

# BIRMINGHAM CITY COUNCIL

## PUBLIC REPORT

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

### **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<sup>th</sup> 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 4<sup>th</sup> 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  
R

**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 6<sup>th</sup> 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 6<sup>th</sup> 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

4<sup>th</sup> 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](mailto: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](http://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@!](mailto: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: **4<sup>TH</sup> 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**

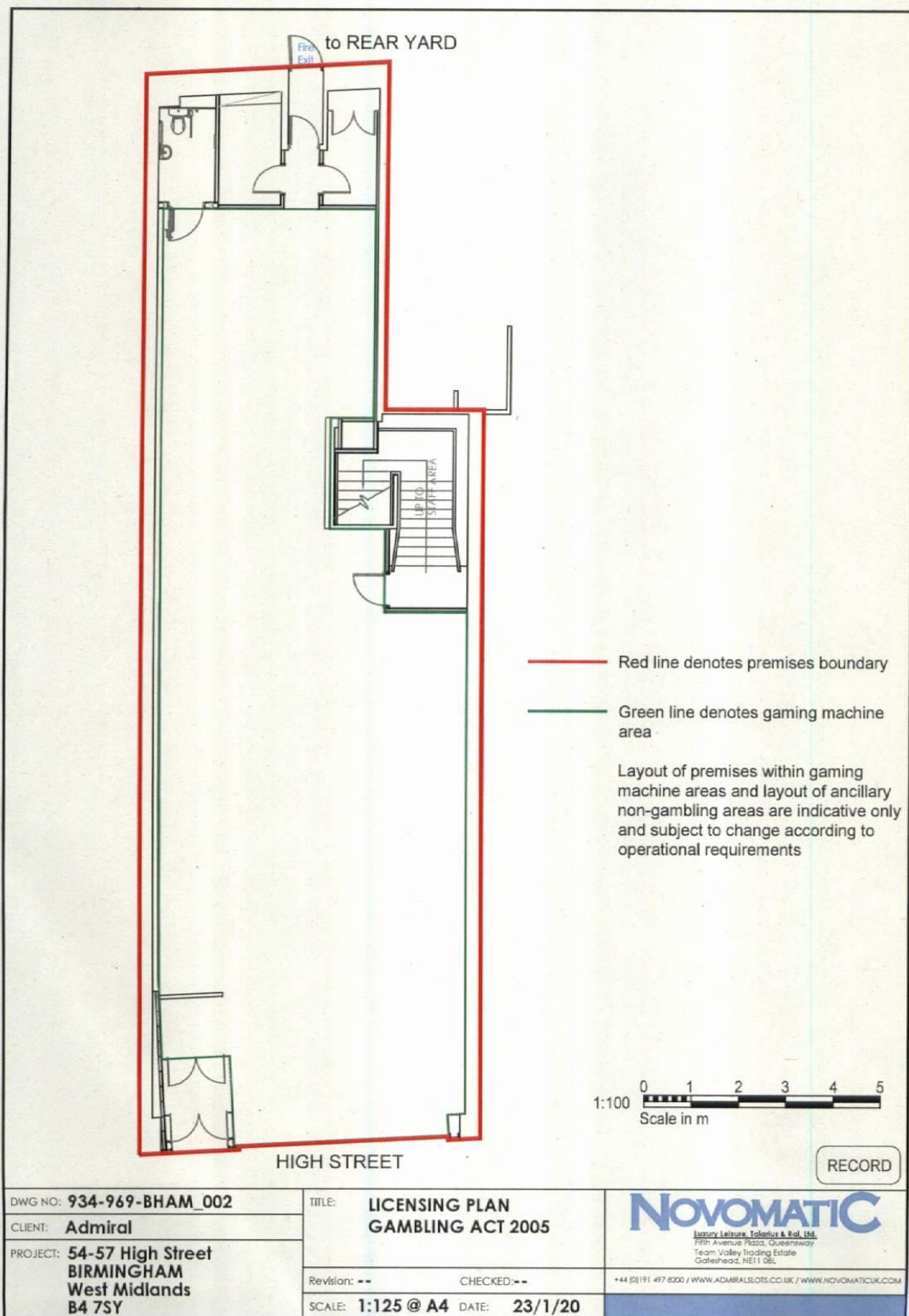
23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

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.*

2

### Social Responsibility Local Gambling Risk Assessment

The venue is situated in the Ladywood Ward of Birmingham and data available on the city council's 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](https://www.birmingham.gov.uk/info/20057/about_birmingham/1294/population_and_census))

