



LOCAL GAMBLING RISK ASSESSMENT

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

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

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

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

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

Ordinary code provision 10.1.2

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

LOCAL AREA PROFILE

Useful websites:

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

Premises Design and Gambling Operation

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

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

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

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

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

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

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

Local Crime Analysis (police.uk)

We have reviewed the Police.UK hot-spot mapping for the area and we are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local police over reducing our involvement in any incident. Crime in the area was 99.66/1000 which is lower than for similar areas at 128.17/1000. There are currently no publised policing priorities.

Assessment of premises incident records (Past 12 Months)

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

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

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

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

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

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