which has been given the following operating licence number by the Gambling Commission:

045-000796-N-103432-001

### **Part 2 – Details of the premises in respect of which the licence is issued**

Facilities for gambling may be provided in accordance with this licence on the following premises:

Shipleys, 167 High Street, Erdington, Birmingham, B23 6SY



**Part 3 – Premises licence details**

This licence came into effect on: 24/10/2014

This licence is of unlimited duration

This licence has been re-issued following the grant of an application to vary the licence.

The variations to the licence take effect on : 09/06/2015

The following conditions have been attached to the licence by the issuing authority under section 169(1)(a) of the Gambling Act 2005:

The premises should be constructed in accordance with the deposited plans and will not trade until such time as they have been inspected and approved as being completed in accordance with the plans by officers of the Council.

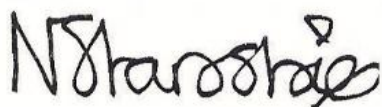
The Licence will be offered for surrender should the extension not have been completed in accordance with the deposited plans within 6 months of the licence being granted.

The following conditions, which would otherwise attach to the licence by virtue of regulations made under section 168 of the Gambling Act 2005, have been excluded by the issuing authority under section 169(1)(b) of that Act:

NOT APPLICABLE

The plan of the premises with reference number 90252-375/2 which is retained with the public register kept by Birmingham City Council and available free of charge for inspection between the hours of 9am – 4pm Monday, Tuesday and Thursday, 10am – 4pm Wednesday and 9am – 3.30pm Friday (excluding Bank Holidays etc) at the Licensing Service, Crystal Court, Aston Cross Business Village, 50 Rocky Lane, Aston, Birmingham B6 5RQ.

**Signed on behalf of the issuing licensing authority**





**NOTICE OF GRANT OF AN APPLICATION TO VARY  
A PREMISES LICENCE**

This notice is issued in accordance with regulations made under section 164(2) of  
the Gambling Act 2005

**Birmingham City Council**  
Licensing Section, Crystal Court, Aston Cross Business Village,  
50 Rocky Lane, Aston, Birmingham, B6 5RQ

An application to vary a premises licence

**is granted to:**

Shipley Estates Ltd

of the following address:

National Leisure House, Etchell Road, Tamworth, B78 3HF

the number of whose operating licence is:

045-000796-N-103432-001

The premises to which the application relates are:

Shipleys, 167 High Street, Erdington, Birmingham, B23 6SY

The premises licence number is:

**375**

The premises licence is to be varied as follows:

Premises Plans

The variations take effect from:

09/06/2015 00:00 AM

In granting the application, the licensing authority have attached the conditions set out in Annex A to this Notice.

The licensing authority did not receive representations in relation to the application.

An appeal may be brought against the grant of the application, or the imposition or exclusion of the conditions referred to above by either the applicant, or any person who made representations in relation to the application. An appeal must be instituted:

- in the magistrates' court for a local justice area in which the premises are wholly or partly situated;
- by notice of appeal given to the designated officer;
- within 21 days beginning with the date of receipt of this notice of grant.

**ANNEX A - CONDITIONS TO BE ATTACHED**

<i>Condition to be attached</i>	<i>Reasons for attaching condition</i>
<p>The premises should be constructed in accordance with the deposited plans and will not trade until such time as they have been inspected and approved as being completed in accordance with the plans by officers of the Council.</p> <p>The Licence will be offered for surrender should the extension not have been completed in accordance with the deposited plans within 6 months of the licence being granted.</p>	<p>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</p> <p>To be consistent with the Judicial Review on 14th January 2008 for Betting Shop Services Ltd versus Southend-On-Sea Borough Council, Done Brothers (Cash Betting Ltd) and Coral Racing Ltd.</p>



BIRMINGHAM CITY COUNCIL

ANNEX B - CONDITIONS TO BE EXCLUDED

<i>Condition to be excluded</i>	<i>Reasons for excluding condition</i>

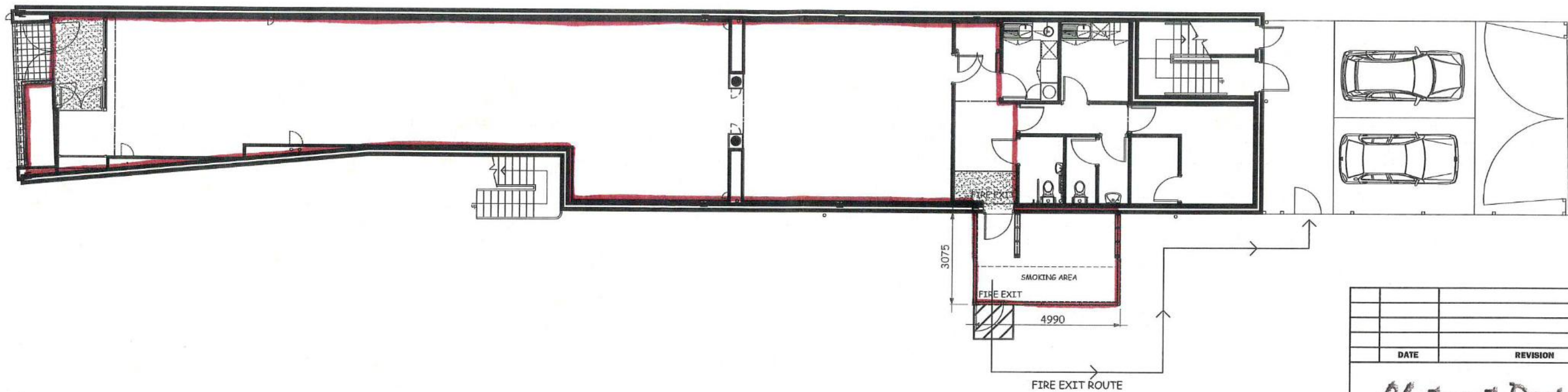
BIRMINGHAM CITY COUNCIL

ANNEX C - REPRESENTATIONS

<i>Representation</i>	<i>Licensing authority's response</i>

© THIS DRAWING AND THE CONCEPT DEPICTED ARE COPYRIGHT AND MUST NOT BE COPIED OR REPRODUCED WITHOUT WRITTEN CONSENT.

ALL DIMENSIONS MUST BE CHECKED ON SITE AND NOT SCALED FROM THIS DRAWING.



DATE	REVISION

*Abstract Design*  
 INTERIOR DESIGN CONSULTANTS  
 TO THE LEISURE INDUSTRY  
 MILLFIELD CHAMBERS, 1A HIGHFIELD ROAD  
 HALL GREEN, BIRMINGHAM, B28 0EL  
 TELEPHONE - 0121 778 6060  
 EMAIL - abstractdesign@btconnect.com  
 www.abstractdesign.net

CLIENT  
 SHIPLEY ESTATES LIMITED

JOB TITLE  
 AMUSEMENT CENTRE  
 167 HIGH STREET  
 ERDINGTON  
 BIRMINGHAM, B23 6SY

DRAWING TITLE  
 PROPOSED SMOKING  
 SHELTER PLAN

SCALE		1:142	
DATE		DRAWN BY	
FEB 2015		MAB	
DRAWING NO.		REV	
497/524			

## Representation 1

From: Councillor Robert Alden

Sent: 05 December 2024 13:42

To: Licensing <

Cc: Councillor Gareth Moore

Subject: Licensing Objection - 90-92 High Street former Costa Coffee

Dear Licensing,

We have been made aware of a Gambling Application to move the existing Adult Gaming Centre at 243 High Street into the unit at 90-92 High Street. This unit is the former Costa Coffee unit.

The application is to transfer the license from the 243 premises and also to expand the use to also have a Bingo Premise Licence as well.

We are very concerned about this application and its impact locally and so oppose the application to convert the former Costa unit into a gambling unit, by relocating a store from further down the High St.

While this is not an increase in the number of units, across the whole High Street, this is replacing a smaller shop with a larger one and so will likely increase the amount of betting machines operating and importantly will also lead to a concentration of gambling shop units in the same location. There is already a betting shop next door and another 4 doors up, very close to this location and therefore the clustering of gambling units close to each other in the pedestrian part of the High Street could increase ASB and crime.

The Gambling Act 2005 has three clear objectives:

- keeping gambling crime free
- making sure that gambling is fair and open
- protecting children and vulnerable adults



Looking at this application and the recent history of Erdington with the Anti-Social behaviour and crime that has taken place nearby a range of gambling establishments the clustering of 3 nearby each other on the pedestrian area of the High Street nearby a range of family aimed shops and the markets will lead to significant risk of gambling associated crime in the location, and will lead to placing many more children nearby the establishment in its new location than go past its current location.

The pedestrian area is home to Erdington Library a mere 5 or 6 units away, which has a dedicated children's library and hosts a range of family activities. It is also the part of the High Street often older children hang around in to socialise after school. These would be exposed to this new unit if given permission, given the double frontage of the place it would be very difficult not to notice it.

This end of the High Street is also leads directly onto terraced roads which house large numbers of families who would regularly be exposed to the new unit if given permission.

The wider Erdington area is we understand home to a number of exempt accommodation units housing recovering gambling addicts and placing one such establishment in such a large and prominent location will increase the risk that those residents could slip back into addiction.

Shops report there is significant levels of shop lifting locally and the application does not give any details about how the applicant would prevent the proceeds of the sale of those goods then being gambled on the premises.

Due to the above and this increase in size of the unit, clustering impact on this part of the High Street and the loss of one of the larger retail units left in Erdington High Street, we urge the Council to reject the application.

Yours sincerely

Cllrs Robert Alden (resident nearby on Orchard Road) and Gareth Moore Erdington's Ward Councillors

Cllr Robert Alden

Erdington Ward

## Representation 2

From:

Sent: 26 November 2024 15:37

To: Licensing

Subject: Gambling application 90-92 Erdington High Street

Orchard Road Erdington B24

Dear Sir or Madam,

I strongly object to the application for a gambling arcade at 90/92 Erdington High Street. There is already a betting shop next door and another one only four doors up. I feel that a cluster of gambling units so close to one another on a pedestrian part of the High Street could certainly increase ASB and crime, indeed BBC Midlands Today did an article on Erdington High Street last evening where the shoplifting and drug taking was discussed.

I am also concerned that this premises is also very close to Erdington Library, which is well used by young people and adults alike and any more ASB in the area would not be fair on children and the vulnerable particularly. This as you obviously know is one of the objectives in the Gambling Act.

The Gambling Act itself has clear objectives and one of these is keeping gambling crime free, I do not think that this would be the case in this part of Erdington, which at the moment is fairly pleasant to be in, unlike the other end of the High Street.

Yours sincerely,

### **Representation 3**

**From:**

**Sent:** 26 November 2024 20:28

**To:** Licensing <

**Subject:** Appeal against Shirley's opening a larger gambling site on Erdington High Street

I am writing to strongly oppose the request by Shipley's to open a larger gambling property in whst was previously Costa Coffee.

As a home owner on Edwards Road I find it more and more terrifying to enter the high street and this would be bringing the trouble even closer.

Shipleys are guaranteed massive profits but at the expense of families that want to live safely in their own community. I'm sure the owners would not be happy to live in Erdington.

This has to stop.

## Representation 4

**From:**

**Sent:** 27 November 2024 08:57

**To:** Licensing <

**Subject:** Gambling Application: 90-92 High Street, Erdington

I am writing to formally object to the gambling application for converting the former coffee shop located at 90-92 Erdington High Street into a gambling arcade.

The High Street already has a significant number of gambling and betting establishments, which has contributed to noticeable anti-social behaviour issues in the area. The introduction of another gambling arcade would exacerbate these problems, further deteriorating the quality of life for local residents and negatively impacting the community.

Key points of concern include:

1. **\*\*Increase in Anti-Social Behaviour\*\***: The presence of multiple gambling establishments has already led to a rise in anti-social activities, including loitering and public disturbances. Adding another such venue would likely intensify these issues.

2. **\*\*Community Well-being\*\***: The High Street should offer a diverse range of businesses that cater to the needs and well-being of all residents. A gambling arcade does not align with the community's needs and could potentially harm vulnerable individuals.

3. **\*\*Economic Impact\*\***: The current economic climate requires supporting businesses that bring positive contributions to the community. Converting a coffee shop, which serves as a social hub, into a gambling arcade could result in decreased foot traffic and a negative impact on other local businesses.

4. **\*\*Public Opinion\*\***: There is a significant concern among residents regarding the proliferation of gambling venues. This sentiment should be considered in the planning process, prioritising the wishes and welfare of the local community. For the reasons outlined above, I urge the council to reject this planning application and consider the long-term impact on the community's safety and well-being.

If you need anything else from me, or further details please let me know.

Thank you.

Concerned resident of Erdington

## **Representation 5**

**From:**

**Sent:** 27 November 2024 10:44

**To:** Licensing

**Subject:** Gambling application: 243 High Street, Erdington to 90-92 High Street Erdington

We are concerned and object to the application for this gambling application, currently at 243 High Street, Erdington to 90-92 High Street, Erdington (formerly Costa Coffee).

We need more retail businesses not gambling shops. The Co-oP is to close soon which will be another blow to the shopping area. We do not want establishments that bring increases in crime and Anti-Social behaviour.

Orchard Road, Erdington, Birmingham, B24

## **Representation 6**

**From:**

**Sent:** 27 November 2024 15:01

**To:** Licensing <

**Subject:** 90-92 high street

To whom it concerns

I wish to add comment on the application for a gambling arcade to move to 90-92 high street , Erdington.

I am resident of the area.

There are already too many gambling and betting shops in that part of the high street. I frequently witness antisocial behaviour on that part of the High Street already and adding a gambling arcade will just add risk to that increasing.

It is not appropriate and puts vulnerable adults at risk by increasing the options and temptations available in one area. There is already a betting shop right next door.

Erdington high street is losing shops and cafes and we need more premises like these to increase footfall in the area and make it a more welcoming place, moving a gambling arcade is not the answer.

Many thanks for consideration of my comments.

Edwards Road Resident

## Representation 7

**From:**

**Sent:** 30 November 2024 20:09

**To:** Licensing <

**Subject:** Shipleys Bingo License application for 90-92 High Street, Erdington

To whom it may concern,

My family and I live in the neighborhood, a short walk away from 90-92 High Street, and we are against having another gambling provider particularly as it's so close to several others.

Having another gambling provider makes the High Street less family friendly, encourages crime and antisocial behaviour.

There are already many issues with antisocial behaviour near to where these gambling providers are located. My children and I do not feel safe walking past these gambling shops as do many other families that I know who live in the area.

Gambling is not a positive thing and our high streets should be at the heart of everything that we do to create positive changes for our children and our community. Our local schools work hard to safeguard children and young people and having gambling establishments in a family area just exacerbates the situation.

Gambling should not be encouraged, and I do hope the application is refused.

Yours faithfully

## Representation 8

From:

Sent: 02 December 2024 23:00

To: Licensing

Subject: Objection to Licence Application (Shipley's Erdington)

Dear Sir or Madam,

I am writing to raise my objection to the granting of a licence of a Bingo Premises License at 90-92 High Street, Erdington which has been filed by Shipley Estates Limited.

Over the last few years, Erdington High Street has sadly developed a reputation for drug dealing and anti-social behaviour (in part due to the unmanaged proliferation of HMO's in the area). I fear that the placement of a large gambling premises as proposed will undermine the work of local councillors, residents associations and the police to make Erdington High Street (and the surrounding area) a safer, more welcoming and crime free environment.

There is already a betting shop next door to the site linked to this application and another just a few doors up from the proposed site and while it is appreciated that the existing Shipleys site would close if the application was approved, this would nonetheless lead to a clustering of gambling premises in very close proximity to each other and potentially fuel an increase the level of anti-social behaviour and crime.

There is also a distinct possibility that granting licence for this premises could result in existing ASB issues which are currently occurring toward the opposite end of the High Street (by Six Ways Island and near where the current Shipley's is located) simply moving up the road to what is the more family friendly pedestrianised end of the High Street (there is currently a board and card game shop, a video game retailer, a school uniform retailer, Wilton Market, a cafe and other retail units that regularly attract parents and children while out shopping).

Home Office data has highlighted Erdington as being one of the worst areas in the city for antisocial behaviour and this application will NOT do anything to alleviate this or help contribute positively to the profile of the area and make Erdington High Street a more family friendly and inviting place to visit.

As such I ask that you refuse to grant the licence that has been applied for.

Kind regards



## **Representation 9**

**From:**

**Sent:** 04 December 2024 14:28

**To:** Licensing

**Subject:** Gambling arcade application

### **RE. GAMBLING APPLICATION FOR GAMBLING ARCADE**

#### **To move to 90-92 High Street, Erdington (former Costa unit)**

I am very concerned about this application, and urge you to reject it.

I believe that the proposed location is wholly inappropriate. It will create a cluster of betting and gambling establishments within a short distance of each other. This is very worrying and has the potential to change the character of this section of the high street, to its detriment. Currently, the proposed unit is by a pleasant, pedestrianised area of the high street, near to local cafes. The area is well used as a meeting place, and for social, family friendly gatherings (such as the Christmas lights switch on).

I am very worried that a large gambling arcade here will be attractive to young people, encouraging them to partake in gambling. It could also become an after-school meeting point, leading to potential issues. It could be a magnet for anti-social behaviour, making young people and local residents very vulnerable.

An increase in access to gambling can also create social issues. Gambling can be highly addictive, and can lead to issues around debt as well as having a negative impact on mental health.

Many businesses, community groups and local residents in Erdington are keen to promote social cohesion, and increase opportunities to engage in positive activities. The creation of more, and larger, gambling establishments does the opposite of this. Places such as this only serve to perpetuate a negative image of Erdington, and exacerbate some of the issues we currently encounter on the high street, such as shoplifting, drug dealing and alcohol consumption.

I object to this application in the strongest terms, and again urge you to not allow it to go ahead.

Thank you.

York Road

Erdington

Birmingham B23

## Representation 10

**From:**

**Sent:** 04 December 2024 19:54

**To:** Licensing

**Subject:** Re: 90-92 High Street, Erdington

Dear Sir/Madam,

I am writing to object to the application to move the Adult Gaming Centre from 243 to 90-92 High Street Erdington.

The re-purposing of the former Costa unit will further reduce the retail stock within the High Street. This is an increasing concern with several businesses (e.g. Boots, Walter Smith and the Co-op) closing their Erdington shops in the last two years.

It will also significantly expand Shipley's presence on the High Street. They currently have two single fronted premises, Nos. 90-92 being the smaller of the two. The former Costa unit is double fronted and will therefore increase the number of terminals etc which they can install and thus their footfall.

At the same time, their parallel request for a Bingo Premises Licence seems to be a means to allow under 18s onto these premises as long as they only use gaming (i.e. slot) machines. The Gambling Act 2005 has the objective to protect children and vulnerable adults. This seems directly to conflict with Shipley's request. Moreover there are already many vulnerable adults in the Erdington area. Money is very tight. Begging is commonplace on the High Street. How can this expansion improve the situation?

There are eight gaming or gambling outlets on the High Street all told. Indeed, there are two bookmakers (Boyle Sports and William Hill) very close to 90-92, the latter being next door. This new cluster of outlets will clearly draw more people down to the pedestrianised end of the street.

Erdington High Street already has a very bad reputation (as reported throughout November by both local and national press) for anti-social behaviour and criminality. This application will only add to this if approved. The 2005 Act also has the objective to keep gambling crime free. Shipley's application will likely have the opposite effect. It must be rejected.

Yours faithfully,

P.S. My address is Orchard Road Erdington B24 . This is within easy walking distance of the end of the High Street directly affected by this application.

## Representation 11

From:  
Sent: 05 December 2024 17:09  
To: Licensing  
Subject: 90-92 High St Erdington

We have just become aware of the application to transfer the gambling licence from 243 High St to the above.

We wish to object to this as this part of the High St is becoming a gambling centre with two bookmakers in the immediate vicinity and a total of 7 such operations on the High St. If any change is needed it is surely to reduce the number of such licences.

This would replace a cafe with yet another gambling establishment, ruining what remains of the community retail facilities. Such businesses are accompanied by anti social behaviour.

