

BIRMINGHAM CITY COUNCIL

LICENSING SUB-COMMITTEE B

TUESDAY, 22 SEPTEMBER 2020 AT 10:00 HOURS
IN ON-LINE MEETING, MICROSOFT TEAMS

Please note a short break will be taken approximately 90 minutes from the start of the meeting and a 30 minute break will be taken at 1300 hours.

A G E N D A

1 **NOTICE OF RECORDING**

Chairman to advise meeting to note that members of the press/public may record and take photographs except where there are confidential or exempt items.

2 **DECLARATIONS OF INTERESTS**

Members are reminded that they must declare all relevant pecuniary and non pecuniary interests arising from any business to be discussed at this meeting. If a disclosable pecuniary interest is declared a Member must not speak or take part in that agenda item. Any declarations will be recorded in the minutes of the meeting.

3 **APOLOGIES AND NOTIFICATION OF NOMINEE MEMBERS**

4 **MINUTES**

3 - 12

To confirm and sign the Minutes of the meeting held on 4 August 2020.

5 **GAMBLING ACT 2005 PREMISES LICENCE - GRANT ADMIRAL, 54-57 HIGH STREET, BIRMINGHAM, B4 7SY**

13 - 94

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

6 **OTHER URGENT BUSINESS**

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

BIRMINGHAM CITY COUNCIL

LICENSING SUB-COMMITTEE B 4 AUGUST 2020
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MINUTES OF A MEETING OF THE LICENSING SUB-COMMITTEE B HELD ON TUESDAY 4 AUGUST 2020 AT 1000 HOURS AS AN ON-LINE MEETING.

PRESENT: - Councillor Nagina Kauser in the Chair;

Councillors Nicky Brennan and Adam Higgs.

ALSO PRESENT

David Kennedy – Licensing Section
Joanne Swampillai – Legal Services
Katy Townshend – Committee Services

(Other officers were also present for web streaming purposes but were not actively participating in the meeting)

NOTICE OF RECORDING/WEBCAST

- 1/040820 The Chairman advised, and the Committee noted, that this meeting would be webcast for live or subsequent broadcast via the Council's Internet site (www.civico.net/birmingham) and that members of the press/public would record and take photographs except where there are confidential or exempt items.

2/040820 **DECLARATION OF INTERESTS**

Members were reminded that they must declare all relevant and pecuniary and non-pecuniary interests arising from any business to be discussed at this meeting. If a disclosable pecuniary interest is declared a Member must not speak or take part in that agenda item. Any declarations will be recorded in the minutes of the meeting.

APOLOGIES AND NOTIFICATION OF NOMINEE MEMBERS

- 3/040820 No apologies were submitted.
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**LICENSING ACT 2003 PREMISES LICENCE – VARIATION - EDEN MANNA
SUPERMARKET, 122 FRANCES ROAD, COTTERIDGE, BIRMINGHAM, B30
3DX**

Report of the Interim Assistant Director of Regulation and Enforcement was submitted:-

(See document No. 1)

On Behalf of the Applicant

Anthony Gregson – Agent – Hospitality Training Solutions
Stacey Lukika – Employee and Applicant's wife.

Those Making Representations

Chris Jones – West Midlands Police (WMP)
Mary Locke – Local Ward Councillor.

* * *

The Chairman introduced the Members and officers present and the Chair asked if there were any preliminary points for the Sub-Committee to consider.

The Chairman then explained the hearing procedure prior to inviting the Licensing Officer, David Kennedy to outline the report.

Afterwards, the Chairman invited the applicant to make their submission. At which stage Anthony Gregson, made the following points on behalf of the applicant: -

- a) That the shop had been trading 17 months and was a vital part of the community; especially during the recent outbreak of Covid-19. The shop provided local residents with daily essentials. The applicant was putting himself at increased risk to ensure the residents felt comfortable and could get their daily essentials.
- b) Since the store had been open, there hadn't been any complaints.
- c) That the location of the premises did not pose a risk to children. Further, other premises close by were able to sell alcohol.
- d) The concerns needed evidencing before the application could be rejected.
- e) The grant application received objections in relation to children and an agreement was made at that hearing to 'show willing' to the local community. Which demonstrated the character of the applicant and his commitment to the area.

- f) The alcohol in the shop had to be kept behind shutters. The reason for the variation was due to the expense of shutters, which meant they had to move the alcohol every day because the applicant could not afford shutters.
- g) The applicant had arthritis in his knee which was making moving the alcohol difficult.
- h) They believed that selling alcohol for the duration of the opening hours would not put children at risk.
- i) Children passed by many shops that sold alcohol on the way to school and would often go and buy sweets from such shops.
- j) They should not be the only shop that has a condition about alcohol not being sold in the morning.
- k) They had stuck by the guidance that was given at the time of the grant application and were not advertising outside even though other premises did.

Chris Jones on behalf of WMP made the following points: -

- a) That the original application last year requested a licence from 11am-midnight 7 days a week and the Committee decided to curtail the hours to 5:30pm-midnight Monday-Friday and 11am-midnight Saturday-Sunday. The initial hours applied for would not have impacted children, yet the Committee noted that the head teacher was concerned about children being vulnerable.
- b) The decision was accepted by the licence holder in that alcohol was not to be on view and must be covered with lockable shutters.
- c) The new application offered some extra conditions regarding CCTV, yet there was already a substantial CCTV condition on the licence.
- d) There was also another offered condition regarding external lighting, yet that did nothing to negate the Committee's concerns.
- e) The condition regarding no advertisements outside the premises also did nothing to negate concerns and alcohol could still be seen through the windows from the pavement.
- f) He attended the premises on 12 June, he was concerned at the amount of alcohol on display at the premises, the details of the visit were at pages 54-65.
- g) None of the alcohol was behind shutters.
- h) When Chris spoke to the PLH (Premises Licence Holder) about the issues he said he knew he was in breach of the conditions, but in mitigation said the shop was too small for the alcohol he had and moving it was therefore not practical.

Licensing Sub-Committee B – 4 August 2020.

- i) Due to the concerns WMP requested the CCTV footage, yet they were told the system was broken and they did not have the password either. Another licence condition breach.
- j) The applicant knew the CCTV was not working, but was happy to continue trading even whilst in breach of his licence conditions.
- k) WMP revisited on 15 June to review the CCTV system once they had reset the password and the CCTV was working and had a new hard drive.
- l) WMP asked for the hard drive that was removed and the PLH said he didn't have it; the engineer had taken it. Therefore, they gave the applicant a week to recover the hard drive and they arranged to come back.
- m) The alcohol on that occasion was covered by sheets, but again this was not compliant with the Committee's imposed condition of lockable shutters.
- n) The PLH sent an email stating that the hard drive was not available, and the engineer had taken it, so they didn't know where it was. This posed various GDPR and Data Protection issues.
- o) There were no complaints since the premises opened but on 14 January 2020 there was a burglary reported and £2000 worth of vodka was stolen – an excessive amount of alcohol.
- p) The statement from PC Williams at page 69 raised issues about CCTV.
- q) The applicant and the conditions offered did not negate the concerns the original Licensing Committee had for the grant application.

Councillor Mary Locke, Local Ward Councillor made the following points: -

- a) She was the Councillor for this area and was objecting due to the premises being located opposite a primary school.
- b) The licensing objective of protecting children from harm was her concern.
- c) The hours were far too early (6am).
- d) The applicant had submitted documents showing other premises close to schools, however, the school closed several decades ago and the Council District Offices had also closed 5 years ago and were now empty.
- e) There was also a parent refuge nearby for parents who were fleeing from domestic violence.
- f) The head master who previously made an objection to the grant application had left the school and she was not sure if the new head master was aware of the application. However, she could not speak on their behalf.

- g) Safeguarding children is important and serious. Lockdown easing concerned her as schools would be getting back up and running.

In summing up, Cllr Mary Locke made the following points: -

- That the conditions agreed last time were fine and she did not feel the new hours requested were suitable.

In summing up, Chris Jones, on behalf of WMP made the following points: -

- That premises had not proven that they can address the concerns the Committee raised at the previous hearing.
- He did not have faith that the PLH would comply with the conditions of licence, given that they had already breached their current licence conditions.
- Therefore, the application should be refused.

In summing up, Anthony Gregson, on behalf of the applicant made the following points: -

- That the school had not chosen to object to the application.
- That it was not the case that children should be sheltered from alcohol and it didn't happen anywhere else, so it was not fair that it should happen with this premises.
- Variation applications were a new application and should not be compared with the original application.
- That the 6am opening hour was not for monetary gain, it was due to the applicant's health concerns.
- The applicant wasn't in attendance as he was very nervous, and English was his second language. He sometimes stuttered if he got nervous.
- That the CCTV condition was imposed, no evidence to say that he didn't have CCTV. As soon as the PLH realised the CCTV was not working he got it repaired. The circumstances about the hard drive were all speculation.
- The alcohol being on display was a mistake. The condition was imposed during school times, so he assumed that because children weren't at school due to Covid-19 he didn't have to cover the alcohol.
- The challenge 25 policy would protect children from harm.

- The applicant did a very good job trying to promote the Licensing Objectives and to grant the application would be best for the business and the licensing objectives.

At this stage Stacey Lukika indicated that she wished to address the points made by the police officer.

The Chair advised that the time for addressing the Committee had gone and that she should have indicated she wished to speak when invited earlier in the meeting.

At this point the Chair advised that the Committee would be going into private session to seek legal advice. The Members, Committee Lawyer and Committee Manager joined a private teams meeting.

At 1112 the Members and officers re-joined the meeting having taken legal advice and the Chairman invited Stacey Lukika to make her points.

Stacey Lukika made the following points: -

- a) That they submitted the evidence for the burglary. There was a power cut so no one was in the premises at the time; they were not trading.
- b) The £2000 worth of vodka was incorrect – it was alcohol and cigarettes which was the reason it was a big amount.
- c) They haven't made any changes to the building.
- d) The investigation of the robbery was not done properly.
- e) 2 officers attended the premises, saw the shop was closed due to power cut and that was why the burglary occurred. It would not have happened if they were trading as they would have been in the premises.
- f) That she didn't know much about the licence as she wasn't a DPS. However, how would anyone know the CCTV wasn't working until it was checked. They couldn't sit and watch it all day to ensure it was always working.
- g) The screen said it was recording, it wasn't until they went to access it that they realised it was not working.
- h) That Councillor Locke misunderstood the condition so why couldn't they misunderstand it? The school was only open to key worker children, so there were hardly any children around.
- i) They did not sell alcohol before 1730 hours.
- j) Bars and Clubs were closed due to Covid-19 so the demand for alcohol in the shop increased so they had to increase their stock.

- k) That there was a letter from the GP explaining her husband's health concerns.
- l) If they wanted to breach the conditions, they wouldn't have made a variation application.
- m) The school had no concerns and had not objected to the application.
- n) Her husband wanted to work with the community.
- o) They were being victimised for doing what they thought was right.
- p) If they weren't protecting children, why had no parents made objections.
- q) That the Councillor's objection last year was about crime and now it was about children. She had just objected for the sake of it.

