



Doncaster Council

Agenda

To all Members of the

LICENSING SUB-COMMITTEE

Notice is given that a Meeting of the above Sub-Committee is to be held as follows:

Venue: Microsoft Teams - Virtual Meeting

Date: Friday, 19th March, 2021

Time: 10.00 am

The meeting will be held remotely via Microsoft Teams. Members and Officers will be advised on the process to follow to attend the meeting. Any members of the public or Press wishing to attend the meeting by teleconference should contact Governance Services on 01302 736723/737462/736709 for further details.

BROADCASTING NOTICE

This meeting is being recorded for subsequent broadcast via the Council's web site. The Council is a Data Controller under the Data Protection Act and images collected during this recording will be retained in accordance with the Council's published policy.

Please be aware that by entering the meeting, you accept that you may be recorded and the recording used for the purpose set out above.

**Damian Allen
Chief Executive**

Issued on: Thursday, 11th March 2021

Governance Services Officer for this meeting

Sarah Maxfield
(01302) 736723

**Doncaster Metropolitan Borough Council
www.doncaster.gov.uk**

Items for Discussion:

	PageNo.
1. Apologies for Absence	
2. To consider the extent , if any, to which the public and press are to be excluded from the meeting.	
3. Declarations of interest, if any.	
4. Minutes of the meeting held on 28th January 2021.	1 - 2
A. Reports where the Public and Press may not be excluded.	
5. Application for a New Gambling Premises Licence application for 'Merkur Slots', 37-39 St Sepulchre Gate, Doncaster, DN1 1TD. (Appendix E to the report is not for publication as it contains personal information protected by Data Protection Legislation, not required to be published in accordance with the Licensing Act 2003).	3 - 338

Members of the Licensing Sub-Committee

Chair – Councillor Iris Beech

Councillors Duncan Anderson, Bev Chapman and Ian Pearson

Public Document Pack Agenda Item 4

DONCASTER METROPOLITAN BOROUGH COUNCIL

LICENSING SUB-COMMITTEE

THURSDAY, 28TH JANUARY, 2021

A MEETING of the LICENSING SUB-COMMITTEE was held VIRTUALLY via MICROSOFT TEAMS on THURSDAY, 28TH JANUARY, 2021, at 10.00 am.

PRESENT:

Chair - Councillor Iris Beech

Councillors Steve Cox, Charlie Hogarth and Nikki McDonald

1 DECLARATIONS OF INTEREST, IF ANY.

No declarations were reported at the meeting.

2 MINUTES OF THE LICENSING SUB-COMMITTEE HELD ON 13TH OCTOBER, 2020.

RESOLVED that the minutes of the Licensing Sub-Committee held on 13th October 2020, be approved as a correct record.

3 MINUTES OF THE LICENSING SUB-COMMITTEE HELD ON 17TH NOVEMBER, 2020.

RESOLVED that the minutes of the Licensing Sub-Committee held on 17th November 2020, be approved as correct record.

4 APPLICATION FOR A NEW PREMISES LICENCE FOR EDEN STORES, 146 THORNE ROAD, EDENTHORPE, DONCASTER.

The Sub-Committee considered an application for a new Premises Licence in respect of Eden Store, 146 Thorne Road, Edenthorpe, Doncaster.

The Sub-Committee Members, the Applicants, persons making representations and Responsible Authorities, had received the agenda prior to the meeting. Copies of the representations were attached to the report at Appendix E.

At the commencement of the hearing, the Chair welcomed all parties to the meeting, made introductions and outlined the procedure to be followed.

As the hearing was being held via a teleconferencing facility, Members of the Sub-Committee and other parties, were informed by the Chair that she would indicate who would speak next in order to ensure that the meeting ran as smoothly as possible.

The Senior Licensing Practitioner introduced the report and outlined the salient points in relation to the application.

The Applicant's Agent Mr Ian Rushton and the Applicant Mr Ratheesan Selvanayakam, were in attendance at the meeting, made representations and answered questions.

Mr Gurbhej Singh who had made written representations in respect of the application, outlined his concerns and objections to the application, and answered questions.

All parties were then asked to leave the teleconference meeting whilst the Sub-Committee deliberated on the application and reached a decision.

All parties were then invited back in to the meeting to be informed of the Sub-Committee's decision.

RESOLVED that the Sub-Committee, having considered the application for a new Premises Licence in respect of Eden Stores, 146 Thorne Road, Edenthorpe, Doncaster and have taken into account the written representations made, the evidence presented today, the steps that are appropriate to promote the Licensing Objectives, the Home Office Guidance and our Statement of Licensing Policy, has decided to grant the licence in the terms set out in Appendix B including the conditions at pages 44 and 45 with the addition that CCTV will be made available to the Police and other authorised officers upon request.

The Committee have noted that the applicant has worked in licensed premises for 10 years and has experience of owning such premises. He has held a personal licence for 7-8 years.

The committee noted that the applicant has agreed to reduce the hours of selling alcohol from 8:00am to 11:00pm and removed the provision relating to late night refreshment as a concession to those making representations.

Mr G Singh addressed the committee and explained that he was aware of crime and anti-social behaviour from social media, but had no further substantiating evidence. Mr G Singh accepted that reducing the hours for selling alcohol was reasonable.

The committee, were satisfied that the applicant has properly addressed the licensing objectives and whilst the representations were fully considered, they do not provide any evidence to substantiate their representations and the committee have noted the provision within the guidance issued under the Licensing Act 2003 which confirms that need and commercial demand are not issues for the licensing authority to consider.

CHAIR: _____

DATE: _____



19 March 2021

**To the Chair and Members of the
LICENSING SUB-COMMITTEE**

Gambling Act 2005 – Application for a New Premises Licence Bingo.

Merkur Slots, 37-39 St Sepulchre Gate, Doncaster DN1 1TD

EXECUTIVE SUMMARY

1. To request that members of the Sub-Committee determine the application for a new premises licence in respect of Merkur Slots, 37-39 St Sepulchre Gate, Doncaster, DN1 1TD. The procedure for considering the application is set out in Appendix A.

RECOMMENDATIONS

2. It is recommended that the Sub-Committee determine this application having regard to the representations made and the evidence before it.

WHAT DOES THIS MEAN FOR THE CITIZENS OF DONCASTER

3. The Gambling Act 2005 requires the Licensing Authority to exercise its obligations on licence applications, which are the subject of representations.

EXEMPT REPORT

4. There are no confidentiality issues.

BACKGROUND

5. The premises concerned is currently used as a travel agent. The application is for a new premises licence to operate the site as a Bingo Premises.
6. A summary of the application is attached as Appendix B to this report.
7. A location plan of the premises is attached at Appendix C.
8. A copy of the application is attached at Appendix D.

9. Under the Gambling Act 2005, the Statutory Guidance issued under Section 25 of the Act, and the Licensing Authority's Statement of Gambling Policy, any application under the Act in respect of which representations have been made to the Licensing Authority and which have not been withdrawn or resolved by mediation fall to be determined by the Licensing sub-committee having regard to the evidence before it.
10. One relevant Representation regarding the application has been received from the Licensing Responsible Authority, which relates to one or more of the three licensing objectives. The representation, which does not form part of the public report, but as required by law, has been provided to the APPLICANT and to the members of the Licensing Sub-Committee as Appendix E.
11. The applicant has indicated that a copy of the application was sent to the Responsible Authorities. Details of the application have been published on the Council website.

OPTIONS CONSIDERED

12. The Gambling Act 2005 requires the Licensing Authority to exercise its obligations on applications, which are the subject of representations and therefore no other option other than to hold a hearing can be considered.

IMPACT ON THE COUNCIL'S KEY OUTCOMES

- 13.

	Outcomes	Implications
	<p>Doncaster Working: Our vision is for more people to be able to pursue their ambitions through work that gives them and Doncaster a brighter and prosperous future;</p> <ul style="list-style-type: none"> • Better access to good fulfilling work • Doncaster businesses are supported to flourish • Inward Investment 	<p>It is recognised that licensed premises are, quite often, businesses and places of employment.</p> <p>The Licensing Committee/Sub-Committee, subject to the general principles set out in the Council's Statement of Licensing Policy and the overriding need to promote the 3 licensing objectives, will have regard to this outcome when making licensing decisions.</p> <p>The licensing objectives are:</p> <ol style="list-style-type: none"> 1. preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime 2. ensuring that gambling is

		<p>conducted in a fair and open way</p> <p>3. protecting children and other vulnerable persons from being harmed or exploited by gambling</p>
	<p>Doncaster Living: Our vision is for Doncaster’s people to live in a borough that is vibrant and full of opportunity, where people enjoy spending time;</p> <ul style="list-style-type: none"> • The town centres are the beating heart of Doncaster • More people can live in a good quality, affordable home • Healthy and Vibrant Communities through Physical Activity and Sport • Everyone takes responsibility for keeping Doncaster Clean • Building on our cultural, artistic and sporting heritage 	<p>The Licensing Committee/Sub-Committee, subject to the general principles set out in the Council’s Statement of Licensing Policy and the overriding need to promote the 3 licensing objectives (see above), will have regard to this outcome when making licensing decisions.</p>
	<p>Doncaster Learning: Our vision is for learning that prepares all children, young people and adults for a life that is fulfilling;</p> <ul style="list-style-type: none"> • Every child has life-changing learning experiences within and beyond school • Many more great teachers work in Doncaster Schools that are good or better • Learning in Doncaster prepares young people for the world of work 	<p>The Licensing Committee/Sub-Committee, subject to the general principles set out in the Council’s Statement of Licensing Policy and the overriding need to promote the 3 licensing objectives (see above), will have regard to this outcome when making licensing decisions.</p>
	<p>Doncaster Caring: Our vision is for a borough that cares together for its most vulnerable residents;</p> <ul style="list-style-type: none"> • Children have the best start in life • Vulnerable families and individuals have support from someone they trust 	<p>The Licensing Committee/Sub-Committee, subject to the general principles set out in the Council’s Statement of Licensing Policy and the overriding need to promote the 3 licensing objectives (see above), will have regard to this outcome when making licensing decisions.</p>

	<ul style="list-style-type: none"> • Older people can live well and independently in their own homes 	
	<p>Connected Council:</p> <ul style="list-style-type: none"> • A modern, efficient and flexible workforce • Modern, accessible customer interactions • Operating within our resources and delivering value for money • A co-ordinated, whole person, whole life focus on the needs and aspirations of residents • Building community resilience and self-reliance by connecting community assets and strengths • Working with our partners and residents to provide effective leadership and governance 	<p>The Licensing Committee/Sub-Committee, subject to the general principles set out in the Council's Statement of Licensing Policy and the overriding need to promote the 3 licensing objectives (see above), will have regard to this outcome when making licensing decisions.</p>

RISKS AND ASSUMPTIONS

14. There are no risks or assumptions other than those referred to in the Legal Implications below.

LEGAL IMPLICATIONS [MC Churchman 26.1.21]

15. The Licensing Authority must ensure it complies with its obligations under the Gambling Act 2005 and associated Regulations which includes, but is not limited to the following:-

In considering an application, the committee must have regard to the 3 licensing objectives (preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime, ensuring that gambling is conducted in a fair and open way, protecting children and other vulnerable persons from being harmed or exploited by gambling) and take into account the Council's Statement of Gambling Policy. The committee shall consider the application in accordance with both the Gambling Act 2005 and the Gambling Act 2005 (Proceedings of Licensing Committees and Sub-committees) (Premises Licences and Provisional Statements) (England and Wales) Regulations 2007, and any amending secondary legislation. The committee must make its decision based on evidence submitted in accordance with the legislation and give reasons for reaching its decision.

The 2007 Regulations also set out the pre-hearing requirements including to whom notice of hearings and details of the representations received must be sent. The report confirms we have complied with the statutory requirements.

An appeal against the decision of the Licensing Authority may be made to the Magistrates' Court.