Does nobody care what is happening to Erdington High St which is becoming lost to betting and gaming operations and all the social degeneration that accompanies it?

Orphanage Rd  
Erdington

## Representation 12

**From:**

**Sent:** 05 December 2024 17:38

**To:** Licensing

**Subject:** Objection to Shipley's Gaming Erdington

Hello,

I wanted to raise my objection to Shipley's Gaming relocation.

The area is already filled with addicts and the most vulnerable.

I have sat with very fragile people in Erdington who have been betting in Erdington and had to escape for safety and their lives have been turned upside down.

Young, vulnerable women and young men need support not further chances to ruin their lives.

Kind Regards

## Representation 13

**From:**

**Sent:** 05 December 2024 18:52

**To:** Licensing

**Subject:** Shipley Gaming.

Dear Sir/Madam

I am writing to protest in strongest terms the proposal from Shipley Gaming to relocate to the old Costa Coffee on Erdington High Street.

This application will see the increase of anti social behaviour which already blights the area.

It will also see the introduction of more unlimited gaming machines due to bigger property. Erdington is an area of high unemployment and poverty and this would encourage more money lost by people who can ill afford to loose it

Yours

## **Representation 14**

**From:**

**Sent:** 05 December 2024 21:55

**To:** Licensing

**Subject:** Oppose - gambling move application Erdington High Street

Dear council,

I am very disappointed to hear that a gambling application is in consideration for the former Costa Coffee site at Erdington High Street. I am a local resident and I believe this will increase crime and ASB behaviour in the area.

Recent development near to the proposed application is retirement homes. I am certain the elderly and vulnerable adults therefore in the long run will have increased fear due to increased gambling of the multiple other gambling shops in very close proximity.

With all of this, I am concerned it will impact the local businesses such the Wilton Market and the Acorns Charity shop, which I believe is one of the largest stores in the UK.

I always do my best to support the local businesses on the High Street by shopping there and my concern of gambling sites near each other will increase the crime and would make me think twice in venturing out to the High Street.

I feel very strongly against the move of the gambling site to the application site proposed and hope the council reject the proposal.

Kind regards

Local Erdington Resident.

BINGO PREMISES LICENCE APPLICATION

---

**STATEMENT OF WILLIAM SHIPLEY**

---

1. My name is William Shipley I am a Director of Shipley Estates Limited.
2. I have worked for Shipley Estates Limited for 19 years. I started working for Shipley Estates Limited in 2005 as a shop attendant and shop manager at a number of our venues. I was appointed as a Director in 2005. As Shipley Estates Limited is a family business I, alongside my brother and father, am intimately involved in all aspects of our operation.
3. This statement is submitted in support of the New Bingo Premises Licence Application submitted for 90 – 92 High Street, Erdington, Birmingham, B23 6RS. We currently operate an Adult Gaming Centre ('AGC') Premises Licence at 243 High Street, Erdington, Birmingham, B23 5SS. This licence will be surrendered to Birmingham City Council once our New Bingo Licensed Premises at 90 – 92 High Street, Erdington opens. We also operate a Bingo licensed premises at 167 High Street, Erdington, Birmingham, B23 6SY, this licence will be retained.

**Shipley Estates Limited Background**

4. Shipley Estates Limited is a family business which dates back to the 1950s.
5. My father Harry Shipley and uncle Jon Shipley opened their first amusement arcade for the Shipley family in the 1960s and grew their business to approximately 60 High Street amusement arcades. This business is now operated by myself, my brother Harry Shipley Junior and father. We currently operate 14 High Street gaming premises under the Shipleys name and 3 Bingo Halls under the brand BJS Bingo.
6. Shipley Estates Limited is first and foremost a family business which is run by myself, my brother and my father who is still involved in the operation of the business, we visit our sites every week. We, and our staff, pride ourselves on the community which has been created over the last 60 years and are proud of the Shipleys name.
7. We have an experienced management team beneath us who have operated in the gaming sector for many years. We own the freehold of the majority of our sites that we trade from, and take pride in ensuring that the properties we purchase are brought back to life and maintained to a good standard.



## Overview

8. Our 14 sites hold a mixture of Bingo and AGC Premises Licences issued under the Gambling Act 2005. None of our Premises Licences have ever been subject to Premises Licence Review.
9. All of our premises are 18+ and we operate a strict Think 25 policy. Age verification measures are embedded in our company training, our policies and procedures can be found our Group Compliance Manual which supports this application. Anyone who is unable to prove their age will not be allowed to enter the premises, or be asked to leave. Any refusal must be logged on our IHL SmartHub tablets.
10. Age verification test purchasing is conducted by third party companies (Serve Legal and Check Policy). Test purchasing was conducted at our existing AGC premises at 243 High Street, Erdington on 1 February 2024, and at our existing Bingo premises at 167 High Street, Erdington on 29 July 2024. Our stores passed on both occasions.
11. We are a local business. Myself, my brother and father live in close proximity to many of our venues, including Erdington. Our head office is only 12 miles away from 90 – 92 High Street, Erdington. We go into our stores every week to engage with staff and customers which allows us to know what is happening in our stores. We care about our staff and have good working relationships with our employees.

## Operating Licence

12. We have authority to provide facilities for Bingo through the grant of our Non-Remote Bingo Operating Licence issued by the Gambling Commission (licence number 000796-N-103432-019). Our Operating Licence can be found in our supporting documents to this application. In granting our Operating Licence, the Gambling Commission has approved the measures which we have in place to ensure that we implement effective player protection, anti-money laundering and security procedures; and trade responsibly in accordance with gambling legislation, the Licensing Objectives and the Gambling Commission's Licence Conditions and Codes of Practice ('LCCP').
13. Shipley Estates Limited is subject to Gambling Commission inspection, ensuring that its training and compliance policies and procedures comply with the LCCP attached to our Operating Licence.
14. Shipley Estates Limited completed a Compliance Assessment with the Gambling Commission in April 2023. The inspection was conducted via a premises visit to 6-8 Silver Street, Leicester, LE1 5ET on 18 April 2023. A further unannounced targeted premises visit was made to our premises at 128 The Parade, Leamington Spa, CV32 4AG. The Gambling Commission also reviewed our policies and procedures on 31 March 2023. The Gambling Commission concluded that no further action was required by us. The advisory comments made were actioned immediately and reflected in our



Group Compliance Manual which is submitted in support of this application. The Gambling Commission's letter outlining the outcome of our Compliance Assessment can be found in the supporting documents to this application.

15. I have a Personal Management Licence which was issued by the Gambling Commission on 1 January 2009. My Personal Management Licence number is 000-000-000798-M-201084-002.

## **Operation**

16. We have operated from Erdington High Street and the wider Birmingham area for over 20 years. We are proud to contribute to the High Street and know the High Street well as long standing operators.
17. We operate two premises in the wider Birmingham area, a Bingo licensed venue at Unit 48, One Stop Shopping Centre, Perry Barr, Birmingham, B42 1AA and an AGC licensed venue at Shipleys, Hawthorn Road, Kingstanding, Birmingham, B44 8PP. We attach a letter from One Stop Shopping in relation to our Perry Bar venue in support of our operation.
18. Our new venue at 90 – 92 High Street, Erdington will be managed by an experienced venue manager who will be supported by a team of staff.
19. All current staff currently working at our existing AGC premises 243 High Street, Erdington will transfer over to the new venue at 90 – 92 High Street, Erdington. The team will be made up of long-standing members of staff, some of whom have been with us since 2005.
20. Our Erdington Town Manager, Samantha Sones, will be directly involved in the transition of staff and initial training. Samantha has been with our company for 18 years.
21. Our new venue 90 – 92 High Street will incorporate a lobby with a set of glazed internal automatic doors equipped with Maglocks. The Maglock system is operated by staff who will supervise the premises circulating the floor. The use of the Maglock will be at the discretion of the staff at any time on any day in the light of local conditions.
22. Our staff are not confined to counter positions. Our staff are active within our premises walking the floor, and proactively engage with customers. Engagement is had particularly on entry, not only to implement our Think 25 policy, but to build customer relationships and ensure effective identification of potentially vulnerable individuals.
23. All of our premises operate CCTV to monitor customer behaviour. CCTV displays are appropriately situated to ensure that all customer areas are monitored. Myself and my brother Harry have 24 hour access to our CCTV which enables us to monitor our venues remotely at all times. This system allows us to not only monitor customers, but to also review our customer service to ensure customers are being interacted with.



24. All premises have access to the Staff Guard security system provided by Linked Integrated. We have used the Staff Guard system for 10 years. Staff have handheld devices enabling them to alert the Linked Integrated control room to an incident. The control room staff are able to speak to site staff through 2 way audio and review the nature of any incident via our CCTV before determining its seriousness. Linked Integrated then decide whether the assistance of emergency services may be required. The system provides added security for staff, as well as assisting management. Staff Guard is widely used in the retail and leisure industry.

### **Responsible Authorities**

25. On 23 October 2024 we contacted West-Midlands Police and Birmingham City Council's Licensing team via email to conduct pre-consultation on our proposed New Bingo Premises Licence Application for 90 – 92 High Street, Erdington. The West-Midlands Neighbourhood team visited our premises at 243 High Street, Erdington following our consultation with them. The Neighbourhood Team spoke with our staff and relayed no concerns to them. No subsequent comments were made to our solicitors Poppleston Allen and no objection was made by West-Midlands Police to our application. No comments nor representations were made by the Council Licensing Department, the Gambling Commission, Planning, Environmental Health, the Fire Authority, Child Protection or His Majesty's Revenue and Customs.

### **Training and Compliance**

26. All of our staff receive initial training when they join our team. This is followed by refresher training which is provided as a minimum every 6 months. All training is logged on our system which can be viewed by us at any time.
27. Training is provided by Rod Stone who is an Area Manager. Rod has been with Shipley Estates Limited for 2 years. Rod works closely with Mark Wilson who is our Head of Operations and responsible for compliance. Mark and Rod have primary responsibility for ensuring that we are up to date with any changes to the Gambling Act 2005, the LCCP and any relevant guidance and regulations. We also receive industry updates from the Gambling Commission and our legal advisors Poppleston Allen.
28. Staff training considers local area characteristics, as identified in our Local Area Risk Assessment, consultations with responsible authorities and any representations made. Our Local Area Risk Assessment is submitted as part of our supporting documents to this application. We understand that our local risk assessment and staff training are live matters which are regularly re-assessed and adapted to any emerging or changing risks in the locations in which we operate. We are committed to partnership working and engage with the local Erdington BID to share best practice and local knowledge of venue operation or identified risks, whether or not they strictly relate to gambling premises.
29. All of our premises must adhere to our Group Compliance Manual which outlines our policies and procedures, risk assessments and staff training. Our manual includes policies and procedures which cover the following areas:-

- a. Access to Gambling by Children and Young Persons,
- b. Access to Premises by the Gambling Commission's Enforcement Officers,
- c. Advertising Standards & Marketing,
- d. Customer Interaction,
- e. Employment of Children and Young Persons,
- f. Fair and Open Practice, Complaints and Disputes Resolution,
- g. Customer Information and Help for Problem Gamblers,
- h. Anti-Money Laundering, and
- i. Cash Related and Self Exclusion.

**Statement of Truth**

The facts stated in this witness statement are true to the best of my belief.

Sign ..... 

Date ..... 23/12/2024



BINGO PREMISES LICENCE APPLICATION

---

**STATEMENT OF ROD STONE**

---

1. My name is Rod Stone I am an Area Manager for Shipley Estates Limited.
2. This statement is submitted in support of the New Bingo Premises Licence application for 90 – 92 High Street, Erdington, Birmingham, B23 6RS. Shipley Estates Limited currently operate an Adult Gaming Centre ('AGC') Premises Licence at 243 High Street, Erdington, Birmingham, B23 5SS. This licence will be surrendered to Birmingham City Council once the new Bingo Licensed venue at 90 – 92 High Street, Erdington opens. Shipley Estates Limited also operate a Bingo Licensed Premises at 167 High Street, Erdington, Birmingham, B23 6SY, this licence will be retained.

**Background**

3. I joined Shipley Estates Limited as an Area Manager in May 2022. As an Area Manager I am responsible for overseeing our 14 premises. I am responsible for delivering training to our employees.
4. Prior to my role at Shipleys, I was a General Manager for JD Wetherspoon and Stonegate Pub Company Limited. As a small family run business I must acknowledge the care and support provided by Shipley Estates Limited to their employees, and customers. The community feel created by Shipleys is present in all of our venues.
5. I hold a Personal Management Licence granted by the Gambling Commission (licence number 066159-M-339883-001).

**Training**

6. I deliver training to our staff on behalf of Shipley Estates Limited. I work closely with my colleague Mark Wilson who is our Head of Operations and responsible for compliance. Our training materials are live working documents which are continually updated to reflect changes to guidance and legislation, and internal policies and procedures.

7. As part of our induction all new starters are given our level 1 training. This training covers compliance and social responsibility and ensures all staff are aware of our obligations under the Gambling Act 2005. Training modules include:-
- a. The Licensing Objectives,
  - b. Protection of Children and Young People,
  - c. Access to Premises by Statutory Authorities,
  - d. Advertising Standards and Marketing, Customer Interaction,
  - e. Tools to Help Customers Keep Control,
  - f. Employment of Children and Young Persons,
  - g. Fair and Open Practice and Dispute Resolution,
  - h. Information on how to Gamble Responsibility, and Help for Gamblers with Problems, Money Laundering,
  - i. Self Exclusion,
  - j. Customers who Breach / Attempt Breach,
  - k. Local Area Risk Assessments,
  - l. Gaming Machines, Tablets and B3 Ratios, Shop Security and General Knowledge,
  - m. Understanding of the IHL Smart Tablet, and
  - n. How to use, complete and enter information on all sections.
8. Refresher training is given to our employees at a minimum of 6 monthly intervals. Scheduled training may be pulled forward should there be updates to guidance or legislation which we must relay to our staff. Our 2024 Compliance and Social Responsibility Refresher Training is submitted in support of this application.
9. All training is recorded electronically on our system which is available to review at any time.

## **Operation**

10. As an Area Manager I am in our venues daily. I actively engage with staff and customers, and assist in the day to day management of our stores.
11. Our venues attract a wide demographic of individuals. As many of our staff have worked with us for a long time they have built longstanding relationships with many of our customers. Our staff are aware of their obligation to interact with customers, whether they be new or regulars. Our staff interact with customers daily across all of our venues.
12. We operate on High Streets across the Midlands and have no knowledge of issues relating to stolen goods or proceeds from stolen goods being present in our venues. Should such a situation arise the goods would not be permitted in our venue. The customer would be barred and we would notify the relevant authority. Similarly, we do not experience issues with the Homeless community in Erdington, or any of our other towns.

### Statement of Truth

The facts stated in this witness statement are true to the best of my belief.

Sign .....  


Date ..... 2/1/25



## **OPERATIONAL, SECURITY AND NOISE MANAGEMENT PLAN**

**September 2024**

### **Background**

Shipley Estates Limited are an independent operator of both Adult Gaming Centres and Bingo premises. It is a family owned business with the owners being very hands on operators visiting their sites on regular occasions during the week. Shipley Estates Limited holds an operating licence issued by the Gambling Commission and trades other premises throughout the country.

We will operate a good neighbour policy by implementing a robust operational management plan and measures to ensure that the premises, our customers and our relationship with our neighbours are all well managed. Experienced trained staff operating at the company's current premises at 243 High Street, Erdington, where there have been no complaints of nuisance or crime and disorder, will be relocated to the new premises.

All staff will be provided with a copy of this Operational, Security and Noise Management Plan, which will be discussed as part of their staff induction and training. They will be reminded of the plan as part of their ongoing staff training and refresher courses and annual workplace reviews.

The Plan will be reviewed by management annually and updated as necessary to respond to any new initiatives, best practices and experiences.

### **Documents**

Shipley Estates Limited in operating these premises will have in place a Local Area Risk Assessment which will be amended from time to time and all operational and security measures in the Local Area Risk Assessment will be complied with. The current Risk assessment is available on request and deals with operational and security matters and has been approved. This is in practice the Operational and Security Plan.

### **Operational**

The application site has direct access off the pavement onto the street and all customers will be clearly seen by staff when they enter the premises. Staff <sup>58</sup>do not remain behind a counter but operate on the

shop floor and interact with customers. Shipley Estates Limited have in place operating policies and procedures which promote the licensing objectives which include protecting the vulnerable. No person under 18 is allowed to enter the premises. Those visiting the premises will be monitored and looked after by staff who work on the shop floor, as opposed to behind a screen, and all staff are trained to be both aware of vulnerable people and other social needs.

Staff will be present at the premises throughout the duration of the opening hours. Any individuals who are deemed under the influence of excessive alcohol or banned substances shall not be allowed to enter the premises. Notices at the entrance shall be in place stating that consumption of alcohol is not permitted on the premises.

Shipley Estates Ltd operate a Think 25 proof of age scheme, which shall be operated at the premises where any person who appears to be under the age of 25, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry. Notices at the entrance will also be displayed in regard to the Think 25 policy.

Entry will be controlled by staff and if deemed appropriate by an electronic lock. The use of the Mag lock will be at the discretion of the staff at any time in light of the local conditions.

## **Security Measures**

The premises shall install and maintain a comprehensive CCTV system, which shall continuously record whilst the premises are open. The CCTV system will cover all public areas including all entry and exit points. All recordings shall be stored for a minimum period of 14 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.

The CCTV will be available to review remotely and footage can be provided to relevant parties when required. To enable the active management of the premises and monitoring of customers, the floor layout will be designed to avoid blind spots. Notices shall be prominently displayed within the premises stating that CCTV is in operation.

The company would operate the 'Staff Guard' system (<https://www.staffguard.co.uk/>) whereby a number of cameras with audio are linked to Staff Guard's control room. Site staff would have personal 'on person/handheld' devices enabling them to alert the remote control room to an incident and for control room staff to speak to site staff through 2 way audio and review the nature of any incident before determining its seriousness and deciding whether the assistance of the emergency services might be required. The system provides added security for staff as well as assisting management and is



now widely used.

There will be limited access to cash when the premises are trading, cash is stored in a cash recycler which is locked at all times.

The premises will also keep an incident log and record any incidents, Challenge 25 refusals of entry, any attempts by children or young persons to gain access to the premises to gamble, any visits by a relevant authority or emergency service or any other relevant issues. The incident log will be made available on request to an authorised officer of the Licensing Authority or the Police.

All incidents will be recorded on the IHL SMART Tablet including crime reference numbers where applicable. Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.

Shipleys operate are registered with the respective trade associations for crime bulletins (BACTA and the Bingo Association) and also have their own internal security alert system.

### **Dispersal Policy**

The premises will not attract large crowds of people and there will not be a mass departure of people at the same time, therefore we do not have formal dispersal policies in place for our premises. Customers do not tend to loiter outside the premises, however, customers will be reminded to respect our neighbours when they leave and any customers found to be loitering near the building after dusk will be politely asked by staff to move on. Staff will also assist to provide relevant information to customers who require taxi or other transport information.

### **Noise Management Plan**

Entry will be controlled by staff and if deemed appropriate by an electronic lock.

The double access door system with controlled automatic doors for the entrance lobby will minimize incidental noise egress.

Staff will at all times monitor and observe customers and have measures in place to protect local amenities. Staff will also monitor the area immediately outside the premises and assist customers who need transport information.

There will be no tannoy systems and no loud amplified music will be played inside or outside the

premises, apart from the usual background music played inside the premises.

Raised voices and noisy behaviour will be discouraged.

The new shopfront will incorporate a lobby with a set of lazed internal automatic doors equipped with Maglocks capable of being operated by staff who will supervise the premises circulating the floor. The use of the Maglock will be at the discretion of the staff at any time and on any day in light of local conditions.

The main entrance doors will incorporate an automatic closer system. Staff will ensure the main entrance doors will not be fixed or propped open at any time whilst the premises are trading.