The Chairman advised that Councillor Locke had the right to object, and this was a fresh application.

Stacey Lukika advised that the information submitted by WMP and Councillor Locke all made reference to the previous application and if it was deemed a new application then that information shouldn't be considered. Her final point was in relation to the objectors who she felt had approached the issues wrongly. She felt they should have sat the applicant down and tried to make him understand as there was a language barrier.

Councillor Locke advised that the school was open during lockdown.

Chris Jones, WMP advised that the premises had not proven or negated any concerns and had also breached their licence conditions. Further, the PLH did not give Chris the impression they he did not understand what was happening or being said when they carried out inspections.

Anthony Gregson reminded Members that it was a fresh application. The hours agreed at the grant hearing were agreed with the head teach and not imposed by the Committee – therefore because it wasn't a Committee concern it does not need to be negated.

Councillor Locke added that the hours agreed at the previous hearing were sufficient, she still had concerns about the protection of children.

The Committee Lawyer asked Stacey Lukika whether there were lockable shutters or blinds over the alcohol.

She responded to say that they did have blinds, but due to the increase in alcohol they did not have enough blinds, therefore they currently had no shutters or blinds.

The Committee Lawyer then asked Stacey Lukika to clarify what was stolen during the robbery.

She said she did not understand the importance of the question – it was not just vodka but other types of alcohol and cigarettes.

The Chair asked how many CCTV cameras were in the premises.

She stated that the premises had 4 CCTV cameras.

Anthony Gregson concluded that mistakes had been made however the police had the power to discuss and explain things to the licensee. The application was enough to show how children would be protected from harm and if there were any problems in the area, that would have been brought to the Committees attention. The applicant was an outstanding member of the community and was running a good store.

At this stage the meeting was adjourned in order for the Sub Committee to make a decision and all parties left the meeting. The Members, Committee Lawyer and Committee Manager conducted the deliberations in private and decision of the Sub-Committee was sent out to all parties as follows: -

4/040820

RESOLVED:-

That the application by Eden Manna Supermarket Ltd to vary the premises licence in respect of Eden Manna Supermarket, 122 Frances Road, Cotteridge, Birmingham B30 3DX, under section 34 of the Licensing Act 2003, be refused.

The Sub-Committee carefully considered the operating schedule put forward by the applicant, and the likely impact of the variation application, but is not satisfied that the protection of children from harm licensing objective would be promoted, due to the style of management displayed by the applicant - particularly given the observations made by West Midlands Police.

The applicant, via his agent, stated that the application to vary had not been made for any commercial reason; rather, it was because of the applicant's health problems, and to "ease the burden" on him. This was confirmed by the applicant's wife, who also attended the meeting and addressed the Sub-Committee. The applicant did not attend.

The Sub-Committee determined that the variation sought was substantial as it would extend the licensable hours, on all days of the week, far earlier into the hours of the morning and afternoon; moreover, the effect of the proposed operation would extend beyond the licensed premises itself. There was a primary school opposite the shop; there was also a parents' refuge nearby, which the Sub-Committee heard was used by those fleeing domestic violence.

Consequently, significant weight was attached to the representations made by West Midlands Police and a local Ward Councillor, relating to the impact of the proposed operation on those in the neighbourhood, especially children attending the primary school.

Both of those making representations felt that only the existing hours for the sale of alcohol (as determined in the decision of the Sub-Committee in March 2019) gave proper protection from harm for local children. To bring the hours forward, such that alcohol would be on sale from 06.00 hours daily, risked undermining the licensing objective.

In addition, West Midlands Police expressed concerns that the conditions agreed and imposed in March 2019 were not in fact being observed by the applicant. The Police drew the attention of the Sub-Committee to the condition that *'the licence holder shall ensure that at times when the premises are open but alcohol is not for sale that alcohol is not on view and is covered by lockable blinds or shutters.'* Upon attending at the premises at 11.50 hours on a Friday, ie a day when alcohol was not to be sold until 17.30 hours, officers observed that alcohol was openly on display behind the sales counter in an open fridge and on shelving units, and could be seen from the public footpath.

When spoken to by officers, the applicant had stated that he was aware of his licence conditions and knew that he was in breach of them by displaying alcohol in the premises outside his licensable hours; however he stated that the shop was too small to store the amount of alcohol and that it was impracticable to keep removing it on and off display. This appeared to be a reference to his health condition, which made moving the alcohol difficult.

The Police had also been dissatisfied with the applicant's arrangements regarding CCTV, and considered him to not be following the relevant conditions of the licence. Accordingly the Police had not been persuaded that the new conditions proposed by the applicant would add anything to uphold the licensing objectives; the issue was the applicant's capability in promoting the licensing objectives.

The Sub-Committee agreed with this; the Members were not altogether impressed with the management style described, and noted in particular that the applicant had admitted breaching the condition regarding the display of alcohol outside the licensable hours. Whilst the Sub-Committee accepted that the applicant was providing a service to the community, this type of failure to follow conditions already on the licence hardly inspired confidence that the applicant was a suitable person to have his licensable hours extended such that he would be able to sell alcohol all day, starting from 06.00 hours, or that he would take his responsibilities under the Act seriously. Accordingly, the Sub-Committee resolved to refuse the application.

In reaching this decision, the Sub-Committee has given due consideration to the City Council's Statement of Licensing Policy, the Guidance issued under Section 182 of the Licensing Act 2003 by the Secretary of State, the information in the application for a variation, the written representations received, and the submissions made at the hearing by the applicant's agent, the applicant's wife, West Midlands Police and the local Ward Councillor.

All parties are reminded that under the provisions contained within Schedule 5 to the Licensing Act 2003, there is the right of appeal against the decision of the

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Licensing Authority to the Magistrates' Court, such an appeal to be made within twenty-one days of the date of notification of the decision.

Please note, the meeting ended at 1152.

Report to:	Licensing Sub Committee B
Report of:	Interim Assistant Director of Regulation & Enforcement
Date of Meeting:	Tuesday 22nd September 2020
Subject:	Gambling Act 2005 Premises Licence - Grant
Premises	Admiral, 54-57 High Street, Birmingham, B4 7SY
Ward affected:	Ladywood
Contact Officer	Shaid Yasser, Senior Licensing Officer 0121 303 9896 licensing@birmingham.gov.uk

1. Purpose of report:
To consider a relevant representation made in respect of an application for an Adult Gaming Centre (AGC).

2. Recommendation:
To consider the representation that has been made and to determine the application.

3. Brief Summary of Report:
Premises Licence application received on 4 th February 2020 in respect of Admiral, 54-57 High Street, Birmingham, B4 7SY. A representation has been received from an Interested Party.

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:

Talarius Ltd submitted an application for an Adult Gaming Centre Premises Licence on 4th February 2020 for Admiral, 54-57 High Street, Birmingham, B4 7SY.

A representation has been received from an Interested Party, which is attached at Appendix 1.

The application is attached as Appendix 2.

Supporting documents have been submitted by the applicant, which are attached to this report as a separate appendix.

Site Location Plan Appendix 3.

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 Appendix 1
Application Form Appendix 2
Site Location Plan, Appendix 3

7. Options available

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

Entered
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From:
Sent: 29 February 2020 13:10
To: Licensing
Cc:
Subject: RE: Pending application for an Amusement Centre licence at 54-57 High Street, Birmingham, B4 7SY

Shaid

I am instructed by my clients Done Brothers (Cash Betting) Limited t/a Betfred to make the following representation on their behalf against the grant of this application by **Talarus Limited t/a Admiral for an AGC at 54-57 High Street Birmingham B4 7SY.**

Betfred presently operates a betting shop which is immediately adjacent to these proposed premises and accordingly, they are an 'interested party' given that they have 'business interests that might be affected' in the event of this application being granted and the premises opening as an AGC.

Licensing Objective Section 1 (a) Gambling Act 2005; "the prevention of gambling from being a source of crime and disorder, being associated with crime or disorder, or being used to support crime"

1. Betfred is very concerned, then when open, there is a significant risk that this AGC will contribute to levels of crime, anti-social behaviour and disorder that are prevalent in this particular locality.
2. The Licensing Authority will be familiar with Dale End, and perhaps familiar with the existing levels of crime and antisocial behaviour that exist in this particular locality. Betfred has, in the past, worked very closely with the West Midlands Police and the Licensing Authority in agreeing strategies and implementing measures designed to address crime and disorder in and around their premises, and the area, and continues to do so.
3. Betfred is therefore concerned at the impact that an AGC is likely to have on those levels of crime and disorder in this particular locality, which may in turn impact upon Betfred's ability to continue to successfully address such issues.
4. The Applicant acknowledges that "the area itself does have relatively high levels of crime", and further acknowledges that the biggest type of crime recorded in the wider quarter mile radius from the premises (as recently as November 2019) was violent crime.
5. In support of its representation, Betfred relies upon the previous refusal by the Licensing Sub Committee on the 6th November 2017 when an identical application was refused on these grounds.
6. In short, Betfred contends that the grant of this application would not be reasonably consistent with, and neither would it promote, this Licensing Objective.

Licensing Objective 1 (c) Gambling Act 2005; "the protection of children and other vulnerable persons from being harmed or exploited by gambling"

1. Betfred is also very mindful of this Licensing Objective, given the particular location of the application premises.
2. The Applicant acknowledges that "school children do congregate in the area because of the service interchanges at the bus stops opposite and the presence of a McDonalds nearby". This is Betfred's experience.
3. Betfred further contends that there are problems in this area with drug users and homeless people (rough sleepers) who would be regarded as vulnerable individuals.
4. In support of its representation, Betfred relies upon the previous refusal by the Licensing Sub Committee on the 6th November 2017 when an identical application was refused on these grounds.
5. In short, Betfred contends that the grant of this application would not be reasonably consistent with, and neither would it promote, this Licensing Objective.

My clients reserve the right to make further representations once details of the Applicants social responsibility measures are known.

Will you please let me know when this application will be listed for a hearing before the Licensing Sub-Committee, as my clients would wish to be present to advance their representations.

Thank you in anticipation of your assistance.

Regards;

Solicitor Regulated and Authorised by the SRA SRA Number 372018



COVERING LETTER

4th February 2020

Birmingham City Council
Licensing Section
1-3 Ashted Lock Way
Birmingham
B7 4AZ

Our Ref: TCR/GA05/AGC-new

By e-mail only:-
licensing@birmingham.gov.uk

Dear Sirs

Re: Gambling Act 2005 ("the Act")
Application for an Adult Gaming Centre Premises Licence ('AGC') for
Admiral, 54-57 High Street, Birmingham, B4 7SY
Applicant – Talarius Limited

As you know, Talarius Limited operates AGCs at Admiral, Unit 3 Acorn Shopping Centre, Erdington, Birmingham, B23 6RG and Admiral, 4 Priory Square, Priory Square Shopping Centre, Birmingham, B4 7LG and its sister company Luxury Leisure operates AGCs at Admiral, 106A High Street, Kings Heath, Birmingham, B14 7JZ and Admiral, 12-14 Alcester Road South, Kings Heath, Birmingham, B14 7PU.

