

BIRMINGHAM CITY COUNCIL

PUBLIC REPORT

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

1. Purpose of report:

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

2. Recommendation:

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

3. Brief Summary of Report:

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

Representations have been received from Interested Parties.

4. Compliance Issues:

4.1 Consistency with relevant Council Policies, Plans or Strategies:

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

5. Relevant background/chronology of key events:

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

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

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

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

Site Location Plan Appendix 5.

When carrying out its licensing function, a licensing authority shall aim to permit the use of premises for gambling in so far as the authority think it is in accordance with any relevant codes of practice issued by the Gambling Commission, in accordance with guidance to licensing authorities issued by the Commission, in accordance with the authorities' statement of licensing principles and is reasonably consistent with the licensing objectives, which are: -

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

6. List of background documents:

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

7. Options available

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

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

Hi,

Please find attached representations with regards to this application.

Regards,

John

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

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

Application for Bingo Licence at 1076 Warwick Road

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

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

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

Local Area Risk Assessment - unfit for purpose

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

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

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

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

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

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

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

Protecting children and the vulnerable

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

Cash Fall – 17 Shirley Road, B27 7XU

Shaws – 13 Shirley Road, B27 7XU

Admiral Casino – 1105 Warwick Road, B27 6RA

Ladbrokes – 1111 Warwick Road, B27 6RA

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

Coral – 1192 Warwick Road, B27 6BT

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

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

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

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

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

From:

Sent: 02 December 2020 09:49

To: Licensing

Subject: licensing application

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

submission on behalf of Acocks Green Focus Group.

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

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

Hi Arvi,

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

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

Regards
Gary

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

**Birmingham City Council
Licensing Service**

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

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

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

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

Reason for attaching conditions listed above.

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

Gary Callaghan
Licensing Enforcement Officer

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

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

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

Where the application is—

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

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

Part 1 – Type of premises licence applied for

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

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

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

Part 2 – Applicant Details

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

Section A

Individual applicant

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

2. Surname: Other name(s):

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

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

Postcode:

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

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

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

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

Section B

Application on behalf of an organisation

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

7. The applicant's registered or principal address:

Seebeck House

1A Seebeck Place

Knowlhill

Milton Keynes

Postcode: **MK5 8FR**

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

000-003266-N-103444

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

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

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

Part 3 – Premises Details

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

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

1076 Warwick Road

Acocks Green

Birmingham

Postcode: **B27 6RD**

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

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

Ground Floor High Street Location

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

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

N/A

Part 4 – Times of operation

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

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

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

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

Part 5 – Miscellaneous

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

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

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

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

Yes

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

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

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

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

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

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

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

Part 6 – Declarations and Checklist (Please tick)

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

X

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

X

Checklist:

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

X

X

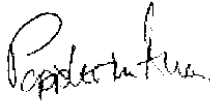
X

X

Part 7 – Signatures

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

Signature:



Print Name: Poppleston Allen

Date: 05 November 2020

Capacity:

Solicitors for & on behalf of the applicant

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

Signature:

Print Name:

Date:

Capacity:

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

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

Part 8 – Contact Details

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

Felix Faulkner

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

24. Postal address for correspondence associated with this application:

Felix Faulkner

Poppleston Allen

37 Stoney Street

The Lace Market

Nottingham

Postcode: NG1 1LS

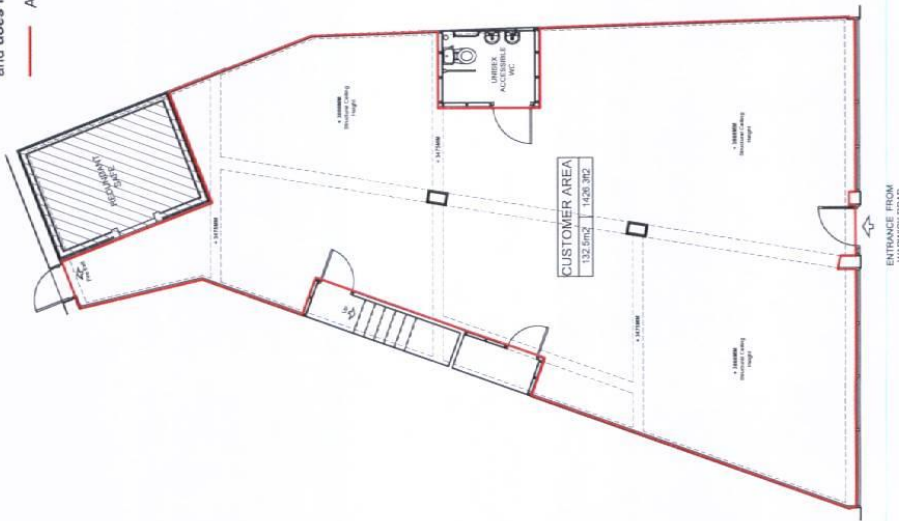
25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:



GAMBLING ACT 2005 LICENSING PLAN

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

— Area in which facilities will be provided for gaming.

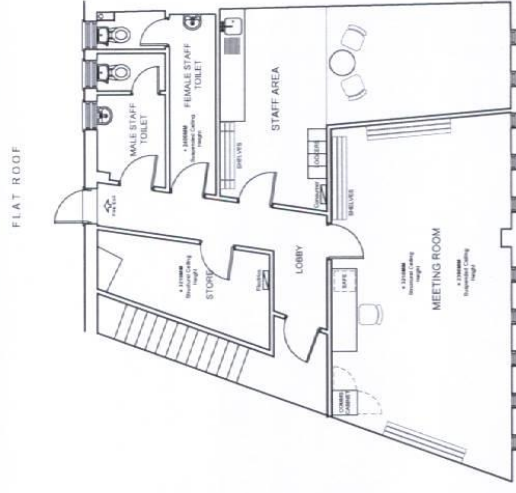


Proposed Ground Floor Plan 1:50

LINE OF CANOPY



Location Plan 1:1250



Proposed First Floor Plan 1:50

LINE OF CANOPY



1076 WARWICK ROAD
ACOCKS GREEN
B27 6RD

LICENCE PLAN

Class	Date	Issue
JAN	2008/0000	1.00 @ A1
Classified Area	22.0000	Residential
Activity	WR/AGR002	Residential
<small>See Schedule 2 of the Licensing Act 2003 for details of the classes of premises and activities.</small>		

Licence Plan



MERKUR



praesepe

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

Local Area Risk Assessment

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

Local Area Profile Risk Factors

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

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

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

Localised Risks to the Licensing Objectives

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

Environmental Factors

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

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

<p>Holy Souls Catholic Primary School, Mallard Ct, B27 6BN Cottesbrooke Infant & Nursery School, Yardley Rd, B27 6LG Cedars Academy, Cedars Avenue, B27 6LL The Oaklands Primary School, Dolphin Ln, B27 7BT Ninestiles School an Academy, Hatfield Cres, B27 7QG Kimichi School, 111 Yardley Rd, B27 6LL Fox Hollies Nursery, 419 Fox Hollies Rd, B27 7QA</p> <p>Community Centres and Youth Centres Friends Community Centre, 55 Yardley Rd, B27 6LL</p> <p>Parks, play grounds and sports/leisure facilities Fox Hollies Park, Pool Farm Rd, B27 7HB Westley Vale Millennium Green, The Avenue, B27 6NN Fox Hollies Park, Gospel Ln, B27 7EG</p> <p>Vulnerable and addiction support services The New Leaf Recovery Project, 16 Flint Green Rd, B27 6QA</p> <p>Homeless shelters and food banks Acocis Green Christian Centre, 100 Westley Rd, B27 7UL</p> <p>Pawnbrokers and Loan Shops H&T Pawnbrokers, 1141A Warwick Rd, B27 6RA Cash Converters, 14/15, 1160 Warwick Rd, B27 6BP CEX, 1080 Warwick Road, B27 6BH</p> <p>Medical Centres, Care Homes and Mental Health facilities Dudley Park Medical Centre, 28 Dudley Park Rd, B27 6OR The Acocis Green Medical Centre, 999 Warwick Rd, B27 6QJ Victoria Road Surgery, 21 Victoria Rd, B27 7XZ Holy House Care Home, 61 Westley Rd, B27 7UQ Christadelphian Care Homes, 17 Sherbourne Rd, B27 6AD Dudley Court Rest Home, 16 Dudley Park Rd, B27 6OR Victoria Lodge, 11 Victoria Rd Acocis Green, B27 7XZ Arden Lodge, 946 Warwick Rd, B27 6QG New Day, 45 Wynter Rd, B27 6JH Alexandra House, Hillborough Rd, Othor, B27 6PF Grey Gables, 39 Fox Hollies Rd, B27 7TH Flint Green House, 4 Sherbourne Rd, B27 6AE</p>	<p>Age verification test purchasing and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the JHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>Vulnerability Training and guidance is given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p>
--	---