# Shipley's Group Compliance Manual

## (Back of House)

### **Contents**

- 1. Premises Licence.**
- 2. Shipley's Group Letter of Corporate Commitment.**
- 3. Principal Concepts.**
- 4. Policies and Procedures.**
  - i. Access to Gambling by Children and Young Persons Policy
  - ii. Access to Premises by the Gambling Commission's Enforcement Officers Policy
  - iii. Advertising Standards & Marketing Policy
  - iv. Customer Interaction Policy
  - v. Employment of Children and Young Persons Policy
  - vi. Fair and Open Practice, Complaints and Disputes Resolution Policy
  - vii. Customer Information and Help for Problem Gamblers Policy
  - viii. Anti-Money Laundering and Cash Related Matters Policy
  - ix. Self-Exclusion Policy
- 5. Risk Assessments.**
  - i. Local Gambling Risk Assessment (LARA)
  - ii. Anti-Money Laundering Risk Assessment (AML)
- 6. Staff Training**
  - i. Summary of Staff Training
  - ii. Summary of IHL Training Log
  - iii. Copy of the Compliance Training File



National House  
Etchell Rd  
Bitterscote  
Tamworth  
B78 3HF

October 2023

## LETTER OF CORPORATE COMMITMENT

**To be agreed and signed by Board for incorporation into the new policies and procedures policy manual.**

Dear Colleagues,

You will all no doubt be aware that the Company and its provision and operation of its various gambling facilities in our Bingo and AGC Venues are the subject of regulation by the Gambling Act 2005. The Act, along with the related Licence Conditions and Codes of Practice (LCCP) is regulated by the Gambling Commission with the primary objective and intention that operators fully comply with the three Licensing Objectives, namely;

- 1) Gambling is conducted in a **FAIR** and **OPEN** way,
- 2) **CHILDREN** and other **VULNERABLE** people are protected from being harmed or exploited by gambling, and that assistance is made available to people who are, or may be, affected by problems related to gambling.
- 3) Preventing gambling from being a **SOURCE OF CRIME OR DISORDER**, being associated with **CRIME OR DISORDER** or **BEING USED TO SUPPORT CRIME**.

We as a company have always committed ourselves as an integral part of our Company ethos, to provide through you all, the best possible levels of care to our customers. We believe that under the previous legislative regime, we achieved this as a consequence of that ethos and your hard work, good sense and commitment. The latest system of regulation now places formalised legislative requirements on us to ensure that the three licensing objectives identified above are met.

These requirements include written policies, dedicated documentation, a risk assessment and extensive training delivery along with the need for us to provide evidence on occasion to the regulators of our commitment to the process.

The gambling that we provide in our premises falls into a number of areas of regulatory focus. As part of these primary offerings, we provide facilities for customers to enjoy playing bingo and gaming machines, which does raise some generic risk issues related to the Licensing Objectives which we all need an on-going commitment to address.

We recognise that gambling is enjoyed by the vast majority of those that experience it. Equally, we also recognise that in a small minority of the population gambling can become an addictive behaviour with all the implications that involves for the individual, their family and those around them.

We believe we have always had in place a focus to ensure that we seek to effectively counter the risk posed by gambling. The fact that the need for this is now driven by legislation and a formalised commitment to the licensing objectives, simply reinforces that focus.

With that in mind, the company is planning comprehensive training and retraining for staff and management who are involved in delivering the gambling product. Personal Management Licence Holders (PML) should be reminded that they have an on-going responsibility to comply with the conditions attached to their licences and to ensure they 'cascade' training information down to their staff are at the front end of that product delivery. Records of all such training are now regularly demanded by the Gambling Commission and management will ensure that such records



are maintained and made available to the regulator when regulatory inspections take place.

We cannot impress on you enough that the regulatory environment is demanding and any failures might well cause us reputational embarrassment at the very least and may even place our continuing gambling offering in jeopardy.

We are however confident you will all support the Licensing Objectives and ensure that all training, communication and procedures are implemented in your premises.

Yours Sincerely,

William Shipley & Harry Shipley  
Directors

**Shipley Estates Ltd**  
**Registered in England – No. 2893985**

#### Document Version Control

Version	Author	Date	Description of change
V1.1	Mark Wilson	23 <sup>rd</sup> March 2023	Amends made re IHL tablet.
V1.2	Mark Wilson	26 <sup>th</sup> March 2023	Versioning added
V1.3	William Shipley	19 <sup>th</sup> October 2023	Amends made re Interaction evaluation Amends made re Customer disputes

#### Document Sign-Off – Key People

Person	Position	Date	Signature
William Shipley	Director	October 2023	
Mark Wilson	Operations Manager	October 2023	



**GAMBLING ACT 2005****PRINCIPAL CONCEPTS****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. Monitoring of procedures is on-going and subject to compliance inspection.

**Licensing Objectives**

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

**Policy and Procedures**

- We pay an annual contribution, to the GambleAware towards the prevention and treatment of problem gambling, public education on the risks of gambling and how to gamble safely, and the identification of and treatment of problem gamblers.
- We operate an on-going training program for key staff to ensure awareness and compliance of our social responsibility and other statutory requirements. Individual written policies and procedures are in place and adhered to in respect of:
  - (a) Access to Gambling by Children and Young Persons
  - (b) Access to Premises by the Gambling Commission's Enforcement Officers
  - (c) Advertising Standards and Marketing
  - (d) Customer Interaction
  - (e) Employment of Children and Young Persons
  - (f) Fair and Open Practice and Dispute Resolution
  - (g) Information on how to Gamble Responsibly and Help for Problem Gamblers
  - (h) Money Laundering, Cash Handling and Suspicious Transactions
  - (i) Self-Exclusion
- Staff are trained on all of the Policies and Procedures above on their induction to the Company and then again on an annual basis as an update and refresher.
- The content of staff training is reviewed by Management and delivered by Area Manager's/Operations Manager.
- Area Manager's/Operations Manager have procedures in place to ensure that interim Policy & Procedure changes are made, implemented and trained in, as and when they are required.
- Staff refresher training is delivered by PowerPoint presentations each year.
- Understanding of the Policies and Procedures is checked using a power point presentation combined with a compliance structured questionnaire, for all staff.
- Documented evidence of the training is recorded and retained.



- We operate our business with integrity, due care and diligence with necessary systems in place to combat crime and disorder. Written policies and procedures are in place concerning the handling of cash, designed to minimise the risk of crime, such as money laundering and the avoidance of illicit credit.
- The Company understands it's responsibility to take all reasonable steps to ensure that staff involved in the provision of facilities for bingo and gaming machines are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become difficult to control. Specifically: -
  - Area Manager's/Operations Manager will ensure that copies of the 'Employee Guide to Responsible Gambling' Leaflets are made available in all staff rooms and management offices.
  - All staff receive induction and annual refresher training on where they can obtain help if they think they, their friends or their family may have problems controlling their gambling.
- Conflicts of interest between the Company and our customers are managed transparently and fairly.
- Gaming machines are only purchased or rented from reputable, licensed manufacturers and comply with the Gambling Commission's technical standards; exhibit the applicable stakes and prizes levels and the chances of winning. The rules of each game are either available to customers in writing or communicated by staff.
- We do not provide credit in connection with gambling nor participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.
- We seek to prevent systematic or organised money lending between customers on the premises, and staff are trained to be alert to such practice, and to report any instances of substantial money lending to the Manager if they become aware of them.

National House  
 Etchell Rd  
 Bitterscote  
 Tamworth  
 B78 3HF

Date .....

Name.....

Position .....

Signature.....

**TO BE RETAINED ON THE PREMISES (MANAGERS COPY ONLY)**



**GAMBLING ACT 2005****ACCESS TO PREMISES BY CHILDREN AND YOUNG PERSONS****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. Monitoring of procedures is on-going and subject to compliance inspection.

**Policy and Procedures:**

The Company acknowledges its obligation to ensure that its' staff prevent children and young persons from accessing gambling facilities. 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 to our premises.

The company operates the 'Think 25' policy

- Any person known to be under 18 years of age must be refused entry to the Licensed Premises (Bingo or AGC)
- If the person admits to being under 18, they must 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, must be challenged at the point of entry.
- If they claim to be 18 or over, satisfactory proof of age must be requested and provided before entry is allowed.
- Acceptable identification should: -
  - Contain a clear photograph.
  - Show the persons date of birth.
  - Be valid. (I.e. In date).
  - Be legible and have no signs of tampering or reproduction.
- Acceptable forms of identification are: -
  - Passport
  - Photo Driving Licence
  - Any ID which contains the PASS logo Hologram such as Citizen Card
- Where the person cannot produce one of the above, they should be politely advised that they will not be permitted to enter until such time as they provide proof.
- They should be shown, have explained to them, and be offered, a Proof of Age Card application form.
- Should the person then refuse to leave, they should be advised that the age restriction is a legal requirement and if broken the police will be notified.
- If they still will not leave, the Manager must be called to take over the situation.
- Think 25 Age Verification Log
  - Each time a customer is asked for identification, this must be recorded in the Age Verification Log section of the IHL Smart Tablet, which is kept at the front of the premises.
  - The Age Verification Log must show the following details: -
    - The date and time of the Interaction
    - The customer's name
    - The type of ID produced





- The customers date of birth and age shown on the ID
  - Whether entry was allowed or refused
  - The signature of the member of staff that carried out the interaction
- If the customer can verify their age by the production of suitable ID, they may be permitted entry to the Premises and 'Entry Allowed' should be entered as the outcome on Age Verification Log
  - If the customer cannot verify their age by the production of suitable ID, they must be refused entry to the club. The Manager must be advised and 'Entry Refused' entered as the outcome in the Age Verification Log.
  - **For Data Protection purposes the identification document/Account/Serial numbers MUST NOT be recorded.**
- In cases where an adult member attempt to facilitate, encourage or endorse the entry of a young person to the Bingo or AGC Venue, entry will be refused to the young person until they can produce valid ID as per the Think 25 Policy. The adult will receive an oral warning from the Manager and if this re-occurs then the matter will be reported to the Gambling Commission and where appropriate the Police.
  - In all cases the member of staff (Attendant, Supervisor or Manager) will complete an Age Verification Log and Incident Log using the IHL Smart Tablet. In compliance with section 83 of the Gambling Act 2005, should the Manager/Supervisor become aware that an underage person has used gambling facilities despite the above controls being in place, the Manager/Supervisor will make best endeavours to return any stake or fee to that person as soon as is reasonably practical. At the same time, any outstanding prizes or winnings for that person will not be paid.
    - In all cases the Manager/Supervisor will complete an Age Verification Log and Incident Log using the IHL Smart Tablet and circulate to Area Management.
    - Management will report incidents of U-18 gambling to the Gambling Commission.
  - The company is a member of BACTA and The Bingo Association. One of the conditions of membership is that we participate in the associations Age-Verification test purchase scheme. The results of these test purchases are reviewed by senior Management. Any instances of test purchase failure is investigated by senior Management and corrective action taken as necessary.
  - 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.

National House  
 Etchell Rd  
 Bitterscote  
 Tamworth  
 B78 3HF

Date.....

Name.....

Position.....

Signature.....

**TO BE RETAINED ON PREMISES (MANAGERS COPY ONLY)**



**GAMBLING ACT 2005****ACCESS TO PREMISES BY ENFORCEMENT OFFICERS AND AUTHORISED OFFICERS AND  
REPORTING INFORMATION****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. Monitoring of procedures is on-going and subject to compliance inspection.

**Policy and Procedures**

The Company acknowledges its obligation to ensure that staff co-operate with the Gambling Commission's Enforcement Officers, the Police or Licensing Authority's Authorised Officers in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises contained under Part 15 (S.303 to S.326) of the Gambling Act 2005 (refer to page 2 of this document) and that:

- The Company must provide the Gambling Commission, Police or local Licensing Authority with any information that they suspect may relate to the committing of an offence under the Act, including an offence resulting from a breach of an operating or premises licence condition or a code of practice provision having the effect of a licence condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating Licence.
- 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:
  - (i) The numbers of people making use of the facilities and the frequency of such use;
  - (ii) The range of gambling activities provided by the licensee and the number of staff employed in connection with them; and
  - (iii) The licensee's policies in relation to, and experience of, problem gambling.
- The Company must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time, and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.
- The Manager/Supervisor will be informed immediately an Enforcement Officer or Authorised Person (such as a licensing authority officer) properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with Enforcement Officers and Authorised 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.

National House  
Etchell Rd  
Bitterscote  
Tamworth  
B78 3HF

Date .....

Name .....

Position .....

Signature .....

**TO BE RETAINED ON PREMISES (MANAGERS COPY ONLY)**



**GAMBLING ACT 2005, PART 15**

Staff are to co-operate at all times with the Commission's enforcement officers and local authority authorised persons in the proper performance of their compliance functions.

The officers' rights of entry to premises are contained in Part 15 of the Act which deals with inspection (Sections 303 to 326).

- 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 (Section 306).
- Constables, enforcement officers or authorised person may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating licence or premises licence is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating licence (Section 307).
- Entry may also be made to assess the likely effects of activity when application has been made for a premises licence (section 313).
- A constable or enforcement officer may require the holder of an operating licence to produce, within a specified period, a copy of the authorisation (Section 316). Failure to comply without reasonable excuse to a request to produce a copy of the authorisation may result in an offence and be liable on summary conviction to a fine not exceeding level 2.
- Section 317 sets out powers of the constable, enforcement office or authorised person and include inspection of any part of the premises or any machine on 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.
- Section 320 provides that 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 (Section 321).
- Section 323 provides that a constable, enforcement officer or authorised person may use reasonable force to enter premises.
- Section 326 provides that it is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

**Reporting 'Key Events'** – 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 of the occurrence of any of the key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence.

Date .....

Name .....

Position .....

Signature .....

**TO BE RETAINED ON PREMISES (MANAGERS COPY ONLY)**



**GAMBLING ACT 2005****OVERVIEW OF ADVERTISING AND MARKETING POLICY  
AND MANAGEMENT/STAFF RESPONSIBILITIES****Statement**

The Company recognises that advertising bingo and gaming machines in the UK may cause social responsibility issues for a small number of vulnerable people and as a consequence the company will use advertising and marketing techniques with particular caution, in line with the LCCP and Licensing Objectives and in accordance with the Committee of Advertising Practice (CAP), the Broadcast Committee of Advertising Practice (BCAP) and the Gambling Industry Code for Socially Responsible Advertising.

**Introduction**

The company will not advertise in any way intended to stimulate the interest of persons under the age of 18 years, either in content, location or timing of advertising.

The company will not market to persons under the age of 18 years.

Any incentive or reward scheme or other arrangement under which customers may receive money, goods, services or any other advantage the company offers, will be made available strictly in accordance with the LCCP marketing code. The company will only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

Staff will not make unsolicited offers of free alcoholic drinks for consumption at a time when they are gambling.

The relevant extracts from the Gambling Commission Licence Conditions and Codes of Practice are set out below for information.

**LICENCE CONDITIONS AND CODES OF PRACTICE - MARKETING****Social responsibility code provision**

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:
  - a. Dependent on the customer gambling for a pre-determined length of time or with a predetermined frequency; or
  - b. 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.

**Ordinary code provision**

Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling. Licensees must take into account the Commission's guidance on high value customer incentives.

## GAMBLING ACT 2005

### LICENCE CONDITIONS AND CODES OF PRACTICE -ADVERTISING

#### Ordinary code provision

All advertising of gambling products and services should be undertaken in a socially responsible manner. In particular, licensees should comply with the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) advertising codes of practice which apply to the form and media in which they advertise their gambling facilities or services, and for media not explicitly covered should apply the principles included in these codes of practice as if they were explicitly covered. Licensees should also follow any relevant industry code of practice on advertising.

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.

#### MANAGEMENT AND STAFF INSTRUCTIONS;

- Any proposed advertising needs to be seen and approved at Head Office level and any issues or concerns as to its content etc., will follow and comply with the policy identified in the narrative of this section.
- Any rewards or incentives similarly must comply with the LCCP requirements identified in this Section and staff must heed the restrictions and circumstances where complementary drinks might be made available to customers.
- PML Holders will ensure they have an in-depth knowledge of this section and keep up to date with the Gambling Commission's codes of practice.

National House  
Etchell Rd  
Bitterscote  
Tamworth  
B78 3HF

Date.....

Name.....

Position.....

Signature.....

**TO BE RETAINED ON THE PREMISES (MANAGERS COPY ONLY)**

## CUSTOMER INTERACTION POLICY

**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. Monitoring of procedures is on-going and subject to compliance inspection.

**Policy and Procedures:**

The company operates 'open plan' premises that are manned by staff and management throughout operational hours. Gambling, including gambling on machines, is not hidden away in private areas. All areas are well lit and are covered by CCTV.

The Company operates a 3 stage Policy for Customer Interactions. The 3 stages are: -

- **Identifying Problem Gamblers** – All staff and management should be aware of and alert to the signs of problem gambling and know when it is appropriate to take action.
- **Interaction with the Customer** – If a member of staff or management identifies a potential problem gambler then the Manager/supervisor will perform the Customer Interaction. All cases of suspected problem gambling must be reported to the Manager.
- **Recording the Details of the Interaction** – All Customer Interactions that are performed by a Manager/Supervisor must be reported to senior management via the customer interaction log on the IHL Smart Tablet.

**Identifying Problem Gamblers**

Staff and management should be alert to the characteristics or signs of problem gambling, including:

- Customer informs an employee that they feel their gambling spend is out of control.
- Family and friends may inform staff/management about people that they are concerned about.
- Unacceptable behaviour towards staff, other customers, machines or company property.
- Crying, mood swings, irritability, restlessness, not caring about their appearance, even personal hygiene.
- Demonstrating signs of distress, agitation or aggression.
- Approaching staff or other customers for a loan.
- Significant periods of time engaged in gambling activity, particularly on gaming machines.
- Repeated use of ATM's
- Obvious money difficulties and debts.
- Concealing or lying about their gambling behaviour.
- Frequently spending all the money, they have brought with them. It should be noted however that some customers may have brought in a pre-determined amount to limit their spending.
- Sees gambling as a way to 'make money'
- Paranoid belief that their gambling losses are as a result of the game being 'fixed'
- Chasing losses.
- Customers engaging other customers to gamble on their behalf

**Staff and Management should also take into account all other relevant information when deciding to perform an interaction**

- This includes taking into account non-obvious signs of, or overt behaviour associated with, problem gambling, such as time or money spent on gambling.
- Examples of non-obvious behaviours associated with customers that may have potential problem gambling problems include: -

1. Customers that 'loiter' around for promotional offers in the hope of winning money to gamble with.
2. Customers that play a machine until closing time, then are back the next morning to continue playing.

### Interaction with the Customer.

- Where a member of staff is approached by a customer who believes that they have a gambling problem, the member of staff must be supportive and sympathetic and direct the customer initially to the 'Let's Keep It Fun' notices as well as 'Let's Keep It Fun' leaflets that are provided in all arcades and toilets. Additionally, they should let the customer know that the Manager has more information that will assist the customer with their queries or concerns. Tell the customer that you will let the Manager know that the customer was interested in the information.
- In cases where a suspected problem gambler has been reported to or observed by a member of the team, then ideally the Duty Manager, would initiate a customer interaction. Where possible this interaction will be conducted discreetly and in private, by the Duty Manager who will discuss their concerns about the customers well-being and will provide either materials produced by the company or details of the most appropriate provider of help or guidance for the customer's needs. (Refer to 'Let's Keep It Fun' Leaflets in the first instance or the BeGambleAware website if further details may help).
- In addition to providing support contact details of the sources of help, the Manager should discuss the possibility of Self-exclusion (See Self Exclusion Policy for more details) with any customer who admits to having lost control of their gambling or who are exhibiting symptoms of distress.
- In serious cases it may be necessary to stop the customer gambling by asking them to leave the premises; this should be conducted at a time when it is safe to do so.
- The Manager may act on 3<sup>rd</sup> party information (such as family member or friends) after ascertaining the truth of the facts.
- With the players consent, the Manager may act on information provided, including information from any treatment agency or service, or pass on information to these services.