We obtained planning permission to operate an AGC at 54-57 High Street, Birmingham, B4 7SY (the "Premises") and we now wish to apply for an AGC premises licence for it and enclose an application.

You have confirmed that you are happy to receive this application by e-mail.

Together with its sister company Luxury Leisure, Talarius Limited, is the largest operator of AGCs in the UK. We are long established and now part of the global Novomatic Group of companies. We have a long record of effective and responsible management throughout Great Britain, where we are founder members of the industry trade association BACTA, where I am the past Chairman of the AGC division and the current Chairman of its Social Responsibility committee.

We have a good relationship with GambleAware, to which we make substantial contributions and are the first land-based gambling operators in the UK to be successfully audited and certified for Responsible Gambling by the internationally renowned Global Gambling Guidance Group.

The grant to Talarius Limited of its operating licence evidences the Gambling Commission's satisfaction with its integrity, competence, finances and operating model. All required personal management licences are in place and maintained centrally.

- 1 -

As with all of our sites, the operation of the Premises will be fully compliant with applicable legislation, including compliance with the relevant mandatory and default conditions set out in the Gambling Act 2005 (Mandatory and Default Conditions (England and Wales) Regulations 2007).

Our operations at the Premises will reinforce the licensing objectives and in particular in the following ways:-

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

- a) A local risk assessment (enclosed) has been prepared for the site using both local knowledge and a third-party mapping tool.
- b) As with our other local sites, the Premises will have a fully up to date CCTV system with records kept for an appropriate length of time and signage to indicate the presence of the system. I refer you to the details of the local risk assessment.
- c) A Maglock entry system will be in use during later opening hours.
- d) All of our staff will be provided with local and emergency contact details for emergency services and these will be displayed clearly in the office areas of the Premises.
- e) We will as appropriate hold regular security reviews with a Crime Reduction Officer within the Birmingham police team as requested with them.
- f) Our cash handling processes are detailed, safe and secure and all staff are trained in recognising individuals who might be under the influence of drink or drugs.
- g) We provide a safe system for payment of winnings. The majority of the machines in the Premises will be "ticket in ticket out" (TITO), which is a system that gives tickets on winning, which can be redeemed for cash at the customer's convenience and time of choosing.
- h) The Premises will have adequate lighting inside and out.
- i) Staff will be provided with portable alarm activators, and the Premises will be fitted with a Staff Guard system.

2. Ensure that gambling is conducted in a fair and open way

As you are aware, adherence to this licensing objective is primarily a matter for the Gambling Commission and the operator and the Gambling Commission granted Luxury Leisure an operating licence for the relevant activities, as soon as the regime was implemented in 2007.

3. Protect children and other vulnerable persons from being harmed or exploited by gambling

- a) As with all of our national AGC operations (including our existing Priory Square site) we will operate a **Think 25** policy at the Premises. Training on this policy will be given to all members of staff and refreshed regularly.
- b) Staff will be trained in relation to customer interaction and records of customer interactions will be maintained. Staff are trained in recognising customers who may be experiencing difficulties or stress and are able to signpost individuals to external support services as part of such an interaction. I deal further with training generally as a separate item below.
- c) As we do at all of our AGC sites in accordance with our operating licence conditions, we will offer self-exclusion to customers who experience difficulties with gambling. We are members of a multi-operator self-exclusion scheme for AGCs administered by BACTA. At the end of any self-exclusion period, the self-exclusion will remain in place for a further 6 months unless the customer takes positive action in order to gamble again. Furthermore, our policies go beyond the requirements of our licence conditions in that following the expiry of the further 6-month period, the customer will be given one day to cool off before being allowed to access gambling facilities, regardless of when they choose to gamble again (ie not just within the 6-month period following the end of the self-exclusion period as set out in the LCCP). In any event, when the customer makes a request to return to gambling, a meeting will first be held with a trained member of staff before re-admittance is agreed and again, this will apply regardless of when the customer seeks to return to gamble.
- d) We will install beacon technology to operate the GambleWise app for customers who wish to use it to help manage their time spent in the venue.
- e) We retain the services of a third-party independent test purchasing organisation, Serve Legal, to conduct unannounced test purchases at all of our age restricted sites and this will apply to the Premises. As you are aware, the results are reported to the relevant local authority and to the Gambling Commission. We have a higher "pass rate" than the industry average, and any issues are investigated promptly and dealt with.
- f) Appropriate amounts of problem gambling leaflets and posters will be available on the Premises, both within the gaming areas and for collection in more discreet locations, such as the toilet areas.

In terms of training generally, our staff are provided with detailed training (both through e-learning and face to face) on induction and this is refreshed at regular intervals. Training covers a wide range of areas including legislative and licence requirements and matters of social responsibility (such as categories and numbers of gaming machines; stakes and prizes; age verification procedures; identification of and interaction with vulnerable persons; signposting; and the importance of not encouraging customers to enter into dangerous gambling activity).

In compliance with applicable Gambling Commission machine technical standards, the details of return to player percentages are provided for each game.

Finally, amongst the notices on the Premises and in compliance with legislation, there will be notices displayed in a prominent place at the entrances to the Premises stating that no persons under the age of 18 will be permitted to enter and that the consumption of alcohol will not be permitted on the Premises at any time.

I trust that the above will provide you with the information you require to process the application, but if anything further is required, please let me know.

On the basis of the above, I accordingly enclose:-

- an application form;
- a drawing referenced 934-969-BHAM_002. You will see that the drawing is coloured to show the boundary of the premises marked red and the gaming machine area marked green. We draw your attention to the notes on the drawing; and
- a Local Risk Assessment for the site. As you will note, it has been prepared as if we were trading at the Premises.

You have agreed that we can make payment remotely and you will contact us on receipt of this application so we can make payment by telephone.

I confirm that within 7 days of the date on which the application is made (ie today on receipt of your confirmation and payment is made), the Responsible Authorities (details of which have been kindly confirmed by your licensing officers) will be served with notice of the application in statutory form. The requisite press notice will be published in the Birmingham Mail within 10 working days, starting on the day after the date the application is made. The requisite site notice will, from the date on which the application is made, be displayed for 28 consecutive days, again in accordance with regulations.

We will contact you in early course to discuss the application in more detail and to answer any outstanding questions. Once the consultation period has run its course we will need to liaise with you with regard to the date of issue of the licence to allow for the relevant internal fit out works.

Although not relevant to the determination of this application, for information I can confirm that it is not our current long term intention to operate the Priory Square site in conjunction with this site.

In the meantime, please acknowledge receipt of the application and confirm that it is in order.

Yours faithfully

Group General Counsel
Novomatic UK
For Luxury Leisure

NOTICE OF APPLICATION FOR A PREMISES LICENCE

This notice is issued in accordance with regulations made under section 160 of the Gambling Act 2005

Notice is hereby given that:

Talarius Limited

of the following address:

*Fifth Avenue Plaza
Queensway
Team Valley Trading Estate
Gateshead
Tyne and Wear*

Postcode: *NE11 0BL*

whose operating licence reference is *000-001191-N-103508-019*

has made an application for an *Adult Gaming Centre* premises licence.

The application relates to the following premises:

*Admiral
54-57 High Street
Birmingham
B4 7SY*

The application for a premises licence has been made to the following licensing authority:

*Birmingham City Council
Licensing Section
1-3 Ashted Lock Way
Birmingham*

Postcode: *B7 4AZ*

Website: www.birmingham.gov.uk

Information about the application is available from the licensing authority, including the arrangements for viewing the details of the application.

The following person connected with the applicant is able to give further information about the application:

*Elizabeth Speed:
espeed@!*

Any representations under section 161 of the Gambling Act 2005 must be made no later than the following date:

02/03/20

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

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

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

Where the application is—

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

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

Part 1 – Type of premises licence applied for

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

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

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

Part 2 – Applicant Details

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

Section A

Individual applicant

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

2. Surname: Other name(s):

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

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

Postcode:

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

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

REGULATION & ENFORCEMENT RECEIVING SECTION DATE RECEIVED	
04 17 17	
E2000-00 CIC	
REF NO	ADWS 0000 4821
INITIALS	AL

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:

TALARIUS LIMITED

[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.]

7. The applicant's registered or principal address:

**FIFTH AVENUE PLAZA
QUEENSWAY
TEAM VALLEY TRADING ESTATE
GATESHEAD
TYNE AND WEAR**

Postcode: **NE11 0BL**

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

000-001191-N-103508-019

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:

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):

ADMIRAL

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

**54-57 HIGH STREET
BIRMINGHAM**

Postcode: **B4 7SY**

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.

THE PREMISES ARE LOCATED ON THE GROUND FLOOR OF A MULTI FLOOR BUILDING BLOCK WITH MIXED RETAIL AND OFFICE USE.

14(a) Are the premises situated in more than one licensing authority area?

NO [delete as appropriate]

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:

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** [delete as appropriate] [Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be 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.

	Start	Finish	Details of any seasonal variation
Mon	hh:mm	hh:mm	
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:

Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): **SEE LETTER** (dd/mm/yyyy)

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** [delete as appropriate]

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:

ADMIRAL, UNIT 3 ACORN S/C, ERDINGTON, BIRMINGHAM, B23 6RG
AGC PREMISES LICENCE REFERENCED 103/3

ADMIRAL, 4 PRIORY SQUARE, PRIORY SQUARE S/C, BIRMINGHAM, B4 7LG
AGC PREMISES LICENCE REFERENCED 99/3

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

AS EXPLAINED IN OUR COVERING LETTER, FOLLOWING GRANT OF THE PREMISES LICENCE WE WILL LIAISE WITH YOU ABOUT A DATE FOR ISSUE TO TAKE INTO ACCOUNT FIT OUT WORKS.