FINANCIAL IMPLICATIONS [Officer R Taylor - Standard Implications Agreed 27/01/2021]

16. The costs associated with applications of this nature and their determinations are met from fees paid to the Council by applicants for Authorisations/Licences under the Gambling Act 2005 and there are no further financial considerations.

HUMAN RESOURCES IMPLICATIONS [Officer D Knapp - Standard Implications Agreed 25/01/2021]

17. There are no human resource implications to this type of report.

TECHNOLOGY IMPLICATIONS [Officer P Ward – Standard Implications Agreed 26/01/2021]

18. There are no specific technology implications in regard to this type of report. The Northgate M3/ASSURE system is used to process the application and record the outcome of the decision.

HEALTH IMPLICATIONS [Officer R Suckling – Standard Implications Agreed 26/01/2021]

19. The Licensing Authority, in its capacity as a responsible authority under the Gambling Act 2005 (The Act), will actively seek the views of the Director of Public Health on all applications that the Licensing Authority are required to be notified of. Where applicable, these views will be used to make informed decisions regarding any representation the Licensing Authority may be minded to make.

EQUALITY IMPLICATIONS [HO 20.01.2021]

20. Decision makers must consider the Council's duties under the Public Sector Equality Duty at s149 of the Equality Act 2010. The duty requires the Council, when exercising its functions, to have 'due regard' to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the act, and to advance equality of opportunity and foster good relations between those who share a 'protected characteristic' and those who do not share that protected characteristic. There are no specific equality implications arising from this report. However, any activities arising from this report will need to be the subject of separate 'due regard' assessments.

CONSULTATION

21. The applicant has indicated that copies of the application form have been sent to all relevant Responsible Authorities.

Licensing Authority
The Gambling Commission
HM Revenue & Customs
South Yorkshire Police
South Yorkshire Fire and Rescue Authority
Doncaster Council – Environmental Health
Doncaster Council – Planning Authority
Doncaster Safeguarding Children Board

BACKGROUND PAPERS

22. Doncaster Council's Statement of Gambling Policy 2019

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DONCASTER METROPOLITAN BOROUGH COUNCIL

Gambling Act 2005

The Gambling Act 2005 (Proceedings of Licensing Committees and Sub-committees) (Premises Licences and Provisional Statements) (England and Wales) Regulations 2007

1. Meaning of Expressions used in this Document

<i>“the Act”</i>	- Gambling Act 2005
<i>“the Regulations” or any particular reference to a “Regulation”</i>	- the Gambling Act 2005 (Proceedings of Licensing Committees and Sub-committees) (Premises Licences and Provisional Statements) (England and Wales) Regulations 2007
<i>“the Authority”</i>	- Doncaster Metropolitan Borough Council, in its capacity as the relevant licensing authority under the Act, or where the context so admits the Committee
<i>“the Committee”</i>	- the Sub-Committee of the Authority’s Licensing Committee constituted under the Act to determine the matter before it
<i>“the Chair”</i>	- the member of the Committee appointed to act as Chairperson of the Committee
<i>“the Applicant”</i>	- the party making the application e.g. the licence holder or prospective holder, or the party seeking a review
<i>“Responsible Authorities”</i>	- the public or other bodies described in the Act as “responsible authorities” and who have made representations
<i>“party”</i>	- means person(s) to whom notice of hearing is to be given (including their representatives) and “party” and “parties” shall be construed accordingly

2. Rights of attendance, assistance and representation at hearings

- (a) A party may attend the hearing and may be assisted or represented by any other person. There is no requirement that a party's representative is legally or otherwise professionally qualified.

In conducting a hearing, the relevant committee must ensure that each party is given the opportunity to—

- i. address the relevant committee on any matter that is relevant to the application or review, or any representations made on the application or review;
 - ii. call witnesses to give evidence on any matter that is relevant to the application or review, or any representations made on the application or review;
 - iii. provide further information on, or explanation of, any matter on which the relevant committee has indicated that it will want further clarification.
- (b) The hearing shall take place in public, unless the committee direct that all or part of a hearing must be in private if it is satisfied that it is necessary in all the circumstances of the case, having regard to—
- (a) any unfairness to a party that is likely to result from a hearing in public; and
 - (b) the need to protect as far as possible, the commercial or other legitimate interests of a party. A party and any person assisting or representing a party may be treated as a member of the public.
- (c) The Authority may exclude from a public hearing any person attending who acts in a disruptive manner and refuse to re-admit that person, or impose conditions on his/her re-admission. Any such excluded person may, before the end of the hearing, submit to the Authority in writing any such information that he/she would have been entitled to give orally.
- (d) The Authority may dispense with a hearing if all of the persons required by the Act agree that a hearing is unnecessary, have given notice to the Authority that they consider a hearing to be unnecessary, and the Authority have given notice to all parties that the hearing has been dispensed with.
- (e) The Authority has the power to consider adjournments and an extension of time limits provided for within the Regulations on the basis it is in the public interest to do so. When a request for an adjournment or an extension of time is received the request is referred to the Chair for agreement provided the request can be accommodated in the

statutory time frame. If this is not possible the matter shall be determined by the Committee at the prelisted hearing.

3. Non-attendance of a party at the hearing

- (a) If a party has informed the Authority that he/she does not intend to attend the hearing, or be represented at the hearing, the hearing may proceed in his/her absence.
- (b) If a party who has not so notified the Authority does not attend either in person or by his/her representative, the Authority may adjourn the hearing to a specified date if it considers it in the public interest to do so, but it may otherwise proceed with the hearing in that party's absence.
- (c) Where the hearing proceeds in the absence of a party, the Authority shall consider the application, representations or notice made by that party.
- (d) Where the hearing is adjourned, the Authority shall forthwith, notify the parties of the date, time and place to which the hearing has been adjourned.

4. Procedure at the Hearing

The hearing shall take the form of a discussion led by the Authority. The following procedure is intended to give form to such a discussion to ensure that all parties are able to put their case. Each party shall have equal maximum time in which to address the Committee. The Committee may take into account documentary or other information provided by a party before the hearing, or with the consent of all other parties at the hearing. The Committee may change the procedure in individual cases, upon the application of a party, or upon its own motion, if it considers it necessary to properly determine the business before it.

- (a) At the commencement of the hearing, the Chair will make introductions and establish that all parties understand the procedure to be followed. The Committee will then receive and determine any application that a party may wish to make to permit another person to appear at the hearing, and any application that any party wishes to make to vary the following order of addresses.
- (b) The Applicant may then address the Committee and provide any further information that the Authority have requested. At the conclusion of the Applicant's address, members of the Committee may ask the Applicant questions. Following questions by Committee members, any other party that wishes to question the Applicant may request permission to do so. If granted, the party or parties receiving permission may question the Applicant.

- (c) Other parties entitled to address the Committee or given permission to do so under paragraph (a) above, may then do so; and also provide to the Committee any information that the Authority have requested. Following the address, the members of the Committee may question the party addressing the Committee. Following any Committee questions, any other party wishing to question the party that has addressed the Committee may seek the Committee's permission to do so. If granted, the party or parties receiving permission may question the Applicant.

Order of Addresses under paragraph (c)

Subject to any direction given by the Committee under paragraph (a) above, the order of addresses by other parties, under paragraph (c) above, shall be:-

- [1] Any representative of a "responsible authority" (as defined in the Act)
- [2] Any other party opposing the Applicant
- [3] Any other party not falling within category [1] or [2] above, or category [4] below
- [4] Any other party supporting the Application

Permission to question or cross-examine the Applicant or other party

A party may question any other party appearing if given permission by the Authority.

The Committee will determine any application by a party to question another party on its merits.

Cross examination shall not be permitted unless the Authority considers that cross examination is required for it to consider the representations, application or notice, as the case may require.

The Committee shall determine any application by one party to permit cross examination of another on its merits.

Normally, permission will be given to one party to question or cross-examine another, only where:-

- (i) a material fact put forward by one party is disputed by another party and the dispute can be properly determined, only if cross examination is permitted; or

- (ii) the question that one party wishes to put to the other is non-contentious and is for the purpose of clarification only.

5. The Committee's Deliberations and Determination

- (a) The Authority considers that normally, it will be in the public interest that the deliberations of the Committee are conducted in the presence of the note taker and legal adviser only, unless an application is made by any party present for these to be conducted in public. If any such application is made, the Committee shall determine such application. The function of the legal adviser shall be to advise the Committee on points of law and procedure only.
- (b) Subject to paragraph (a) above, the Chair shall formally exclude the public including, the parties and their representatives from the meeting under Regulation 8(2), to enable the Committee to deliberate. All persons required to vacate the room during the deliberations shall be required to take all their personal belongings out of the room except as may be directed by the Committee.
- (c) If during its deliberations, the Committee require any further information from any party in order to assist in its deliberations, the Chair shall reconvene the public hearing for the purpose of attempting to secure that further information.
- (d) Following the Committee's deliberations, the public shall be re-admitted to the hearing, whereupon the Chair shall announce the determination of the Authority, where the provisions of the Act or the Regulations require a determination to be made at the conclusion of the hearing, or otherwise where the Committee is unable to announce its determination, notification will be given to all parties within five days.
- (e) Following the announcement of any determination of the application, representations or notice before the Committee, the hearing shall conclude.

6. Record of proceedings

A record of the hearing will be taken in a permanent and intelligible form. Any such record will be kept for a period of six years from the date that the application or review is finally determined (including any appeal or judicial review).

APPENDIX B

Name of Applicant: Cashino Gaming Limited
Name of Premises: Merkur Slots
Address: 37-39 St Sepulchre Gate, Doncaster, DN1 1TD

The application is for a new premise licence (bingo) at the above address.

The hours of operation are determined by the Gambling Act and associated regulations.

Bingo facilities in bingo halls may not be offered between the hours of midnight and 9am. However, there are no restrictions on access to gaming machines in bingo halls.

(The Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007 Regulation 15 & Schedule 5)

Location Plan



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**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:

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

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

Section B

Application on behalf of an organisation

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

7. The applicant's registered or principal address:

Seebeck House, 1A Seebeck Place, Knowlhill, Milton Keynes

Postcode: **MK5 8FR**

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

000-003266-N-103444

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

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

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

Part 3 – Premises Details

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

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

37/39 St Sepulchre Gate

Doncaster

Postcode: **DN1 1TD**

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

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

Ground floor premises, high street location.

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

No

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

Part 4 – Times of operation

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

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

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

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

Part 5 – Miscellaneous

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

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:

96 High Street, S64 9AU – AGC Premises Licence LN/200700474

52 High Street, Doncaster, DN1 1BB – AGC Premises Licence LN/201200600

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

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

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

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

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

Part 6 – Declarations and Checklist (Please tick)

We confirm that, to the best of our knowledge, the information contained in this application is true. 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.