### Recording the details of Customer Interactions.

- In all cases where a member of staff or management has been approached by a customer who has a concern about their gambling or, has requested information on responsible gambling, this will be reported to the Manager. This interaction will be logged as a Customer Interaction on the IHL Smart Tablet with as many details as are available.
- All Managers will be trained by their Area Manager and given advice on how best to perform Customer Interactions. In addition, all Managers have access to their Area Manager during all operating hours so that they can seek help and advice when considering a Customer Interaction.
- Members of staff and management are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

### Evaluating Customer Interactions.

- The Interaction Manager receives an electronic copy of all Customer Interactions.
- Site Managers also review Customer Interactions on an ad hoc basis in their shop.
- The Interaction Manager will then liaise with the Site Manager to give feedback and suggestions in real time to ensure that Customer Interactions are logged and recorded correctly, and talk through next steps if necessary.
- Customer Interactions are reviewed and evaluated at regular (Usually quarterly) with the Interaction Manager and Operations Manager. Information is shared and reviewed on how many times the Management & Keyholders at each site have performed and recorded an interaction in the previous period.
- Patterns of best practice and gaps are identified, discussed and corrective actions agreed if required.

National House Etchell Rd  
Bitterscote Tamworth  
B78 3HF

Date.....

Name.....

Position.....

Signature.....

**TO BE RETAINED ON THE PREMISES (MANAGERS COPY ONLY)**





## GAMBLING ACT 2005

### EMPLOYMENT OF CHILDREN AND YOUNG PERSONS POLICY

#### **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. Monitoring of procedures is on-going and subject to compliance inspection.

#### **Policy and Procedures:**

- The Company Policy is not to employ Children or Young Persons under the age of 18.
- All job advertisements specify that all applicants must be over 18 years old.
- All job applicants are required to complete an application form which includes a section to confirm that they are over 18 years of age.
- All successful candidates provide the company with a valid form of identification to prove they are over 18 years old.

National House  
Etchell Rd  
Bitterscote  
Tamworth  
B78 3HF

Date.....

Name.....

Position.....

Signature.....

**TO BE RETAINED ON THE PREMISES (MANAGERS COPY ONLY)**



COMPLAINTS AND DISPUTES POLICY

**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. Monitoring of procedures is on-going and subject to compliance inspection.

**Policy and Procedures:**

The Company is committed to ensuring that our customers receive the best possible service at all times. However, we recognise that, sometimes, some of customers do experience problems.

This Policy refers to Complaints and Disputes, the definitions of which are:-

- **Complaint** – means a complaint about any aspect of customer service, gambling activity or product experienced in one of our premises
- **Dispute** – means any complaint which:
  - a) Is not resolved at the first stage of the complaint's procedure; and
  - b) Relates to the outcome of the complainant's gambling transaction

**Complaints Procedure**

- All complaints must be notified to the Manager/Supervisor on the same session where possible.
- Any complaints that the Manager/Supervisor is unable to resolve on the session must be referred to their Area/Operations Manager.
- The Area/Operations Manager must respond in writing to acknowledge all written complaints within 14 days of receipt of the complaint.
- Any complaints received at head office relating to particular premises will be referred in the first instance to the Area Manager concerned for investigation.
- All investigations will be conducted by the Area/Operations Manager within 14 days of the complaint and the outcome of the investigation will be communicated in writing to the complainant within 7 days of the conclusion of the investigation.
- All internal investigations will be completed by the company and the final outcome confirmed to the customer within 8 weeks of the initial complaint being received.
- In all cases of written or verbal complaints that result in an investigation, the complainant will be advised of their right to 'appeal' against the outcome/decision of the Area/Operations Manager.
- The appeal will be heard by an appropriate Senior Manager/Director.
- Details of all written complaints and written responses to complaints will be held for at least two years.
- The Complaints and Disputes Policy forms part of the Company's Terms and Conditions.
- All complaints should be kept confidential by the Complainant whilst both parties seek a resolution.
- All complainants agree that they shall not disclose the existence, nature or any detail to any 3<sup>rd</sup> party. If they do, then this shall be considered a breach of the Terms and Conditions and we will no longer be obliged to continue seeking a resolution to the complaint or dispute and shall be entitled to freeze (or close) any accounts and refuse entry to the premises.
- A copy of the complaint's procedure is available for all customers within the premises.

**Disputes Procedure**

- In all cases the Area/Operations Manager or Director that deals with a complaint must keep full records of the complaint for at least two years.
- All internal investigations will be completed by the company and the final outcome confirmed to the customer within 8 weeks of the initial complaint being received.

- In cases where a complaint has not been resolved in the first instance by the Area Manager or on appeal to a Director, the matter will be referred to the company's Alternative Dispute Resolution (ADR) independent party.
- The Company will provide the ADR party will all documents relating to the complaint.
- The complainant will also have the opportunity of submitting their version of events. The ADR will investigate the dispute in full.
- Both parties will be notified in writing of the outcome or proposed outcome of the investigation.
- The fees for the ADR will be paid in part by the company. The company will not make any charge to or seek to recover any part of their costs from the complainant.
- The decision of the ADR party is final and binding.
- The ADR party shall have the right to refuse to investigate any disputes that have not followed the Complaints procedure or which it considers to be 'frivolous' or 'vexatious'.
- The Company will instruct the ADR party to inform the Gambling Commission of the outcome of all disputes.

National House  
Etchell Rd  
Bitterscote  
Tamworth  
B78 3HF

Date.....

Name.....

Position.....

Signature.....

**TO BE RETAINED ON THE PREMISES (MANAGERS COPY ONLY)**

**CUSTOMER INFORMATION AND HELP FOR PROBLEM GAMBLERS POLICY**

**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. Monitoring of procedures is on-going and subject to compliance inspection.

**Policy and Procedures:**

- The Company pays an annual contribution, to the GambleAware towards the prevention and treatment of problem gambling, public education on the risks of gambling and how to gamble safely, and the identification of and treatment of problem gamblers.
- The Company has a Customer Interaction Policy which seeks to identify potential Problem Gamblers and provide them with help and assistance to gamble responsibly.
- The Company provides information in the form of a leaflet entitled 'Lets Keep It Fun' which includes: -
  - Information on responsible gambling
  - Examples of behaviour that may indicate problem gambling
  - Information on our policies and procedures to assist problem gamblers
  - Information on Self Exclusion
  - Advice on how to take control of problem gambling
  - Contact details for organisation that can provide further help, advice and support.
  - Safer Gambling QR code which acts as a direct URL link to the GamCare website.
- These information leaflets are prominently displayed in all premises at/or near all entrance doors, in all public toilets and near to ATM's.
- The Company has a Self-Exclusion Policy, which clearly sets out the procedures that are followed by our Management to assist customers that wish to self-exclude themselves from our premises to help control their gambling.
- The company provides a link on all of our website pages to Begambleaware.org. Within the Company 'App' there is also a link provided to Begambleaware.org.
- The company includes a responsible gambling message and the Begambleaware.org website on all posters, direct mail, advertising media screens and Social media posts.
- The company provides all employees with information and advice on Responsible Gambling as part of their LCCP training contained within the induction-training guide and tests staff knowledge from time to time. The company also provides a leaflet to each employee on Responsible Gambling, which is called 'An Employee's Guide to Responsible Gambling'.

National House  
 Etchell Rd  
 Bitterscote  
 Tamworth  
 B78 3HF

Date.....

Name.....

Position.....

Signature.....

**TO BE RETAINED ON THE PREMISES MANAGERS COPY ONLY)**

ANTI-MONEY LAUNDERING AND CASH RELATED MATTERS

**Statement**

The Company recognises its responsibility and obligation to comply with the licensing objectives of the Gambling Act 2005 and the License Conditions and Codes of Practice. As part of the Company's procedures for compliance with the requirements in respect of the prevention and detection of Money Laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000 the Company has taken 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).

Staff will receive training on the Anti-Money Laundering policy and monitoring of procedures is an ongoing subject of compliance inspection.

**1) Money Lending**

The Company will use reasonable endeavours to identify and prevent substantial systematic and/or organised money lending between customers in its gambling areas. Managers or staff will immediately report to line managers any instances of substantial money lending of which they become aware. Line managers will report any such instances to the MLO.

**2) Provision of Credit**

The Company does not provide credit in connection with gambling or participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

**3) Money Laundering and Suspicious Transactions Introduction**

This policy is necessary in order to comply with the Money Laundering Regulations 2003, which requires processes to be put in place to avoid the possibility of money laundering. This policy applies to all employees.

Obligations in respect of money laundering were imposed by the Proceeds of Crime Act 2002 ("POCA") and the Money Laundering Regulations 2003 (Regulations). This legislation broadens the definition of money laundering and increases the range of activities caught by the statutory control framework. As a result of this legislation the Company is required to establish procedures to prevent the use of its services and resources for money laundering.

The Company has undertaken a detailed risk assessment of the Money Laundering risks to the business.

**Policy and Procedures:**

The Company is committed to ensuring that all necessary safe guards are in place with regards to the receipt of money by the Company in order to avoid the Company being used to launder money that may originate from the proceeds of crime.

The Company has appointed a Designated Money Laundering Officer (MLO), William Shipley. The MLO may delegate his duties as the MLO to the Finance Manager.

**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 become aware of or suspect the existence of criminal money or property and continue to be involved in a matter which relates to that money or property without reporting their concerns.

### Money Laundering Examples

- Exchange of bank notes for other bank notes
- Exchange of bank notes (especially large bank notes) for coins which are not used or which are largely not used to play machines, especially regular/ frequent instances of such exchanges, whether such exchanges are effected at cash desks, note change machines, note acceptors or any other exchange facility
- Stained or unusual bank notes

### Staff

- Staff are trained to look out for transactions which may amount to Money Laundering
- Wherever possible, staff will refuse to effect such transactions and/or any other transactions that they suspect may represent money laundering and will report all/any such transactions using the disclosure procedure below.

### Disclosure Procedure

- Where you know or suspect that money laundering activity is taking/has taken place the disclosure must be notified to William Shipley, the designated MLO, as soon as possible. Due to the importance of this issue, notification should normally take place immediately by telephone or, where that is not possible, by email.
- The MLO should be contacted without delay.
- No discussions should take place with colleagues as confidentiality is paramount and you need to ensure you do not alert the person who you have concerns about.
- You will be informed if the MLO makes a disclosure report to the relevant authorities. In this case, no transactions must be completed until clearance has been given by the authorities, or seven days have elapsed since the disclosure was made to them.
- The MLO shall maintain a file of all notifications received detailing the method of verification used to identify the person.

National House  
Etchell Rd  
Bitterscote  
Tamworth  
B78 3HF

Date.....

Name.....

Position.....

Signature.....

SELF – EXCLUSION

**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. Monitoring of procedures is on-going and subject to compliance inspection.

**Policy and Procedures:**

Whilst most customers are able to enjoy and control their gambling, this business recognises its duty of care to those who cannot. Accordingly, we provide a self-exclusion facility for those clients to request their exclusion for a fixed period of time.

**Customers that request Self Exclusion**

- If a customer asks a member of staff about Self Exclusion, they will be provided information about self-exclusion and the self-exclusion process that gives them the information they need about the process.
- If the customer wishes to proceed with the self-exclusion then the Duty Manager will take the customer to somewhere suitable to discuss Self Exclusion in private.
- During the discussion, if the customer requests that they be refused entry to our premises, the Duty Manager will discuss the implications of Self Exclusion with the customer.
- If the customer wishes to proceed with Self-Exclusion then the Duty Manager will complete the Self-Exclusion using the Smart Exclusion App on the IHL Smart Hub.
- Customers can self-exclude without entering the premises by contacting a manager or head office on the telephone.
- Shipley Estates Ltd provides a Nationwide Self-Exclusion which is supported by both the Bingo Association and BACTA. This service is provided via Smart-exclusion that is operated by IHL tech Ltd.
- During the Self-Exclusion, the Duty Manager should offer the customer information in the form of the 'Lets Keep It Fun' leaflet which contains information, practical help, support and advice on how to get help with problem gambling.
- The Duty Manager should ensure the customer fully understands the Terms and Conditions relating to the Self-Exclusion and the Data Protection permission represented in the App, before the customers signature is obtained.
- The Self-Exclusion application, once signed will serve to immediately exclude the customer from gambling in other related licensed premises, within the geographic location that was selected during the Self-Exclusion process.
- Customers wishing to Self-Exclude will have their details stored on IHL Tech Ltd database and details will be shown on the Smart-exclusion server-based App.
- In all instances, a photograph is compulsory for the application to be accepted.
- All employees are instructed to check the Smart Exclusion App on a daily basis, for any additional Self Exclusions that apply to their site.
- The customer should be encouraged to consider extending their self-exclusion to other gambling premises in the area local to their home and/or workplace. Alternatively, the customer may ask to be excluded from gambling in other sectors. The Company does not work directly in this respect with other gambling trade organisations to be able to facilitate this, but their contact details can be given to the customer, so they can make direct contact with them. The trade organisations details are as follows: -
  - **Association of British Bookmakers (ABB) Tel: 020 7434 2111**
  - **Betting and Gaming Council Tel: 020 7434 2111**
  - **British Amusement Catering Trade Association (BACTA) Tel: 020 7730 6444**
  - **Bingo Association Telephone (BA) 01582 860900**
- By using these Trade Associations, customers will be able to find the relevant contact details of the Manager responsible for Self-Exclusion for most other gambling companies and local gambling premises.

- The Duty Manager will authorise the customer's exclusion for a minimum period of six months, with the option of extending this to a maximum of 12 months and instruct staff not to permit the customer entry during this period.
- It must be made clear to the customer that they may not revoke the self-exclusion during the agreed period and that if found either in the gambling area or attempting to gamble they will be removed.
- Following the successful process of a new Self-Exclusion, the record of this will be stored on the Smart Exclusion App on the IHL Smart Hub tablet, which is retained on the premises
- Those self-excluded are removed from any marketing databases held by this Company within two days of the completed Self-Exclusion.
- Customers are notified that their Self-Exclusion request is completed, as soon as is reasonably practicable.
- Records of self-exclusions are maintained throughout the excluded period and for an additional six months following the end of the exclusion.

### **Reinstatement**

- Reinstatement following Self Exclusion can only be made at the request of the customer, either by phone, in writing or in person and cannot be considered within the period of Self Exclusion.
- Where a customer chooses not to extend the self-exclusion and makes a positive request to begin gambling again, the customer is given a 24-hour 'cooling off' period before being allowed access to the gambling facilities.
- Upon returning to gambling, a customer's details are updated via the IHL Tech Ltd server App to have them removed from the Self-Exclusion list
- 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.

### **Management and Staff Training**

- Members of Management and Staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

National House  
Etchell Rd  
Bitterscote  
Tamworth  
B78 3HF

Date.....

Name.....

Position.....

Signature.....

**TO BE RETAINED ON THE PREMISES (MANAGERS COPY ONLY)**



Mr Harry Shipley Jnr  
Shipley Estates Limited  
National House, Etchell Road  
Tamworth  
B78 3HF

26 April 2023

By email to: [harryshipley@shipleyestates.com](mailto:harryshipley@shipleyestates.com)

Dear Mr Shipley Jnr

## Compliance Assessment Outcome

**Licence holder: Shipley Estates Limited**

**Licence Number: 000796-N-103432-017**

**Gambling Commission reference: 1-354751983**

The outcome of our recent assessment ('the Assessment') of Shipley Estates is:

**No further action – advisory action recommended.**

Further information is detailed within the attached reports.

## Assessment report

Please find an assessment summary report attached at **Annex A and B** of this letter. Annex A provides an Area Ratings summary for the Assessment. Annex B provides more specific detail about the concerns we have identified, where applicable.

## What next?

The Licensee has demonstrated there are appropriate controls in place across the business for the areas covered within the scope of the Assessment. The Licensee must continue to ensure there are appropriate controls and checks in place to ensure compliance is maintained.

Further information is detailed within the attached reports.

## Details of the Compliance Assessment

The assessment was conducted via a premises visit to 6-8 Silver Street, Leicester LE1 5ET on 18 April 2023 by Jane Blade, Regulatory Delivery Manager, accompanied by Mark Wilson, and an unannounced targeted premises visit to 128 The Parade, Leamington Spa CV32 4AG on 18 April 2023 by Darren Shenton, Regulatory Delivery Manager.

The operator also provided compliance policies and procedures on 31 March 2023 and we reviewed these accordingly.

The purpose of the Assessment was to establish whether the licensed activities applicable to your Operating Licence are being carried out in accordance with the Gambling Act 2005 and specifically the Licence Conditions and Codes of Practice (LCCP) that apply to your licence.



The outcome of the Assessment does not constitute an audit and cannot be relied upon to identify any deficiencies in your arrangements, which might, in future, become the focus of action, up to and including regulatory sanctions. The outcome of the Assessment does not signify ongoing validation or approval of your internal processes or procedures.

Please be aware that we may conduct future assessments, either announced or unannounced, based on any information we may receive or in line with our Statement of Principles.

Thanks to you and your staff for the assistance provided during the Assessment.

Should you have any queries regarding this letter, please contact me at [JBlade@gamblingcommission.gov.uk](mailto:JBlade@gamblingcommission.gov.uk).

Yours sincerely

A handwritten signature in black ink, appearing to be 'J Blade', with a horizontal line extending from the end of the signature.

**Jane Blade**  
**Regulatory Delivery Manager**

Annex A		
Area ratings summary		
Area of assessment	High level summary of findings	Outcome
1. Licences held	<p>It was noted that Category C machines were counted as being <a href="#">available for use</a> when calculating Category B machine entitlements without there being sufficient floor space to allow such machines to be used simultaneously.</p> <p>The licensee has since addressed this issue by relocating machines throughout their estate.</p>	Advisory
2. Submission of data to the Commission	No issues identified.	No issues identified.
3. Licensee engagement and co-operation with Commission officials	No issues identified.	No issues identified.
4. Website/ App review	N/A	
5. Policies and procedures review	<p>Policy documents do not describe how the operator understands the impact of safer gambling interactions on the customer and the effectiveness of the Licensee's overall actions and approach.</p> <p>The Gambling Commissions <a href="#">Customer Interaction Guidance</a> does not appear to have been taken into account when the licensee was developing their Customer Interaction Policy, for example in terms of referring to the specific identifiers of vulnerability referred to in the Guidance.</p> <p>Despite the absence of information in the policy documents, the interview with Mark Wilson revealed the operator is compliant with these requirements in terms of practice.</p>	Advisory
6. Marketing and Advertising	No issues identified.	
7. Personal licence holder interviews	N/A	
8. Customer reviews	N/A	

<b>9. Money laundering and Terrorist financing controls</b>	No issues identified.	No issues identified.
<b>10. Safer Gambling Controls</b>	No issues identified.	No issues identified.
<b>11. Business to Business activity</b>	N/A	
<b>Outcomes Explained</b>		
<b>Major Concern</b>	We have identified conduct or failings which may indicate a breach of the requirements of holding a licence, and those circumstances are likely to / or may have already posed significant risk to the licensing objectives.	
<b>Minor concern</b>	We have identified conduct or failings which may indicate a breach of the requirements of holding a licence, and there is no identified likelihood of significant risk to the licensing objectives. However, continued non-compliance could lead to future risk.	
<b>No issues Identified</b>	Based on the information provided by the Licensee during the assessment, we have not identified any conduct or failings in that specific area of the assessment that may indicate a breach of the requirements of holding a licence.	
<b>Advisory</b>	We have identified practice which could be improved and there is no identified significant risk to the licensing objectives.	
<b>Notable Practice</b>	Specific stand out notable practice that significantly exceeds minimum standards, and there are no concerns identified in that area of the business.	