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. ☒

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

Checklist:

- Payment of the appropriate fee has been made/is enclosed ☒
- A plan of the premises is enclosed ☒
- 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 ☒

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: **ELIZABETH JANE SPEED**

Date: **4TH FEBRUARY 2020**

Capacity: **GROUP GENERAL COUNSEL**

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: *(dd/mm/yyyy)*

Capacity: _____

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

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

Part 8 – Contact Details

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

ELIZABETH SPEED – GROUP GENERAL COUNSEL

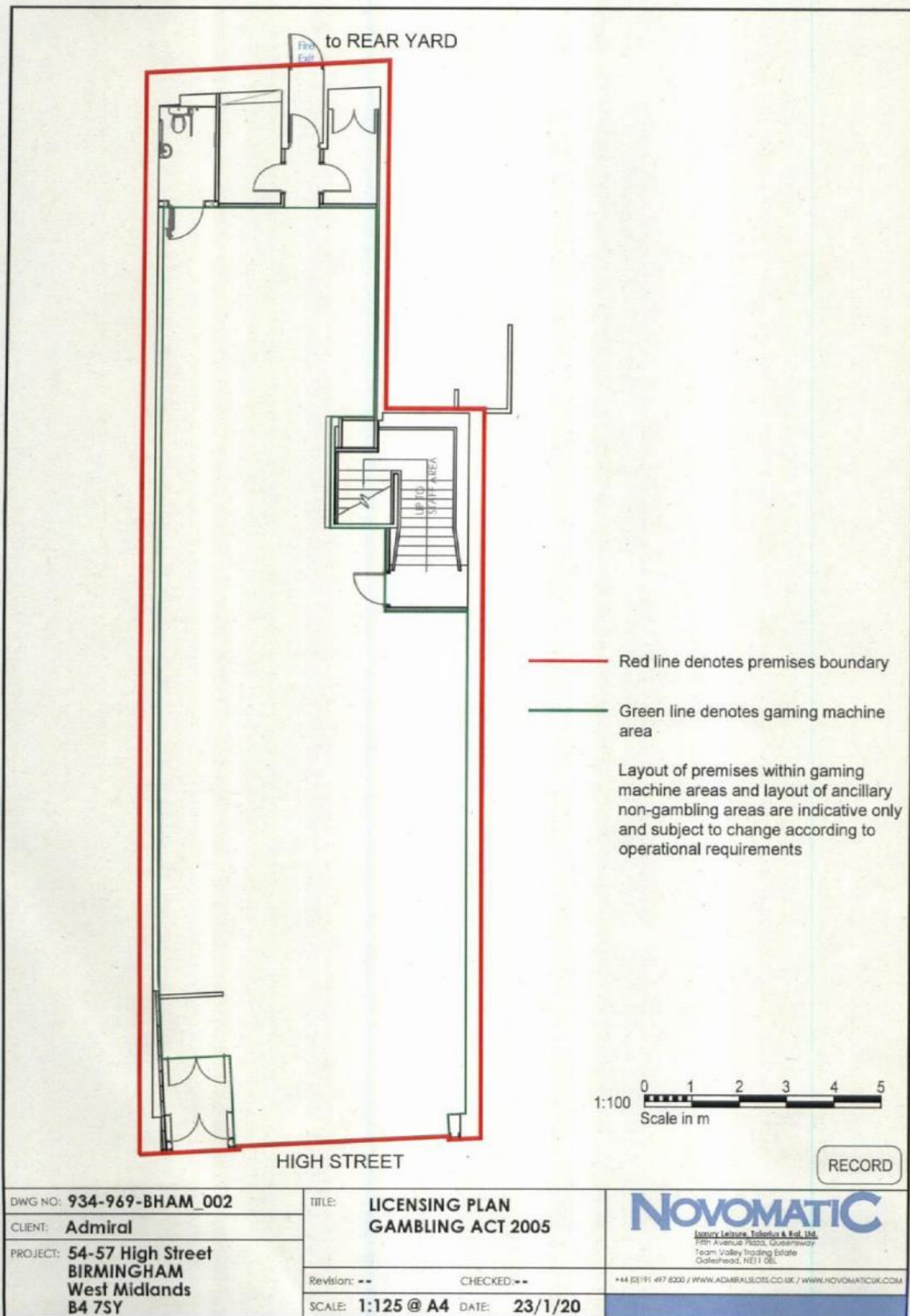
23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

24. Postal address for correspondence associated with this application:

**TALARIUS LIMITED
FIFTH AVENUE PLAZA
QUEENSWAY
TEAM VALLEY TRADING ESTATE
GATESHEAD
TYNE AND WEAR**

Postcode: **NE11 0BL**

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:



Social Responsibility Local Gambling Risk Assessment



Premises

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

Company

Operating Company:	Talarus
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	December 2019
Date that Original Assessment was Written	December 2019

Social Responsibility Local Gambling Risk Assessment

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 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 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. In November 2019 there were 468 reported crimes or incidents within a quarter mile radius of the premises. The three biggest crime types were Violent crime 116, Shoplifting 102 and ASB 57.

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.

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 make up of an area, levels of deprivation and homelessness.

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Social Responsibility Local Gambling Risk Assessment

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 2015 - 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.

Social Responsibility Local Gambling Risk Assessment

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.

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 has minimum of 2 members of staff on during operating hours and will never single man. 	December 2019
Children entering site unnoticed.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - A Door Supervisor will be placed within in the venue daily between the hours of 16:00-22:00 - Staff deployed to specific zones for which they have responsibility. 	December 2019
Children enter site with adult.	C	Low	Severe to business. Moderate to child.	<ul style="list-style-type: none"> - 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. 	December 2019
Children enter site and play before being noticed.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - The cash desk/refreshment station is positioned to give line of sight to the entrance. 	December 2019

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Social Responsibility Local Gambling Risk Assessment

Children enter site and play where age is misjudged.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - CCTV cameras positioned to cover external/external doorway entrance and all gaming venue and back of house of the premises. - A monitor displaying the entrance CCTV is positioned on the cash desk/above the refreshment station. - There is separate 'Over 18' signage next to the doorway in the café. 	December 2019
Age verification is not sought.	C	Low	Severe to business.	<ul style="list-style-type: none"> - A Staff Guard system has been installed to provide additional security and assist staff manage the premises. 	December 2019
Children knowingly allowed to play.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - 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. 	December 2019
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)		Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - Posters and displays of acceptable identification on site for staff. - Clear 'Over 18' signage is displayed, visible from outside and in the entrance to the arcade. - 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. 	December 2019

Social Responsibility Local Gambling Risk Assessment

				<ul style="list-style-type: none"> - Social Responsibility returns data reviewed weekly through submissions from Area Managers to National Compliance Manager. - All social responsibility returns data subject to a quarterly compliance review. 	
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 to PDQ. 	December 2019
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 through regional field auditors and security managers. 	December 2019
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. - Clear policy to detail the procedure for interaction and level of staff that can 'intervene'. 	December 2019
Failure to interact with customer displaying signs of problem gambling.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - 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. 	December 2019
Failure to sign-post customer to help and support.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - Gamblewise new App to allow customers to manage their own gambling behaviours. This is promoted and advertised within the venue. 	December 2019

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Social Responsibility Local Gambling Risk Assessment

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. 	December 2019
Failure to impose exclusion in locality and in same types of establishments.	C	Low	Severe to business. Severe to customer.		December 2019
Customer breaches of self-exclusion.	C	Low	Severe to business. Severe to customer.		December 2019
Customer breaches self-exclusion by using another to gamble on their behalf.	C	Unknown	Moderate to business. Severe to customer.		December 2019
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. Automated alerts via Sentinel relating to machine note levels and handpay limits. Technical parameters on note acceptors designed to reject poor quality notes. (Often notes obtained by way of robbery are perished). Manufacturer activity alerts from SG Gaming. TITO tickets not transferable between sites. Slim change machines set up so that notes cannot be changed 'up'. 	December 2019

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Social Responsibility Local Gambling Risk Assessment

				<ul style="list-style-type: none"> - 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. 	December 2019
Anti-social behaviour associated with late night operation	A	Low	Low – Severe	<ul style="list-style-type: none"> - Access control measures either through door supervision or physical controls, utilised where appropriate. - Policy of non-players refused entry or asked to leave. - Refreshments offered only to players and known customers. 	December 2019
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. - 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 venue is a member of Birmingham CITY SAFE watch scheme and have access to the radio link members use. 	December 2019

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Social Responsibility Local Gambling Risk Assessment

Failure to display Terms and Conditions	B	Low	Low – Moderate	<ul style="list-style-type: none"> - Terms and Conditions displayed prominently within the premises. 	December 2019
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. 	December 2019

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

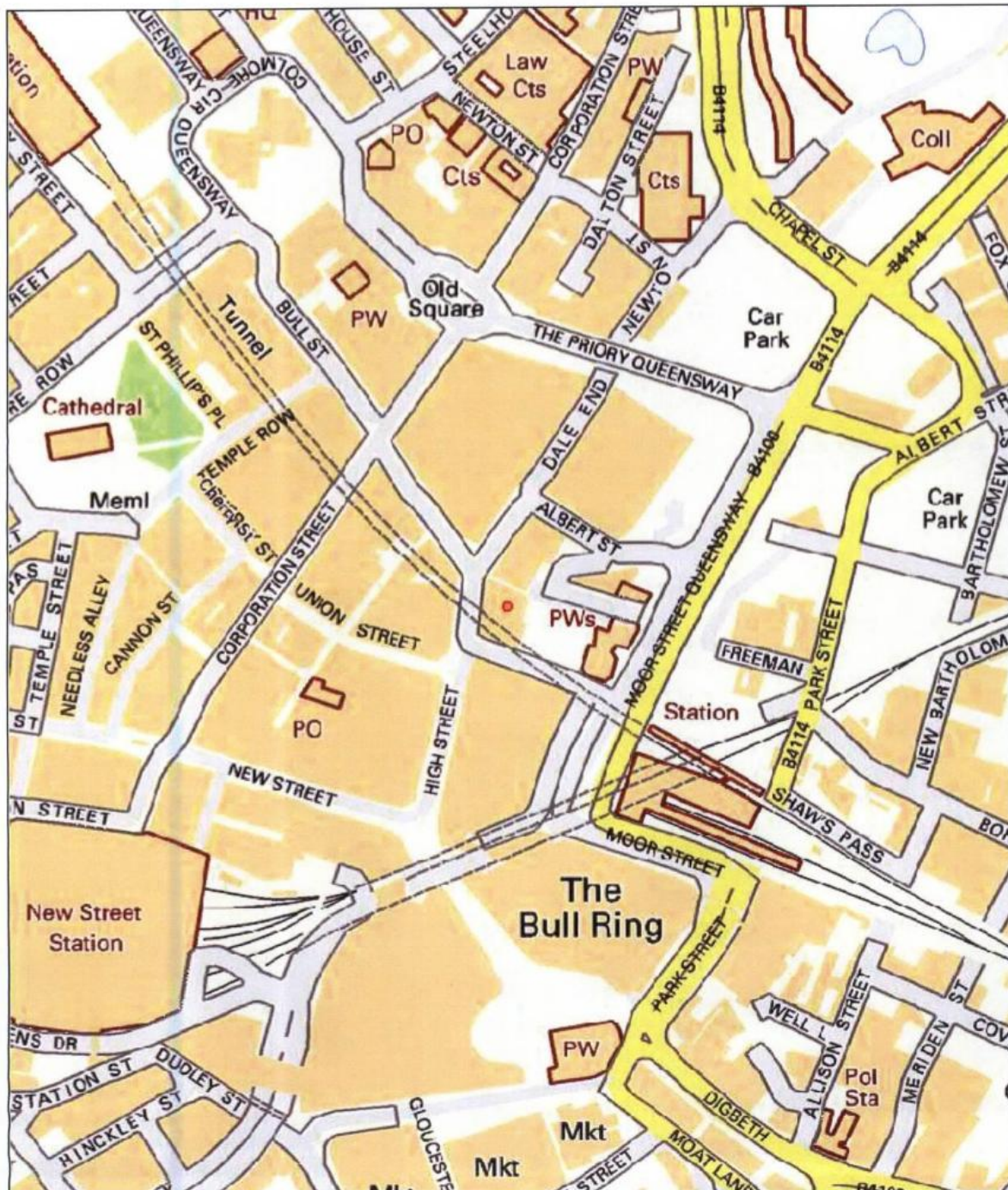
1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at **each of their premises**, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.