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
- we understand that if the above requirements are not complied with the application may be rejected
- 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: Poppleston Allen

Date: 22nd December 2020

Capacity: Solicitors for & on behalf of the applicant

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

Signature:
Print Name: _____
Date: _____ Capacity: _____
<i>[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.]</i>
<i>[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.]</i>

Part 8 – Contact Details
23(a) Please give the name of a person who can be contacted about the application: Richard Bradley
23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted: 0115 948 7424
24. Postal address for correspondence associated with this application: Richard Bradley Poppleston Allen 37 Stoney Street The Lace Market Nottingham Postcode: NG1 1LS
25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent: r.bradley@popall.co.uk



THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

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

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

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

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

Cashino Gaming Limited

Operational Standards

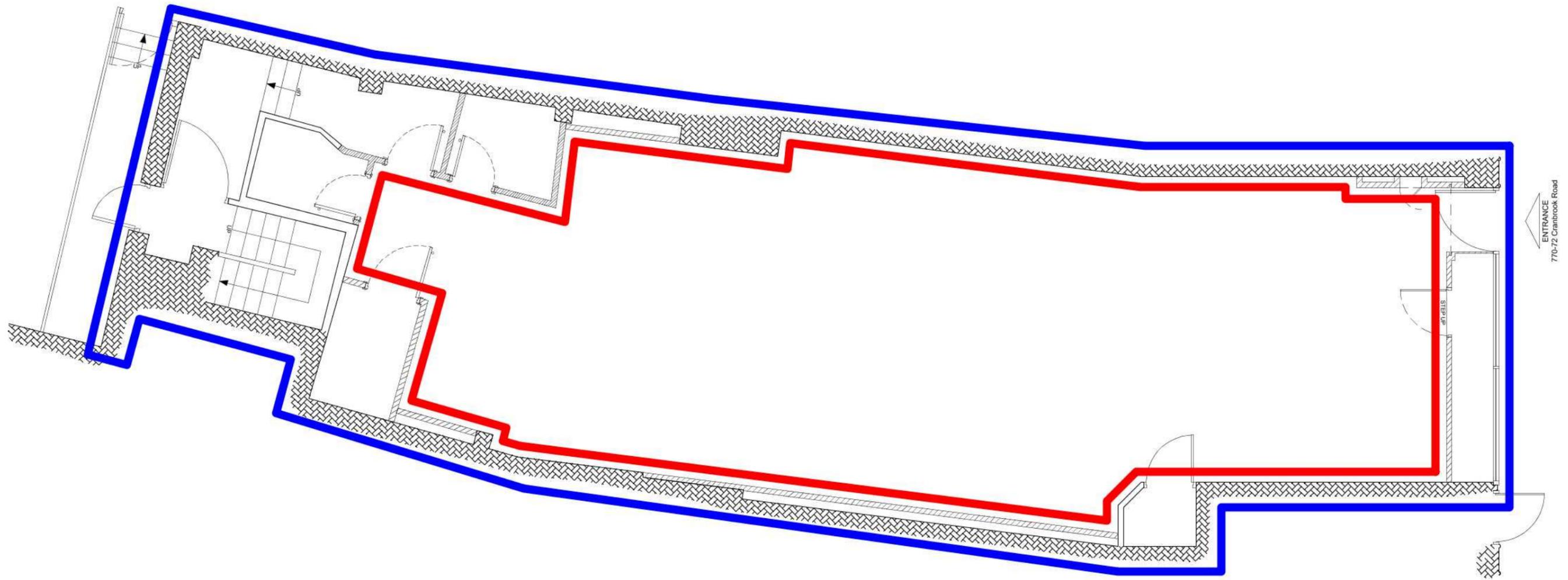


- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our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

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

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

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



LICENSE PLAN LEGEND	
LINE TYPE	LINE TYPE DESCRIPTION
	AREA IN WHICH FACILITIES WILL BE PROVIDED FOR GAMING.
	EXTENT OF PREMISES

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

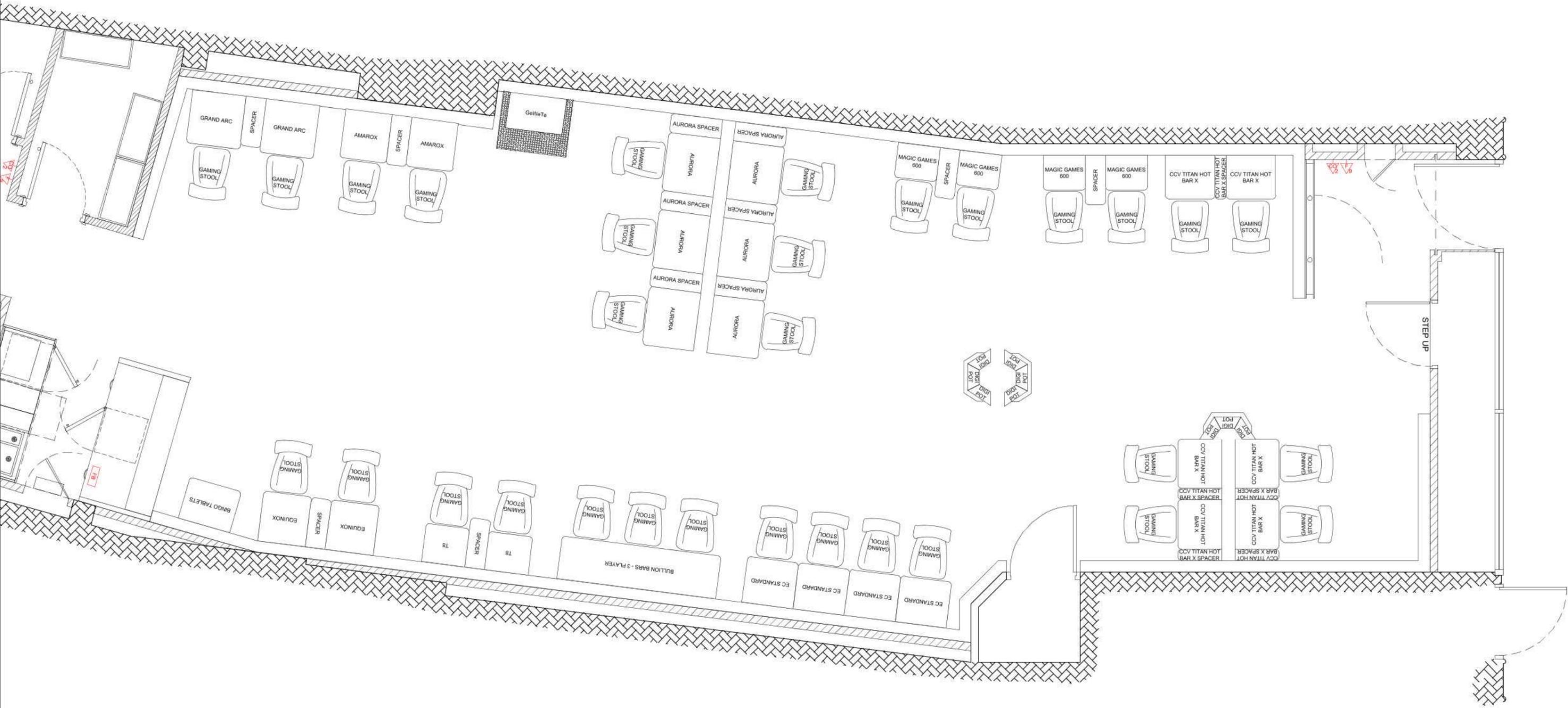
REVISIONS
REV 01: Drawing updated to current template (13/11/20).

FIT OUT TYPE FUTURE VENUE
PROJECT MERKUR SLOTS 37-39 SEPULCHRE GATE DONCASTER DN1 1TD
DESCRIPTION PROPOSED LICENSE PLAN

REFERENCE DRAWINGS MEASURED SURVEY	
SCALE 1:75	
DRAWN BY MG	
DATE 13/11/20	
DRAWING No. 999-PR-07	REVISION 01



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REVISIONS
 REV 01: Drawing updated to current template
 (13/11/20).

FIT OUT TYPE
 FUTURE VENUE

PROJECT
MERKUR SLOTS
 37-39 SEPULCHRE GATE
 DONCASTER
 DN1 1TD

DESCRIPTION
 PROPOSED MACHINE PLAN

REFERENCE DRAWINGS
 MEASURED SURVEY

SCALE
 1:50

DRAWN BY
 S.R.B.

DATE
 13/11/20

DRAWING No.
999-PR-05

REVISION
01



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Merkur Slots, 37/39 Sepulchre Gate, Doncaster, DN1 1TD

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	37/39 Sepulchre Gate Doncaster, DN1 1TD
Local Authority:	Doncaster Metropolitan Borough Council
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-024 (Cashino Gaming Ltd)
Company Details:	Praesepe Group, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Cashino Gaming Limited
Name and Title of Assessor:	Lisa Kennedy - Internal Audit Officer and Amanda Kiernan – Head of Compliance
Date of Assessment:	10th December 2020
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots a former Travel Agency, is situated on the pedestrianised Sepulchre Gate, directly opposite the Frenchgate Centre with other occupiers in the close vicinity including Cafe Nero, Savers, TK Maxx, Co-operative Bank, Nationwide Building Society and Tui Travel Agent. There are bus stops close to the property and Doncaster Train Station is a short walk away (0.02 miles). Merkur Slots Sepulchre Gate is located within the city center, with transport links to other areas/cities.	
Establishments of note:	Two Bookmakers are on Sepulchre Gate, Coral and Bet Extra. There are a further eleven in the local area. The Frenchgate Shopping Center is opposite the premises and offers High Street Shopping chains, Restaurants and Coffee Bars, along with a wide variety of Bars & Restaurants. There are a number of Adult Gambling Centres in the town including Cashino, Admiral and Haynes. Two Public Houses - The Tut n Shive and The Little Plough are a short walk away; both operate late night opening until midnight at weekends. There are a number of late night Bars and Clubs in a separate part of the town centre around 10 minutes' walk away.	
Adjoining premises:	Merkur Slots Doncaster is located between Coral Bookmakers and Café Nero	
Crime statistics:	<p>During October 2020 there were 141 crimes recorded on or around Sepulchre Gate within a 250m, radius. 41 incidents of violent crime, 27 incidents of shop lifting, 18 incidents of anti-social behavior, 18 public order offences, 8 incidents of burglary, 8 incidents of criminal damage/arson, 6 incidents other theft, 4 bicycle thefts recorded, 4 incidents relating to drugs, 4 incidents relating to the possession of weapons, 2 robberies and 1 vehicle crime. In the year ending June 2020, crime rates were down in Doncaster and down in the South Yorkshire force area, compared with the corresponding quarter in June 2019. Local Policing Priorities include, plain clothes operations and burglary prevention patrols, and patrols of hotspot areas including increased foot patrols in areas of high Anti-Social Behaviour incidents.</p>	
Population:	The population of Doncaster postcode area DN1 is 243,552. Compared to other areas, Doncaster has a lower percentage of 20-24 year olds, and a higher proportion of 55-64 year olds Over a quarter of Doncaster residents live in Single households. The accommodation in the area of Sepulchre Gate consist predominantly of terraced housing & purpose built flats. Most of the housing stock is rented from private landlords, with the main occupancy being one or two people. The Doncaster town population is 19,535 residents of which 21.8% are below the age of 18 yrs. (Doncaster Town Ward Profile 2015).	
Culture:	The Doncaster town population ethnic make up is 81.83% White British, 11.6% Asian/ Asian British and the remaining from other ethnic backgrounds. 31% of residents own their own property. (Doncaster Town Ward Profile 2015).	
Unemployment:	Merkur Slots Doncaster is in an area with an employment rate of 81%. 33.7% work in Senior Occupations, Directors & Managerial. 20.6% work in Administrative roles and skilled trades. 19.2% work in the Care, Leisure, sales & customer service and 26.5% work in factory & Machine production roles. Unemployment rate or full time students is at 19% compared to the average UK rate of 4%. Of the Doncaster town population 4.9% of working age residents are unemployed. (Doncaster Town Ward Profile 2015).	
Deprivation:	The 2019 Indices of Multiple Deprivation show that since 2015 Doncaster's deprivation ranking relative to other areas has worsened, from 48 th most deprived to 41 st (out of 317). Ranking has improved for employment, income and the environment, but has worsened for housing, education, skills, training and crime. There are a number of premises occupied by organisations supporting homeless and vulnerable persons including a YMCA on the edge of the town centre and homeless people can be seen around the town centre.	
Local Police:	South Yorkshire Police, Doncaster Central When contacted local Police had no concerns with proposals	

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

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

Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into consideration Doncaster Council Local Authority Statement of Licensing Policy, Reference section 4.8 for Bingo premises and Doncaster Borough Profile 2011 and Doncaster Town Ward Profile 2015.