<b>Annex B</b>				
<b>Please find below a detailed summary of the concerns we identified during the assessment.</b>				
<b>Concern no.</b>	<b>Assessment area no.</b>	<b>Regulatory Requirement(s)</b>	<b>Details of concern</b>	<b>Suggested actions</b>
1	Area no.5	SR Code 3.4.1	On review of the licensee's compliance policies and procedures, it could not be evidenced how the licensee understands the impact of safer gambling interactions on the customer, and the effectiveness of the Licensee's overall actions and approach.	We recommend the licensee includes their approach to safer gambling interaction evaluation in their policies and procedures and ensures the full range of potential customer vulnerabilities are referred to

			<p>Additionally, the Gambling Commissions <a href="#">Customer Interaction Guidance</a> did not appear to have been taken into account when the licensee was developing their Customer Interaction Policy, for example in terms of referring to the specific identifiers of vulnerability referred to in the Guidance.</p> <p>Despite the absence of information in the policy documents, the interview with Mark Wilson revealed the operator is compliant with all these requirements in terms of practice.</p>	both in the policy documents and in staff training.
2	Area no.1	s.172 Gambling Act 2005	<p>It was noted that Category C machines were counted as being <a href="#">available for use</a> when calculating Category B machine entitlements without there being sufficient floor space to allow such machines to be used simultaneously.</p> <p>The licensee has since addressed this issue by relocating machines throughout their estate.</p>	In future, the Commission's current guidance on making gaming machines available for use should be taken into account when calculating Category B gaming machine entitlements.

# Shipley Estates Ltd

## Anti-Money Laundering / Proceeds of Crime Act - Risk Assessment

<b>AML / POCA Risk in the Context of Shipley Estates Ltd</b>	<p>Overall Low Risk – Shipley Estates Ltd is a high-volume business consisting mainly of many low spending customers. There are however some high spending customers and a mix of regular and occasional customers.</p> <p>The level of stakes and prizes which apply to gaming machines in our venues make for a low overall risk. The amount of time and level of investment which would be required to cycle a significant amount of illicit cash through these machines would render this an impractical means of laundering money.</p> <p>Our business is highly regulated, through the oversight of the Gambling Commission, and Licensing Authorities and through a strong industry commitment to self-regulation. We hold an operating licence granted by the Gambling Commission as well as premises licence(s) granted by Licensing Authorities. All management receive induction and refresher training on Company Policy and Procedure, including Money Laundering and training records are maintained.</p>	
<b>Work activities being assessed</b>	General work activities in a Shipley Estates Ltd premises involving cash transactions, gaming machines and bingo.	
<b>Historical incidents of AML / POCA problems</b>	None reported or suspected	
<b>Information relating to local area of our premises:</b>	<p>Our venues are predominantly located on main High Streets of urban town centres. The premises generally have good access to local bus route services and there are places to be able to access taxis. Our venues are in areas with a wide range of retail outlets in close vicinity including banks, licensed betting offices, fast food outlets, restaurants, and public houses. Crime levels tend to be at medium levels in the areas where our venues are located.</p> <p>The majority of our regular customers reside close to or in close proximity to our premises. Our staffing levels are proportionate to the overall level of customer visits. Employees are mindful of the risk of criminal spend using our slot machine products. Owing to the fact our premises cater primarily for their respective local population, our premises tend to have a higher visitation on a Friday and at the weekend.</p>	
<b>Classification of those involved in or affected by the activity. (Tick all that apply <input checked="" type="checkbox"/>)</b>	<input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Customers <input checked="" type="checkbox"/> Site Management <input checked="" type="checkbox"/> Senior Management	
<b>Number of people (staff and customers) affected by the work activity at any one time</b>	Staffing:    Approx 3 staff Customers: Approx 20 customer	
<b>Date of Assessment:</b>	<b>March 2023</b>	
<b>Names and Positions of Persons Completing the Risk Assessment</b>	<b>Name:</b>	<b>Position:</b>
	William Shipley, Harry Shipley	Directors
	Mark Wilson	Operations Manager
	Nigel Leat / Rod Stone	Area Managers

List the tasks / transactions that have the potential to involve AML / POCA issues	Level of Risk	Record all existing controls that are in place and any other information that may be relevant to reducing the risk – details any historical data regarding previous AML / POCA incidents	Additional Action / Control Measures Required / Comments
<b>Gaming Machines Cash Transactions</b>	Low 3	<ul style="list-style-type: none"> <li>Supervision by staff at all times.</li> <li>Staff trained to look out for unusual / dyed notes</li> <li>Staff trained to report any concerns to Duty Manager</li> <li>CCTV coverage over all machines</li> <li>SG/Flex terminals flag up suspicious transactions when scanning pay out tickets.</li> </ul>	<ul style="list-style-type: none"> <li>Staff &amp; management to be alert to customers exchanging large volumes of paper/polymer notes for alternative denominations</li> <li>If suspicious transaction is flagged up staff member is to phone senior management to make them aware</li> <li>Annual refresher training as part of 'Social Responsibility' course.</li> </ul>
<b>Gaming Machines Ticket In Ticket Out (TITO) Transactions</b>	Medium	<ul style="list-style-type: none"> <li>Supervision by staff at all times.</li> <li>Staff trained to look out for unusual / dyed notes</li> <li>Staff trained to report any concerns to Duty Manager</li> <li>Specific CCTV coverage for TITO machines &amp; ATR</li> <li>Management to supervise all machine collections including Notes</li> </ul>	<ul style="list-style-type: none"> <li>Staff &amp; management to be alert to customers entering large volumes of paper/polymer notes to machines and printing ticket without playing.</li> <li>Staff &amp; management to be alert to customers making repeated trips to ATR / Change Machine.</li> <li>Staff and management to be alert to suspicious behaviour from customers and report if necessary.</li> <li>Annual refresher training for all staff as part of 'Social Responsibility' course.</li> </ul>
<b>Bingo Cash Transactions</b>	Low 3	<ul style="list-style-type: none"> <li>Supervision by staff at all times.</li> <li>Staff trained to look out for unusual / dyed notes</li> <li>Staff trained to report any concerns to Duty Manager</li> <li>CCTV coverage over bingo area</li> </ul>	<ul style="list-style-type: none"> <li>Staff &amp; management to be alert to customers exchanging large volumes of paper notes for alternative denominations</li> <li>Annual refresher training as part of 'Social Responsibility' course.</li> </ul>
<b>Cash Banking Transactions</b>	Low 3	<ul style="list-style-type: none"> <li>All staff trained on AML / POCA</li> <li>Staff trained to look out for unusual / dyed notes</li> <li>Staff trained to report any concerns to Duty Manager</li> <li>CCTV coverage over machine and bingo areas</li> <li>All cash is either banked by Security Plus Cash collections &amp; taken to Lloyds Cash Centres or banked at a Lloyds bank.</li> </ul>	<ul style="list-style-type: none"> <li>Staff &amp; management to be alert to customers exchanging large volumes of paper notes for alternative denominations</li> <li>Annual refresher training as part of 'Social Responsibility' course.</li> <li>Any AML / POCA concerns / suspicions would be reported to Area Management</li> </ul>

Assessment Review, Distribution and Dissemination			
Frequency of Review:	Every 12 months or after any incidents or changes	Date Review Due:	March 2024
Overall AML / POCA Risk Rating	Low risk		
Signature of Lead Assessor:	William Shipley		
Completed risk assessment brought to the attention of:	Name:	Position:	
	All Management and staff	All staff	



# Challenge

# 25

If you are  
lucky enough  
to look  
under 25  
you will be  
asked to  
prove that  
you are

**over 18**

If you are under 18  
and are attempting  
to enter these premises  
you are committing  
an offence.



The **ONLY** acceptable forms  
of proof are:

- Photocard Driving Licence
- Passport
- Proof of age cards bearing the PASS hologram







**No smoking  
allowed in  
these premises**



**24hr audio/visual  
CCTV monitoring  
for your safety**



**No alcohol  
consumed in  
these premises**

**We will not  
tolerate  
physical or  
verbal abuse  
towards  
our staff  
& customers**





# LET'S KEEP IT FUN

**LET'S KEEP IT FUN**

93  
Page 126 of 240

[gambleaware.co.uk](https://www.gambleaware.co.uk)  
GAMBLE RESPONSIBLY





CASINO SLOTS

SHIPLEYS

SLOTS | BINGO | GAMING

Welcome to  
**Shipleys**

PARTYBINGO

47

CALLS 12

28

55

3

69

3

14

17

**BINGO  
IS BACK**

REVITALISING THE HIGH STREET





# BINGO IS BACK...

As the popularity of traditional bingo halls wanes and many close their doors, bingo players are left wanting more.

At Shipleys, we are reimagining bingo for the modern era by creating dynamic, welcoming spaces that breathe new life into local communities. Our mission is simple: to bring energy and excitement back to the high street, offering a contemporary twist on the game of bingo.

By linking our venues nationally, we're giving players the chance to compete for big prizes, while enjoying the friendly, social atmosphere that local communities are known for.

With our blend of games and the charm of in-person bingo, we're creating spaces that serve as hubs for social connection and fun. Whether you're an experienced player or new to the game, our modern venues offer something for everyone, making Shipleys the heart of a new bingo movement in towns across the UK.



## The HIGH STREET BINGO Concept

We aim to bring people together and revitalise communities by making bingo a central part of the British high street again. Shipleys offers a fresh, modern take on a traditional pastime, with convenient venues designed for today's players. This has never been more needed.

The growth of online platforms has led to customers staying at home, while the cost of living has affected consumer confidence. While it's not just the bingo sector looking to change its traditional model, ultimately, our traditional customers want something new and exciting.

Which is why we have developed the High Street Bingo Concept, to reflect the shift in demands of modern living. Whether you prefer playing on paper or tablet, our spaces are perfect for relaxing, meeting friends, and enjoying complimentary refreshments. Shipleys is more than just bingo, it's about creating vibrant places where people can connect and have fun.





Our new  
**BINGO LOUNGE**  
Concept

# ENJOY BINGO your way

Shipleys has transformed the traditional bingo experience into something vibrant and modern.

We've blended the warmth of a coffee shop with the fun of bingo, creating a welcoming space that's both contemporary and comfortable.

Our new concept lets you enjoy bingo your way, whether you prefer playing on tablets in a lounge environment or good, old fashioned paper bingo.

We've designed our venues to be as relaxing as possible, with no loud announcements or disruptive noise.

Refreshments are complimentary, with a selection of hot and cold drinks, sandwiches and snacks. We do not serve alcohol or allow entry to anyone who looks intoxicated.

It's all about creating a fun, laid-back atmosphere where everyone can feel at home. Ensuring a friendly and enjoyable experience for everyone.







# Community BENEFITS

Our long-term goal is to establish a chain of UK venues that connect communities nationally, making bingo a cost-effective and enjoyable experience for everyone. As bingo evolves for the digital age, we're committed to helping people rediscover the joy of in-person play and the connections that come with it.

- ★ At Shipleys, we invest around £500,000 in each of our high street venues, and **bring something new and exciting for the local community** to try. Attracting new customers to spend more time on the high street and nearby shops.
- ★ We occupy formerly vacant units, helping to increase footfall on the high street and **contributing to the local economy and community**
- ★ Our venues create between 10 and 14 local jobs, offering **meaningful employment opportunities** for local residents.
- ★ **Our venues are easy to access**, provide a welcoming space for people to gather, socialize, and enjoy bingo in a modern, friendly environment.
- ★ In the day, our **target visitors are high street regulars and people who want to feel part of the community**. In the evening our customer base consists of the local workforce who like to **relax after their busy day**.
- ★ **Increasing safety** by providing important natural surveillance on the high street, particularly late into the evenings.



## Our legacy of **ENTERTAINMENT AND GROWTH**



Shipleys have shaped the bingo industry for the last 50 years, the development of the Shipleys and BJs Bingo brand which is still the leading traditional bingo operator today. Shipleys remains a family-run business, now led by Harry and William Shipley with genuine care and a continued commitment to innovation.

Shipleys has even developed its own bingo network, Bingo Express, to connect players nationwide and bring the excitement of the game to a new generation.

As active members of The Bingo Association and The British Amusement & Catering Trade Association (BACTA), Shipleys upholds its responsibility to both its customers and staff.

We create a safe and social entertainment space for adults to play electronic bingo and gaming machines on the high street. Our venues do not operate high-stakes fixed-odds betting terminals (FOBTs); instead our machines offer low stakes from 10p to a £2 max stake.

Shipleys has built a strong reputation for balancing sustainable profits with evolving entertainment options to meet modern needs. We are proud of our history and excited for the future as we continue to grow and innovate in the amusement and leisure industry.



BJs Bingo - Kitts Green



BJs Bingo - Leigh



**Shipleys remains a family-run business, now led by Harry and William Shipley with genuine care and a continued commitment to innovation.**





# Compliance & Social Responsibility

## Refresher Training - 2024



LET'S KEEP IT FUN

BeGambleAware.org

Page 133 of 240



Safer Gambling



# OBJECTIVES

**The Company's objective is to ensure all staff have sufficient training and, refresher training so they fully understand Compliance & Social Responsibility as well as, all relevant sections of importance when operating licensed Gambling premises. These relevant sections are broken down as;**

- A. Protection of Children and Vulnerable People
- B. Access to Premises by the Statutory Authorities
- C. Advertising Standards and Marketing
- D. Customer Interaction
- E. Tools to Help Customers Keep Control
- F. Employment of Children and Young Persons
- G. Fair and Open Practice and Dispute Resolution
- H. Information on how to Gamble Responsibly and Help for Gamblers with Problems
- I. Money Laundering
- J. Self Exclusion
- K. Customers who Breach / Attempt Breach
- L. Local Area Risk Assessments
- M. Gaming Machines, Tablets and B3 Ratios
- N. Shop Security and General Knowledge
- O. Understanding of the IHL Smart Tablet and how to use, complete and enter information on all sections



LET'S KEEP IT FUN BeGambleAware.org

101  
Page 134 of 240



Safer Gambling



# The 3 x Licensing Objectives

These are the 3 objectives in-line with the LCCP (Licensing Conditions & Codes of Practice) that we must adhere to...

1. Ensuring Gambling is conducted in a... FAIR and OPEN manner.
2. Keep Crime Out of Gambling.
3. Protection of Children and the Vulnerable.





# A - Protection of Children and Vulnerable People

## Challenge 25.....

## Challenge 25.....

## Challenge 25.....

It is the company's recognised policy to request ID from any person **appearing** to be under **25** years of age.

Standing at the front door helps prevent underage persons from entering.

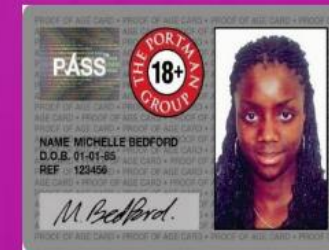
Always check for Photographs, Holograms, Issue Date, Date of Birth. Does the ID look tampered with?

Remember to complete the Smart Tablet Age Verification Log.

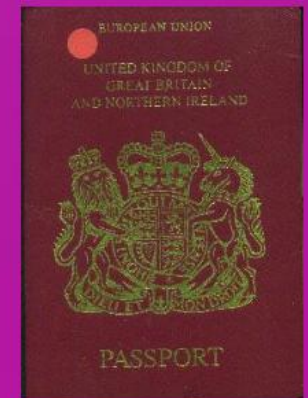
Forms of acceptable ID...



Driving Licence



Citizen ID Card



Passport

## A - Protection of Children and Vulnerable People

Any person under the age of 18 is prohibited from entering our premises. THIS IS THE LAW.

This includes all forms of gambling (machines, bingo, betting, casinos)

If an under-age person places a stake (money), then that initial stake should be returned to them but any winnings must be withheld.

If a person has no proof of age (ID), you could give them a CITIZEN ID application form (located at the front door) and politely ask them to leave.

You can PREVENT UNDER-AGE gambling by;

- Having Staff either at, or close to, the front door
- Requesting proof of age (ID) from any person who appears to be under the age of 25
- Being aware of everyone playing in the shop

Remember... All Age Verification Checks must be logged on the IHL Smart Tablet!

## B - Access to Premises by the Statutory Authorities

- There are 3 bodies that have the right of access to the premises on gambling related matters:
- **The Gambling Commission; the Police and the Local Authority (the Council).**
- These visits can be conducted at any time and they do not need an appointment!
- **Always ask to see ID and make a note of the visitors name in the grey Visitors Book.**
- They are likely to want to see your Premises Licence and Compliance folders. Always be aware of where these are.
- **It pays to keep these documents up to date, tidy and in good order.**
- The Governing Body and Regulator for the Gambling Industry within the United Kingdom is... **The Gambling Commission.**
- **Please Notify your Line Manager and the Operations Manager after any visits.**

Remember... Any visits from Statutory Authorities will end with some form of receipt which should be filed in your Compliance Manner.



## C - Advertising Standards and Marketing

- We should always be mindful that our Marketing campaigns are not aimed at Children or Vulnerable people.
- All advertising of gambling related products should be aimed at people over the age of 18.
- Key points are: to not include childish or cartoon like images; always use models that look over 25.
- Advertising and Marketing campaigns should be compliant with;
  - CAP Regulations (Committee of Advertising Practice)
  - BCAP Regulations (Broadcasting Committee of Advertising Practice)

## D - Customer Interaction

- On October 31<sup>st</sup> 2019 the Gambling Commission introduced new Regulations for ALL land based gambling operators – this includes bingo and AGC's.
- These new Regulations make it a specific Licence Condition to **Identify and Interact** with customers that might, potentially, have a problem with their gambling.
- Most importantly the company is required to **Record these Gambling related Interactions**. We use the **IHL Smart Tablet** to record Interactions.
- If you are in any doubt about whether a conversation is, or is not an Interaction – Record it on the Smart Tablet.

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## D - Customer Interaction

QUESTION... What is... a Customer Interaction?

- a) Attending to a customer's dispute with a gambling related issue?
- b) Advising a customer where to gain advice about gambling (Let's Keep It Fun Leaflets)?
- c) Asking if a customer wishes to take a break after seeing signs of problem gambling?

ANSWER... It is ALL of the above... AND... more!

We all need to be more vigilant and observant, with all customers who are playing within the venue, to ensure that as a company, all our staff are acting in accordance with the requirements of the LCCP, by ensuring our full commitment towards Responsible Gambling!

Interacting with customers can be as simple as asking if they would like a cup of tea (noting their response, tone of speech and body language when they reply). If they are showing signs of problem gambling (stress, anger, irritation) then ask them if they would like to take a break (offering a 'Machine Reserved' sign) to allow them to go outside for a break from gambling.

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## D - Customer Interaction

In order to actually be more vigilant and observant, you should... be aware of;

- Who is in the venue...
- Who is playing machines...
- Which machines they are playing...
- What games they're playing...
- What stake they're playing at...
- Has a regular customer begun playing at much higher staked games...
- Have you noticed a regular customer beginning to play a lot longer than they 'usually' do...
- Have you noticed customers borrowing any money...
- Are customers becoming aggressive and agitated with the machines/games they are playing...
- Are they 'short' or abrupt with you when you try to interact with them...

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## D - Customer Interaction

- Regular use of the Smart Tablet will increase confidence and knowledge of its features. Don't be frightened of it!
- Multiple Interactions for the same customer can be easily stored and retrieved;
- On the first Interaction page select "View" to find a customers previous Interaction, using their name. Then;
- Use the + button in the bottom right hand corner of the screen to add a further Interaction for that same customer.
- This allows Management to more easily identify and analyse customers with potential problems with their gambling.

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!



## D - Customer Interaction

As a Socially Responsible Operator, we must be able to demonstrate at **ANY** given time of check by the Gambling Commission, that we **do conduct Customer Interactions** with Customers and, that **ALL interactions are recorded** accordingly.

**REMEMBER... It is NOT just the Venue Manager's job to do this!**

ALL employees at every level are required to abide by any Codes of Conduct set by the Gambling Commission and to abide with all Legislative requirements.

- **ALWAYS...** Complete the Customer Name section.

**Identify – Interact – Record on the IHL Smart Tablet!**

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

# E - Tools to Help Customers Keep Control

## Information leaflets...

Information leaflets titled 'LET'S KEEP IT FUN' are designed to help people who are concerned about their gambling.

'LET'S KEEP IT FUN' leaflets must be available at all entrances and customer toilets.

If a customer asks you where they can obtain help and advice, offer them a Let's keep it Fun leaflet, or show them where the leaflets are located.

