

Local Risk Assessment – Gambling Act 2005 Licensing Objectives

Premises

Premises Name:	Admiral
Premises Address:	54-57 High Street, Birmingham
Premises Post Code:	B4 7SY
Premises Licence Number:	
Category of Premises:	AGC

Company

Operating Company:	Talarium Ltd
Operating Licence Number:	1191

Assessment Writer

Name of Person Writing this Assessment:	Martin Scott
Position within Company or Name of Authorised Agent:	Regional Operations Manager
Date of this Assessment	August 2020
Date that Original Assessment was Written	December 2019

Gambling Act 2005 – The Licensing Objectives

The Gambling Act 2005 sets out the three licensing objectives (LO), 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; and
- (C) Protecting children and other vulnerable people from being harmed or exploited by gambling.

This document seeks to assess the risk to these objectives that our operation may pose and where necessary what measures we have put in place to mitigate that risk.

Independent Accreditation

Luxury Leisure Talarius have attained the prestigious Global Gaming Guidance Group (G4) accreditation. This is only awarded after a rigorous audit of the company's responsible gambling measures. Furthermore, the company have to be reassessed every 2 years in order for it to be maintained.

Local Area and Site Profile

The AGC is located within the city centre on the high street and sits amongst other national high street retailers as well as some local shops. There are high street banks nearby which have ATM facilities. There are several other licensed betting offices in the immediate vicinity, one immediately next door and the others are spread along the high street and throughout the vicinity, they are not clustered in one part of the city centre. There are another three AGC's, two operated by competitors within the 500-metre radius used in this assessment. There are several premises licensed for the sale and consumption of alcohol within the 500-metre radius but none in the immediate vicinity of the premises.

There are no schools nearby. However, school children do congregate in the area because of the service interchanges at the bus stops opposite and the presence of a McDonalds nearby. Our door supervisors will start at 1500hrs so that there is strict access control for the period in the late afternoon when children of school age tend to congregate in this part of the city centre.

There are bus stops outside the venue and on the opposite side of the street, which is one way for public transport and delivery access only. The mainline tram station is opposite the venue which passes through the city centre. Birmingham Moor Street train station is located within the 500-metre radius of the venue.

There are no Drug and Alcohol services within 500-metre radius of the AGC. However, Birmingham City does have several Drug and Alcohol service centres which offer support for those suffering from drug and alcohol dependency problems.

The venue has a single entrance/exit at street level to the front, a double doorway leading to a lobby area, leading directly into the gaming area. The meet and greet station is located prominently within the venue, giving a clear line of sight and command of the entrance. The venue also has an access control system fitted to the entrance for use in conjunction with and the door supervisors but also capable of being utilised at times of the day when they are not on duty.

There are no known local problems with crime or anti-social behaviour specifically linked to gambling but the area itself does have relatively high levels of crime. Latest www.ukcrimestats.com/Postcode/B47SY update May 2020 there were 681 reported crimes or incidents within a quarter mile radius of the premises. The three biggest crime types were ASB 236, Violent 182 and CD&A 51.

Our regulatory returns data at our nearby venue in Priory Square does not indicate that in this area we have any specific problems associated with consumer complaints, the need to call police for assistance or attempts by young persons to enter the premises.

The venue trades 7 days per week, Mon-Sun 09:00-22:00.

15.00 – 22.00 evening trading has additional support of Door Supervisor.

The venue will be part of the Birmingham CITY SAFE radio scheme and the RETAIL BID.

The local authority statement of principles in relation to the Gambling Act 2005 has been considered in the completion of this assessment. The statement does not offer specific guidance on the geographic extent to be considered when completing this assessment and does not currently contain local area profile although it does state that reference should be made to the demographic makeup of an area, levels of deprivation and homelessness.

The venue is situated in the Ladywood Ward of Birmingham and data available on the city councils website from the 2011 census shows that of a relatively small population of 22,250 it has a diverse ethnic makeup with 46.9% described as 'White', 6.9% as 'Mixed' 23.7% as 'Asian' and 18.2% as 'Black'. (source Birmingham City Council website – Population and Census - https://www.birmingham.gov.uk/info/20057/about_birmingham/1294/population_and_census)

Birmingham is the 7th most deprived local authority area nationally and within the 69 wards Ladywood is ranked 42 (an improvement of 10 places from 32 in 2015) but this still places it in the top 20% of most deprived nationally. (source Birmingham City Council website – index of deprivation 2019 - https://www.birmingham.gov.uk/downloads/file/2533/index_of_deprivation_2015)

The latest figures available on the Birmingham City Council website regarding homelessness are from the rough sleeper count of January 2018 when there were 57 rough sleepers. Like any major city centre there are a relatively high number of rough sleepers in and around the city centre of Birmingham.