Environmental Factors

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

Licensing Objectives	Local Risks	Control Measures
Protecting children and other vulnerable people from being harmed or exploited by gambling	<p>Unemployment: Merkur Slots Doncaster is in an area with an employment rate of 81%. 33.7% work in Senior Occupations, Directors & Managerial. 20.6% work in Administrative roles and skilled trades. 19.2% work in the Care, Leisure, sales & customer service and 26.5% work in factory & Machine production roles. Unemployment rate or full time students is at 19% compared to the average UK rate of 4%. Of the Doncaster town population 4.9% of working age residents are unemployed. (Doncaster Town Ward Profile 2015).</p> <p>Deprivation: The 2019 Indices of Multiple Deprivation show that since 2015 Doncaster’s deprivation ranking relative to other areas has worsened, from 48th most deprived to 41st (out of 317). Ranking has improved for employment, income and the environment, but has worsened for housing, education, skills, training and crime. There are a number of premises occupied by organisations supporting homeless and vulnerable persons on the edge of the town centre and homeless people can be seen around the town centre.</p> <p>Schools and Education Doncaster UTC, College Road, DN1 3BF Atlas Academy, Prospect Place, DN1 3QP Hall Cross Academy, Thorne Road, DN1 2HY St Francis Xavier Catholic Primary School, Roberts Road, DN1 2JS Town field Primary School, Thorne Road, DN1 2JS</p>	<p>Age Verification <i>Ensuring Under 18’s do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18’s only).</p> <p>Gambling is an age restricted product and Praesepe operates a ‘Think 25’ policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18’s notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Sepulchre Gate Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p>

	<p>Balby Central Primary Academy, Littlemore Lane, DN4 0LL</p> <p>Community Centres and Youth Centres Sikh Bhatra's Community Hall, 4175 Trafford Way, DN1 3AN Maridon Pastoral Centre 5 Nether Hall Road, DN1 2PH The Junction Community Advice Centre, 28 Urban Road, DN4 0BE Nether Hall Area CIC, 9-13 Highfield Road, DN1 2LA Hexthorpe Parish Hall, 12 Shady Side, DN4 0DN Doncaster Central Development Trust, Unit 1A The Church View Centre, Church View, DN1 1AF Doncaster Deaf Community Centre, Milton Walk, St James Street, DN1 3QG Expect Youth, The Point, S.Parade, DN1 2DR YMCA, 31 Wood Street, DN1 3LH Doncaster Childrens Services Trust, Colonnades House, Duke St, DN1 1ER Changing Lives, 2-5 Prince's Street, DN1 3NJ Doncaster Sea Cadets, 1 Chappell Drive,</p> <p>Parks, play grounds and sports/leisure facilities Westfield Park, Littlemoor Lane, DN4 0LN Town Fields, DN2 6BZ Regent Square, South Parade, DN1 2DR Playground, 61 Beechfield Road, DN1 2AJ Westfield Park Playground, 61 Balby Road, DN4 0RD Stirling Street Playground 147 Milton Walk, DN1 3QL St James Street Play Area, DN1 3RT Elmfield Park, DN4 5AP St Mary's Crescent Play Area, DN1 2NJ Doncaster Town Fields Sports Club, Bennetthorpe, DN2 6AA The Gym, Frenchgate Shopping Centre, DN1 1SW Boon Khwan Thai Boxing Camp, Civic Quarter, College Road, DN1 3JH Doncaster Martial Arts Centre, 76a, Baxter Avenue, DN1 2NN Active Doncaster, Waterdale, DN1 3BU</p> <p>Vulnerable and addiction support services Aspire Drug and Alcohol, 37 Thorne Road, DN1 2EZ Better Deal Young Persons Drug Service, 83 Thorne Road, DN1 2ES Project 3, East Laith Gate House, DN1 1JE</p> <p>Homeless shelters and food banks Food Bank, BME United 56-58 Beckett Road, DN2 4AJ Food Bank, Christ Church, Thorne Road, DN1 2HG Food Bank, Trussell Trust, Thorne Road, DN1 2HG</p>	<p>Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the Industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>Vulnerability Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Merkur Slots take 'know your customer' seriously including affordability checks, engaging with customer on products to enabled an informed choice and take a risk-based approach to harm minimization.</p> <p>Merkur Slots, Sepulchre Gate will support the promotion of the NHS Northern Gambling Service within the premises and guide any vulnerable people or those at risk of harm from gambling towards this support service.</p> <p>Praesepe will incorporate reference to the NHS Northern Gambling Service in its employee Safeguarding Vulnerable People from Gambling Harm training modules.</p>
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	<p>Homeless Shelter – YMCA, 31 Wood Street, DN1 3LH</p> <p>Pawnbrokers and Loan Shops H&T Pawnbrokers, 23 High Street, DN1 1DW Antique & Bargain Stores Ltd, 28 Market Place, DN1 1NE Cash Shop, 19 French Gate, DN1 1PZ Ramsdens, 49 High Street, DN1 1BB Cash Converters, 11 Wood Street, DN1 3LH Doncaster Jewellers, 22 High Street, DN1 1DW Albemarle & Bond Pawnbrokers Ltd, 47 Sepulcher Gate, DN1 1TD Everyday Loans, 20-22 French Gate, DN1 1QQ Bad Credit History Loans, 11 East Laith Gate, DN 1 1JG Finance & Asset Leasing Ltd, 18 Thorne Road, DN1 2HS CEX, 21 Printing Office Street, DN1 1TJ Ramsdens, Frenchgate Shopping Centre, St Sepulchre Gate, DN1 1SW Herbert Brown 47 St Sepulchre Gate, DN1 1TD Re-Generate, 27 High St, DN1 1DW</p> <p>Medical Centres, Care Homes and Mental Health facilities The Medical Centre, 2 Francis Street, DN1 1JS Doncaster Health Centre, St Sepulchre Gate West, DN1 3AP The Flying Scotsman Health Centre, St Sepulchre Gate West, DN1 3AP The Mount Group Practice, 54 Thorne Road, DN1 2JP Mills Medical Services, Portland Place, DN1 3DF DRG Health Clinic, 9 Priory Place, DN1 1BL The Phoenix Medical Practice, Cavendish Road, DN1 2DJ Chequer Road Clinic, Chequer Road, DN1 2AD The Burns Practice, 4 Albion Place, DN1 2EG Tri Health, East Laith Gate House, DN1 1JE The St Vincent Practice, 77 Thorne Road, DN1 2ET St Mary's Nursing Home, Thorne Road, DN1 2JT Amphion View Residential Home, 17-19 Avenue Road, DN2 4AG Thorndene, 107 Thorne Road, DN2 5BE Hollybrook House, 3 Avenue Road, DN2 4AH Wycar Leys Doncaster Ltd, 4 Avenue Road, DN2 4AH Socratis Clinic, 1 Cavendish Court, South Parade, DN1 2DJ Rotherham, Doncaster, and South Humber NHS Trust, East Laith Gate, Cheswold Park Hospital, Cheswold Lane , DN5 8AR Wentbridge Centre, Cheswold Lane, DN5 8AR Yorkshire Counselling, 1st Floor, Danum House, DN1 2DY Rebound, 1 South Parade, DN1 2DY</p>	<p>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioral changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behavior, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behavior, such as the Playright App or Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Player Protection <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i> <i>Failure to provide information to customers on responsible gambling</i> <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p> <p>'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are in prominent locations within the premise and in private areas, such as customer toilets.</p> <p>Playright App available for customers to self-manage their play and spend and can send alerts to Merkur Slots Sepulchre Gate if the customer enters at a time, they have chosen not to play which instigates an interaction with the customer. Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling.</p>
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Gambling premises

Bet Extra, 1 Sepulchre Gate, DN1 1TD
 Admiral Casino, 25 Baxter Gate, Dn1 1LD
 Coral, 35 St Sepulchre Gate, DN1 1TD
 Paddy Power, 41 Market Place, DN1 1NH
 BetFred, 54 High Street, DN1 1BE
 Merkur Cashino, High Street, DN1 1BE
 Ladbrokes, 49 Market Place, DN1 1NJ
 William Hill, 8 Market Place, DN1 1LQ
 Ladbrokes, 39,47 Printing Office, DN1 1TP
 Coral, 154 Carr House Road, DN4 5AP
 Mecca Bingo, 1c East Laith Gate, DN1 1JG
 Hayes Family Amusements, The Colonnades, 14 Pells Close, DN1 3EG
 Jackpot Amusements, 46 Duke Street, DN1 3EA
 BetFred 31-33 Cleveland St, DN1 3DY

Public Houses and Alcohol Licensed Premise

Old Castle Hotel, 10 Market Place, DN1 1LQ
 Red Lion Hotel, Market Place, DN1 1NH
 Jazz Café, 5-7 Printing Office, DN1 1TJ
 Mallard, Unit 14, Frenchgate Shopping Centre, DN1 1SW
 The Grind, 25 High Street, DN1 1DW
 The Leopard, 2 West Street, DN1 3AA
 Sibella Shisha Bar, 12 Priory Walk, Dnm1 1TS
 Paris Gate, 76 Sepulchre Gate, DN1 1SD
 Number Fifteen, 21 High Street, DN1 1DW
 The White Swan, 34 French Gate, DN1 1QQ
 Zest Bar & Grill, 19-20 High Street, DN1 1DW
 The Queen Crafhouse & Kitchen, 1 Sunny Bar, DN1 1LY
 The Lord Nelson, 54 Printing Office, DN1 1TR
 Ballers Sports Bar, 14 Silver Street, DN1 1HQ
 Tut N Shive, 6 West Laith Gate, DN1 1SF
 Manana Manana, 7 Bradford Row, DN1 3NF
 Doncaster Brewery & Tap, 7 Young Street, DN1 3EL
 The Pad, 3 Priory Walk, DN1 1TS
 Debbie's Bar, 6 Silver Street, DN1 1HQ
 The Lockwood, 50 Hall Gate, DN1 3PB
 The Gate House, Priory Walk, DN1 1TS
 The Angel & Royal, Cleveland Street DN1 3EF
 St Leger Tavern, 8 Silver Street, DN1 1HQ
 Toast Bar, 10-12 Priory Place, DN1 1TS
 Corner Pin, 145 St Sepulchre Street, DN1 3AH
 Vintage Bar, 64-66 Silver Street, DN1 1HT

Socially Responsible messaging is implemented on all digital B3 and Cat C machines.

All machines display Gamble Responsibly stickers with helpline contact details.

Senior Management are members of the Bingo Association Executive and Socially Responsible Committees and BACTA Divisional and Socially Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.

Deprivation

Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm

Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.

Homelessness

Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.

Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.

Staff are trained how to manage situations with homeless people seeking refuge.

A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.