Any interaction of this type with any customer, must be recorded on the interaction app on the IHL smart tablet.

The best method for approaching someone you might consider to be vulnerable, is to start talking to them and ask if they are ok?

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!



# E - Tools to Help Customers Keep Control

## QR Codes...

On the front of each 'Lets Keep It Fun' leaflet holder, is a sticker with a QR code. Using the camera function of any smart phone/device, customers are able to obtain a direct link from the QR code directly to the GameCare website.



Using the GamCare website customers are then able to obtain information on helplines, self-exclusion and other advice, all relating to problem gambling.

Again, we ask that if you offer this form of advice to any customer that you record this as an interaction on the IHL Smart Tablet.

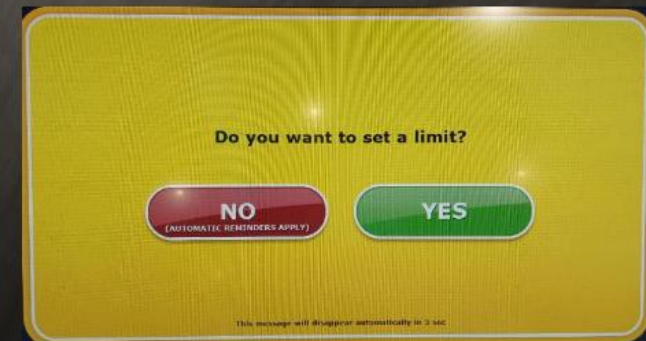
Please be aware that any customer will find talking about potential problem gambling extremely sensitive and could be easily embarrassed. So, always move away from other customers and staff, when discussing problem gambling.

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

# E - Tools to Help Customers Keep Control

## Setting Limits...

- Most of our B3 / £500 Jackpot Machines offer customers the chance to set limits.
- Limits can be set against either...
  - The amount of money a customer wishes to spend.  
Or,
  - The amount of time a customer wishes to play for.



This can be a great help to a customer to help them control/realise the amount of either time, or money, that they are spending whilst playing present in gambling facilities..

It is important ALL staff understand these functions, how to use them and how we can explain them to customers when asked.

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

# E - Tools to Help Customers Keep Control

## GamCare Self Assessment...

- We can offer any customer a 10 Point Questionnaire relating to their gambling.
- This can be completed using the IHL Smart Tablet.
  - Please move the customer away from other players (for privacy).
  - Ask the questions, responding from the list of answers provided.
  - The IHL Smart Tablet will then analyse and offer guidance based on the customers responses.
- To access the GamCare Self Assessment, simply select the following...
  - Smart EXCLUSION
  - Add New Exclusion
  - New Customer Exclusion
  - Take GamCare Self-Assessment Test



Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## F - Employment of Children and Young Persons

- All employees must be at least 18 years of age to be eligible for work in an AGC/Bingo Club.
- If workmen are in over night and there are workers under 18 years of age, then all gaming machines must be switched off.
- Nobody is permitted entry whilst they have anyone under the age of 18 with them. This is against the law, even for a moment. Allowing this is likely to result in disciplinary action and possibly dismissal.



# G - Fair and Open Practice and Dispute Resolution

Shipleigh Estates Ltd offers a FOUR STAGE COMPLAINTS Procedure Policy.

Whenever a customer makes a complaint or dispute, you should refer to the red A4 folder titled 'Complaints & Disputes'. This folder should be kept in a place away from customers but readily available to ALL staff.

Ideally, the senior member of staff on duty should complete this process, but all staff are required to fully understand what to do.

The 'Complaints & Disputes' folder must always have...

- |                                       |            |
|---------------------------------------|------------|
| 1. Disputes Procedure Guidance        | (sleeve 1) |
| 2. Complaints / Disputes Leaflets     | (sleeve 2) |
| 3. Customer Complaint Forms           | (sleeve 3) |
| 4. Completed Customer Complaint Forms | (sleeve 4) |

Please ensure you complete the customer complaint form in full with as much information relating to the dispute as possible.

All documents stored in the Complaints & Disputes folder need to remain and not be stored elsewhere

After you have dealt with the customer, any Complaint in relation to Gambling must then be recorded on the IHL Smart Tablet.

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## G - Fair and Open Practice and Dispute Resolution

The Gambling Commission requires the company to **RECORD** all complaints that are specifically gambling related. If the complaint cannot be resolved in the first instance, we operate a **FOUR** stage complaints procedure. Should a customer wish to complain about any aspect of the **GAMBLING** operation, you should deal with it as follows:

Firstly listen, then **APOLOGISE** for the experience. It is important to find out what the customer would like as a **SOLUTION** and do what you can to achieve a positive outcome. If the customer is happy then thank them and return to your work. If the customer is not happy at this stage of the complaints procedure then you must call your **MANAGER** who will attempt to resolve the issue at the second stage.

Should the customer still be unhappy, they are asked to complete a dispute form (using the paper IRF forms). The dispute must also be recorded on the IHL Smart Tablet in the shop. The customer is then given a Complaints & Disputes leaflet which gives details of the **OPERATIONS MANAGER**, for them to write to.

If the complaint is not satisfactorily resolved, the final stage is one where an Alternative Dispute Resolution (ADR) entity will talk to the customer in an attempt to negotiate a **RESOLUTION** to the complaint.

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

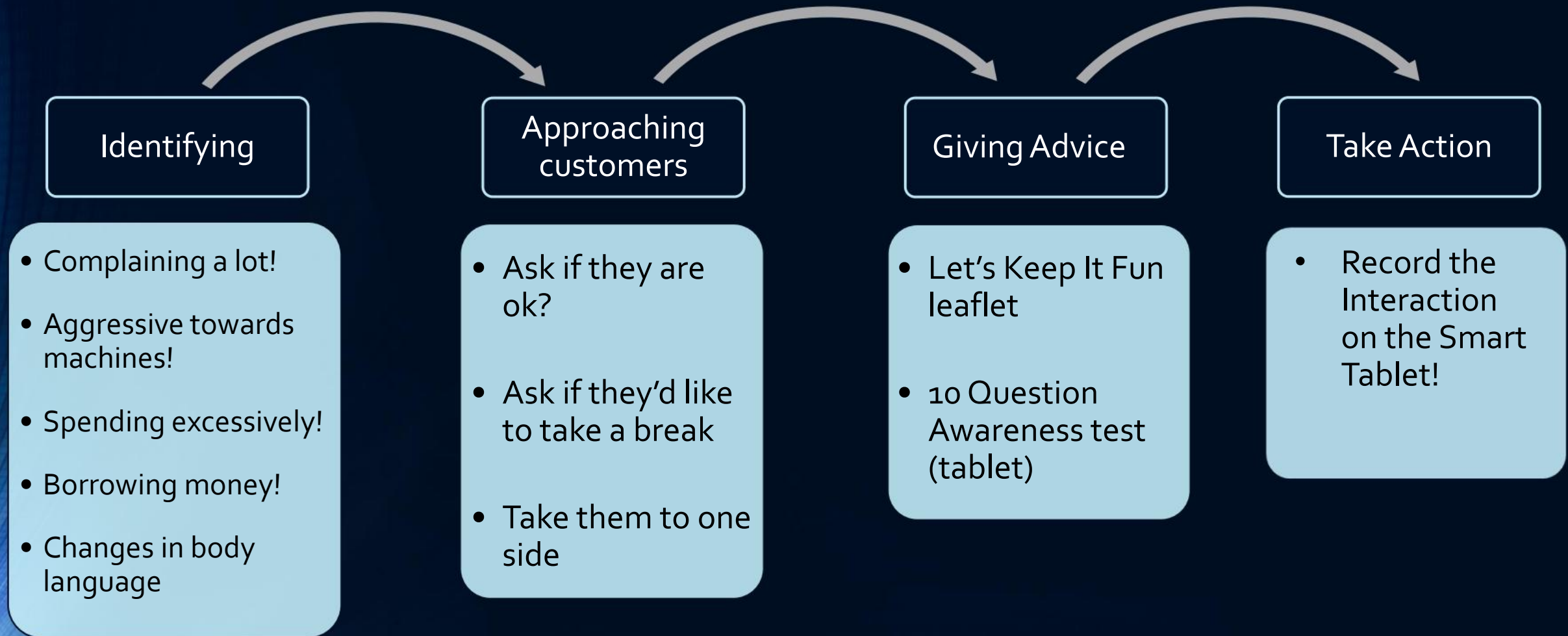


## G - Fair and Open Practice and Dispute Resolution

- Who are our Alternative Dispute Resolution Providers?
- ADR for AGC Licensed premises is provided by Pegasus ADR Service (the red leaflet).
- ADR for BINGO Licensed premises is provided by IBAS – the Independent Betting Arbitration Service (the blue leaflet).

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## H - Information on how to Gamble Responsibly and Help for Gamblers with Problems



Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## H - Information on how to Gamble Responsibly and Help for Gamblers with Problems

- A vulnerable person, who you may be concerned about, could;
  - Be Looking agitated with changes in body language
  - Be shouting and swearing at the gaming machine and possibly striking the machine
  - Be visibly upset
  - Be known to have borrowed money to gamble with
- Should a customer approach you to discuss a potential problem, they should be taken to one side (away from other customers) and the problem discussed quietly and sensitively.
- All of the above should then be logged as a Customer Interaction on the Smart Tablet.

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!



# H - Information on how to Gamble Responsibly and Help for Gamblers with Problems

- As part of the Company's commitment to Compliance and Social Responsibility there are leaflets available to any one with concerns over gambling.
- These are located at all entrances and customer toilets. Check this regularly.

## NATIONWIDE SELF EXCLUSION SCHEME

### What are my options for self-exclusion?

If you wish to exclude from Shipley Estates Ltd for any other land based bingo or AGC operator, you will automatically be enrolled in the national scheme.

### What is the National Scheme and where can I get more information?

The national self-exclusion scheme enables a customer to self-exclude from every UK bingo club with just one request. We also offer this facility in our Adult Gaming Centres. Please ask one of our team for further details of the scheme, including terms and conditions.

### How do I join the National Scheme?

Ask a member of our team who will speak with you about self-exclusion and talk you through the process about what is involved and how to apply. If you wish to apply, we will need some basic details along with a photo and signature. By joining the scheme you are providing permission to share your self-exclusion with other bingo and AGC operators using the secure national database.

### How long will I be excluded for?

The minimum period of self-exclusion you can request is six months, and your exclusion will automatically remain in force for a further period of 6 months at which time it will then lapse. You can apply for reinstatement at any time following your stated exclusion period.

### Who is responsible for keeping me out of Bingo Clubs and other high street gambling premises, which I have self excluded from?

You are primarily responsible, however bingo clubs and AGC's participating in the scheme will do all they reasonably can to help you.

### What if I only want to exclude from Shipleys?

It is not possible to self-exclude from Shipleys Bingo and AGC's only. Any customer wishing to self-exclude from any of Shipley Estates Ltd premises or any other operator will need to join the national scheme.

### What other steps should I consider taking?

We would recommend that you exclude yourself from all other forms of gambling that you use or may be tempted to use, such as casino's, betting shops and online gambling sites.

## WHAT DO I DO IF I THINK I HAVE A PROBLEM?

### Taking Back Control...

The first step in taking back control is to be honest with yourself and accept that there may be a problem.

Talk to the Duty Manager in confidence at your local Shipleys Bingo or AGC. They understand the issues involved and can provide you with information or put you in contact with qualified counsellors. Alternatively speak to someone else who you feel you can trust.

### Practical steps to help you gain control...

- Stop all gambling to break the habit.
- Ask someone you trust to handle your money for an agreed amount of time (e.g. three months).
- Leave your cashpoint, debit or credit cards at home and only bring a limited amount of cash with you.
- Use a calendar to mark each day you don't gamble, so that you can see the progress you make.
- Reward yourself after a 'gambling free' period by treating yourself with some of the money you have saved.
- If all else fails – stop gambling. Apply for Self-exclusion by speaking with one of our team and exclude yourself from all bingo clubs and AGC's within your local area.

**Remember** - take one day at a time...

**Be optimistic** - you can gain control

**gambleaware.co.uk**  
GAMBLE RESPONSIBLY



# Let's Keep It Fun

Revised January 2019

## HELPING YOU TO STAY IN CONTROL

### Playing at Shipleys...

Whilst most people see a visit to Shipleys as a fun and sociable way to spend their time, a small minority find that playing the slot machines or bingo can become a problem.

Many customers don't even see bingo as gambling, however, gambling can affect people, and some are more vulnerable than others, just as they can be with alcohol and other drugs.

At Shipleys we take the issue of problem gambling seriously. We also take responsibility for protecting our customers by providing a safe and responsible environment in our premises as well as being committed to providing support to those who find it hard to control their gambling.

This leaflet is aimed at ALL customers, offering useful information and tips to help everyone play responsibly, avoid problems and Keep It Fun.

However, at the same time, it also offers practical help and advice for those who may have difficulty keeping control of their gambling.

Information is provided on how to voluntarily self-exclude nationally from land based bingo clubs and AGC's in the UK. The leaflet also includes information on where to find more specialist help, if required, from the leading support agencies such as GamCare.



## HOW WE CAN HELP YOU TO KEEP IT FUN

### Helping You...

Be assured that we only want the best for our customers, and we will provide help and support to help you keep in control of your gambling by:

- Ensuring our staff are fully trained enabling them to advise customers on how to get help.
- Offering the option to self-exclude nationally from all bingo clubs in the UK as well as self-exclude from high street gaming venues (AGC's). The scheme prevents any further visits for a minimum of 6 months. You can easily enrol in the national scheme by speaking with one of our managers. Alternatively, you can self-exclude nationally by following the process detailed on the Bingo Association website – [www.bingo-association.co.uk](http://www.bingo-association.co.uk)
- Providing information detailing how to prevent and control problem gambling
- Working closely with charities and support groups who provide assistance for problem gamblers.

## HOW DO I GET HELP?

### If you or someone you know is unable to control their gambling, the following associations are available to help:

National Gambling Helpline: 0800 8020 133 Information, advice and counselling for individuals, their family and friends who have concerns about problem gambling. [www.gamcare.org.uk](http://www.gamcare.org.uk)

Gamblers Anonymous A self-help fellowship of compulsive gamblers wanting to address their gambling problems. Their sister organisation GamAnon run support groups for partners/families of compulsive gamblers. Groups are held weekly nationwide. [www.gamblersanonymous.org.uk](http://www.gamblersanonymous.org.uk)

Gordon Moody Association Tel: 01384 241 292 A hostel providing accommodation, counselling and rehabilitation for compulsive gamblers. [www.gordonmoody.org.uk](http://www.gordonmoody.org.uk)

National Debtline Tel: 0800 808 4000 Advice and support to help deal with debts in a proactive and informed way. Self-help packs are sent free of charge to those with debt problems. [www.nationaldebtline.org.uk](http://www.nationaldebtline.org.uk)

## HOW DO I GET HELP?

If you think that your gambling may be getting out of control ask yourself the following questions...

- Do you feel you have put your education or job at risk because of gambling?
- Do you chase losses by continuing to gamble when on a losing streak?
- When you win do you have an overwhelming desire to win more?
- Do you ever gamble until you completely run out of money?
- Have you lied, stolen or borrowed to get money for gambling?
- Are you reluctant to spend your money on anything else?
- Do you ever gamble for longer, or more often, than you had planned?
- Do you ever gamble to escape negative elements of your life?
- Do you feel depressed or suicidal because of your gambling?
- Have you ever sold any possessions to get money to gamble or pay gambling debts?

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## H - Information on how to Gamble Responsibly and Help for Gamblers with Problems

- There are also posters displayed at all entrances and customer toilets.
- We also use digital marketing screens (where present) to promote Responsible Gambling.
- There are also QR Codes available for customers to scan to seek further help/advice.



Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!



## H - Information on how to Gamble Responsibly and Help for Gamblers with Problems

### BeGambleAware



- 1. Set Your Limits
- 2. Only spend what you can afford
- 3. Never chase your losses
- 4. Don't gamble if you're angry or frustrated
- 5. Never put gambling before your friends and family

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

# I - Money Laundering

- 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.
- You should be particularly aware of suspicious activity in connection with customers using change machines and Ticket In, Ticket Out (TITO) gaming machines.
- Any customers continually exchanging abnormally high value tickets, or high volume of medium win tickets, could be exchanging proceeds of crime through the money laundering process.
- Any suspicion of money laundering must be reported to the company's MLO (Money Laundering Officer) as soon as possible and recorded on the AML app on the Smart Tablet
- The IHL Smart Tablet has a section named AML Log where you can log Anti-Money Laundering incidents. These should be added AFTER you have spoken to your dedicated MLO!
- The company's MLO is Mr. William Shipley

Remember... All Interactions relating to AML Logs must be logged on the IHL Smart Tablet!

# I - Money Laundering

- The most likely form of money laundering in AGC's and Bingo Clubs is the spending of stolen or counterfeit bank notes.
- Where contactless debit card facilities are available you should be vigilant of suspicious behaviour related to crime or abuse.
- Always be aware of customers who constantly feed notes into change machines, but spend very little.
- Be on constant look out for bank notes that might be stained or dyed – the tell tale sign of stolen notes.
- Should you ever encounter this be sure to record it on the AML app of the Smart Tablet and advise your line manager.
- Large amounts of stolen notes should be reported to the Money Laundering Officer and recorded on the AML app of the Smart Tablet.

Remember... All Interactions relating to AML logs must be logged on the IHL Smart Tablet!

## J - Self Exclusion

This is a process designed to assist any vulnerable person, or anyone that has concerns over their gambling, to be refused entry to premises with certain gambling facilities.

There are several reasons why a customer may wish to self exclude. These could be either the customer is spending money they do not have, cannot afford to spend, or they are in a position where they are spending too much time and/or money on gambling facilities. Another reason is they do not understand exactly what they are doing. Remember – A vulnerable person could also be someone with learning difficulties or mental health issues.

If a customer approaches you with concerns over their gambling, please advise them of the Company's Let's Keep It Fun leaflet and explain that advice and guidance relating to help with gambling can be found in the leaflet. You can also advise of the QR code that is easily scanned from a mobile phone, offering a direct link to the GamCare website (Both Leaflets and QR codes can be easily located at all main entrances and customer toilets).

For any customer wishing to approach a member of staff to enquire about self-exclusion, this can be an embarrassing event for them. So it is important to respond in an empathetic and understanding manner as this could easily be the very first step for any customer to recognise they may have difficulties in controlling their expenditure and for those who require help/ guidance with gambling.

**Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!**

## J - Self Exclusion

It is important to remember: - A customer can request to apply for Self-Exclusion at any given time!

You should ideally call the Duty Manager/Supervisor to complete the Self-Exclusion process with the customer.

However, if you are working alone then you must understand the process in order to be able to complete the Self-Exclusion yourself.

When you begin this Interaction with any customer, please...

- Obtain a LET'S KEEP IT FUN leaflet from the entrance!
- At this point... It is imperative that you take the customer to one side (to offer privacy)
- Now fully explain (with the leaflet) exactly what self exclusion is!

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!



## J - Self Exclusion

- A customer may Self-Exclude for a minimum of 6 months and a maximum of 12 months
- **REMEMBER – If a customer requests to Self Exclude, we must be in a position to do so. We must NOT refuse them!**
- But... please ensure you are completing Self Exclusion requests, in-line with vulnerable people who, have expressed their concerns over their gambling.
- **ALL staff must understand how to complete this process using both the IHL Smart Tablet and, the Manual A4 sheets.**
- Upon completion of any Self-Exclusion request, the Customer must be politely asked to leave the Premises. They are NOT permitted to stay and play!



Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## J - Self Exclusion

- WHENEVER... You complete any Self-Exclusions you MUST... Communicate with your colleagues to notify them who has just excluded (remember to tell staff not customers so talk discreetly)!
- You also are expected to notify the staff taking over the next shift, so they too are also aware of the recent exclusion in-store.
- However... Any customer wishing to Self Exclude because they are unhappy with a Gaming Machine, they should be directed to the company's 4 stage Complaints Procedure Policy, inline with the company's Complaints & Disputes Policy.