Risk Identification	LO	Level of Risk	Impact	Risk Management	Reviewed
Children entering site unnoticed.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - Layout of premises considered in staff numbers and deployment. The venue is never single staffed, ensuring staff are employed at busy periods of the day which coincide with school closing times. - Additional Door Supervisor will be placed within the venue daily between the hours 15:00 – 22:00 - Staff deployed to specific zones for which they have responsibility. - Machine layout takes into consideration lines of site to the entrance. - There is a lobby area beyond the doorway from the street ensuring that those who enter cannot simply inadvertently walk in without passing through a further door and past clear Over 18 signage. - The cash desk/refreshment station is positioned to give line of sight to the entrance. - CCTV cameras positioned to cover external/internal doorway entrance, gaming areas and back of house. - A monitor displaying the entrance CCTV is positioned on the cash desk/above the refreshment station. 	August 2020
Children entering site unnoticed.	C	Low	Severe to business. Severe to child.		August 2020
Children enter site with adult.	C	Low	Severe to business. Moderate to child.		August 2020
Children enter site and play before being noticed.	C	Low	Severe to business. Severe to child.		August 2020
Children enter site and play where age is misjudged.	C	Low	Severe to business. Severe to child.		August 2020
Age verification is not sought.	C	Low	Severe to business. Severe to child.		August 2020
Young person wearing face covering is not challenged for verification of age.	C	Low	Severe to business. Severe to child.		August 2020
Children knowingly allowed to play.	C	Low	Severe to business. Severe to child.		August 2020

<p>Those made vulnerable through abuse of drugs and/or alcohol having access to gambling. Those considered to be vulnerable, having access to gambling. (We adopt a broad definition of 'vulnerable' to include but not limited to those suffering from mental illness, recently bereaved, suffering from long-term or terminal illness, difficulty communicating, learning disability, substance misuse or addiction, breakdown of close personal relationships etc)</p>		<p>Low</p>	<p>Severe to business. Severe to customer.</p>	<ul style="list-style-type: none"> - A Staffguard system has been installed to provide additional security and assist staff manage the premises. - There is a 'Think 25' policy in operation which has been trained to all staff. - All staff are trained in social responsibility as part of their induction and are provided with regular refresher training. - Posters and displays of acceptable identification on site for staff. - Clear 'Over 18' and 'No Alcohol' signage is displayed, visible from outside and in the entrance to the arcade. - Any persons entering the venue who we suspect of being under the influence of drugs and alcohol will not be permitted into the venue. - Luxury Leisure/Talarius use independent test purchasing operations. All venues are tested at least twice in a rolling 12-month period. - The venue is installed with iBeacon technology able to work with the 'Gamblewise' app which is free for our customers to download and use to assist them manage their time spent gambling. - Stringent disciplinary procedures for failures identified through Test Purchasing or other investigation. - Social Responsibility returns data reviewed weekly through submissions from Area Managers to National Compliance Manager. 	<p>August 2020</p>
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				<ul style="list-style-type: none"> - All social responsibility returns data subject to a quarterly compliance review. - All customers arrive through a new reception point where they must await to be seen by a staff member first. This has the effect of allowing staff to adjudge the apparent age of all customers and if necessary, challenge for verification by the presentation of ID. - Staff have been trained to ask a customer to lower a face covering if necessary. 	
Failure to provide information to players on responsible gambling.	C	Low	Severe to business Severe to customer	<ul style="list-style-type: none"> - A responsible Gambling message is displayed at point of sale through posters, leaflets and stickers on machines. - Responsible Gambling Poster or leaflet holder adjacent PDQ Machine. 	August 2020
Failure to provide information in a suitable format.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - Poster/Leaflet designs to incorporate QR codes for GAMCARE, Playnice.org and Gambleaware contact information. - Responsible Gambling information stickers on all machines. - Compliance Audit function performed by Area Manager and also through regional field auditors and security managers. - Luxury Leisure Talarius have attained the Global Gaming Guidance Group (G4) accreditation for our responsible gambling measures. 	August 2020
Failure to recognise signs of problem gambling.	C	Low	Severe to business Severe to customer	<ul style="list-style-type: none"> - Additional aspects to training incorporating guidance on identifying problem gambling, procedure for interaction and sources of help. 	August 2020