The Rum Rooms, 7 Market Road, DN1 1LS
 Hogan's Bar, 24-28 Silver Street, DN1 1HQ
 Yates Doncaster, 58 Hall Gate, DN1 3PB
 The Draughtsman Alehouse, Platform 3 Doncaster Railway Station, DN1 1PE
 Decades Doncaster, 10-12 Cleveland Street, DN1 3EH
 Relish Bar & Grill, 19 East Laith Gate, DN1 1JG
 Biscuit Billys, 8 Silver Street, DN1 1HQ
 Frank & Stein, 18-20 Silver Street, DN1 1HQ
 La Rustica Restaurant & Wine Bar, 5 Nether Hall Road, DN1 2PH
 Mambo, 14 Silver Street, DN1 1HQ
 The Mason Arms, 22 Market Place, DN1 1ND
 The Black Bull, 12 Market Place, DN1 1LQ
 The Social, 10-20 Lazarus Court, DN1 3NF
 Courtyard, 36 Market Place, DN1 1NE
 Modiva Tapas, 10 Priory Walk, DN1 1TS
 Horse & Groom, 3 East Laith Street, DN1 1JG
 Woolpack Live, 32 Market Place, DN1 1NE
 Flares Doncaster, 5 Hall Gate, DN1 3LU
 The Salutation, 14 South Parade, DN1 2DR
 The Saracens, 38-40 Cleveland Street, DN1 3DZ
 The Establishment, 1A Bradford Row, DN1 3NF
 Hallcross, 32 Hall Gate, DN1 3NL
 Magdalen 20 Market Place, DN1 1NE
 The Little Plough, 8 West Laith Gate, DN1 1SF
 Bentleys Gentleman's Club. 44 Hall Gate, DN1 3NR
 Shooters Shot Bar, 60 Hall Gate, DN1 3PB
 Market Place, Alehouse & Deli, 21 Market Place, DN1 1ND
 The Coach & Horses, 5 Scot Lane, DN1 1EW
 Banditos Bar, 12 Cleveland Street, DN1 3EH
 The Harewood, 28 Waterdale, DN1 3EY
 The Night Jar, 54 Silver Street, DN1 1HT
 The Railway, West Street, DN1 3AA
 Yorkshire Grey, 16 Hall Gate, DN1 3NA
 Rock-A-Hula Tiki Bar, 20 Hall Gate, DN1 3NG
 The Staff of Life, Princegate, DN1 3EN
 Angels Champagne Bar, 23 Hall Gate, DN1 3NG
 Boogie Bar, DN1 1HH
 Turkuaz Bar & Grill, 8b Nether Hall Road, DN1 2PW
 Barley Twist Table Table, High Fisher Gate, DN1 1QZ
 Doncaster Brewery, 7 Young Street, DN1 3EL
 Don Valley Tap, The Wool Market, DN1 1NG
 Utopia Bar & Restaurant, 8c Nether Hall Road, DN1 2PW

	<p>La Barraca, 56-60 Silver Street, DN1 1HT Slug & Lettuce, 53-54 Hall Gate, DN1 3PD Gallery Bar & Club, 34/36 Silver Street, DN1 1HQ Craft Gin Lounge & Gin Club, 6B Sunny Bar, DN1 1LY Anthony's, Danum Hotel, High Street, DN1 1DN Corporation Brewery Taps, 135 Cleveland Street, DN1 3AR La Familia, 41 Prince Gate, DN1 3EN Luxx Shisha Bar & Lounge, 14 Priory Walk, DN1 1TS The City Restaurant, 2 Kingsgate, DN1 3JZ</p> <p>Residential Areas The accommodation in the area consist predominantly of terraced housing & purpose built flats. Most of the housing stock is rented from private landlords, with the main occupancy being one or two people.</p> <p>Bus stops and other Transport links St Sepulchre Gate Doncaster Train Station (0.2mile)</p> <p>Locally Identified Premises French Gate Shopping Centre, St Sepulchre Gate, DN1 1SW McDonalds, 68 St Sepulchre Gate, DN1 1RX</p>	
<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p> <p>Page 33</p>	<p>Crime statistics: During October 2020 there were 141 crimes recorded on or around Sepulchre Gate within a 250, radius. 41 incidents of violent crime, 27 incidents of shop lifting, 18 incidents of anti-social behavior, 18 public order offences, 8 incidents of burglary, 8 incidents of criminal damage/arson, 6 incidents other theft, 4 bicycle thefts recorded, 4 incidents relating to drugs, 4 incidents relating to the possession of weapons, 2 robberies and 1 vehicle crime. In the year ending June 2020, crime rates were down in Doncaster and down in the South Yorkshire force area, compared with the corresponding quarter in June 2019 Local Policing Priorities include, Plain clothes operations and burglary prevention patrols, and patrols of hotspot areas. Increased foot patrols of high ASB areas.</p> <p>Local Police: South Yorkshire Police, Doncaster Central When contacted Local police had no concerns over the application.</p>	<p>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots Sepulchre Gate is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots Sepulchre Gate will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will</p>

Public Houses and Alcohol Licensed Premise

Old Castle Hotel, 10 Market Place, DN1 1LQ
 Red Lion Hotel, Market Place, DN1 1NH
 Jazz Café, 5-7 Printing Office, DN1 1TJ
 Mallard, Unit 14, Frenchgate Shopping Centre, DN1 1SW
 The Grind, 25 High Street, DN1 1DW
 The Leopard, 2 West Street, DN1 3AA
 Sibella Shisha Bar, 12 Priory Walk, Dnm1 1TS
 Paris Gate, 76 Sepulchre Gate, DN1 1SD
 Number Fifteen, 21 High Street, DN1 1DW
 The White Swan, 34 French Gate, DN1 1QQ
 Zest Bar & Grill, 19-20 High Street, DN1 1DW
 The Queen Crafthouse & Kitchen, 1 Sunny Bar, DN1 1LY
 The Lord Nelson, 54 Printing Office, DN1 1TR
 Ballers Sports Bar, 14 Silver Street, DN1 1HQ
 Tut N Shive, 6 West Laith Gate, DN1 1SF
 Manana Manana, 7 Bradford Row, DN1 3NF
 Doncaster Brewery & Tap, 7 Young Street, DN1 3EL
 The Pad, 3 Priory Walk, DN1 1TS
 Debbie's Bar, 6 Silver Street, DN1 1HQ
 The Lockwood, 50 Hall Gate, DN1 3PB
 The Gate House, Priory Walk, DN1 1TS
 The Angel & Royal, Cleveland Street DN1 3EF
 St Leger Tavern, 8 Silver Street, DN1 1HQ
 Toast Bar, 10-12 Priory Place, DN1 1TS
 Corner Pin, 145 St Sepulchre Street, DN1 3AH
 Vintage Bar, 64-66 Silver Street, DN1 1HT
 The Rum Rooms, 7 Market Road, DN1 1LS
 Hogan's Bar, 24-28 Silver Street, DN1 1HQ
 Yates Doncaster, 58 Hall Gate, DN1 3PB
 The Draughtsman Alehouse, Platform 3 Doncaster Railway Station, DN1 1PE
 Decades Doncaster, 10-12 Cleveland Street, DN1 3EH
 Relish Bar & Grill, 19 East Laith Gate, DN1 1JG
 Biscuit Billys, 8 Silver Street, DN1 1HQ
 Frank & Stein, 18-20 Silver Street, DN1 1HQ
 La Rustica Restaurant & Wine Bar, 5 Nether Hall Road, DN1 2PH
 Mambo, 14 Silver Street, DN1 1HQ
 The Mason Arms, 22 Market Place, DN1 1ND
 The Black Bull, 12 Market Place, DN1 1LQ
 The Social, 10-20 Lazarus Court, DN1 3NF
 Courtyard, 36 Market Place, DN1 1NE
 Modiva Tapas, 10 Priory Walk, DN1 1TS

regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.

General Crime and Disorder

To identify aggressive customers to prevent crime and disorder
Awareness of local crime issues in the local area

We have reviewed the Police.UK hot-spot mapping for Doncaster policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with Kent Police over reducing our involvement in any incident.

Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.

All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.

Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.

The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).

Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.

Merkur Slots Sepulchre Gate will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.

Anti-social behavior outside the premise

Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.

Horse & Groom, 3 East Laith Street, DN1 1JG
 Woolpack Live, 32 Market Place, DN1 1NE
 Flares Doncaster, 5 Hall Gate, DN1 3LU
 The Salutation, 14 South Parade, DN1 2DR
 The Saracens, 38-40 Cleveland Street, DN1 3DZ
 The Establishment, 1A Bradford Row, DN1 3NF
 Hallcross, 32 Hall Gate, DN1 3NL
 Magdalen 20 Market Place, DN1 1NE
 The Little Plough, 8 West Laith Gate, DN1 1SF
 Bentleys Gentleman's Club. 44 Hall Gate, DN1 3NR
 Shooters Shot Bar, 60 Hall Gate, DN1 3PB
 Market Place, Alehouse & Deli, 21 Market Place, DN1 1ND
 The Coach & Horses, 5 Scot Lane, DN1 1EW
 Banditos Bar, 12 Cleveland Street, DN1 3EH
 The Harewood, 28 Waterdale, DN1 3EY
 The Night Jar, 54 Silver Street, DN1 1HT
 The Railway, West Street, DN1 3AA
 Yorkshire Grey, 16 Hall Gate, DN1 3NA
 Rock-A-Hula Tiki Bar, 20 Hall Gate, DN1 3NG
 The Staff of Life, Princegate, DN1 3EN
 Angels Champagne Bar, 23 Hall Gate, DN1 3NG
 Boogie Bar, DN1 1HH
 Turkuaz Bar & Grill, 8b Nether Hall Road, DN1 2PW
 Barley Twist Table Table, High Fisher Gate, DN1 1QZ
 Doncaster Brewery, 7 Young Street, DN1 3EL
 Don Valley Tap, The Wool Market, DN1 1NG
 Utopia Bar & Restaurant, 8c Nether Hall Road, DN1 2PW
 La Barraca, 56-60 Silver Street, DN1 1HT
 Slug & Lettuce, 53-54 Hall Gate, DN1 3PD
 Gallery Bar & Club, 34/36 Silver Street, DN1 1HQ
 Craft Gin Lounge & Gin Club, 6B Sunny Bar, DN1 1LY
 Anthony's, Danum Hotel, High Street, DN1 1DN
 Corporation Brewery Taps, 135 Cleveland Street, DN1 3AR
 La Familia, 41 Prince Gate, DN1 3EN
 Luxx Shisha Bar & Lounge, 14 Priory Walk, DN1 1TS
 The City Restaurant, 2 Kingsgate, DN1 3JZ

Pawnbrokers and Loan Shops

H&T Pawnbrokers, 23 High Street, DN1 1DW
 Antique & Bargain Stores Ltd, 28 Market Place, DN1 1NE
 Cash Shop, 19 French Gate, DN1 1PZ
 Ramsdens, 49 High Street, DN1 1BB
 Cash Converters, 11 Wood Street, DN1 3LH

Staff are aware to monitor the outside of the premise and surrounding area for anti-social behavior and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.

Incidents of anti-social behavior are recorded on the IHL SMART Tablet Incident App.

Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behavior occurring in the vicinity and encourages a partnership approach with local authorities.

Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.

Money Laundering

Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.

Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML policies with clear escalation and reporting processes.

There are 15 pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behavior, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.

IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.

Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.

Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.

Adequate staff will always be maintained and subject to regular review and risk assessment.

Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 8pm until 6am.

Doncaster Jewellers, 22 High Street, DN1 1DW
 Albemarle & Bond Pawnbrokers Ltd, 47 Sepulcher Gate, DN1 1TD
 Everyday Loans, 20-22 French Gate, DN1 1QQ
 Bad Credit History Loans, 11 East Laith Gate, DN 1 1JG
 Finance & Asset Leasing Ltd, 18 Thorne Road, DN1 2HS
 CEX, 21 Printing Office Street, DN1 1TJ
 Ramsdens, Frenchgate Shopping Centre, St Sepulchre Gate, DN1 1SW
 Herbert Brown 47 St Sepulchre Gate, DN1 1TD
 Re-Generate, 27 High St, DN1 1DW

Gambling premises

Bet Extra, 1 Sepulchre Gate, DN1 1TD
 Admiral Casino, 25 Baxter Gate, Dn1 1LD
 Coral, 35 St Sepulchre Gate, DN1 1TD
 Paddy Power, 41 Market Place, DN1 1NH
 BetFred, 54 High Street, DN1 1BE
 Merkur Cashino, High Street, DN1 1BE
 Ladbrokes, 49 Market Place, DN1 1NJ
 William Hill, 8 Market Place, DN1 1LQ
 Ladbrokes, 39,47 Printing Office, DN1 1TP
 Coral, 154 Carr House Road, DN4 5AP
 Mecca Bingo, 1c East Laith Gate, DN1 1JG
 Hayes Family Amusements, The Colonnades, 14 Pells Close, DN1 3EG
 Jackpot Amusements, 46 Duke Street, DN1 3EA
 BetFred 31-33 Cleveland St, DN1 3DY

Residential Areas (impacted by Anti Social Behavior)

The accommodation in the area consist predominantly of terraced housing & purpose built flats. Most of the housing stock is rented from private landlords.

In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots will primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.

Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.

Merkur Slots Doncaster will operate TITo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.

As such staff are based predominately on the venue floor and have very little need to work in a back area, any back office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management.

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.

Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.

Alcohol and Drugs

Anti-social behavior caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.

'No Alcohol Allowed' signage on the door.

