



LOCAL GAMBLING RISK ASSESSMENT

Premises Name:	ERDINGTON				
Premises Address:	Merkur Slots, 220 High Street, Erdington, B23 6SJ				
Operator Premises Code:	913	Area Manager:		Area:	Area
Category of gambling premises licence:	Bingo	Staffguard System: Y/N	Yes	24 hours opening:	Yes
Premises Licence Number:	0				
Local Authority details:	Birmingham City Council				
Name of person completing assessment:	Gill Clulow	Position within Company:	Senior Auditor		
Date original Assessment completed:	24/01/2020				
Date of Assessment Review:	30/06/2020				
Reason for Assessment Review:	New Premise Application				
Operating Licence No:	000-003266-N-103444-024				

REQUIREMENT TO COMPLY – social responsibility code provision 10.1.1 - with effect from 6th April 2016

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

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

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

Ordinary code provision 10.1.2

Licensees are required to share their risk assessment with Licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

LOCAL AREA PROFILE

Useful websites:

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

Premises Design and Gambling Operation

This Local Area Risk assessment takes into account Birmingham Statement of Gambling Principles Feb 2019 and referenced relevant section 1 General Principles and section 5 Bingo, the Erdington District's Community Plan 2017-2020, Erdington Constituency Economic & Employment Profile 2015 and the Indices of Deprivation 2019, Economic Policy of Birmingham City Council.

The venue will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area. Ability to review CCTV remotely and provide footage to when required.

Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons.

The premise and employees will be protected by a Staffguard security system, Maglock and intruder alarms will be installed. Adequate staff will be maintained at all times and subject to regular review and risk assessment.

Any emergency periods of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy. Venue and machine keys will be secured in a time delay safe accessible only by Management.

Premises Logs - Information pertaining to the Licence Conditions and Codes of Practice will be recorded electronically using the IHL SmartTablet including customer interactions, self-exclusions, breaches, reinstatements, AML, incidents and alerts, this data is collated centrally and reviewed by an independent team of compliance auditors, a quarterly report is submitted to the Gambling Commission.

The company operate a Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them. Age verification text purchase and mystery shopper visits are frequently carried out (CheckPolicy).

All employees complete onboarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People; Age Verification and Customer Interaction. Employees are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers. Employees are trained how to manage situations with homeless people seeking refuge. Employees are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate. Employees are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged and reported to the police if necessary.

The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).

The proposed venue will operate under a Bingo Licence, with proprietary bingo equipment. and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p). Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. All machines adhere to Gambling Commission Technical Standards and will be appropriately labelled, providing details of machine operation/winning combinations, contain safer gambling messaging and Gamcare signage.

Employees are trained to identify suspicious activity and have the ability to interrogate real-time machine data to prevent criminal activity, identify AML or fraudulent incidents which are logged and escalated where appropriate. The venue will operate TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Employees do not carry cash floats and only management can access the machines and change machines. Machine data is captured in real-time and full cash reconciliation completed on a weekly basis, the machine data and cash collections are monitored by a centrally based income protection team.

Premises frontage will be of a style which obscures the interior with appropriate advertising inline with Licence Conditions and Codes of Practice. 'Stay in Control' Posters and Leaflets containing the Gamcare helpline number will be located in prominent locations within the premise.

Playright App available for customers to self-manage their play and spend with the ability to send alerts to the venue if the customer enters at a time they have chosen not to play which instigates an interaction with the customer.

External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, Bingo Played Here, opening times and promotional activity.

The Company Code of Practice and Complaints and Disputes Policy will be displayed at the entrance with leaflet available within the premise - ADR provider is IBAS.

Local Risk

The premise is located in a 'predominately retail' high street location in a suburb of Birmingham. Directly opposite the premise is Shipleys High Street Bingo venue and within a few minutes walk are another Shipleys AGC, an Admiral AGC, a Betfred and Ladbrokes Bookmakers. Addresses: Shipleys, 165 High Street, B23 6SY; Shipleys, 243 High Street B23 6SS; Admiral, Unit 3 High Street, Acorn Centre, B23 6RG; Betfred, 239 High Street, B23 6SS and Ladbrokes, 225-227 High Street, B23 6SS. There are two pawnbrokers on the street - H&T and Cash Converters both within a 5 minute walk. Addresses: Cash Converter, 89 High Street, B23 6SA; H&T, 140 High Street, B23 6RS.

The railway station is 0.7miles away and there are multiple bus stops within 0.12 miles servicing the local area and city centre.

Three public houses are within a few minutes walk: The Swan in Wilton Market open 10am -11pm; Church Tavern 8am - 6pm and The Charlie Hall 8am - midnight. Addresses: The Swan, 65 High Street, B23 6SA; Church Tavern, 196 High Street, B23 6SJ and The Charlie Hall, 49 Barnabus Road, B23 6SH. Employees area aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged and reported to the police if necessary.

There are two homeless help centres, St Barnabas which is opposite the premise and Slade Road is 1.35 miles away. Foodbanks can be found 0.4 and 0.9 miles from the venue. YMCA located 0.6 miles. Addresses: St Barnabus Charity Shop, 193-197 High Street, B23 6SY; Slade Road Centre, 411 Slade Road, B23 7LA; The Trussell Trust Food Bank, 10 Wood End Road, B24 8AD; George Road Baptist Church, B23 7RY and YMCA, Will Steel House, 109 Grosvenor Road, B6 7LZ.