Remember - Once an application for Self-Exclusion is completed via the IHL Smart Tablet it cannot be undone. Thereby excluding the customer from other related operators, within a given location.

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

# J - Self Exclusion

## Self - Excluding from Bingo Licensed Venues...

- If any customer chooses to self-exclude and your shop is licensed for bingo (you will have bingo express if you are), then that customer choosing to self-exclude **will** be excluded from **every other bingo club** in the UK (this will include Mecca, Buzz + Independents). You must relay this information to the customer **before** processing the Self-Exclusion.

Note: By default, the IHL hub will automatically select '**BINGO**' from the list. You can then ask the customer if they also wish to self-exclude from 'AGC'. When 'AGC' is selected there are a further two options to offer the customer and these are 'High Street/Seaside' and 'Holiday Park'. Double check with the customer if they want just BINGO or, the additional exclusions as well.

## Self - Excluding from Adult Gaming Centres (AGC's)

- If any customer wishes to self-exclude from one of our AGC Venues (a venue without Bingo Express), then that customer choosing to self-exclude **will** be excluded from **every other AGC** within the allocated distance for which the customer has chosen as part of the exclusion process.

Note: By default, the IHL hub will automatically select 'High Street/Sea Side' and 'Holiday Park' from the list. You can then ask the customer if they also wish to self-exclude from 'Bingo'.

The key thing here is to ensure that you are fully explaining what Self Exclusion is, how it works and what will happen, so that Customers can make a fully informed decision!

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## J - Self Exclusion

- PLEASE NOTE: If there is an error with the Self Exclusion tablet and you are unable to 'complete' the process (for example it is off-line), then please ensure you...
  - 1. Complete a Manual A4 paper Self Exclusion form (Make sure you know where these are kept)!
  - 2. Make sure you have full details (name, address, date of birth etc..)
  - 3. Ask the customer to sign the form.
  - 4. Explain to the customer that the system is off-line but you will ensure the application is completed ASAP.
  - 5. Once the customer has left, make a note of the date/time and a brief description of the customer. This is required so we can obtain an image from our CCTV to ensure a 'photo' of the customer can be added to the Smart Exclusion Tablet App (when it is back on-line)

REMEMBER.. To Notify your Line Manager ASAP when a Manual Self-Exclusion has been completed so that we can address any outstanding Self-Exclusions in a prompt manner!

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## J - Self Exclusion

- All Staff should check the IHL Smart Tablet at the start of their shift to check for any new Self Exclusions (both internal and external), also check for interactions.
- When a Self-Exclusion expires, any customer may return to gambling, but **ONLY** after a 'Customer Re-instatement' has been completed.

Note: The Re-instatement of ANY Self-Excluded customer can only be processed by the Venue at which the customer originally chose to self-exclude from!

- THEN a 24 hour 'Cooling Off' Period is given BEFORE the customer is allowed to return to play



Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!



## K - Customers who Breach / Attempt Breach

After a Customer has completed a request for Self-Exclusion... they are NOT permitted Entry!

It is YOUR responsibility when working ANY shift... to ensure that any Customers that are currently Self Excluded are NOT permitted entry!

Any Customer that tries to gain entry when they are Self-Excluded is; breaking the rules of their Self-Exclusion Agreement.

There are 2 ways of breaking the Self-Exclusion Agreement;

1. Actual Breach
2. Attempted Breach

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## K - Customers who Breach / Attempt Breach

### **ACTUAL BREACH**

Any Customer that is Self-Excluded has gained entry to the premises and is, or has been, participating in Gambling (bingo or machines).

Double Check the IHL Smart Tablet (Self-Exclusions) so you know you have the correct customer.

If a Customer is, or has been playing then they must be politely asked to STOP gambling.

Approach them, and politely remind them that they are currently still self-excluded.

As a result, you need to ask them to stop gambling.

Politely ask them to collect any credit/winnings they may have and to leave the premises.

On the IHL Smart Tablet, under Self Exclusions, find the customer and report an **ACTUAL** BREACH.

Then using the IHL Smart Tablet enter a Customer Incident against the customer, and detail this against 'Barred or Previously Barred Customer'.

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## K - Customers who Breach / Attempt Breach

### ATTEMPTED BREACH

Any Customer that is Self-Excluded has 'tried' to gain entry to the premises and has been refused entry.

Double Check the IHL Smart Tablet (Self-Exclusions) so you know you have the correct customer.

Better still if the customer is known to you, then you will be aware they are Self-Excluded.

Politely remind the customer they are still currently Self-Excluded and as a result they cannot be permitted entry.

On the IHL Smart Tablet, under Self Exclusions, find the customer and report an ATTEMPTED BREACH.

Then using the IHL Smart Tablet enter a Customer Incident against the customer, and detail this against 'Previously Barred Customer'.

Remember... All Interactions relating to Gambling must be logged on the IHL Smart Tablet!

## L - Local Area Risk Assessments

- The LARA (Local Area Risk Assessment) became a requirement on 6<sup>th</sup> April 2016.
- The LARA is designed to ensure that the operator has fully assessed and recorded the risk to the Licensing Objectives posed by the provision of gambling in their individual premises .
- An example of this 'Risk' would be... A Gamblers Anonymous meeting opens just a few doors from your licensed premises... Could this be an issue for a vulnerable person?
- The LARA is kept in the Compliance Manual (Back of House) in the office and should be reviewed and updated at least once every 12 months.



# M - Gaming Machines, Tablets and B3 Ratios

It is important to understand the maximum number of B3 machines permitted in your venue, can be **no greater than 20%** of the total number of Gaming Machines in the shop.

Tablets are in most shops. These Tablets have been setup to play Bingo and Machines, or just Machines only (depending whether you are Bingo Licensed).

- Bingo Licensed Premises will have Tablets with **BOTH** Bingo and Machine content.
- AGC Venues will have Tablets with **JUST** Machine content.

However, Tablets **MUST** be kept available for play at any time. So when Bingo/Bingo Express finishes at Midnight, should any customer wish to play Machine Content via a Tablet at say 2am, then they should be able to do so. It is this availability which contributes part of the 20% ratio in your venue.



Tablets should be checked EVERY day to ensure they are working and any faults reported ASAP to your Line Manager and reported to Head Office!



## N - Shop Security & General Knowledge

- If you believe someone has tampered with a gambling machine you should put the machine out of service and leave for inspection, plus report the issue asap.
- If policy and procedures are not adhered to in relation to Compliance and Social Responsibility, the company's Operating Licence and Premises Licence become at risk!
- Where contactless debit card facilities are available you should be vigilant of suspicious behaviour related to crime or abuse.
- Customers wearing caps/hoodies, should be politely asked to remove their head wear (so not to be hiding their faces)
- We must be mindful NOT to be talking too loudly on the shop floor with any information regarding shop floats or levels of money.
- Staff Guard is there for your Safety and Protection. It should be tested Once each Day!

## N - Shop Security & General Knowledge

- Staff are NOT permitted to play gaming machines or any other form of gambling products on any company premises.
- No Staff are permitted to accept Gratuities (tips). This specifically goes against the Code of Conduct for Fair & Open Gaming.
- It is best not to argue back with customers, better to listen, empathise and take action.
- If you are dealing with a customer complaint, please ensure you take full contact details so the company can investigate and contact the customer accordingly.
- Ensure you record customer Interactions or Incidents on the Smart Tablet.
- If in any doubt, phone your Manager, Area Manager or Operations Manager for help...

## N - Shop Security & General Knowledge

- The IHL Tablet is our heart & soul for Compliance & Social Responsibility. It is vital this tablet is kept in a secure location, away from any possibility of theft.
- I remind YOU, that it is YOUR responsibility to complete the details for the customer. Only in certain events (language difficulties) can you ask the customer to enter their details. (Even then you are still expected to fully monitor what is being typed into the tablet).
- All employees are expected to check the IHL tablet EVERY shift they work, to familiarise themselves with people who are self-excluded.
- All employees are expected to use the IHL tablet to record both INCIDENTS and INTERACTIONS!
- NOTE:
- INCIDENTS – Are when (for example).. a customer has fallen over, Police were called to the venue, an ambulance was called, customers were arguing.
- INTERACTIONS – Are for when you have spoken to a customer who, you have concerns over the volume of money they are spending, change in behaviour, offered advice (Let's Keep It Fun leaflets)



**Onestop Shopping**  
**2 WALSALL ROAD**  
**BIRMINGHAM**  
**B42 1AA**  
**D: 0121 344 3697**  
**M: 07949 322587**

25/9/2024

To whom it may concern

**RE: Shipley Estates Ltd – Trading as Shipleys**

I manage Onestop Shopping, a major mixed use shopping centre, retail park and transportation hub on behalf of the managing agents and owners.

Shipleys are a key tenant anchoring the frontage of the retail level in our transportation hub.

This tenant has garnered our respect for their professionalism since the inception of our business relationship, from handover, through fit out and in their continuing operation.

The fit out in the unit is of a high standard and is well maintained.

We have experienced no operational difficulties during their tenure and indeed, we feel that they have enhanced the dwell and footfall at the scheme.

Shipleys management stand out in terms of their relationship management and reasonableness, in fact, they demonstrated an over and above level of cooperation and patience during a major redevelopment of our bus station.

This tenant benefits the centre in drawing and retaining a demographic that we may not usually attract and are an excellent fit for the scheme.

Yours faithfully

*Robert Fusco*

Robert Fusco  
General manager

**E: [rob@onestop-shopping.co.uk](mailto:rob@onestop-shopping.co.uk)**  
**[www.onestop-shopping.co.uk](http://www.onestop-shopping.co.uk)**

# **Extract of Licence Conditions and Codes of Practice (LCCP) for Bingo**

**Version effective from 29 November 2024**



### 1.1.1 - Qualified persons – qualifying position

**Applies to:**

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 X<sup>1</sup> 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 X<sup>1</sup>.
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.

---

<sup>1</sup> The schedules mentioned here will be attached to individual licences.

## 1.2.1 - Specified management offices – personal management licences

### Applies to:

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 (this is likely to be the Chief Executive Officer, Managing Director or equivalent
  - b. chairing the board (where the licensee has such a body) where that appointment is held for a fixed or indeterminate term of office, unless:
    1. the position is held only on a transient and short-term basis for individual meetings; and
    2. the licensee retains evidence in support of point 1.
  - c. the licensee's finance function as head of that function
  - d. the licensee's gambling regulatory compliance function as head of that function
  - e. the licensee's marketing function as head of that function
  - f. the licensee's information technology function as head of that function in so far as it relates to gambling-related information technology and software
  - g. 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
  - h. 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, and
  - i. the licensee's anti-money laundering and counter-terrorist financing function as head of that function this is likely to include the following:
    - a. for holders of casino licences, the person responsible for compliance with the relevant regulations (and appointed in accordance with those regulations); and the person responsible for submission of reports of known or suspected money laundering or terrorist financing activity under the relevant legislation (and appointed in accordance with the relevant regulations);
    - b. for holders of licences other than casino licences, where an individual has been appointed to submit reports of known or suspected money laundering or terrorist financing activity under the relevant legislation, that individual.
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.

### 2.1.1 - Access to (and provision of data from) key equipment

**Applies to:**

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.

### 2.2.1 - Gambling software

**Applies to:**

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

- 1 All gambling software<sup>1</sup> 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.

---

<sup>1</sup> As defined in section 41(2)&(3) of the Act

### 2.3.1 - Technical standards

**Applies to:**

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.

## 2.3.2 - Bingo equipment specifications

### Applies to:

Non-remote bingo operating licences and bingo ancillary remote licences.

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

## 3.1.2 - Other networks

### Applies to:

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 (for example, the National Bingo Game).

### 3.1.3 - Hosting

#### Applies to:

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 (for example, the National Bingo Game).



### 4.1.1 - Segregation of funds

**Applies to:**

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.

### 4.2.1 - Disclosure to customers

**Applies to:**

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.

### 5.1.1 - Cash and cash equivalents

**Applies to:**

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 (for example, 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.

### 5.1.2 - Payment methods and services

**Applies to:**

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

Effective from 31 January 2024:

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 2017 (SI 2017 No 752) if the provider of those services is a 'payment service provider' within the definition of that term in regulation 2 of those Regulations (or the equivalent requirements of any UK Statutory Instrument by which those regulations are amended or superseded).

### 6.1.2 - Use of credit cards

**Applies to:**

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.

## 7.1.1 - Fair and transparent terms and practices

### Applies to:

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.

## 8.1.1 - Display of licensed status

### Applies to:

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.

[Read additional guidance on the technical requirements](#) contained within this section.

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).

## 9.1.2 - Prohibited bingo prize games

### Applies to:

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.

## 12.1.1 - Anti-money laundering - Prevention of money laundering and terrorist financing

### Applies to:

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.

## 14.1.1 - Access to premises

### Applies to:

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.

### 15.1.1 - Reporting suspicion of offences etc – non-betting licences

**Applies to:**

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.<sup>1</sup>

Read additional [guidance on the information requirements](#) contained within this section.

---

<sup>1</sup> These matters are to be reported to us online via our [‘eServices’](#) digital service on our website

### 15.1.3 - Reporting of systematic or organised money lending

**Applies to:**

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.<sup>1</sup>

Read additional [guidance on the information requirements](#) contained within this section.

---

<sup>1</sup> These matters are to be reported to us online via our [‘eServices’](#) digital service on our website



## 15.2.1 - Reporting key events

### Applies to:

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 occurrence<sup>1</sup>.

### 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 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.

Read additional [guidance on the information requirements](#) contained within this section.

<sup>1</sup>Key events are to be reported to us online via the '[eServices](#)' digital service on our website.

## 15.2.2 - Other reportable events

### Applies to:

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 events<sup>1</sup>:
  - a. any material change in the licensee's arrangements for the protection of customer funds in accordance with licence condition 4 (protection of customer funds) (where applicable)
  - b. 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.
  - 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 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.
2. The licensee must notify the Commission, as soon as reasonably practicable, if it knows or has reasonable cause to suspect that a person who has gambled with it has died by suicide, whether or not such suicide is known or suspected to be associated with gambling. Such notification must include the person's name and date of birth, and a summary of their gambling activity, if that information is available to the licensee.

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.

Read additional [guidance on the information requirements](#) contained within this section.

<sup>1</sup> Other reportable events are to be reported to us online via the '[eServices](#)' digital service on our website.

### 15.3.1 - General and regulatory returns

**Applies to:**

All operating licences.

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.

In particular within 28 days of the end of each quarterly period licensees must submit an accurate Regulatory Return to the Commission containing such information as the Commission may from time to time specify.

---

<sup>1</sup>Regulatory returns are to be submitted to us online via the '[eServices](#)' digital service on our website.

### 16.1.1 - Responsible placement of digital adverts

**Applies to:**

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.

## 17.1.1 - Customer identity verification

### Applies to:

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 frequency <sup>1</sup> 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.

---

<sup>1</sup> 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.

### Ordinary code

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.

### Social responsibility code

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.

### 1.1.1 - Cooperation with the Commission

#### Ordinary code

##### Applies to:

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.

### 1.1.2 - Responsibility for third parties – all licences

#### Social responsibility code

##### Applies to:

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.



### 1.1.3 - Responsibility for third parties – remote

#### Social responsibility code

##### Applies to:

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.

### 2.1.2 - Anti-money laundering – other than casino

#### Ordinary code

##### Applies to:

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). \*

### 3.1.1 - Combating problem gambling

#### Social responsibility code

##### Applies to:

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.

### 3.2.5 - Bingo and FEC SR code

#### Social responsibility code

##### Applies to:

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. All 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.

Read additional [guidance on the information requirements](#) contained within this section.

### 3.2.6 - Bingo and FEC ordinary code

#### Ordinary code

##### Applies to:

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 25 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<sup>1</sup> 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. 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.

Read additional [guidance on the information requirements](#) contained within this section.

---

<sup>1</sup> These matters are to be reported to us online via our '[eServices](#)' digital service on our website.

### 3.2.11 - Remote SR code

#### Social responsibility code

##### Applies to:

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.

### 3.2.12 - Remote ordinary code

#### Ordinary code

##### Applies to:

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.

### 3.3.1 - Responsible gambling information

#### Social responsibility code

##### Applies to:

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.

### 3.3.2 - Foreign languages

#### Ordinary code

##### Applies to:

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.

### 3.3.4 - Remote time-out facility

#### Social responsibility code

##### Applies to:

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.

### 3.4.1 - Premises-based customer interaction

#### Social responsibility code

##### Applies to:

All non-remote licences (except non-remote lottery, gaming machine technical, gambling software and host licences); only the following remote licences – ancillary remote bingo, ancillary remote casino, ancillary remote betting, remote general betting limited, and remote betting intermediary (trading rooms only).

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.



### 3.4.3 - Remote customer interaction

#### Social responsibility code

##### Applies to:

All remote licences, except any remote lottery licence the holder of which does not provide facilities for participation in instant win or high frequency lotteries<sup>1</sup>, remote gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, ancillary remote betting, remote betting intermediary (trading rooms only) and remote general betting limited licences.

##### In force dates:

- in paragraph 1, the words ‘as explained in the Commission’s guidance (see paragraph 2)’; and the entirety of requirements 2 and 3 are in force from 31 October 2023
- paragraph 10 is in force from 12 February 2023
- the remainder of Social Responsibility (SR) Code Provision 3.4.3 is in force from 12 September 2022.

1. Licensees must implement effective customer interaction systems and processes in a way which minimises the risk of customers experiencing harms associated with gambling. These systems and processes must embed the three elements of customer interaction – identify, act and evaluate – and which reflect that customer interaction is an ongoing process as explained in the Commission’s guidance (see paragraph 2).
2. Licensees must take into account the Commission’s guidance on customer interaction for remote operators as published and revised from time to time (‘the Guidance’).
3. Licensees must consider the factors that might make a customer more vulnerable to experiencing gambling harms and implement systems and processes to take appropriate and timely action where indicators of vulnerability are identified. Licensees must take account of the Commission’s approach to vulnerability as set out in the Commission’s Guidance.
4. Licensees must have in place effective systems and processes to monitor customer activity to identify harm or potential harm associated with gambling, from the point when an account is opened.
5. Licensees must use a range of indicators relevant to their customer and the nature of the gambling facilities provided in order to identify harm or potential harm associated with gambling. These must include:
  - a. customer spend
  - b. patterns of spend
  - c. time spent gambling
  - d. gambling behaviour indicators
  - e. customer-led contact
  - f. use of gambling management tools
  - g. account indicators.
6. In accordance with SR Code Provision 1.1.2, licensees are responsible for ensuring compliance with the requirements. In particular, if the licensee contracts with third party business-to-business providers to offer any aspect of the licensee’s business related to the licensed activities, the licensee is responsible for ensuring that systems and processes are in place to monitor the activity on the account for each of the indicators in paragraph 5 (a-g) and in a timely way as set out in paragraphs 7 and 8.
7. A licensee’s systems and processes for customer interaction must flag indicators of risk of harm in a timely manner for manual intervention, and feed into automated processes as required

by paragraph 11.

8. Licensees must take appropriate action in a timely manner when they have identified the risk of harm.
9. Licensees must tailor the type of action they take based on the number and level of indicators of harm exhibited. This must include, but not be limited to, systems and processes which deliver:
  - a. tailored action at lower levels of indicators of harm which seeks to minimise future harm
  - b. increasing action where earlier stages have not had the impact required
  - c. strong or stronger action as the immediate next step in cases where that is appropriate, rather than increasing action gradually
  - d. reducing or preventing marketing or the take-up of new bonus offers where appropriate
  - e. ending the business relationship where necessary.
10. Licensees must prevent marketing and the take up of new bonus offers where strong indicators of harm, as defined within the licensee's processes, have been identified.
11. Licensees must ensure that strong indicators of harm, as defined within the licensee's processes, are acted on in a timely manner by implementing automated processes. Where such automated processes are applied, the licensee must manually review their operation in each individual customer's case and the licensee must allow the customer the opportunity to contest any automated decision which affects them.
12. Licensees must implement processes to understand the impact of individual interactions and actions on a customer's behaviour, the continued risk of harm and therefore whether and, if so, what further action is needed.
13. Licensees must take all reasonable steps to evaluate the effectiveness of their overall approach, for example by trialling and measuring impact, and be able to demonstrate to the Commission the outcomes of their evaluation.
14. Licensees must take account of problem gambling rates for the relevant gambling activity as published by the Commission<sup>2</sup>, in order to check whether the number of customer interactions is, at a minimum, in line with this level. For the avoidance of doubt, this provision is not intended to mandate the outcome of those customer interactions.