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

		<p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p>Marketing Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, Bingo Played here, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
<p>Other</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 38</p>	<p>Places of worship and Religious Buildings Priory Place Methodist Church, 20-26 Printing Office Street, DN1 1TR All Nations Living Springs Church, 77-70 Sepulchre Gate, DN1 1RX HallGate URC Church, 7B HallGate, DN1 3NG Doncaster Unitarian & Free Christian Church, 60 HallGate, DN1 3PB National Spiritualist Church, College Road, DN1 3JH St James Church, Sepulchre Gate West, DN1 3AQ The Minster Church of St George, 9 Church Street, DN1 1RD Jamia Mosque Doncaster, Bentinck Close, DN1 3ST</p>	<p>Ethnicity and Local Area Demographic Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training & Social Responsibility Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p>

		<p>Praesepe have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Praesepe work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice yearly.</p> <p>COVID 19 All staff receive training on COVID-19 guidelines.</p> <p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p> <p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p>
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Merkur Slots 37-39 Sepulchre Gate, Doncaster, DN1 1DT Premise Layout

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

Additional Comments

I have worked in the Gaming Industry for 16 years in operations as a Bingo Manager for 5 years and Internal Audit Officer for Praesepe for 11 years. I was requested to complete a Local Area Risk Assessment for the new Merkur Slots premises in Doncaster. My work area covers Merkur Slots, High Street Doncaster, and I usually visit at least twice a year, I have not encountered any issues during my visits, which have been during daylight hours and through the night. I have spent time driving and walking around the area to build the required information. I used this information, together with my own further research to put together the LARA. I am confident that a venue in this location would not present any particular risk.
(Lisa Kennedy – Internal Auditor)

I am a Chartered Institute of Internal Auditors (IIA) Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries. In 2011 I started working in the Gambling Industry occupying the role of Internal Audit Manager for Praesepe, responsible for all internal and external audit policies and procedures. During 2018 a merge of the Audit and Compliance departments created the role of Head of Compliance, I now hold this position and am responsible for Internal Audit, Risk/Fraud Management and the Regulatory Compliance of the Praesepe organization.
(Amanda Kiernan – Head of Compliance).

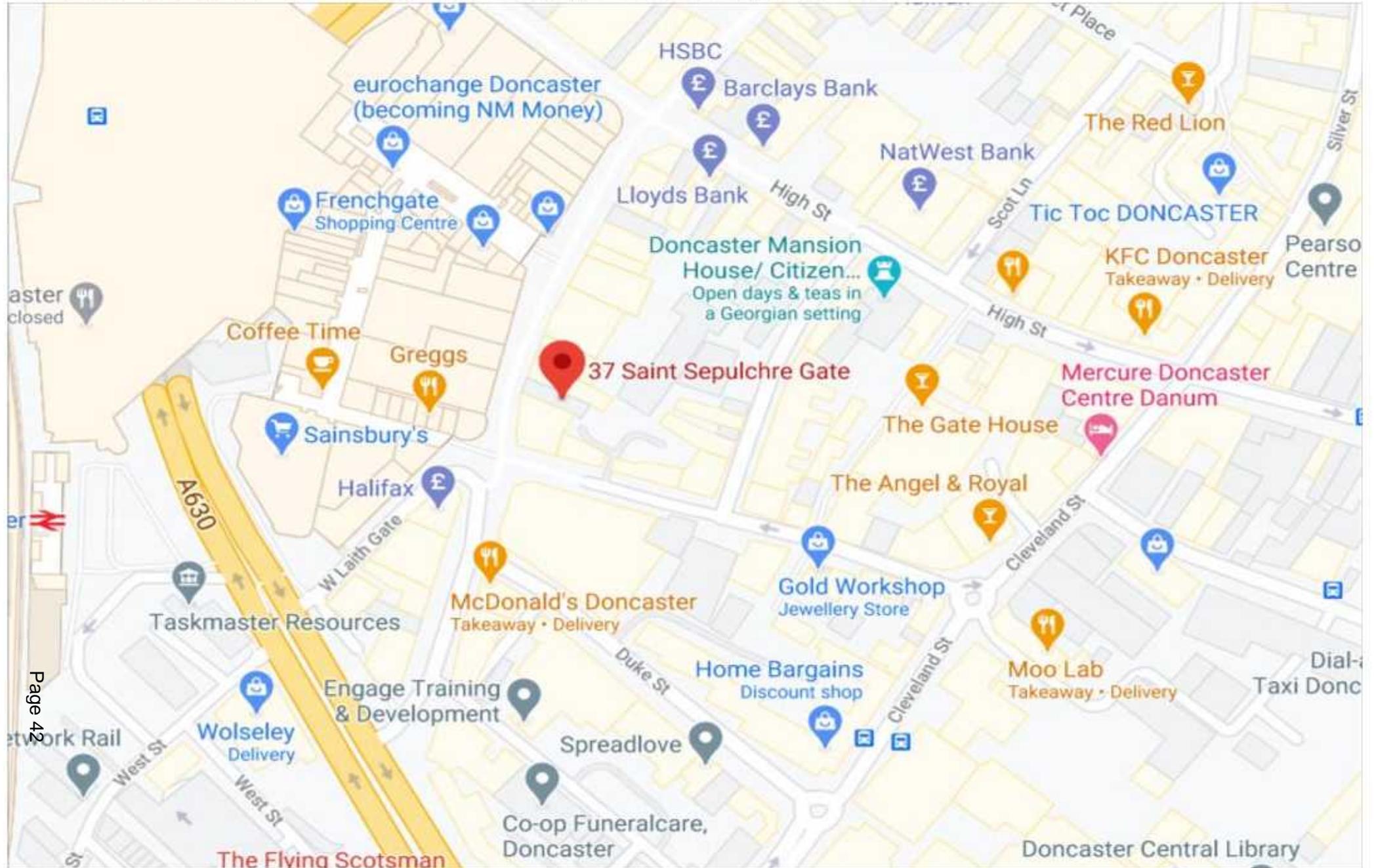
Praesepe Group already operate two other gambling premises under Doncaster Borough Council, Cashino Gaming, 52 High Street, Doncaster, DN1 1BB and Cashino Gaming, 96 High Street, Mexborough, S64 9AU and previously Cashino Gaming, 2 Queensgate, The Waterdale Centre, Doncaster, DN1 3JN (ceased trading 2018). These premises have been operated by Praesepe since 2017 and Have never been subject to a local authority or Gambling Commission review.

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

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

Assessors Name:	Lisa Kennedy - Internal Audit Officer and Amanda Kiernan – Head of Compliance
Signature:	
Date:	17.12.2020

Merkur Slots, 37-39 Sepulchre Gate, Doncaster, DN1 1DT

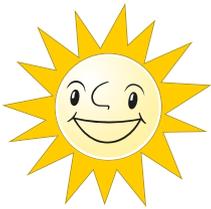


Merkur Slots, 37-39 Sepulchre Gate, Doncaster, DN1 1DT – Shop frontage example



WORKING TOGETHER





PART OF THE GAUSELMANN GROUP

A Strong Partner For More Than 60 Years



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

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



61% of employees are female

39% of employees are male



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



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



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

HIGH STREET BINGO



What is it?

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



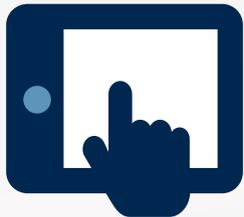
Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.



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



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



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



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



Bingo is available for play from 9am until midnight.

Bingo Terminals



Think 25

RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging



Players in Venue



We Are Not A Problem

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

GAMBLING COMMISSION

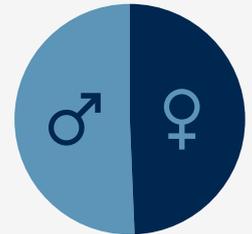
Praesepe is regulated by the
Gambling Commission and
Licensing Authorities



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



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



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



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



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

SOCIAL RESPONSIBILITY MEASURES IN PLACE



In Venue

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



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



Dedicated Learning & Development Team and National training centres.

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



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



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

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



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

Compliance



Training Centre



PlayRight App



Online Training





SOCIAL RESPONSIBILITY MEASURES IN PLACE

Machine Messaging



Customer Interaction Training



All Levels

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



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



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

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



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



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

BENEFITS TO THE HIGH STREET



Benefits for your High Street Include:



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



Increased footfall to the high Street.



Linked trips with other shops helping to support other businesses.



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



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

COMMUNITY & CHARITY



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

Please contact us.

Praesepe PLC

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MERKUR SLOTS, 37/39 ST SEPULCHRE GATE, DONCASTER, DN1 1TD

LICENSING SUB-COMMITTEE HEARING

19 MARCH 2021

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MERKUR SLOTS, 37/39 ST SEPULCHRE GATE, DONCASTER, DN1 1TD

LICENSING SUB-COMMITTEE HEARING

19 MARCH 2021

PROPOSED LICENCE CONDITIONS

1. The premises shall install and maintain a comprehensive CCTV system. All entry and exit points must be covered enabling frontal identification of persons entering in a light condition including customer facing areas. The CCTV system shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Viewing of recordings shall be made available immediately upon the request of Police or authorised officer of the Licensing Authority.
2. A think 25 proof of age scheme shall be operated at the premises where Any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry. Acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
3. Prominent signage and notices advertising the Think 25 policy will be displayed.
4. A magnetic locking device, commonly referred to as a Maglock will be installed, maintained and available for use on the main entrance/exit to the premises which will be operable by ground floor staff.
5. Appropriate staffing levels will be assessed by way of risk assessment and cognisance will be taken of any police advice.
6. An incident log shall be maintained and made available on request to an authorised Local Authority officer or the Police, which will record the following:
 - a. All crimes reported to the venue.
 - b. Any complaints or incidents regarding crime and disorder.
 - c. Refusals and banned customers.
 - d. Any faults in the CCTV system.
 - e. Any visit by a relevant authority or emergency service.
 - f. Any Challenge 25 Refusals.
7. Third party testing on age restricted sales systems shall be carried out on the premises at least 3 times a year and the results shall be provided to the Licensing Authority upon request.
8. The licensee shall participate in a local Betwatch or similar scheme, where available.

9. Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises.

10. The licensee shall take reasonable steps to prevent nuisance directly outside the Premises.

Skeleton Argument from Philip Kolvin QC, Counsel for the applicant

DONCASTER METROPOLITAN COUNCIL
APPLICATION FOR BINGO PREMISES LICENCE
CASHINO GAMING LIMITED
37/39 ST SEPULCHRE GATE, DONCASTER

SKELETON ARGUMENT ON BEHALF OF APPLICANT

INTRODUCTION

1. This is an application by Cashino Gaming Limited (“the applicant”) for a new bingo premises licence.
2. The Licensing Sub-Committee has been presented with a large quantity of documents. The purpose of this skeleton argument is to help the Sub-Committee navigate the material by setting out some of the background to the application, explaining the legal context under the Gambling Act 2005, replying briefly to the representations made, and making brief concluding submissions.
3. In considering the application, the Sub-Committee may be particularly assisted by looking at the following documents:
 - Witness statements:
 - Amanda Kiernan, Head of Compliance (supplementary bundle page 16).
 - Steve Ambrose, Operations Director, (page 25).
 - Andy Tipple, Head of Product (page 28).
 - Darrell Butterworth, Independent Licensing Consultant (page 30).
 - Legal obligations to promote licensing objectives:
 - Gambling Commission’s Licence Conditions and Codes of Practice applicable to non-remote bingo licences (page 125).

- Mandatory and default conditions attaching to bingo premises licences (page 272).
- Individual conditions proposed by applicant (page 1).