<p>Gambling premises</p> <p>Shaws Amusements, 13 Shirley Road, B27 7XU Cash Fall Amusements, 17 Shirley Road, B27 7XU Betfred, Unit 1, 1160 Warwick Rd, B27 6BP Coral, 1192 Warwick Rd, B27 6BT Mecca Bingo Accods Green, Stockfield Rd, B27 6BB Admiral Casino, 1105 Warwick Rd, B27 6BA</p>	<p>Residential Areas</p> <p>Warwick Road, Accods Green in Birmingham consists predominantly of flats (65%) and detached houses (27%). There is higher than average level of social housing - 36% of household spaces. This contrasts with the national average of just over 18%. 32% of properties is rented from private landlords and 20% is owned with a mortgage. Majority of households are occupied by a single person.</p> <p>Bus stops and other Transport links</p> <p>Accods Green Village (Stop AG), B27 7XU Accods Green Station, B27 6EB</p> <p>Locally Identified Premises</p> <p>Select Express, 21-23 Shirley Road, B27 7XU Accods Green Library, Shirley Rd, B27 7XH</p> <p>Public Houses and Alcohol Licensed Premises</p> <p>INN on the GREEN, 2 Westley Rd, B27 7UH The Spread Eagle, 1146C Warwick Rd, B27 6BL</p>	<p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare; encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Player Protection</p> <p>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</p> <p><i>Failure to provide information to customers on responsible gambling</i></p> <p><i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p> <p>'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are located in prominent locations within the premise and in private areas, such as customer toilets.</p> <p>Playright App available for customers to self-manage their play and spend and is able to send alerts to Merkur Slots Birmingham if the customer enters at a time they have chosen not to play which instigates an interaction with the customer.</p> <p>Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling.</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p>
---	--	--

<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p>Crime statistics</p> <p>Warwick Road, Acocks Green, Birmingham, where Merkur Slots Birmingham is situated, is within the Acocks Green policing neighbourhood, under the West Midlands Police force area. Crime rate in Birmingham is lower than the average crime rate across similar areas like Stoke on Trent or Leicester but higher than average for the West Midlands force area. Number of reported crime incidents in the area has increased since 2019. Most commonly reported crimes in the area has included violence and sexual offences and anti-social behaviour. In August 2020 there were 152 crime incidents recorded within half a mile from Merkur Slots Birmingham postcode predominantly consisting of violence and sexual offences (59) and anti-social behaviour (23). 8 of all crime incidents were reported directly on Warwick Road; 4 related to violence and sexual offences, 4 related to drugs, 1 possession of</p>	<p>Senior Management are members of the Bingo Association Executive and Social Responsible Committees and BACTA Divisional and Social Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamercare training programme and the Machine Messaging trial and evaluation.</p> <p>Deprivation</p> <p>Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm.</p> <p>Merkur Slots operates on the basis that its controls and best practice is adopted at all times, therefore it is not a question of degrees of vigilance being implemented in different areas.</p> <p>Homelessness</p> <p>Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high risk premises, homeless shelters, foodbanks to provide social responsibility information.</p> <p>Premise Security and violence in the workplace</p> <p>Poor security control measures which may increase vulnerability to crime</p> <p><i>Failure to protect employee and customers from harm during the hours of late night opening.</i></p> <p>Merkur Slots Birmingham is subject to a separate security risk assessment, local factors are considered and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots Birmingham will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p>
---	--	--