---

<sup>1</sup> A high frequency lottery is a lottery in which any draw takes place less than one hour after a draw in a previous lottery promoted on behalf of the same non-commercial society or local authority or as part of the same multiple lottery scheme.

<sup>2</sup> [Problem gambling rates for the relevant gambling activities](#) are available on our website.

### 3.4.4 - Financial vulnerability check

#### Social responsibility code

##### Applies to:

All remote licences, except any remote lottery licence the holder of which does not provide facilities for participation in instant win or high frequency lotteries<sup>1</sup>, remote gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, ancillary remote betting, remote betting intermediary (trading rooms only) and remote general betting limited licences.

##### In force dates:

- Social Responsibility (SR) Code 3.4.4 is in force from 30 August 2024
  - paragraph 7 is in force between 30 August 2024 to 27 February 2025.
1. Licensees must undertake a financial vulnerability check for customers that meet the relevant threshold.
  2. A financial vulnerability check must include at a minimum a customer-specific public record information check for significant indicators of potential financial vulnerability. The check must include whether the customer is subject to any of the following:
    - a. bankruptcy order, or equivalent, or
    - b. county court judgment (CCJ); an individual voluntary arrangement (IVA); high court judgment (HCJ); administration order (AO) or decree; Debt Relief Order (DRO); or equivalent.
  3. Licensees must:
    - a. consider the financial vulnerability information they obtain, together with all of the other information they know about the customer and are permitted to use, in order to assess risk,
    - b. take proportionate action when risk is identified, and
    - c. record the rationale for the decision on proportionate action.
  4. Licensees must have and put into effect policies and procedures on:
    - a. whether, when taking decisions on proportionate action, it is appropriate for such a decision to be taken manually, in a fully automated manner (offering the customer the opportunity for manual review where decisions for action are taken), or through a combination of automated processing and subsequent manual review, and
    - b. the circumstances in which immediate action is necessary to limit harm where significant risk is identified.
  5. The licensee is not required to conduct this financial vulnerability check at the point when the customer reaches a relevant threshold, if the operator has previously conducted a financial vulnerability check or a financial risk assessment within the previous 12 months.
  6. From 28 February 2025, the relevant threshold is where the customer's deposits minus withdrawals exceeds £150 in a rolling 30-day period.
  7. Between 30 August 2024 and 27 February 2025, the relevant threshold is where the customer's deposits minus withdrawals exceeds £500 in a rolling 30-day period.

<sup>1</sup> A high frequency lottery is a lottery in which any draw takes place less than one hour after a draw in a previous lottery promoted on behalf of the same non-commercial society or local authority or as

part of the same multiple lottery scheme.

### 3.4.6 - Financial risk assessments pilot

#### Social responsibility code

#### Applies to:

All remote bingo, casino and betting licences of fee categories J1, K1 and L1.

#### 1. Subject to paragraph 2 below, in this provision:

- a. the pilot phase is the period from 30 August 2024 to 31 March 2025 inclusive;
- b. the pilot stages of the pilot phase are three stages which operate over such periods of the pilot phase as may be specified by the Commission from time to time;
- c. a threshold is a threshold which is specified by the Commission for the purposes of subparagraph h below from time to time;
- d. a customer's account is an inactive account for the purposes of a pilot stage if the customer did not use that account for gambling during the period of 12 months prior to the commencement of the relevant pilot stage;
- e. a customer's account is an active account for the purposes of a pilot stage if the customer used that account for gambling during the period of 12 months prior to the commencement of the relevant pilot stage;
- f. the stage one historical period is such period as the Commission may specify for the purposes of subparagraph h(i);
- g. the stage two historical period is such period as the Commission may specify for the purposes of subparagraph h(ii);
- h. a relevant customer is:
  - i. during the first pilot stage, a customer of the licensee who has an account which is inactive, and in relation to which during the stage one historical period the deposits into that account minus the withdrawals from that account exceeded either the relevant threshold during a calendar day or the relevant threshold over a 90-day period;
  - ii. during the second pilot stage, a customer of the licensee who has an account which is active, and in relation to which during the stage two historical period the deposits into that account minus the withdrawals from that account exceeded either the relevant threshold during a calendar day or the relevant threshold over a 90-day period;
  - iii. during the third pilot stage, a customer of the licensee who has an account which is active, and in relation to which:
    - the deposits into that account minus the withdrawals from that account exceed the relevant threshold over any 24-hour period; or
    - the deposits into that account minus the withdrawals from that account exceed the relevant threshold over any 90-day period;
- i. a credit reference agency is any one of the three credit reference agencies, Equifax, Experian and TransUnion;
- j. a financial risk assessment is an assessment provided by a credit reference agency of the financial risk in relation to a customer which takes into account information that the credit reference agency holds about the customer, including (where available) credit performance data and aggregated current account turnover data.

#### 2. The Commission may:

- a. extend the pilot phase so that it concludes on a date no later than 30 April 2025, any such extension to be notified to licensees no later than 17 March 2025;
- b. for the purposes of paragraph 1b above, specify that pilot stages operate over different periods in respect of different licensees and/or categories of licensees;
- c. for the purposes of paragraph 1c above, specify different thresholds for different pilot stages and/or for different cases and/or categories of case;
- d. for the purposes of paragraph 1f above, specify different stage one historical periods in respect of different licensees and/or categories of licensees;

- e. for the purposes of paragraph 1g above, specify different stage two historical periods in respect of different licensees and/or categories of licensees; and
  - f. for the purposes of paragraph 1h above, specify the relevant calendar days and the relevant 90 day periods, and the Commission may specify different such days or periods in respect of different licensees or categories of licensees.
3. During the pilot phase, a licensee must request from a credit reference agency a financial risk assessment in respect of each relevant customer. The request must be made:
- a. during the first and second pilot stages, within 10 working days of the relevant pilot stage commencing; and
  - b. during the third pilot stage, within 24 hours of the time at which the customer first becomes a relevant customer.
4. In a case in which a licensee receives a financial risk assessment pursuant to a request made under paragraph 3 above, the licensee must:
- a. consider the financial risk assessment and any other relevant information that it holds about the relevant customer and:
    - i. assess whether the relevant customer is or was (as the case may be) at risk of harm associated with gambling, and
    - ii. determine what action, if any, the licensee would take or would have taken (as the case may be) under SR Code Provision 3.4.3 as a result of that assessment if paragraph 6 below did not apply;
  - b. record the assessment and the determination referred to in subparagraph a above, and the reasons for the determination; and
  - c. provide to the Commission such information in relation to the assessment and/or determination referred to in subparagraph a above, and/or information in relation to such assessments and determinations generally, at such time and in such form and manner as the Commission may specify from time to time.
5. During the pilot phase, a licensee must:
- a. determine the policies and procedures that it would be appropriate for the licensee to adopt in relation to the provision to and receipt from credit reference agencies of data about customers (including the receipt of financial risk assessments);
  - b. determine the policies and procedures that it would be appropriate for the licensee to adopt in relation to assessments of whether a customer is at risk of harm associated with gambling, and determinations of what action (if any) the licensee would take as a result of that assessment, if the licensee were required to obtain and consider a financial risk assessment for the purposes of SR Code Provision 3.4.3; and
  - c. report to the Commission its conclusions under subparagraphs a and b above, and its reasons for those conclusions, at such time and in such form and manner as the Commission may specify from time to time.
6. A licensee must use the financial risk assessment obtained pursuant to a request made under paragraph 3 above, and any information available to the licensee only because it was included in such an assessment, only during the pilot phase and only for the purposes of complying with paragraphs 4 and 5 above. A licensee must not use such a financial risk assessment or such information for any other purpose. In particular, a licensee must not use such a financial risk assessment or such information for the purpose of compliance with its obligations under SR Code Provision 3.4.3.



### 3.5.1 - Self exclusion – Non-remote and trading rooms SR code

#### Social responsibility code

##### Applies to:

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.

### 3.5.2 - Self-exclusion – non-remote ordinary code

#### Ordinary code

##### Applies to:

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.

### 3.5.3 - Self-exclusion – remote SR code

#### Social responsibility code

##### Applies to:

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.

### 3.5.4 - Self-exclusion – Remote ordinary code

#### Ordinary code

##### Applies to:

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.

### 3.5.5 - Remote multi-operator SR code

#### Social responsibility code

##### Applies to:

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 when relied upon to provide facilities for betting via a machine (commonly known as self-service betting terminals) on premises where a betting or track premises licence has effect, remote general betting (remote platform), remote betting intermediary (trading room only), 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.

### 3.5.6 - Multi-operator non-remote SR code

#### Social responsibility code

##### Applies to:

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.



### 3.5.7 - Multi-operator non-remote ordinary code

#### Ordinary code

##### Applies to:

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).

### 3.6.2 - Bingo

#### Ordinary code

##### Applies to:

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.

### 3.6.7 - Remote

#### Ordinary code

##### Applies to:

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.

### 3.8.2 - Money-lending – other than casinos

#### Ordinary code

##### Applies to:

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.

### 3.9.1 - Identification of individual customers - remote

#### Social responsibility code

##### Applies to:

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.

### 4.1.1 - Fair terms

#### Social responsibility code

##### Applies to:

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.

## 4.2.2 - Display of rules - bingo

### Social responsibility code

#### Applies to:

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.

## 4.2.3 - Display of rules – remote SR code

### Social responsibility code

#### Applies to:

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.

## 4.2.4 - Remote ordinary code

### Ordinary code

#### Applies to:

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.

## 5.1.1 - Rewards and bonuses – SR code

### Social responsibility code

#### Applies to:

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.

## 5.1.2 - Proportionate rewards

### Ordinary code

#### Applies to:

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.

### 5.1.3 - Alcoholic drinks

#### Social responsibility code

##### Applies to:

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.

### 5.1.6 - Compliance with advertising codes

#### Social responsibility code

##### Applies to:

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 (that is, 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.

### 5.1.8 - Compliance with industry advertising codes

#### Ordinary code

##### Applies to:

All licences.

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



## 5.1.9 - Other marketing requirements

### Social responsibility code

#### Applies to:

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.

## 5.1.10 - Online marketing in proximity to information on responsible gambling

### Ordinary code

#### Applies to:

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

## 5.1.11 - Direct electronic marketing consent

### Social responsibility code

#### Applies to:

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.

## 6.1.1 - Complaints and disputes

### Social responsibility code

#### Applies to:

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.

Read additional [guidance on the information requirements](#) contained within this section.

## 7.1.2 - Responsible gambling information for staff

### Social responsibility code

#### Applies to:

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.

## 8.1.1 - Ordinary code

### Ordinary code

#### Applies to:

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 specify<sup>1</sup>, 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 licence<sup>2</sup>:
  - 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.

Read additional [guidance on the information requirements](#) contained within this section.

<sup>1</sup> These matters are to be reported to us online via our '[eServices](#)' digital service on our website.

<sup>2</sup> 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

## 9.1.2 - Bingo

### Social responsibility code

#### Applies to:

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.

## 10.1.1 - Assessing local risk

### Social responsibility code

#### Applies to:

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 policy<sup>1</sup>.
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.

<sup>1</sup>This is the statement of licensing policy under the Gambling Act 2005.

## 10.1.2 - Sharing local risk assessments

### Ordinary code

#### Applies to:

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.



## 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 \(opens in new tab\)](#).

---

## 3 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 (policy statement) (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 objectives or the licensing authority's own policy statement.

## 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

---

## 1 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 policy statement, having taken into account local circumstances. This is dealt with in more detail at [Part 6 of this guidance](#).

## 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 of this guidance](#). A non-exhaustive list of licence conditions is provided at [Part 9 of this guidance](#).

**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 \(opens in new tab\)](#) and the [Licensing \(Scotland\) Act 2005 \(opens in new tab\)](#), 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 \(opens in new tab\)](#) (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. For example, The Safe Bet Alliance's Voluntary Code of Safety and Security National Standards for Bookmakers. Further information can often be found on the websites of industry trade associations.

**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 are 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 (for example, bingo and family entertainment centre (FEC) premises) but which make gambling products and facilities available.

**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 floorwalkers 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 \(LCCP\)](#) or as [Gambling codes of practice](#). 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 [Part 9 of this guidance](#) and [Part 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 policy statement. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

---

## 2 Section 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 (the [LCCP](#))
- b. in accordance with any relevant guidance issued by the Commission under s.25 (this guidance)
- 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 (policy statement) (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 licensing 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 policy statement 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.

---

## 3 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 the second part 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.

---

## 4 Good practice in regulation

**5.27.** Under the [Legislative and Regulatory Reform Act 2006 \(opens in new tab\)](#), any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation in the exercise of the function ([Legislative and Regulatory Reform Act 2006 \(opens in new tab\)](#), section 21). 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' Code (previously the Regulators' Compliance Code), Department of Business, Innovation and Skills<sup>5</sup>, 2014, issued under section 23 of the Legislative and Regulatory Reform Act 2006 (opens in new tab). 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 Code also apply to local authorities, who are under a statutory duty to have regard to them when fulfilling their regulatory functions under the Act. The



[Legislative and Regulatory Reform \(Regulatory Functions\) Order 2007 \(opens in new tab\)](#), was amended by the [Legislative and Regulatory Reform \(Regulatory Functions\) \(Amendment\) Order 2009 \(opens in new tab\)](#), 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 \(opens in new tab\)](#) - see [Part 3 of this guidance](#) and [Part 7 of this guidance](#).

**5.29.** Guidance produced by Regulatory Delivery now replaced by the Office of Product Safety and Standards seeks to assist local authorities in interpreting the requirements of the Regulator's Code for example in delivering risk-based regulation in relation to age restrictions.

Age-restricted products and services framework<sup>6</sup> 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<sup>7</sup>.

<sup>5</sup> Now the Department for Business, Energy and Industrial Strategy

<sup>6</sup> [Age-restricted products and services framework \(opens in new tab\)](#)

<sup>7</sup> [Age-restricted products and services: a code of practice for regulatory delivery \(opens in new tab\)](#)

## 5 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 \(opens in new tab\)](#) 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.

## 6 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. 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.

**5.32.** Licensing authorities must ensure that the application is in accordance with the relevant codes of practice, this guidance, the licensing objectives and the licensing authority's own policy statement. There is, therefore, significant scope for licensing authorities to request additional information from the applicant where they have concerns about both new applications and variations.

**5.33.** Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in [Part 9 of this guidance](#) and a non-exhaustive list of licence conditions is included at [Part 9 of this guidance](#) of this guidance.

**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).

a more effective method of doing so. Local circumstances and concerns, and the layout of a particular premises, will determine what is most appropriate for an individual application.

## Notice of application

**7.48.** The Secretary of State and Scottish Ministers have made regulations (SI 2007/459: The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulations 2007 and SSI 2007/196 for Scotland) requiring the applicant to publish notice of their application and to notify responsible authorities and other persons about the application. These also apply, with one or two modifications, in relation to applications for provisional statements and some ancillary applications that can be made in relation to a premises licence.

**7.49.** Notice must be given in three ways:

- a notice placed outside the premises for 28 consecutive days in a place where it can be read conveniently
- in a newspaper or newsletter of local relevance, on at least one occasion within ten days of the application being made
- to all responsible authorities, which includes the Commission, within seven days of the application being made.

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

---

## 6 Application for premises variation (s.187): ‘material change’

**7.51.** Previous guidance from [the Department for Culture, Media and Sport \(opens in new tab\)](#) 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 policy statement, 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)
- d. in accordance with the licensing authority's statement of licensing policy (policy statement) (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.

---

## 7 Consideration of planning permission and building regulations

**7.58.** In determining applications, the licensing authority should not take into consideration matters that are not related to gambling and the licensing objectives. One example would be the likelihood of the applicant obtaining planning permission or building regulations approval for their proposal. Licensing authorities should bear in mind that a premises licence, once it comes into effect, authorises premises to be used for gambling. Accordingly, a licence to use premises for gambling should only be issued in relation to premises that the licensing authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use. Equally, licences should only be issued where they are expected to be used for the gambling activity named on the licence. This is why the Act allows a potential operator to apply for a provisional statement if construction of the premises is not yet complete, or they need alteration, or he does not yet have a right to occupy them. [Part 11 of this guidance](#) gives more information about provisional statements.

**7.59.** As the Court has held in a 2008 case (*The Queen (on the application of) Betting Shop Services Limited –v- Southend-on-Sea Borough Council* [2008] EWHC 105 (Admin)), operators can apply for a premises licence in respect of premises which have still to be constructed or altered, and licensing authorities are required to determine any such applications on their merits. Such cases should be considered in a two stage process; first, licensing authorities must decide whether, as a matter of substance after applying the principles in s.153 of the Act, the premises ought to be permitted to be used for gambling; second, in deciding whether or not to grant the application a licensing authority will need to consider if appropriate conditions can be put in place to cater for the situation that the premises are not yet in the state in which they ought to be before gambling takes place.

- the layout of the premises must be maintained in accordance with the plan that forms part of the premises licence.
- neither National Lottery products nor tickets in a private or customer lottery may be sold on the premises in England and Wales. Sale of National Lottery and private lottery tickets are prohibited in Scotland.

**9.26.** There are also mandatory conditions attaching to each type of premises licence controlling access between premises. There can be no direct access between one premises licensed under the Act and another premises licensed under the Act, with the following exceptions:

- between licensed betting premises
- between bingo premises and alcohol-licensed premises and/or clubs with a club gaming or club machine permit or family entertainment centres (FECs) and tracks
- between tracks and alcohol-licensed premises and/or clubs with a club gaming or club machine permit, FECs or betting premises and bingo premises
- between FECs and alcohol-licensed premises, bingo halls or clubs with club gaming or club machine permit and tracks.

## Default conditions

**9.27.** S.169 of the Act gives licensing authorities:

- the ability to exclude from premises licences any default conditions that have been imposed under s.168
- the power to impose conditions on premises licences that they issue.

**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.



### 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>

<sup>6</sup> 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 hearing<sup>1</sup> 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)<sup>2</sup>.

A hearing may, however, be dispensed with if the applicant and any interested party or responsible authority who have made representations consents to this course<sup>3</sup>, or the authority think that the representations are vexatious or frivolous or will certainly not influence their determination of the application<sup>4</sup>. 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 representations<sup>5</sup>, 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 licence<sup>6</sup> the authority cannot determine the application until the relevant operating licence has been issued<sup>7</sup>.

On considering an application for a premises licence (whether at a hearing or not) the licensing authority must either grant it or reject it<sup>8</sup>. 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*<sup>9</sup> 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*<sup>10</sup> 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 authorities<sup>11</sup> 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 provide<sup>12</sup>, nor may they have regard to the question whether or not the proposal is likely to be granted planning permission or building regulation approval<sup>13</sup>. 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 rejected<sup>14</sup>.

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 HMRC<sup>15</sup> 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 condition<sup>16</sup> they must give their reasons<sup>17</sup>. If representations were made by an interested party or a responsible authority they must give their response to the representations<sup>18</sup>.

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 grant<sup>18</sup>. The notice must give the authority's reasons for rejecting the application<sup>19</sup>.

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

<sup>2</sup> GA 2005, s 162. See further para 5.159 below.

<sup>3</sup> GA 2005, s 162.

<sup>4</sup> GA 2005, s 162(3).

<sup>5</sup> GA 2005, s 162(4).

<sup>6</sup> Ie under GA 2005, s 159(3)(b).

<sup>7</sup> GA 2005, s 163(2).

<sup>8</sup> GA 2005, s 163(1).

<sup>9</sup> *The Oxford English Dictionary* (2nd edn, 1989).

<sup>10</sup> (5th Edn, OUP).

## 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.