BACKGROUND

4. The applicant is part of the Gauselmann group, which is one of the most experienced providers of gaming premises on the high street across the UK, including adult gaming centres and bingo premises. Players in high street bingo premises access bingo games through the use of tablets (see page 120), which are increasingly replacing paper bingo cards as provided in large, flat-floor bingo halls.
5. As one would expect, the applicant and its sister companies have detailed systems for compliance with the law and promotion of the licensing objectives, which they implement through staff training and management programmes and supervise through area and national management oversight and independent audit.
6. Bingo premises are subject to a high degree of regulation in order to support the licensing objectives, including the following:
 - Premises and their management and operation are subject to the Gambling Commission's extensive Licence Conditions and Codes of Practice applicable to non-remote bingo operating licences.
 - Premises licences are subject to mandatory and default conditions set by the Secretary of State with the approval of Parliament.
 - The number of machines, the way they operate and their stake and prize limits, are strictly regulated through the Gambling Act 2005 (by Parliament), regulations (by the Secretary of State) and technical standards (by the Gambling Commission). For example, at least 80% of the machines in bingo premises have the same stake and prize limits as pub fruit machines, with 20% governed by the same limits as other high street gambling establishment (AGCs and betting offices).
7. The applicant has also submitted a precis of its operational standards (page 108).

The nature of high street bingo premises

8. Gambling on the high street in Great Britain tends to be dominated by betting offices, both numerically and in terms of environmental impact. As to numbers, betting offices outnumber bingo premises 11:1 (7,315 v 642¹). As to impact, betting offices can bring with them social issues, including street drinking and disorder and loitering outside. Hence, when an application is made for a bingo premises licence, it is sometimes thought, perfectly understandably, that it will bring with it the same kind of issues as sometimes arise at high street betting offices.
9. In fact, high street bingo premises in general and the applicant's in particular are completely different from betting offices in terms of local impact. It is therefore important to try to convey why the applicant's premises trade without regulatory concern.
10. *On arrival.* It is noticeable that groups do not loiter or gather outside high street bingo premises smoking, drinking, littering and importuning passers-by. The absence of such activity is not only observable empirically but is explained by several facts:
 - The customer demographic is different from betting offices. It is older and 50% female with customers coming in alone or with partners rather than in groups.
 - There are no "events" in bingo premises such as football matches or horse races and therefore no reason to hang around, and nowhere to cluster or socialise.
 - There are no general seating areas for people to gather inside. The premises are not fitted out for groups.
 - Alcohol is not only not sold but it is strictly prohibited.
 - Those under the influence of drugs or alcohol are not admitted.
 - Unlike in betting offices, staff are not behind the counter taking or paying out bets. They are there to greet customers as they enter, which also means controlling who is permitted to enter and effectively supervising the premises.
 - Good quality CCTV systems are fitted to the exterior of the premises and are monitored. Those outside know they are under surveillance. If loitering occurs, it is dealt with.
11. The effect on the streetscape is important. Those walking past high street bingo premises do not have to run the gauntlet of street drinkers or other groups, whether during the school run, the evening or otherwise. Evidence on this topic is given by Amanda Kiernan and Gill Clulow.

¹ Gambling Commission industry statistics.

12. *Exterior appearance.* The facades of high street bingo premises are smart, well-maintained and spotlessly clean. It is not possible to see gambling taking place inside, unlike (for example) betting offices or pubs which admit children. There is no advertising on the exterior which might be attractive to children: this is strictly controlled by the Advertising Standard Authority's Codes of Practice which are translated into legally enforceable regulation by the Gambling Commission's Licence Conditions and Codes of Practice. The exterior contains signage explaining that Think 25 is operated, that alcohol is not permitted and that CCTV is in operation, alongside responsible gambling messaging.
13. *Upon entry.* Those entering will be greeted face to face by a uniformed member of staff. This is an opportunity to ascertain whether the customer may appear to be under 25 (in which case Think 25 is operated), or whether there may be any other issue such as inebriation, in which case the customer will politely be asked to leave. The staff member will ascertain whether the customer needs any other form of assistance. This interaction means that staff are aware of who is using their premises. Again, this is unlike betting offices where staff are behind a counter taking and paying out bets.
14. *Appearance.* Like the exterior, the interior of premises is clean, well-lit, comfortable and carpeted. Toilet facilities are provided. Responsible gambling messaging is prominently displayed throughout the premises and on the machines. Customer information leaflets are similarly prominently displayed, explaining where and how to obtain help with problem gambling.
15. *Participation.* Customers have an opportunity to play bingo on tablets, which includes being linked to a national game, and to play gaming machines, the limits for which are set by law. During their stay they will be offered tea/coffee and snacks, and will often chat with the friendly staff. When they are finished playing they wander off with zero impact on the locality.
16. *Protection of vulnerable people from being harmed or exploited by gambling.* So far as vulnerable persons are concerned:
 - Alcohol is not permitted in Cashino bingo premises.
 - Those who are intoxicated through alcohol or drugs are not permitted on the premises.
 - "Stay in Control" posters and leaflets with the GamCare helpline number are located prominently in the premises, including the WC. An example is at page 212.

- All machines display responsible gambling messages with helpline contact details.
 - Customers are encouraged to use a self-help, app-based tool named Play Right to assist them with managing their gambling behaviour.
 - As required by the Gambling Commission's Licence Conditions and Codes of Practice, Cashino's systems include processes for customer interaction and self-exclusion, operated by trained staff. Interventions are recorded electronically so that they can be overseen by independent compliance auditors.
17. To elaborate slightly, GB regulation of gambling premises places great focus on customer interaction, which the applicant takes extremely seriously. If a customer is showing signs of problem gambling, a trained staff member will interact with the customer. This may lead to a number of outcomes, including: customer opting to cease playing; self-referral to a care provider; self-exclusion; customer signing up for the applicant's Play Right app, or the customer being banned. Outcomes are recorded on staff tablets (along with other relevant events) which are then reviewed at national level to ensure that the conduct of individual staff members is correct. Interaction data is supplied to the Gambling Commission to ensure that the obligation is being met across the company.
18. The applicant's approach to protecting vulnerable people is approved by the Gambling Commission through the operating licence and is also internationally accredited (page 237), while the staff training is accredited by GamCare. (The applicant is amenable to local statutory or other bodies participating in the training to ensure that the local context is fully conveyed.) The applicant subjects itself to independent field-based audit, mystery shopping and test purchasing. It is also the subject of an annual assurance statement to the Gambling Commission.
19. *Protection of children from being harmed or exploited by gambling.* As regards this objective:
- Although children are entitled to enter bingo premises as a matter of law, children are not allowed in the applicant's premises.
 - The exterior contains no advertising or marketing which might be attractive to children.
 - Gambling cannot be seen from the outside unlike, say, in betting offices and sometimes pubs.

- The exterior - and the interior - contain prominent messaging stating that Think 25 is applied.
- Those entering are greeted by staff members, so that their appearance is checked immediately.
- Staff are required to log all Think 25 events on their tablets, with premises data checked by the applicant's audit department to ensure that the system is being properly operated.
- Third party age verification testing is conducted at least three times a year.

20. It is fair to report that the outward appearance, interior ambience, supervision, layout and product in bingo premises are not attractive to children, and its systems have proved more than effective to ensure that underage gambling is not an issue in Cashino premises.

21. *Security.* As stated above, the applicant does not suffer significant issues with anti-social behaviour. This is a function of the customer demographic, the ban on alcohol and the nature of the product, but is also because of the measures taken by the applicant to prevent it:

- Staffing levels are set following a security risk assessment, which is updated periodically in the light of experience.
- Customer numbers are low, with usually only a handful of customers in the premises. Double digit numbers occur very rarely. This means that any miscreant behaviour would be immediately identified, recorded and dealt with.
- The layout of the premises facilitates effective supervision. There is no space for groups to gather.
- Staff members are on the trading floor, not behind a counter.
- Good quality CCTV is used throughout and customers are aware they are monitored.
- The use of Staff Guard which enables staff to use a portable alarm to liaise with a central security hub and SIA-licensed staff with audio and visual feeds, and for hub staff to speak directly with customers who therefore know they are being overseen. Staff Guard personnel can liaise directly with local Police if necessary.
- Staff members do not carry floats.

- Safes are time-delayed.
- Anti-money laundering systems are used on the machines.
- The locational and social context is part of induction training for all staff.
- Staff are also trained in how to deal with difficult customers (there is a 6 week training course at the outset followed by regular refresher training).
- Any incidents are logged on the tablet and reviewed at national level.
- Premises are fitted with maglocks, enabling entry to be controlled when necessary. The applicant maintains good liaison with local Police.

THE REGULATORY RECORD OF THE APPLICANT

22. In the previous section, we have briefly described the standard controls used by the applicant to provide a safe, welcoming and congenial environment for customers while also promoting the licensing objectives.

23. That it does all of this to a standard of excellence is demonstrable:

- It has 190 licences. It has been granted licences in every premises it has applied for.²
- It has never experienced a licence review.

24. This is despite the range of areas in which the applicant operates, including some with high social deprivation and other social issues. Its systems, staff training, compliance monitoring and audit have proved sufficient to ensure that the licensing objectives are promoted.

25. It is a record of which the applicant is proud and guards assiduously. In the very rare event of any kind of issue, Cashino will always liaise with relevant authorities to ensure that it is resolved promptly and effectively.

THE LAW

26. As the Sub-Committee will be aware, each piece of licensing legislation sets out a different approach to the question of grant. The approach relevant to gambling is in section 153 of the Gambling Act 2005:

² For completeness, there was one refusal in Blackpool but this was granted on re-application three months later following submission of further information.

“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 thinks it:

(a) in accordance with any relevant code of practice [issued by the Gambling Commission]

(b) in accordance with any relevant guidance issued by the Commission

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

(d) in accordance with the [authority’s statement of licensing policy] (subject to (a) to (c).”

27. The following points should be noted:

- a. The test is mandatory: *“a licensing authority shall”*
- b. The obligation to *“aim to permit”* where (a) – (d) are satisfied is described by the Gambling Commission in its Guidance as *“the licensing authority’s primary obligation”* (page 253).
- c. The *“aim to permit”* is explained in the leading textbook Patersons (page 261):

“... it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb ‘to aim’ is defined by the OED as meaning ‘To calculate one’s course with a view to arrive (at a point); to direct one’s course, to make it one’s object to attain. Hence to have it as an object, to endeavour earnestly....’ A person who ‘aims’ to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling.”

As the Gambling Commission Guidance says (page 263):

“5.31 Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through use of conditions”

- d. Conditions should only be added where it is necessary to do so, and even then such conditions need to be proportionate to the circumstances requiring a response, relevant, directly related, fair and reasonable (Guidance paras 9.26 and 9.31).
- e. As the Guidance makes clear, any refusal should be for “*reasons which demonstrate that the licensing objectives will not or are unlikely to be met*” (para 5.34). That means demonstrate by evidence.
- f. Conversely, the following considerations are legally irrelevant to the determination of an application for a premises licence:
 - i. A dislike of gambling (para 5.34).
 - ii. A general notion that it is undesirable to allow gambling premises in an area (ditto).
 - iii. Moral or ethical objections to gambling (ditto).
 - iv. The demand for gambling premises (see s 153 Gambling Act 2005). As such, objections which state that there are enough gambling establishments in a locality may be relevant to planning, but they are irrelevant to licensing.
 - v. Planning considerations (see section 210 Gambling Act 2005).
 - vi. Nuisance (see Guidance para 5.5).

REPRESENTATIONS

- 28. The application was submitted with documentary evidence and a Local Area Risk Assessment. The applicant engaged directly with the Police.
- 29. The upshot is that there is no objection from any responsible authority, or any other agency or organisation involved with promotion of the licensing objectives.
- 30. There is a representation from the Director of Public Health running to some 5 pages, stating that he does not support the application, together with a brief objection from the licensing service, based on the Director’s representations.