Birmingham is the 7<sup>th</sup> 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](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"> <li>- 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.</li> </ul>	December 2019
Children entering site unnoticed.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> <li>- A Door Supervisor will be placed within in the venue daily between the hours of 16:00-22:00</li> <li>- Staff deployed to specific zones for which they have responsibility.</li> </ul>	December 2019
Children enter site with adult.	C	Low	Severe to business. Moderate to child.	<ul style="list-style-type: none"> <li>- Machine layout takes into consideration lines of site to the entrance.</li> <li>- 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.</li> </ul>	December 2019
Children enter site and play before being noticed.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> <li>- The cash desk/refreshment station is positioned to give line of sight to the entrance.</li> </ul>	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"> <li>- CCTV cameras positioned to cover external/external doorway entrance and all gaming venue and back of house of the premises.</li> <li>- A monitor displaying the entrance CCTV is positioned on the cash desk/above the refreshment station.</li> <li>- There is separate 'Over 18' signage next to the doorway in the café.</li> </ul>	December 2019
Age verification is not sought.	C	Low	Severe to business.	<ul style="list-style-type: none"> <li>- A Staff Guard system has been installed to provide additional security and assist staff manage the premises.</li> </ul>	December 2019
Children knowingly allowed to play.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> <li>- There is a 'Think 25' policy in operation which has been trained to all staff.</li> <li>- All staff are trained in social responsibility as part of their induction and are provided with regular refresher training.</li> </ul>	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"> <li>- Posters and displays of acceptable identification on site for staff.</li> <li>- Clear 'Over 18' signage is displayed, visible from outside and in the entrance to the arcade.</li> <li>- Luxury Leisure/Talarius use independent test purchasing operations. All venues are tested at least twice in a rolling 12-month period.</li> <li>- 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.</li> <li>- Stringent disciplinary procedures for failures identified through Test Purchasing or other investigation.</li> </ul>	December 2019

### Social Responsibility Local Gambling Risk Assessment

				<ul style="list-style-type: none"> <li>- Social Responsibility returns data reviewed weekly through submissions from Area Managers to National Compliance Manager.</li> <li>- All social responsibility returns data subject to a quarterly compliance review.</li> </ul>	
Failure to provide information to players on responsible gambling.	C	Low	Severe to business Severe to customer	<ul style="list-style-type: none"> <li>- A responsible Gambling message is displayed at point of sale through posters, leaflets and stickers on machines.</li> <li>- Responsible Gambling Poster or leaflet holder adjacent to PDQ.</li> </ul>	December 2019
Failure to provide information in a suitable format.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> <li>- Poster/Leaflet designs to incorporate QR codes for GAMCARE, Playnice.org and Gambleaware contact information.</li> <li>- Responsible Gambling information stickers on all machines.</li> <li>- Compliance Audit function performed by Area Manager and through regional field auditors and security managers.</li> </ul>	December 2019
Failure to recognise signs of problem gambling.	C	Low	Severe to business Severe to customer	<ul style="list-style-type: none"> <li>- Additional aspects to training incorporating guidance on identifying problem gambling, procedure for interaction and sources of help.</li> <li>- Clear policy to detail the procedure for interaction and level of staff that can 'intervene'.</li> </ul>	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"> <li>- New 'Stay in control leaflets' with QR codes to Playnice.org and GAMCARE and Gambleaware.</li> <li>- All recorded SR data subject to a quarterly compliance review by senior management.</li> </ul>	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"> <li>- Gamblewise new App to allow customers to manage their own gambling behaviours. This is promoted and advertised within the venue.</li> </ul>	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"> <li>Staff training incorporates policy and procedure for self-exclusion.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>All SR returns data subject to a quarterly compliance review.</li> </ul>	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"> <li>Appointed Money Laundering Reporting Officer (MLRO).</li> <li>Staff training at induction and refresh training.</li> <li>Luxury Leisure/Talarius have a corporate AML Risk Assessment and policies and procedures relating to AML.</li> <li>Automated alerts via Sentinel relating to machine note levels and handpay limits.</li> <li>Technical parameters on note acceptors designed to reject poor quality notes. (Often notes obtained by way of robbery are perished).</li> <li>Manufacturer activity alerts from SG Gaming.</li> <li>TITO tickets not transferable between sites.</li> <li>Slim change machines set up so that notes cannot be changed 'up'.</li> </ul>	December 2019

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### Social Responsibility Local Gambling Risk Assessment