Social Responsibility Local Gambling Risk Assessment

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.



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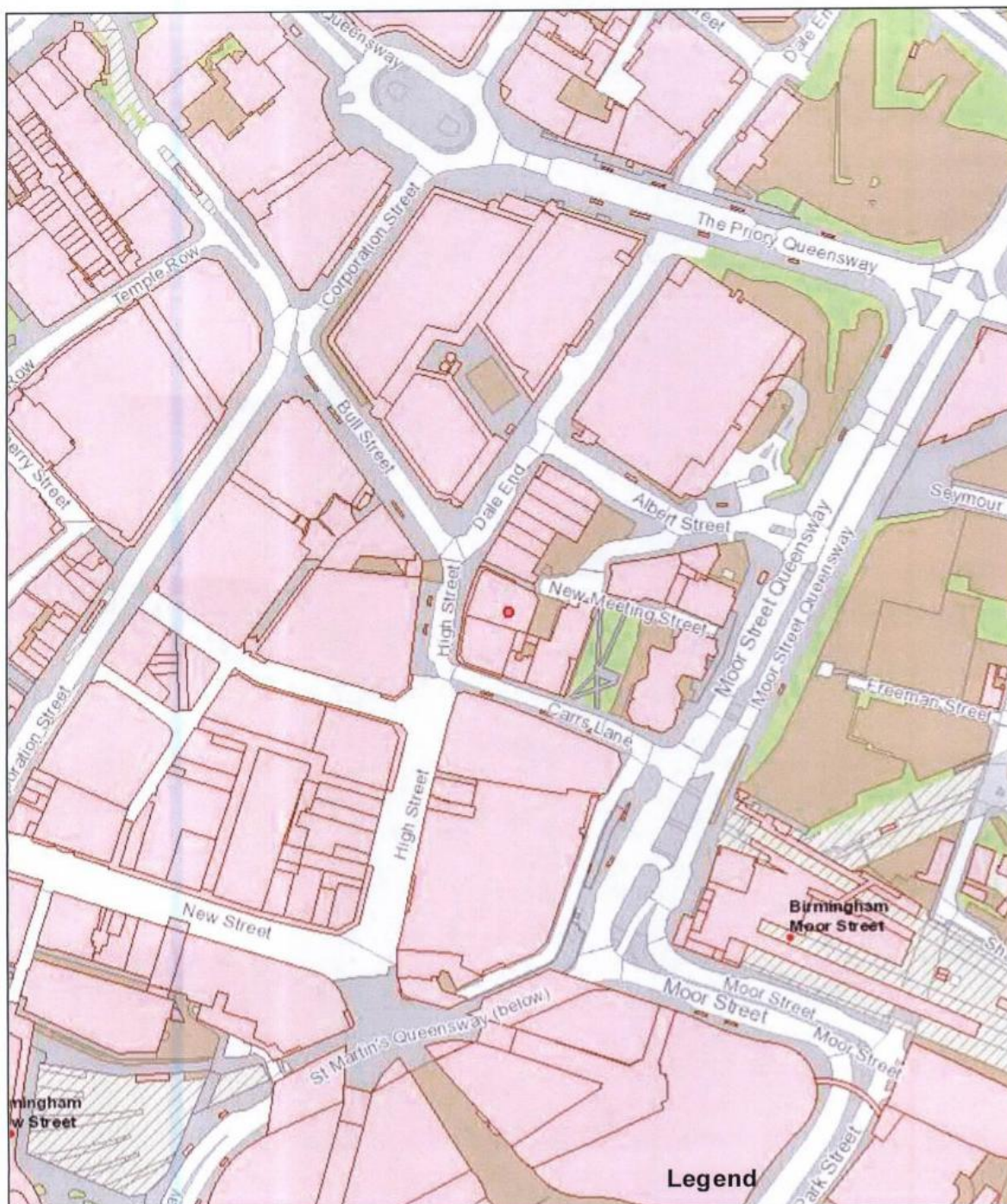
Date of Map Creation: 18/10/2017

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Notes

Legend
Legend

Scale:
1:4,000



Map Created By:

Date of Map Creation: 18/10/2017

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Notes



Scale:
1:2,500

Legend

In the matter of the Gambling Act 2005

**Application for premises licence – Adult Gaming Centre – Admiral, 54-57 High Street,
Birmingham, B4 7SY**

**FURTHER DOCUMENTS SUBMITTED BY
APPLICANT**

1. AGC premises licence for 54-57 High Street Birmingham (application site) issued on 17 January 2008 to Talarius Ltd.
2. Global Gambling Guidance Group accreditation certificate for Talarius Ltd. dated 16 May 2019.
3. Example frontage photographs of Talarius/Luxury Leisure refurbished AGC.
4. Planning appeal decision for application site dated 13 December 2019.
5. Venue plan for application site showing indicative locations of cctv cameras – as agreed with Birmingham City Council planning department.
6. Approved front elevation drawings for application site.
7. Updated Local Risk Assessment for the application site dated August 2020 (filed 19 August 2020).

Elizabeth Speed

Group General Counsel
Novomatic UK
For Talarius Ltd

11 September 2020

Application for an Adult Gaming Centre Premises Licence (AGC) for , 54-57 High St, Bham
B4 7SY by Talarius Limited

Summary Further Submissions of the Applicant

1. The applicant relies on the detailed explanation of the application provided in the letter of Elizabeth Speed, the applicant's General Counsel, to the licensing authority dated 4th February 2020. In that letter Ms. Speed sets out the applicant's extensive experience in the operation of AGC's nationwide and provides details of the procedures and measures to ensure that the operation of the premises as an AGC will be in accordance with the licensing objectives. The applicant does not repeat the matters set out in that letter here but makes the following further brief submissions which will be developed further at the hearing.
2. The application was duly advertised and served on the responsible authorities in accordance with the requirements of the Gambling Act 2005 (the Act). There is only one relevant representation objecting to the grant of the licence from Betfred who operate a betting shop adjacent to the application site. In its representation Betfred asserts that it is an interested party because it has business interests that might be affected in the event that the application were to be granted. In so far as those business interests include the impact from competition resulting from the grant of a licence, the applicant respectfully reminds the licensing authority that the Act prohibits the consideration of trade objections based on the threat to their business on competition or demand grounds (see section 153(2) of the Act below).
3. Section 53 of the Act sets out the principles to be applied by licensing authorities when exercising their functions in relation to applications for licences:

153 Principles to be applied

*(1) In exercising their functions under this Part a licensing authority **shall aim to permit** the use of premises for gambling in so far as the authority think it—*

(a) in accordance with any relevant code of practice under section 24,

(b) in accordance with any relevant guidance issued by the Commission under section 25,

(c) reasonably consistent with the licensing objectives (subject to paragraphs (a) and (b)), and

(d) in accordance with the statement published by the authority under section 349 (subject to paragraphs (a) to (c)).

(2) In determining whether to grant a premises licence a licensing authority may not have regard to the expected demand for the facilities which it is proposed to provide.

4. There are three licensing objectives:

- Ensuring gambling is kept free from crime and disorder
- Ensuring gambling is conducted in a fair and open way
- Protection of children and vulnerable adults.

5. Betfred expresses concern that the grant of this application will impact on existing levels of crime in the vicinity and, in some way, adversely impact on the protection of children and the vulnerable by reason of the fact that school children congregate at bus stops outside the nearby McDonalds and the presence in the area of drug users and homeless people.

6. In answer to those concerns the applicant makes the following assertions:

- (a) There is no evidence before the licensing authority on this application that the use of the premises as an AGC would adversely impact on existing crime levels in the area.
- (b) Whatever concerns may have been expressed on previous applications for planning or licensing, they can have no bearing on this application save that they were addressed by Her Majesties Planning Inspector when granting planning permission on appeal in August 2019. The applicant accepts that planning is a separate regime from licensing but his judgement (at paragraphs 8-10 and 13) is informative because it addresses precisely the same concerns which are raised by Betfred on this application.
- (c) There is no basis for suggesting that a vacant shop front will have less impact on existing crime levels in the area than premises which are occupied, trading and staffed with the applicant's well-trained employees.
- (d) In addition to the measures to address the licensing objectives set out in Ms. Speed's letter of 4th February 2020 (based upon a robust local risk assessment) the applicant will employ an SIA door supervisor each day from 3pm until closure. That will assist in providing an additional element of supervision in the area which, coupled with the installation of external CCTV cameras covering the area in front of the premises, will act as a further deterrent to crime or anti-social behavior in the vicinity.
- (e) The applicant's policies and procedures to adhere to the protection of children and the vulnerable objective are set out in Ms. Speed's letter at pages 3 and 4. It is important to note that persons under the age of 18 are not permitted to enter the premises and the applicant's employees are provided with detailed training to ensure compliance with that requirement.

7. In conclusion, it is submitted that this application is made in full compliance with the requirements of section 153(1) of the Act and the licensing authority is respectfully asked to grant it accordingly.

Stephen Walsh Q.C.

11 September 2020

**3 Raymond Buildings
Gray's Inn
London WC1R5BH**

BIRMINGHAM CITY COUNCIL



No: 265 / 1

ADULT GAMING CENTRE PREMISES LICENCE

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

Part 1 – Details of person to whom licence is issued

This premises licence is issued to:

Talarius Ltd

of the following address:

Silbury Court, 368 Silbury Boulevard, Milton Keynes, Buckinghamshire, MK9 2AF

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

000-001191-N-103508-001

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

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

Quicksilver, Unit 1, 54-57 High Street, Birmingham, B4 7SY

BIRMINGHAM CITY COUNCIL

Part 3 – Premises licence details

This licence came into effect on: 17/01/2008

This licence is of unlimited duration

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

NOT APPLICABLE

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

NOT APPLICABLE

The plan of the premises with reference number 51745-265/1 which is retained with the public register kept by Birmingham City Council and available free of charge for inspection between the hours of 9am – 4pm Monday, Tuesday and Thursday, 10am – 4pm Wednesday and 9am – 3.30pm Friday (excluding Bank Holidays etc) at the Licensing Service, Crystal Court, Aston Cross Business Village, 50 Rocky Lane, Aston, Birmingham B6 5RQ.