<p>weapons and 1 related to criminal damage and arson. There are no currently published policing priorities from this area.</p> <p>Local Police</p> <p>The police have not identified any issues with the proposals.</p> <p>Public Houses and Alcohol Licensed Premises</p> <p>INN on the GREEN, 2 Westley Rd, B27 7UH The Spread Eagle, 1146C Warwick Rd, B27 6BL</p> <p>Pawnbrokers and Loan Shops</p> <p>H&T Pawnbrokers, 1141A Warwick Rd, B27 6RA Cash Converters, 1A/15, 1150 Warwick Rd, B27 6BP CEX, 1080 Warwick Road, B27 6BH</p> <p>Gambling premises</p> <p>Shaws Amusements, 13 Shirley Road, B27 7XU Cash Fall Amusements, 17 Shirley Road, B27 7XU Betfred, Unit 1, 1150 Warwick Rd, B27 6BP Coral, 1192 Warwick Rd, B27 6BT Mecca Bingo Acorns Green, Stockfield Rd, B27 6BB Admiral Casino, 1105 Warwick Rd, B27 6RA</p> <p>Residential Areas (Impacted by Anti Social Behaviour)</p> <p>Warwick Road, Acorns Green in Birmingham consists predominantly of flats (65%) and detached houses (27%). There is higher than average level of social housing - 36% of household spaces. This contrasts with the national average of just over 18%. 32% of properties is rented from private landlords and 20% is owned with a mortgage. Majority of households are occupied by a single person.</p> <p>Anti-social behaviour is second most commonly reported crime type in this area. There were 21 anti-social behaviour incidents reported within half a mile from Merkur Slots Liverpool postcode in August 2020 but none of them occurred directly on Warwick Road. Anti-social behaviour crime hotspots in this area include Higher Educational Building, Mayfield Road and Othon Boulevard East.</p>	<p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p>General Crime and Disorder</p> <p><i>To identify aggressive customers to prevent crime and disorder</i></p> <p>Awareness of local crime issues in the local area</p> <p>We have reviewed the Police UK hot-spot mapping for Acorns Green policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with West Midlands Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App Inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p> <p>Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.</p> <p>Merkur Slots Birmingham will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p> <p>Anti-social behaviour outside the premises</p> <p>Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a</p>
--	---

		<p>responsibility to work in partnership with local residents and authorities to reduce environmental impacts.</p> <p>Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p> <p>Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.</p> <p>Money Laundering <i>Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.</i></p> <p>Mercur Slots has a designated Anti Money Laundering Officer (AMLO) and AML policies with clear escalation and reporting processes.</p> <p>There are 2 pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.</p> <p>IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.</p> <p>Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.</p> <p>Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.</p> <p>Adequate staff will be maintained at all times and subject to regular review and risk assessment.</p>
--	--	--

	<p>Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 8pm until 6am.</p> <p>In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots will primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.</p> <p>Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.</p> <p>Merkur Slots Birmingham will operate TITO machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.</p> <p>As such staff are based predominately on the venue floor and have very little need to work in a back area, any back office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.</p> <p>Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.</p> <p>The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.</p> <p>Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.</p> <p>Alcohol and Drugs</p> <p>Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.</p> <p>No Alcohol Allowed signage on the door.</p> <p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p>
--	---

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

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

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

Merkur Slots Birmingham Premise Layout

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

Additional Comments

I have worked in the Gaming Industry for 25 years in operations as a Venue manager for 4 years and area manager for 20 years before moving to the Audit and Compliance department in 2019, prior to which I was in retail management. During my time in the industry, I have managed venues and areas in many locations from market towns such as Loughborough to large cities like Glasgow and Luton. When I was required to complete a Local Area Risk Assessment for the new Merkur Slots premises in Acco's Green I researched the area and then visited the location. I found Acco's Green to be a vibrant area with a variety of national and independent retailers and food outlets. Despite Covid 19 the area was busy with shoppers, I did not observe any evidence of street lifestyle persons or of any rough sleeping. Merkur Cashia operates 6 venues within Birmingham and the expertise and experience of the teams there will be used to support and train the new team as they are recruited for Merkur Slots.