				<ul style="list-style-type: none"> <li>- Comprehensive CCTV coverage in all sites.</li> <li>- Partnerships with local police where appropriate to identify and discourage criminal spend.</li> </ul>	
Commission of criminal offences to fund problem gambling	A	Low	Low – Severe	<ul style="list-style-type: none"> <li>- 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.</li> </ul>	December 2019
Anti-social behaviour associated with late night operation	A	Low	Low – Severe	<ul style="list-style-type: none"> <li>- Access control measures either through door supervision or physical controls, utilised where appropriate.</li> <li>- Policy of non-players refused entry or asked to leave.</li> <li>- Refreshments offered only to players and known customers.</li> </ul>	December 2019
Poor security increasing vulnerability to robbery or theft.	A	Low	Low – Severe	<ul style="list-style-type: none"> <li>- Static panic alarms.</li> <li>- All staff have personal attack 'hold-up' alarms.</li> <li>- Premises fitted with intruder alarm.</li> <li>- Extensive CCTV coverage.</li> <li>- Strict key storage procedure.</li> <li>- Time lock and/or time delay safes utilised.</li> <li>- Drop safe used for banking.</li> <li>- Staff personal floats limited to £100.</li> <li>- Door Supervisor employed during following hours 15.00 – 22.00</li> <li>- This venue is a member of Birmingham CITY SAFE watch scheme and have access to the radio link members use.</li> </ul>	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"> <li>- Terms and Conditions displayed prominently within the premises.</li> </ul>	December 2019
Failure to deal with customers making complaints about the outcome of gambling	B	Low	Low – Moderate	<ul style="list-style-type: none"> <li>- Machines only acquired from licensed suppliers.</li> <li>- Additional machine compliance checks completed by a technician when installing new machines.</li> <li>- Machine maintenance carried out by qualified technician.</li> <li>- Clear service complaint protocol to deal with machine or game performance related customer complaints.</li> <li>- Customer complaints policy and procedure.</li> <li>- Complaints policy and procedure displayed prominently in each site.</li> <li>- Complaint forms available at each site.</li> <li>- Luxury Leisure head office complaints telephone line.</li> <li>- Novomatic UK group complaints channel.</li> <li>- Registered with an ADR entity – BACTA.</li> </ul>	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.