Signed on behalf of the issuing licensing authority

E. A. Bennett

BIRMINGHAM CITY COUNCIL



No: 265 / 1

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

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

This summary is issued to:

Talarus Ltd

of the following address:

Silbury Court, 368 Silbury Boulevard, Milton Keynes, Buckinghamshire, MK9 2AF

A premises licence of the following type:

Adult Gaming Centre

has been issued in respect of the following premises:

Quicksilver, Unit 1, 54-57 High Street, Birmingham, B4 7SY

BIRMINGHAM CITY COUNCIL

Summary of the Terms and Conditions of the Premises Licence

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

INTERNATIONAL CERTIFICATE OF ACCREDITATION

G4

GLOBAL GAMBLING GUIDANCE GROUP

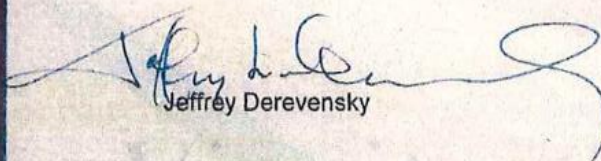
In accordance with the responsible
gaming policies, procedures and
standards set by the Global
Gambling Guidance Group (G4),
Amsterdam, the Netherlands,
accreditation is hereby granted to:

Talarius Ltd.

audit date: 16 May 2019

Certificate Number: EG - 01219
Original Approval: 16 May 2019
Current Certificate: 16 May 2019
Certificate Expiry: 16 May 2021

On behalf of the G4 Foundation:


Jeffrey Derevensky


Pieter Remmers

INTERNATIONAL RESPONSIBLE GAMING ACCREDITATION SYSTEM





Appeal Decision

Site visit made on 21 August 2019

by **E Griffin LLB Hons**

an Inspector appointed by the Secretary of State

Decision date: 13 December 2019

Appeal Ref: APP/P4605/W/19/3229958

54-57 High Street, Ladywood, Birmingham B4 7SY

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Mr Mark Davis of Luxury Leisure against the decision of Birmingham City Council.
The application Ref 2018/09039/PA dated 6 November 2018 was refused by notice dated the 5 February 2019.
- The development proposed is change of use of the ground and first floors to an amusement arcade (sui generis) with external alterations including a new shopfront and associated works.

Decision

1. The appeal is allowed and planning permission is granted for the change of use of the ground and first floors to an amusement arcade (sui generis) with external alterations including a new shopfront and associated works at 54-57 High Street, Ladywood, Birmingham B4 7SY in accordance with the terms of the application 2018/09039/PA dated the 6 November 2018, subject to the following conditions:
 - 1) The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.
 - 2) The development hereby approved shall be implemented in accordance with the details submitted with the application; Existing Ground Floor and First Floor Plan 1441(0)01; Existing Front Elevation 1441(0)02; Proposed Ground Floor and First Floor Plan 1441(0)03; Proposed Front Elevation No Signage 1441(0)05; Site Location Plan; Block Plan.
 - 3) A scheme for the provision of a network of closed circuit television cameras, including the proposed location of the cameras, mounting columns, proposals for the use and management of the system and proposals for its installation shall be submitted to and approved in writing by the Local Planning Authority prior to occupation. The CCTV system shall be installed in accordance with the approved details prior to first occupation and thereafter maintained.
 - 4) The premises shall only be open to customers between the hours of 09:00 and 22:00.

Main Issues

2. The main issues are (i) the effect of the appeal proposal on the character and appearance of the area with particular regard to the design of the shopfront and (ii) whether the proposed change of use would increase opportunities for crime and fear of crime.

Reasons

Character and Appearance

3. The appeal site is located within a high street location in Birmingham City Centre. The surrounding area comprises a mix of retail, leisure and commercial uses including national retail chains such as Boots and Marks and Spencer and a mix of other shops. The appeal building forms part of a larger block of buildings and was empty at the time of my visit but was previously used for retail on the ground floor and part of the first floor was previously used by the adjoining restaurant and takeaway that is still located next door. There is a betting shop "Betfred" to the other side of the appeal site which forms the end of the block. There is an alleyway to the other side of Betfred. There is an existing adult gaming centre located about 90 metres away operated by the appellant's sister company.
4. The appeal proposal includes a new shop front as well as the change of use. Whilst the existing front door is central, there would be a new double door on the left which would have an illuminated yellow frame. The rest of the frontage would be largely glass with two black slatted screen frames that would house two TV screens.
5. The Council considers that the proposed shop front would result in an inactive frontage that would adversely affect the character and appearance of the streetscene. An active frontage would be derived from both its appearance and its use and associated comings and goings. The appeal proposal would share some shop-like characteristics in that it would have an entrance door and windows capable of window display and people can walk in directly in off the street.
6. Whilst there would be two TV screens to either side of the front window, they would be set back and the central panel would be free of a TV screen allowing some natural surveillance. The appellant indicates that just under 70 per cent of the window display would be clear glass. It is also the case that a number of nearby retail units nearby have backdrops which create some limited visibility into the units. As well as the larger high street retail units, there are also units such as a pawnbrokers who have less active frontages.
7. In an area where there is a mix of styles, uses and designs, I do not consider that the design of the shop front which includes TV screens as shown on the submitted plans constitute an inactive frontage that would harm the character and appearance of the area. It would not therefore be contrary to Policy PG3 of the Birmingham Development Plan (the Development Plan) which, amongst other things, states that new development should respond to local area context.

Opportunities for Crime

8. The police confirm that the appeal site is within an area where there are a disproportionately high number of calls to West Midlands Police relating to criminal activity and acts of anti-social behaviour. There is in place a Public Space Protection Order which includes the appeal site due to environmental issues such as misuse of telephone kiosks, and there are a large number of bus stops and benches nearby where people can loiter. The appellant acknowledges that appeal site is located in an area where statistics show that incidents of crime are relatively high. The police comment upon the poorly lit and misused New Meeting Street alleyway which is around 8 metres from the appeal proposal to the side of Betfred. The police indicate that there have been a significant number of calls to the postcode area of the appeal site up to December 2018 but the appeal site was not operating as an adult gaming centre at that time. It is not disputed that the area experiences high levels of crime.
9. It would appear that currently groups of students and school children congregate around 3 and 4pm outside the appeal site which is close to an intersection of various bus routes. Whilst the Council and the police consider that the proposed change of use would have an exacerbating impact on the existing levels of anti - social behaviour, there is limited evidence to show that the appeal proposal would facilitate or increase the likelihood of criminal activities occurring. There are issues with crime in the area and the presence of the empty unit is not assisting in managing any crime issues. The occupation of a currently vacant unit would be likely to provide some natural surveillance and remove the opportunity for groups to gather outside a vacant shop. The presence of CCTV which can be conditioned would provide some monitoring and may act as a deterrent for anti-social behaviour. The appeal proposal would be lit and the premises would be staffed.
10. The police have objected to the appeal proposal on the basis that the number of calls relating to gambling industry establishments is high and that the proposed use would adversely impact upon the location and crime and fear of crime. There is however limited evidence that the appeal proposal would facilitate or increase the likelihood of these activities. The appellant has for example indicated that its sister premises at Priory Square which is approximately 90 metres away has had no reported incidents.
11. The police also object to the appeal proposal operating 24 hours a day. With regard to the hours of operation, the application form has referred to 24 hours of operation although neither party has provided evidence regarding the suitability or otherwise of 24 hour opening. Although the appellant has indicated that the sister company has operated an adult gaming centre nearby without any crime issues, no details are provided of the hours of the existing similar establishment. The Council had not commented upon the hours of operation during the course of the appeal, although a late comment was received suggesting lesser hours. The police as part of their objection within the appeal procedure considered that 24 opening hours would be inappropriate.
12. The appeal site is situated in an area where the surrounding development is largely retail on the ground floor and together with commercial premises at higher levels would generally be closed at night. During the day, the area would be busy with passers-by and shoppers and use of the areas such as the

alleyway to the side of Betfred would be safer during daytime hours when nearby facilities would be open and act as natural surveillance. Having regard to the combination of the nature of the surrounding development, where businesses are largely open during the day and not at night, the Public Space Protection Order and the unlit alleyway to the side of Betfred that has been identified as an issue by the police, I do consider that the appeal proposal is in an area where more limited hours would be appropriate.

13. On balance, subject to suitable conditions, I do not therefore consider that the appeal proposal would increase opportunities for crime and fear of crime. It would therefore not be contrary to Policy PG3 of the Birmingham Development Plan 2017 amongst other things states that new development should create safe environments that design out crime, designing buildings that promote positive social interaction and natural surveillance.
14. Paragraph 127 of the National Planning Policy Framework (the Framework) states that planning decisions should create places that are safe, inclusive and accessible and where the fear of crime does not undermine the quality of life or community cohesion and resilience.

Other Matters

15. Apart from the police there have been objectors. The local Member of Parliament at the time of the application considered that the appeal proposal would aggravate the problems that prevail in the area. A local councillor has referred to the need for regeneration of the whole area and witnessing levels of bad behaviour. Whilst that may be the case, I have not found that the appeal proposal would be likely to exacerbate existing issues, for the reasons given. A nearby occupier has also referred to the loss of a retail unit. Taken as a whole, the Council does not consider that the loss of one retail unit would undermine the vitality/viability of the City Centre and I see no reason to disagree with that view.

Conditions

16. The standard conditions with regard to implementation of the planning permission and with regard to plans are needed in the interests of certainty. I have imposed an hours condition for the reasons already stated. A condition in respect of CCTV is needed to help create safe environments and promote natural surveillance.

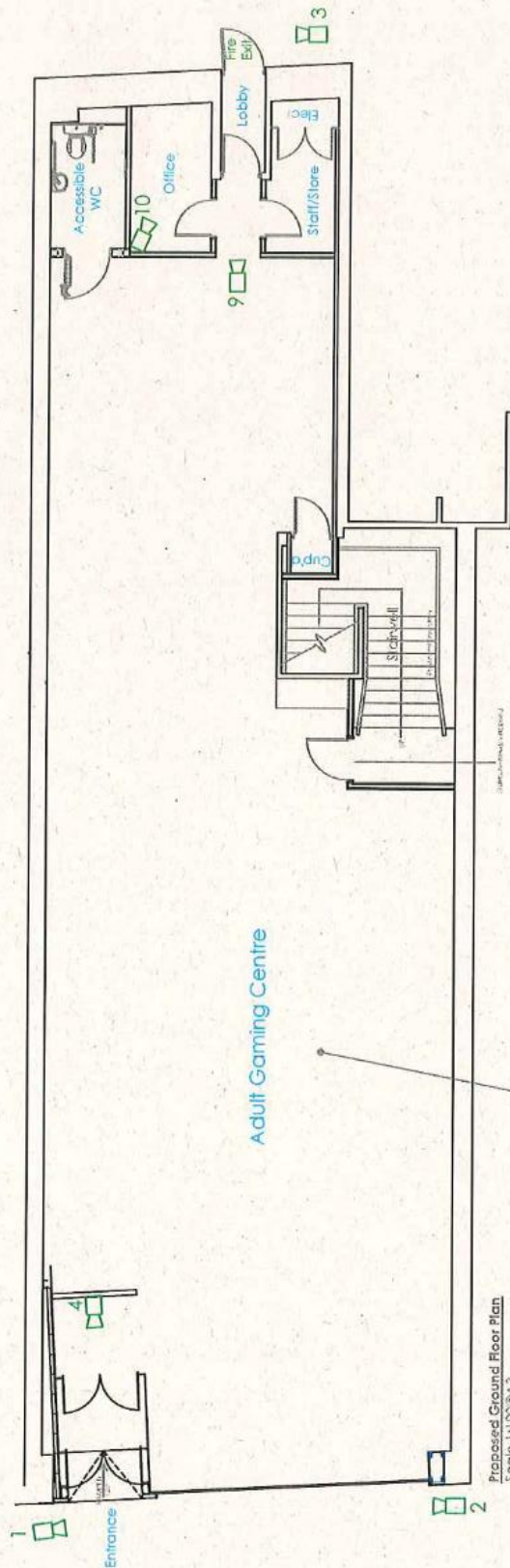
Conclusion

17. For the reasons given, I conclude that the appeal should be allowed subject to conditions.


E. Griffin

INSPECTOR

 Proposed Position of Security Camera
(Not to scale - indicative position only)



Proposed Ground Floor Plan
Scale 1:100 @ A3

 4 No. additional Cameras across full AGC area -
Relocatable to suit Operational Requirements

DO NOT SCALE

ALL DIMENSIONS SHOULD BE CHECKED PRIOR TO
COMMENCEMENT OF ANY CONSTRUCTION,
REFURBISHMENT OR MODIFICATIONS TO LAYOUT
THIS DRAWING IS COPYRIGHT AND MAY NOT BE
REPRODUCED WITHOUT THE COMPANY'S CONSENT

IF IN DOUBT ASK

LOCATION

54-57 High Street
Birmingham

TITLE

Ground Floor
Proposed Layout- Camera Positions

NOVOMATIC

Luxury Leisure, Talarus & Ral Ltd.