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

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

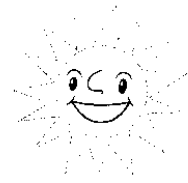
Assessors Name:	Gill Clulow
Signature:	
Date:	30.10.2020

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



Cashino Gaming Limited

Operational Standards



THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

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

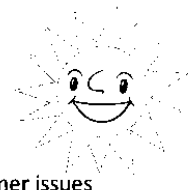
- Cashino Gaming Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Cashino Gaming Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Cashino Gaming Limited has completed its own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

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

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

Cashino Gaming Limited

Operational Standards



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

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

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

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

WORKING TOGETHER



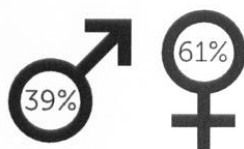


PART OF THE GAUSELMANN GROUP

A Strong Partner For More Than 60 Years

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

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



61% of employees are female

39% of employees are male



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



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

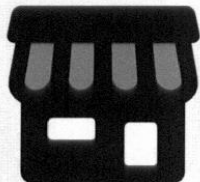


Beacon Bingo clubs are very important to our customers in their local communities. Our teams strive to deliver not just great service but a bingo experience which focusses on ambience, safety and fun in a modern environment. The flagship venue at Cricklewood, in North London, is the largest in Europe.

HIGH STREET BINGO

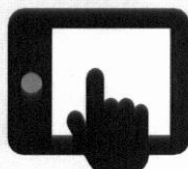
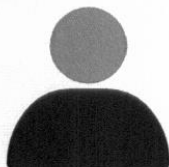
What is it?

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



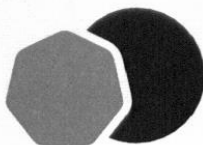
Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.

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



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

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



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



Bingo is available for play from 9am until midnight.



Bingo Terminals



Think 25

RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging



Players in Venue



We Are Not A Problem

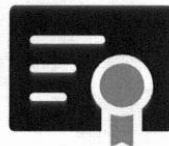
Being a responsible operator is high priority across the Gauselmann group and in the UK Praesepe is always looking at ways to adhere to the three licensing objectives as technology and customer behaviour changes.

GAMBLING COMMISSION

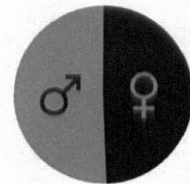
Praesepe is regulated by the
Gambling Commission and
Licensing Authorities



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



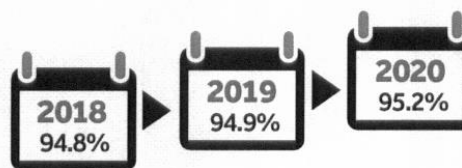
We are immensely proud of the fact that we have never had a licence revoked or even reviewed. Incidents are extremely rare. We simply do not generate noise and anti social behaviour.



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



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



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

SOCIAL RESPONSIBILITY MEASURES IN PLACE

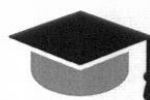


In Venue

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



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



Dedicated Learning & Development Team and National training centres.

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



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



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

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



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

Compliance



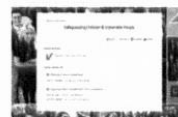
Training Centre



PlayRight App



Online Training





Machine Messaging



Customer Interaction Training



SOCIAL RESPONSIBILITY MEASURES IN PLACE

All Levels

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



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



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

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



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



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

BENEFITS TO THE HIGH STREET



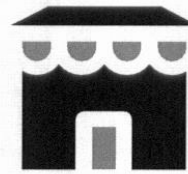
Benefits for your High Street Include:



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



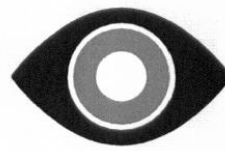
Increased footfall to the high Street.



Linked trips with other shops helping to support other businesses.



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



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

COMMUNITY & CHARITY



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

Please contact us.

Praesepe PLC

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

phone 01908 351200

email info@praesepeplc.com