The closest school is Stockland Green Secondary 0.3 miles, there are nine infant/primary and two secondary within one mile, there are further secondary schools between one and three miles away. Addresses: Stockland Green Secondary School, Slade Road, Birmingham B23 7JH; Imedia School, Faraday Court, Erdington, B23 6UT; Osborne Primary School, Osborne Road, Birmingham, B23 6TY; Saint Barnabas Church of England Primary School, Spring Lane, Birmingham, B24 9BY; Queensbury School Special school, Wood End Road, Birmingham, B24 8BL; Featherstone Primary School, Glenville Drive, Birmingham, B23 6PR; Abbey Catholic Primary School, Sutton Road, Birmingham, B23 6QL; St Mary and St John Junior and Infant School, Beaufort Road, Birmingham, B23 7NB; Erdington Academy, Kingsbury Road, Birmingham, B24 8RE; St Edmund Campion Catholic School & Sixth Form Centre, Sutton Road, Birmingham, B23 5XA; Birches Green Junior and Infant School, Birches Green Road, Birmingham, B24 9SR; St Peter and St Paul RC Junior and Infant School, Kingsbury Road, Birmingham, B24 9ND; Erdington Hall Primary School, Ryland Road, Birmingham, B24 8JJ; Yenton Primary School, Chester Road, Birmingham, B24 0ED; Flexible Learning Centre, 204 Slade Road, Birmingham, B23 7RJ; Court Farm Primary School, Tedbury Crescent, Birmingham, B23 5NS; Paget Primary School, Paget Road, Birmingham, B24 0JP; The Pines Special School, Marsh Hill, Birmingham, B23 7EY; Slade Primary School, Slade Road, Birmingham, B23 7PX; schools between 1 - 3 miles (see appendix 1)

Three medical centres which 0.5 miles: Erdington Medical Centre; The High Street Surgery and Kingsbury Road Surgery. There are a further five medical centres within a mile of the premise. The closest hospital Ardenleigh is 770 yards away. Addresses: Ardenleigh Hospital, 385 Kingsbury Road, Erdington, Birmingham, West Midlands, B24 9SA; Erdington Medical Centre, 103 Wood End Road, Birmingham B24 8NT; The High Street Surgery, 26 High Street, Birmingham B23 6RN; Kingsbury Surgery, 273 Kingsbury Road, Birmingham B24 8RD; The Poplars Surgery, 17 Holly Lane, Erdington, Birmingham, West Midlands, B24 9JN; Reservoir Road Surgery; 192 Reservoir Road, Erdington, Birmingham, West Midlands, B23 6DJ; Dr Roshan Khuroo's Practice, 192 Reservoir Road, Erdington, Birmingham, West Midlands, B23 6DJ ; Tudor Practice Stockland Green, 192 Reservoir Road, Erdington, Birmingham, West Midlands, B23 6DJ and Sutton Road Surgery, 122 Sutton Road, Erdington, Birmingham, West Midlands, B23 5TJ.

Population:

The total population of Erdington District is estimated to be 98,603 with 41,008 households. 70% of the working age population are economically active and 61% are employed above the rates seen at city level.

Age: The district has a slightly older age profile compared to Birmingham as a whole.

- 14.1% of Erdington's population are aged 65 or over (compared to 13% city average)
- 63.5% of Erdington's population are aged 16-64 years
- 22.4% of Erdington's population are children 0-15 year olds (compared to 22.8% city average)

Ethnicity:

- 73.1% of its population are of White ethnicity
- 5.60% of its population are of multiple ethnicity
- 10.4% of its population are from Asian or Asian British ethnicity
- 10.2% of its population are from Black or Black British ethnicity

Deprivation:

Erdington constituency is recorded as the third highest area of deprivation within the city of Birmingham.

Merkur Slots will participate with any local/town centre scheme, Betwatch or similar and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and the sharing of information with other operators. Line of contact will be created with local high risk premises, homeless shelters, foodbank and YMCA to provide social responsibility information.

Local Crime Analysis (police.uk)

We have reviewed the Police.UK hot-spot mapping for the area and we are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local police over reducing our involvement in any incident. Crime in the area was 99.66/1000 which is lower than for similar areas at 128.17/1000. There are currently no publicised policing priorities. We have consulted with West Midlands Police Licensing Team and whilst there are no current specific gambling related concerns, we are aware of general incidents of theft, anti-social behaviour and begging in the vicinity of the premises.

Assessment of premises incident records (Past 12 Months)

As this is an application for a new license no data is currently available however Merkur Cashino data shows that test purchase visits by Check Policy in 2019/20 resulted in a pass rate of 96.09% which is 20% higher than the Industry average, all venues receive 3 or 4 random test purchases per year. We have considered all relevant information relating to the Licensing Objectives, demographics and crime levels and will continue to do so. This risk assessment takes into account the risks and reflects them in its provisions to ensure proper and safe conduct of the premises without impacting on any local problems.

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

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

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

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

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

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