Fifth Avenue Plaza

Queensway

Team Valley Trading Estate

Gateshead

NE11 0BL

Tel: 0191 497 8200

Twitter: @novomatic

SCALE 1:100 @ A3

DRAWN BY
GB

DATE
11/2/20

FILE REF

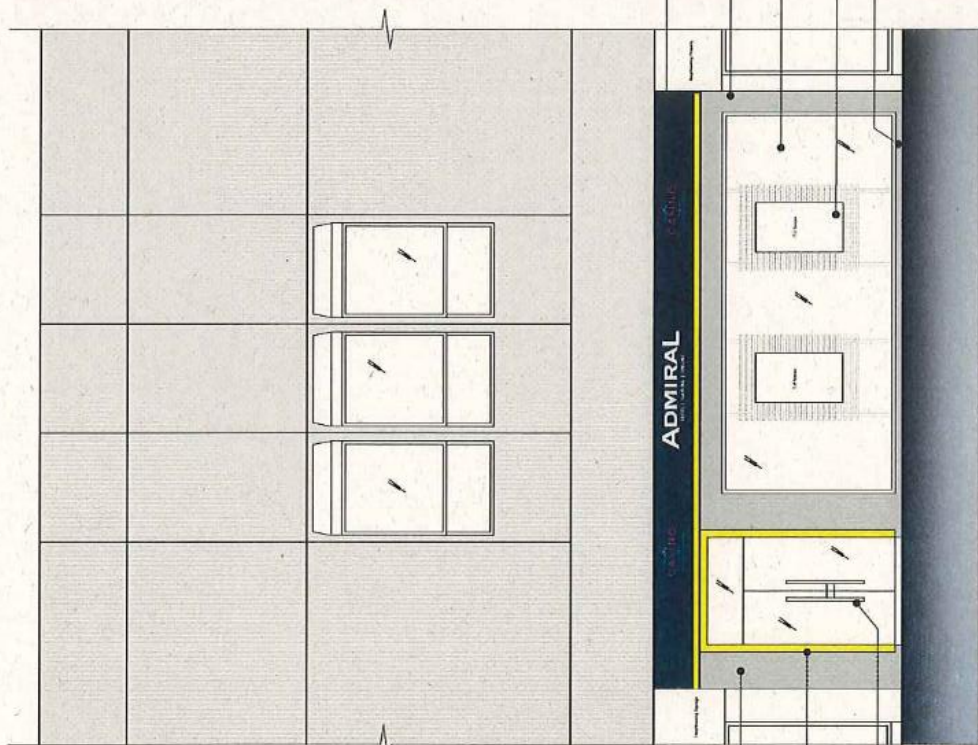
Birmingham High St

CHECKED
--

DRAWING No. 934-969-BHAM_003

REVISION
--

ALL DIMENSIONS ARE TO BE CHECKED ON SITE
SCALED DIMENSIONS ARE NOT TO BE USED
PROPOSALS ARE SUBJECT TO SITE SURVEY
AND STATUTORY APPROVALS

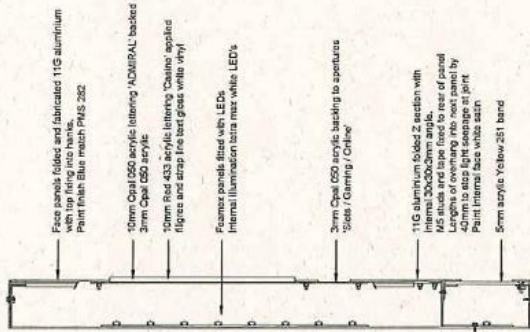


Shopfront surround formed in Treva
Colour Mid Grey A21.5.1 in a
Saltin finish

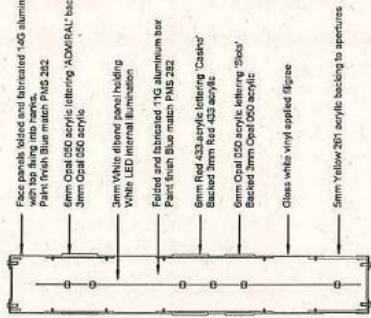
Powder coated aluminium
features door frame surround
in RAL 1021 Rape Yellow

Brushed stainless steel door
handles

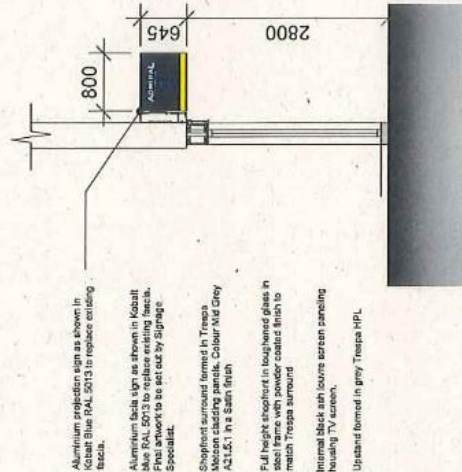
PROPOSED ELEVATION



STANDARD FACIA SIGN (1:10)



STANDARD PROJECTING SIGN
SECTION (1:10)



PROPOSED SECTION

0 0.5 1 1.5 2 2.5
Scale in m

APPROVAL

Keel Row 4
The Watermark
Gateshead
NE11 9SZ
Tel: 0191 465 1411
Fax: 0191 460 3223
architects@belsham.com
www.belsham.com

ian Belsham Associates
Chartered Architects

54-57 High Street
Birmingham

Proposed
Front Elevation



LUXURY LEISURE

DRAWN SH PW
CHECK PW
SCALE 1:50 @A2
DATE 04.10.18

THIS DRAWING IS COPYRIGHT

1441 (0)04 A1

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

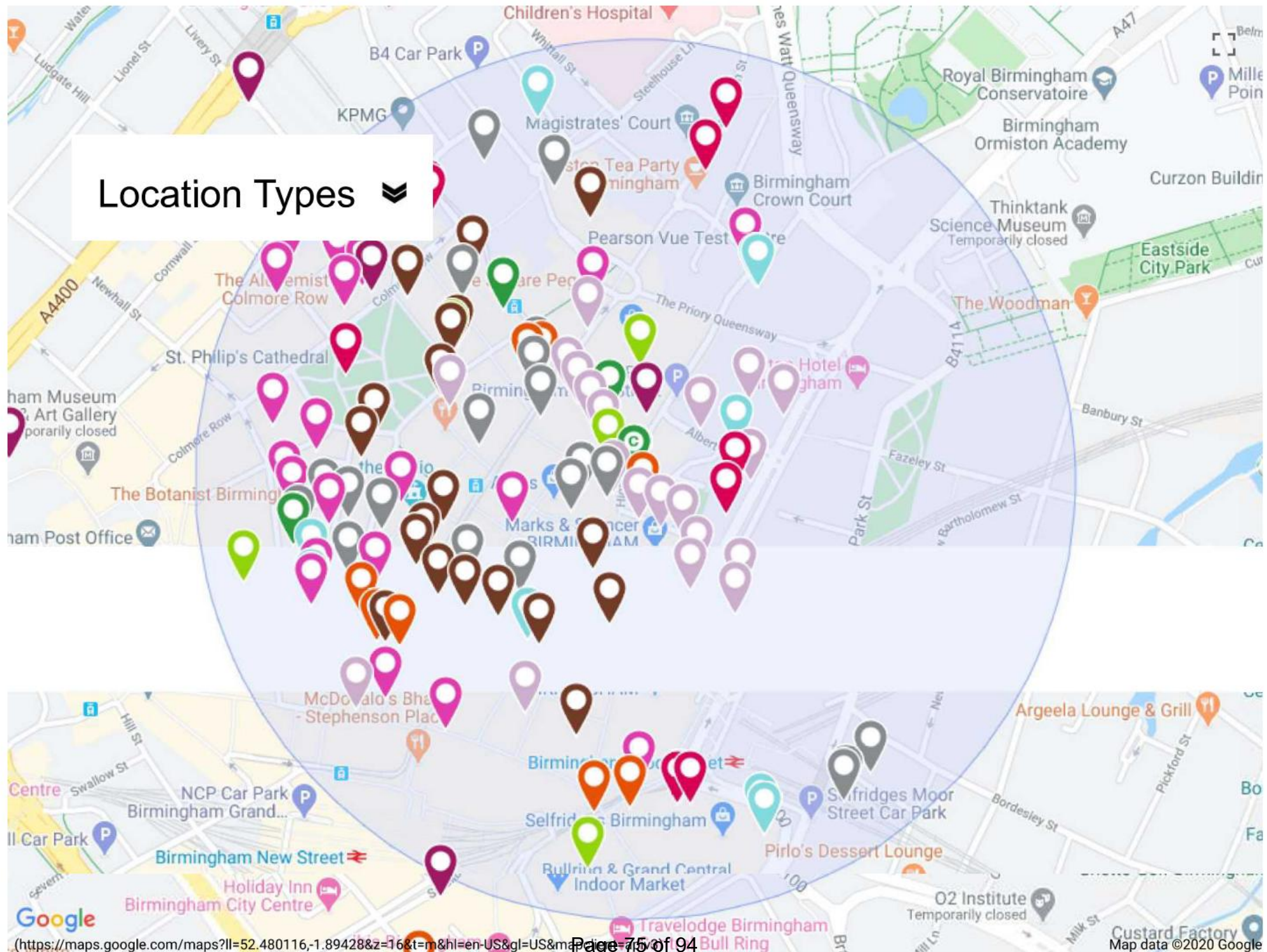
Effective as at 6 April 2016

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.