Failure to interact with customer displaying signs of problem gambling.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - Clear policy to detail the procedure for interaction and level of staff that can 'intervene'. - New 'Stay in control leaflets' with QR codes to Playnice.org and GAMCARE and Gambleaware. - All recorded SR data subject to a quarterly compliance review by senior management. - All customers arrive through a new reception point where they must await to be seen by a staff member first. This has the effect of allowing staff to adjudge the apparent age of all customers and if necessary, challenge for verification by the presentation of ID and also to identify if a customer attempting to enter is self-excluded. - Staff have been trained to ask a customer to lower a face covering if necessary. - The screens sizes are designed to create a barrier when social distancing is not practicable but are not floor to ceiling and are not deep enough to enclose a machine position, they simply divide it from the adjacent machines. Staff can see over them and from behind the machine position therefore they are able to monitor the customer in the much the same way as before. - The screens are portable, on their own foot, and therefore can be moved by staff so as not to create enclosed machine positions in a venue. 	August 2020
Screens erected as part of measures to be 'COVID Secure' preventing staff from being able to effectively monitor players in relation to Age Verification, customer interaction and self-exclusion.	C	Low	Severe to business. Severe to customer.		August 2020
Failure to sign-post customer to help and support.	C	Low	Severe to business. Severe to customer.		August 2020

Failure to properly administer self-exclusion.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - Staff training incorporates policy and procedure for self-exclusion. - Since April 2016 Luxury Leisure/Talarius have operated one or both of the AGC national multi-operator self-exclusion schemes, offered through BACTA and IHL. - Digital cameras or suitable tablet devices are provided at all sites to take an image of customers wishing to self-exclude so that the exclusion can be effectively enforced. - The location of the site in relation to the customer's home address and any regular routes to work for example will be considered if the customer requests a wider exclusion. - All SR returns data subject to a quarterly compliance review. 	August 2020
Failure to impose exclusion in locality and in same types of establishments.	C	Low	Severe to business. Severe to customer.		August 2020
Customer breaches of self-exclusion.	C	Low	Severe to business. Severe to customer.		August 2020
Customer breaches self-exclusion by using another to gamble on their behalf.	C	Unknown	Moderate to business. Severe to customer.		August 2020
Money Laundering (Dye stained notes and Criminal spend).	A	Low	Low – Severe	<ul style="list-style-type: none"> - Appointed Money Laundering Reporting Officer (MLRO). - Staff training at induction and refresh training. - Luxury Leisure/Talarius have a corporate AML Risk Assessment and policies and procedures relating to AML. - £1000 limit on automated transactions using TITO. Any greater amounts require the intervention of a staff member. - Technical parameters on note acceptors designed to reject poor quality notes. (Often notes obtained by way of robbery are perished). - Manufacturer activity alerts from machines on independent networks (primarily SG and Storm). 	August 2020

				<ul style="list-style-type: none"> - TITO tickets not transferable between sites. - Slim change machines set up so that notes cannot be changed 'up'. - Comprehensive CCTV coverage in all sites. - Partnerships with local police where appropriate to identify and discourage criminal spend. 	
Commission of criminal offences to fund problem gambling	A	Low	Low – Severe	<ul style="list-style-type: none"> - Stringent policy and procedures in place to identify and intervene with customers who may be vulnerable to harm through problem gambling. See above under Information to players, Customer Interaction and Self-Exclusion. 	August 2020
Anti-social behaviour associated with late night operation	A	Low	Low – Severe	<ul style="list-style-type: none"> - This venue does not operate late at night. - Policy of non-players refused entry or asked to leave. - Refreshments offered only to players and known customers. 	August 2020
Poor security increasing vulnerability to robbery or theft.	A	Low	Low – Severe	<ul style="list-style-type: none"> - Static panic alarms. - All staff have personal attack 'hold-up' alarms. - Premises fitted with intruder alarm. - Extensive CCTV coverage with recording of approx. 30 days of footage. - Strict key storage procedure. - Time lock and/or time delay safes utilised. - Drop safe used for banking. - Staff personal floats limited to £100. - Door Supervisor employed during following hours 15:00 – 22:00 - This site is a member of Birmingham CITY SAFE local shop watch/town scheme and have access to the radio link members use. 	August 2020

Failure to display Terms and Conditions	B	Low	Low – Moderate	<ul style="list-style-type: none"> - Terms and Conditions displayed prominently within the premises. 	August 2020
Failure to deal with customers making complaints about the outcome of gambling	B	Low	Low – Moderate	<ul style="list-style-type: none"> - Machines only acquired from licensed suppliers. - Additional machine compliance checks completed by a technician when installing new machines. - Machine maintenance carried out by qualified technician. - Clear service complaint protocol to deal with machine or game performance related customer complaints. - Customer complaints policy and procedure. - Complaints policy and procedure displayed prominently in each site. - Complaint forms available at each site. - Luxury Leisure head office complaints telephone line. - Novomatic UK group complaints channel. - Registered with an ADR entity – BACTA. 	August 2020

Requirement to Comply

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

Effective as at 6 April 2016

Social responsibility code provision 10.1.1

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

Ordinary code provision 10.1.2

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