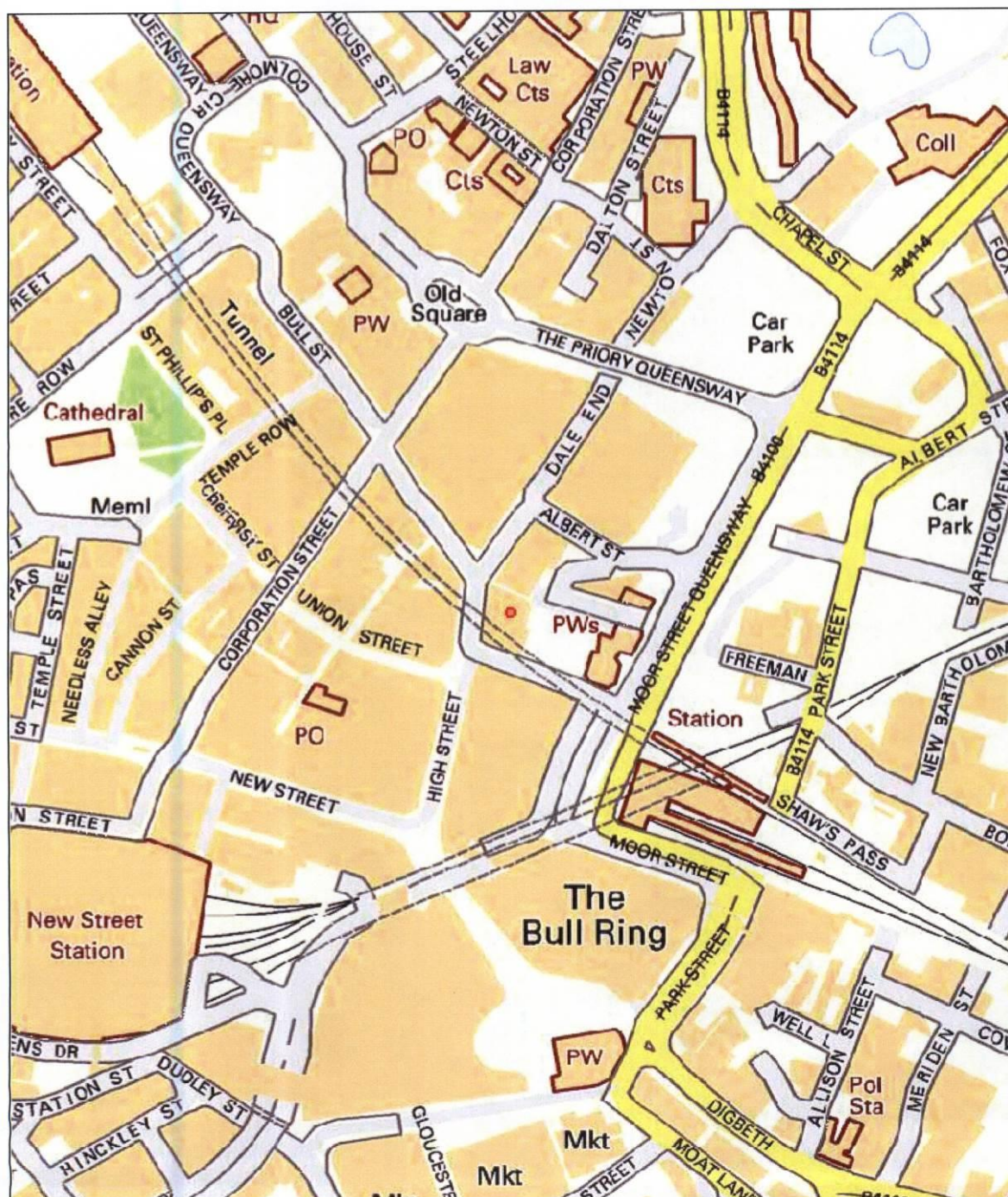


## Social Responsibility Local Gambling Risk Assessment

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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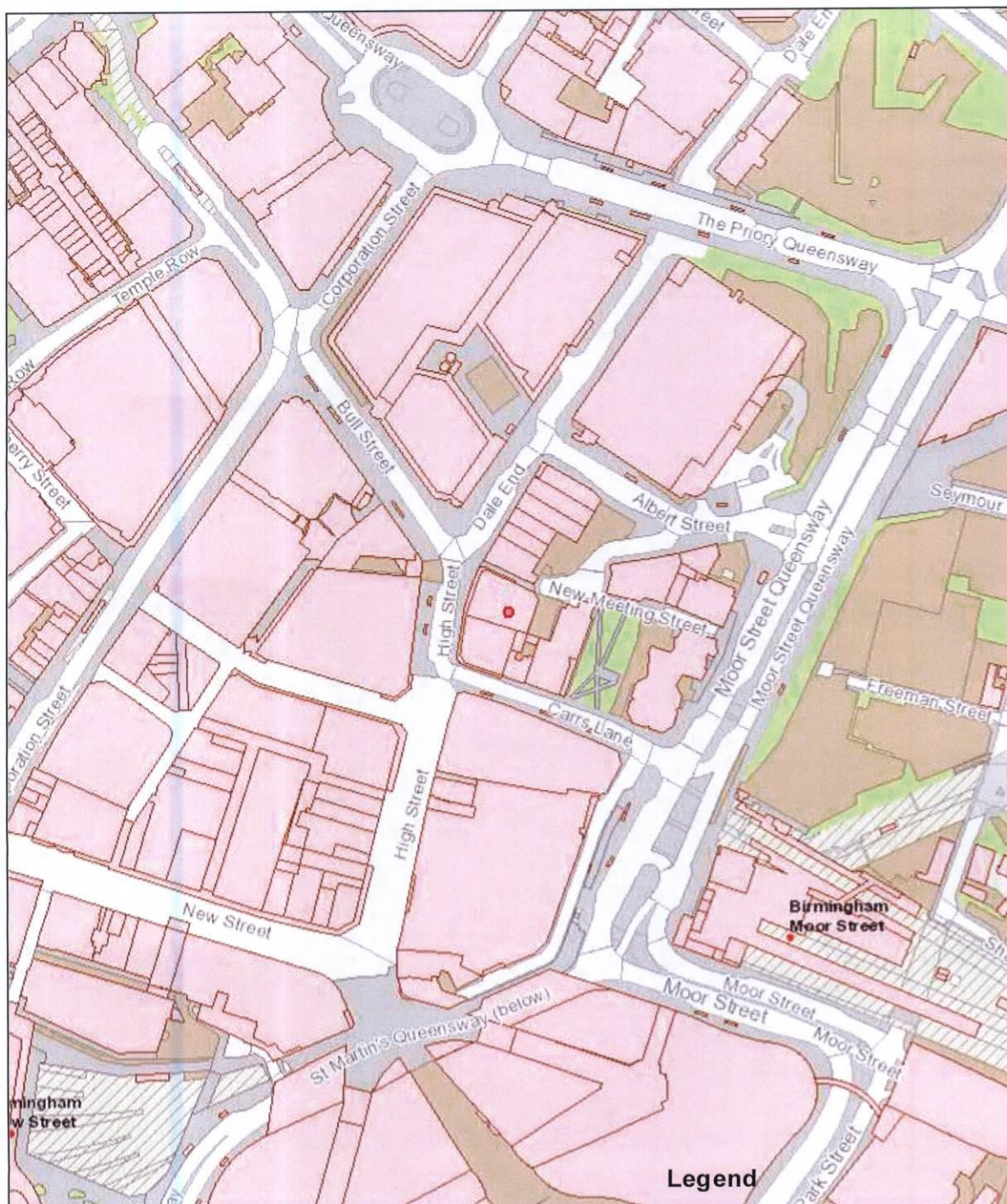
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