Selected Location Types

Banks

Name: Coventry Building Society Birmingham City Centre

Address: 15 Corporation Street, Birmingham

Name: Barclays Bank

Address: 79-84 High Street, Birmingham

Name: Halifax

Address: Unit Su503 Middle Mall, Birmingham

Name: The Royal Bank of Scotland

Address: 144 New Street, Birmingham

Name: Virgin Money

Address: 138 New Street, Birmingham

Name: Independent Financial Adviser - Chris Rohman IFA

Address: 43 Temple Row, Birmingham

Name: Lloyds Bank

Address: 43 Temple Row, Birmingham

Name: TSB Bank
Address: 134 New Street, Birmingham

Name: Santander
Address: Caxton Gate, Unit 6, Birmingham

Name: HSBC
Address: 130 New Street, Birmingham

Name: Lloyds Bank
Address: Caxton Gate, Units 2 & 3, 36/38 New Street, Birmingham

Name: Virgin Money
Address: 41-42 Temple Street, Birmingham

Name: Handelsbanken Regional Bank Central
Address: Two Colmore Square, 38 Colmore Circus Queensway, Birmingham

Name: Handelsbanken Birmingham Temple Row
Address: 67 Temple Row, Birmingham

Name: Natwest
Address: Unit 24, 68A East Mews, Birmingham

Name: Nationwide Building Society

Address: 21 High Street, Birmingham

Name: NatWest Bank

Address: 1 Saint Philip's Place, Birmingham

Name: Citysave Credit Union

Address: 4th Floor, Colmore Gate, Colmore Row, Birmingham

Name: Halifax

Address: 26, 28 Colmore Row, Birmingham

Name: Coutts

Address: 2 Saint Philip's Place, Birmingham

Betting shops

Name: Betfred

Address: 63 New St, Birmingham

Name: Ladbrokes

Address: Unit D, 103 Chaplins Court, Birmingham

Name: Ladbrokes

Address: 99 Corporation St, Birmingham

Name: Betfred
Address: 58 High St, Birmingham

Name: Ladbrokes
Address: Unit ESU5 - Bullring Shopping Centre, Birmingham

Name: Ladbrokes
Address: 99 Corporation Street Temple Point, Birmingham

Name: William Hill
Address: 56, 57 Stephenson St, Birmingham

Name: Ladbrokes
Address: Units 9/12 The Burlington, Stephenson St, Birmingham

Name: Ladbrokes
Address: Unit D - 103 Chaplin Court, Hurst St, Birmingham

Name: Ladbrokes
Address: 84 Hurst St, Birmingham

Name: Paddy Power
Address: 23A Hurst St, Birmingham

Name: Ladbrokes
Address: Unit A107A Arcadian Centre, Hurst St, Birmingham

Name: William Hill
Address: Unit 6 Inge St, Southside, Birmingham

Casino/AGC

Name: Admiral (custom)
Address: 54-57 High Street, undefined, B47SY

Name: Merkur Cashino Bull Street Birmingham
Address: 73 Bull Street, Birmingham

Name: Merkur Cashino
Address: 53 New Street, Birmingham

Name: Admiral Casino: Birmingham Priory Square
Address: 4 Priory Square, Priory Square Shopping Centre, Birmingham

Doctors Surgery

Name: Specsavers Opticians and Audiologists - Birmingham
Address: 14-15 New Street, Birmingham

Name: Optical Express Laser Eye Surgery & Opticians: Birmingham

Address: Ground Floor, Imperial House, 31 Temple Street, Birmingham

Name: Shuropody Birmingham inside House of Fraser

Address: House of Fraser Dept Store, Corporation Street, Birmingham

Name: sk:n Clinics

Address: 86 Bull Street, Birmingham

Name: DestinationSkin

Address: 16 Lower Temple Street, Birmingham

Name: St Johns Dental Practice

Address: 18 Bennetts Hill, Birmingham

Name: Boots Opticians

Address: 67 - 69 High Street, Birmingham

Name: Footworks Chiroprody

Address: Burlington Court, 18 Lower Temple Street, Birmingham

Name: Boots Hearingcare

Address: 67-69 High Street, Birmingham

Name: Dr R Wood - Halcyon Medical Centre

Address: Ground Floor 67, 69 High Street, Birmingham

Name: Halcyon Medical Centre

Address: Unit 8, 24 Martineau Way, Birmingham

Name: Scrivens Opticians & Hearing Care

Address: 93 Corporation Street, Birmingham

Name: Love Spells

Address: 23 New Street, Birmingham

Name: Podia Health

Address: 10 Great Western Arcade, Birmingham

Name: Amplifon

Address: 16 Needless Alley, Birmingham

Name: jennyR LTD

Address: 36 Colmore Circus Queensway, Birmingham

Name: The Doctors Clinic Group Private GP

Address: Colmore Circus Queensway, Birmingham

Name: Polski-Pediatra-Endokrynolog-Internista-Birmingham

Address: 89 Allison Street, Birmingham

Name: Polska Przychodnia Birmingham - Top Medical Clinic

Address: 89A Allison Street, Birmingham

Name: Polski Ginekolog Birmingham

Address: 89A Allison Street, Birmingham

Drug and Alcohol Treatment facilities

Hostels

Nurseries

Name: Pre-school Learning Alliance West Division

Address: 5 Lower Temple St, Birmingham

Name: Aston University Nursery and Pre-School

Address: 1 Woodcock St, Birmingham

Name: Smart Kids Nursery

Address: Moat Ln, Birmingham

Pawn Shops

Name: H&T Pawnbrokers

Address: 102 Bull St, Birmingham

Name: Nathan & Co Birmingham - Pawnbroker - Currency Exchange - Buyback

Address: 7 Lower Temple St, Birmingham

Name: Cashline Pawnbrokers Ltd

Address: The Birmingham Indoor Market, 104 Edgbaston St, Birmingham

Name: H&T Pawnbrokers

Address: 10 Ethel St, Birmingham

Name: Gizmo Electronics Birmingham

Address: The Square Shopping Centre, Birmingham

Name: Lombard Direct

Address: 2 St Philip's Pl, Birmingham

Payday Loan Shops

Name: Everyday Loans Birmingham

Address: Ground Floor, 35 Livery St, Birmingham

Name: Everyday Loans

Address: 71 Smallbrook Queensway, Birmingham

Name: Investors Deposit Earnest Loan Ltd

Address: 27 Colmore Row, Birmingham

Name: A.B Trota International

Address: 86 Old Snow Hill, Birmingham

Name: Street UK Loans

Address: 64 Dale End, Birmingham

Name: Insurance Sale

Address: 2 Margaret St, Birmingham

Place of worship

Name: St. Martin in the Bull Ring

Address: Edgbaston Street, Birmingham

Name: St. Philip's Cathedral

Address: Colmore Row, Birmingham

Name: Birmingham Diocesan Board of Finance

Address: 1 Colmore Row, Birmingham

Name: Birmingham Chinese Methodist Church

Address: Central Hall, 208 Corporation Street, Birmingham

Name: St. Michael's Church
Address: Moor Street, Birmingham

Name: Church of England - Birmingham
Address: 1 Colmore Row, Birmingham

Name: Carrs Lane Church Centre
Address: 7SX, Carrs Lane, Birmingham

Name: Polska Rzymskokatolicka Parafia św. Michała w Birmingham
Address: 6 New Meeting Street, Birmingham

Name: Victory Outreach church Birmingham
Address: 190 Corporation Street, Birmingham

Name: Second City Church
Address: Edgbaston Street, Birmingham

Pubs and Bars

Name: Hotel du Vin Birmingham
Address: 25 Church Street, Birmingham

Name: The Windsor
Address: 33 Cannon Street, Birmingham

Name: The Wellington
Address: 37 Bennetts Hill, Birmingham

Name: The Square Peg
Address: 115 Corporation Street, Birmingham

Name: The Briar Rose
Address: 25 Bennetts Hill, Birmingham

Name: The Trocadero
Address: Temple Street, Birmingham

Name: Bacchus Bar
Address: Burlington Arcade, New Street, Birmingham

Name: The Shakespeare
Address: Lower Temple Street, Birmingham

Name: The Sun On The Hill
Address: 23 Bennetts Hill, Birmingham

Name: Scruffy Murphy's
Address: Dale End, Birmingham

Name: Primitivo

Address: 10 Barwick Street, Birmingham

Name: Browns Birmingham

Address: Unit 1, 7 Saint Martin's Walk, Birmingham

Name: Tilt

Address: City Arcade, 2 Union Street, Birmingham

Name: Utopia the Country Bar

Address: 16 Church Street, Birmingham

Name: All Bar One New Street Station

Address: Unit 28B, New Street Station, Smallbrook Queensway, Birmingham

Name: Bar + Block Steakhouse Birmingham

Address: 3-6 Waterloo Street, Birmingham

Name: Sheldon Inns Ltd

Address: Colmore Row, Birmingham

Name: Tapas Revolution

Address: Stephenson Place, Birmingham

Name: The Alchemist Colmore Row

Address: THE GRAND, Colmore Row, Birmingham

Name: Be At One - Birmingham

Address: Piccadilly Arcade, Birmingham

School

Name: Sensory Support Services - BSL Trainers & Tutors for the Deaf

Address: 109 New Street, Birmingham

Name: Pre-school Learning Alliance West Division

Address: 5 Lower Temple Street, Birmingham

Name: Europa School

Address: 26 Moat Lane, Birmingham

Name: Smart Kids Nursery

Address: Moat Lane, Birmingham

Name: Kosciol

Address: Dingley's Passage, Birmingham

Name: Gadgets Junction

Address: Saint Martins Gate, 5 Worcester Street, Birmingham

Name: Uni
Address: B4, The McLaren Building, Birmingham

Name: Pte Pearsons
Address: Dale End, Birmingham

Name: City English Corner
Address: St. Martin-in-the-Bullring, Edgbaston Street, Birmingham

Name: Relentless Data Privacy and Compliance Services
Address: the colmore building, Colmore Circus Queensway, Birmingham

Transport nodes

Name: Birmingham New Street
Address: Birmingham

Name: AIGER UK LIMITED
Address: 43 Temple Row, Birmingham

Name: Birmingham Moor Street railway station
Address: United Kingdom

Name: Birmingham Moor Street

Address: Birmingham

Name: Church Centre

Address: United Kingdom

Name: Lower Bull St

Address: United Kingdom

Name: Bus Mall

Address: United Kingdom

Name: The Square Peg

Address: United Kingdom

Name: Albert St

Address: United Kingdom

Name: High Street (Stop BS16)

Address: United Kingdom

Name: Carrs Lane (Stop MS7)

Address: United Kingdom

Name: Bull Street (Stop BS2)

Address: United Kingdom

Name: Carrs Lane (Stop MS5)

Address: United Kingdom

Name: Dale House (Stop BS17)

Address: United Kingdom

Name: Bull Street (Stop BS3)

Address: United Kingdom

Name: Moor Street Queensway (Stop MS4)

Address: United Kingdom

Name: Bull Street (Stop BS4)

Address: United Kingdom

Name: Moor Street Queensway (Stop MS8)

Address: United Kingdom

Name: New St Station

Address: United Kingdom

Name: Moor Street Queensway (Stop MS3)

Address: United Kingdom

 Other