31. The essence of the objection is that Doncaster is a deprived community and that deprived people are more prone to harmful gambling and the negative consequences that can ensue. The representation states, however, that the full extent of harmful gambling is uncertain.
32. The first and most important thing to say is that the applicant takes the risk of problem gambling very seriously, is required by national regulation and its own corporate values to respond appropriately to that risk, and does so to a standard of best practice as set out above. It has received no criticism in this regard, let alone regulatory intervention, in relation to any of the premises it operate in the UK, including two in Doncaster Borough itself.
33. Second, however, and with respect, the representation provides no evidence whatsoever against this application. It contains no evidence that the applicant's operation in the location applied for would not be reasonably consistent with the licensing objectives, let alone any criticism of the applicant's operation or regulatory record.
34. Third, the objection falls into the very error against which paragraph 5.34 of the Gambling Commission's Guidance is intended to guard, in that it amounts to a general notion that it is undesirable to allow further gambling in Doncaster.
35. Fourth, it also falls foul of the same paragraph of the Guidance, which looks for a demonstration that the licensing objectives are unlikely to be met.
36. Fifth, it ignores the aim to permit, which is the founding principle of the legislation as well as the "primary obligation" of the licensing authority.
37. Sixth, the Director of Public Health's representation is an abbreviated version of a representation made by the same department against a planning application for this site (page 88). The Council's argument was comprehensively rejected for lack of evidence by a Planning Inspector on appeal (page 106 paragraphs 14-17).
38. In the High Court case of R (Manchester City Council) ex parte Dransfield Mr Justice Glidewell explained the relevance of such findings in licensing applications (page 86):

“However, if an inspector in a matter of this sort has specifically dealt with a particular issue, and expressed his view or conclusion on that issue, it is clear that his view or conclusion must be given great weight by the local authority... and there would have to be good reason for rejecting that view or conclusion...”

39. In this case, following the rejection of the department's objection by the Inspector in July 2020, the department has simply resubmitted the previous views, still without any evidence. There is no reason for rejecting the Inspector's reasoned conclusion.
40. The department is entitled to be averse to gambling in Doncaster. But the licensing sub-committee has a primary obligation to aim to permit gambling, is concerned with whether this application at this site is reasonably consistent with the licensing objectives rather than with whether it is generally supportive of gambling in Doncaster. It can only refuse if there is evidence which demonstrates that the particular application is contrary to one of the limbs of section 153 of the Gambling Act, and even then has to consider whether its concerns can be overcome by further conditions. In this case, there is no evidence against the application at all.

SUBMISSIONS

41. In the light of the above, the applicant's submissions can be stated very briefly:

- The applicant is a highly competent organisation, regulated by the Gambling Commission, and one whose corporate systems, staff training, management and audit are directed towards promotion of the licensing objectives.
- It is part of a group which operates 190 licensed gambling premises in a wide variety of locations of higher and lower deprivation and population density.
- Despite that, it has never experienced a regulatory review or prosecution, including in Doncaster where it operates two premises.
- The type of premises, their customer demographic, the low numbers of customers simultaneously using premises and the quality of management mean that issues of crime and disorder are rare.
- The applicant has a well-developed and well-regarded approach to protecting children and vulnerable people, for which it has received no criticism either here or elsewhere.
- The premises, if licensed, will be subject to strict regulatory requirements, deriving from: the Licence Conditions and Codes of Practice; machine stake, prize and numbers limits, mandatory and default premises licence conditions and individual licence conditions.

- The applicant has carried out a risk assessment pursuant to the Licence Conditions and Codes of Practice. The risk assessment will be kept up to date periodically.
- The applicant has a strong track record of co-operation with local statutory bodies. In the unlikely event of an untoward consequence, Cashino Gaming Limited will work to resolve the issue promptly and efficiently.

42. For these reasons, it is submitted that the test in section 153 is fully met. Conversely, taking into account the competence and track record of the applicant, its legal obligations under the Act, Regulations and codes, and the comprehensive suite of individual licence conditions to which it is proposing to submit, it has not been demonstrated that the licensing objectives are unlikely to be met.

43. Accordingly, the Sub-Committee is respectfully invited to grant the application as asked.

PHILIP KOLVIN QC
9th March 2021

11 KBW
Temple EC4

**Witness statement from Amanda
Kiernan, Head of Compliance at
Cashino Gaming Limited**

LICENSING SUB - COMMITTEE HEARING – 19 MARCH 2021

SUPPLEMENTAL STATEMENT – AMANDA KIERNAN

Cashino Gaming Limited

1. I am a Chartered Institute of Internal Auditors (IIA) Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries, including High Street Retail and Optical Health. In 2011 I started working in the Gambling Industry occupying the role of Internal Audit Manager for Praesepe, responsible for all internal and external audit policies and procedures. During 2018 a merge of the Audit and Compliance departments created the role of Head of Compliance, I now hold this position and am responsible for Internal Audit, Risk/Fraud Management and the Regulatory Compliance of the Praesepe organization.
2. Cashino Gaming Limited operates a national estate of over 190 licensed bingo, adult gaming centre and family entertainment centre premises.
3. Cashino Gaming Limited is a leading national operator of bingo premises with clear and proactive policies to promote the Gambling Licensing Objectives. We always endeavour to liaise with Responsible Authorities concerning the operation of our premises and pre-consult with the police prior to making new applications.
4. Cashino Gaming Limited has full authority to provide bingo facilities through the grant of an Operating Licence issued by the Gambling Commission, which has approved the measures which Cashino Gaming Limited has put in place to ensure that it implements effective anti-money laundering procedures, security procedures and trades responsibly in accordance with gambling legislation, the Licensing Objectives and the Licence Conditions and Codes of Practice.
5. Cashino Gaming has never had a review of a bingo premises licence.
6. Cashino Gaming Limited holds key positions within the Bingo Association and BACTA (the trade association for the amusement and gaming machine industry in the UK) Executive and Social Responsibility Committees, working closely with these groups to innovate and promote Compliance and Social Responsibility within the industry.
7. Cashino Gaming Limited has over 50 Personal Management Licence Holders throughout its Operational structure, all of which are aware of their roles and responsibilities in regard to the Licence Conditions and Codes of Practice (LCCP). Legal obligations are placed upon personal licence holders to promote the Licensing Objectives whilst undertaking their respective duties.
8. Cashino Gaming Limited has appointed a dedicated team of compliance auditors that work independently of the Company's Operations Team to continually assess premises' compliance with the governing legislative standards and Company Policy and Procedure. The Company conducts a minimum of two compliance audits per year in each venue. Audits include Regulatory Compliance, Customer Interaction, Incidents, Self-exclusion breaches and Age Verification records. During the audits, premises staff are tested on their level of knowledge and understanding of all relevant criteria. Venues may be re-visited and any additional training needs addressed. Records of incidents, interactions, self-exclusion breaches and age verification checks are collated on a central hub, which is regularly reviewed and monthly reports are provided to Operations Teams.
9. Cashino Gaming Limited operates a strict marketing and promotional guidelines policy, which has been developed in accordance with the Gambling Commission's Licence

Conditions and Codes of Practice and the Advertising Standards Authority's Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP) Codes. A copy of the Company's Marketing Code of Practice and sample window displays can be seen in the supporting documents.

10. Venue window displays are designed in consideration of premises location, particularly in busy high street areas where Children and Young Persons may pass by, and maintain the Company's focus that all gambling should be carried out in a socially responsible manner. Direct line of sight into premises is blocked by appropriate window displays and barriers adjacent to entrances, which minimise exposure of underage individuals to ambient gambling.

Relationship with the Responsible Authorities and Interested Parties

11. Cashino Gaming Limited takes its duty to operate safe and Gambling Act 2005 compliant premises seriously. To this end, the Company has always sought to maintain good relations with local police and licensing authority teams.
12. For the purposes of the current application the Police Licensing Team on 19 November 2020, and they confirmed on the same date by response that they had no issues or concerns with the premises.
13. It is rare for our venues that operate throughout the night to attract customers leaving alcohol licensed venues as the entertainment offering is significantly different. Cashino Gaming Limited's late night operation appeals to shift workers and employees of the late night economy and our detailed policies, procedures and safeguards are designed to ensure that premises operation remains safe and secure for both staff and our customers.
14. All Cashino venues operate a strict zero tolerance drugs policy and refuse service to individuals who are deemed to be under the influence of alcohol. The company's extensive training, which incorporates Gamcare approved social responsibility and customer interaction tools are designed to ensure minimal conflict and successful implementation of our strict policies. In our experience, incidents of customers attempting to enter our venues whilst intoxicated or attempting to consume alcohol within our venues remains low across the Company's licensed estate regardless of premises location.
15. None of the remaining Responsible Authorities under the Gambling Act 2005 such as the Police, Gambling Commission, Environmental Health and Child Protection teams, have raised any specific concerns regarding Cashino Gaming Limited's bingo premises licence proposals. None have objected.
16. During the consultation period no trade body or private organisation specialising in adult or child vulnerability support have raised any concerns regarding Cashino Gaming Limited's proposals for the new bingo premises.
17. Cashino Gaming Limited's detailed policies and procedures are designed to ensure that all gambling in Company premises remains responsible, controlled and that the Licensing Objectives are continually promoted.
18. Cashino Gaming Limited has considered local police crime statistics and the premises location along with the Council's Statement of Licensing Principles under the Gambling Act 2005. We understand that the local area does suffer with general crime and disorder albeit not specifically associated with gambling premises. We understand that the Police believe that there are some betting premises that suffer with incidents of Anti-Social behavior. However, it has been our consistent experience that we do not experience the kind of difficulties sometimes experienced by betting offices in terms of crime and disorder, due to our different clientele, product, layout and management. Nevertheless, lines of communication will be maintained with the local police and the Licensing Authority to

ensure that local knowledge is continuously shared and that the premises adapt to any emerging risks or local concerns identified.

19. We have identified local providers of vulnerability support services within the local area risk assessment. Whilst these organisations have not raised any concerns regarding the current proposals, the Company will contact local organisations to offer information regarding responsible play, discuss gambling addiction support services that can be referred to, and will invite feedback on any local concerns that can be incorporated into premises training and evaluation.

Cashino Gaming Limited Compliance – Protection of Children and Vulnerable

20. Cashino Gaming Limited was selected by the Gambling Commission as one of the first top 40 licensees to prepare an annual assurance statement due to its size and scale of operation. Annual Assurance Statements enable an annual comprehensive review of the business, completed at Board level, in consideration of the effectiveness of the Company's governance and risk management arrangements designed to facilitate positive consumer protection, address gambling-related harm and crime prevention measures. This process ensures that the highest standards are implemented across the Company's estate from Board through to premises level.
21. In August 2020, Praesepe Limited, Cashino Gaming Limited's parent Company, and Cashino Gaming Limited's Merkur brand premises obtained G4 Global Gambling Guidance Group accreditation, which can be seen in the supporting documents. G4 is a group of international experts in the field of problem gambling and responsible gambling and accreditation is awarded to responsible operators. Audit reports identified that 'Customer care is of an exemplary standard in all Merkur Venues, regulatory compliance policies and procedures are excellent...and provide a strong foundation for consistent approaches to Responsible Gambling across the (Company's) estate'.
22. Cashino Gaming Limited operates training upon recruitment and then 6-monthly refresher training programmes for all employees. Training modules include 'The Essentials of Compliance and Social Responsibility' which covers the Gambling Act 2005, Licence Conditions and Codes of Practice, the Licensing Objectives under the Gambling Act 2005 and 'Safeguarding Children & Vulnerable People', which focus on assisting staff to recognise and respond to indicative behaviours of potential problem gambling and vulnerability and how to conduct effective customer interaction. Initial six-week, classroom based, induction training is completed for all new venue teams and includes customer interaction role play and exposure to operation and customers in live venues. Following site opening, new teams are provided regular follow up and support. The Company also incorporates Gamcare and Bingo Association accredited Social Responsibility and Interaction training for its premises management teams. Excerpts from the Company's training platform are provided in the supporting documents.
23. Cashino Gaming Limited has two National Training Centres where venue teams receive face to face training which includes identifying signs of potential problem gambling and other vulnerabilities such as homelessness. Staff are rigorously trained to take appropriate action, such as where to offer gambling control support including managing time spent playing (time outs), controlling stake limits, providing information on gambling support agencies such as GambleAware, offering participation in the Bingo Association's national self-exclusion scheme and refusing service where deemed necessary.
24. Cashino Gaming Limited ensures that all staff continue to promote responsible gambling through customer behaviour observation and interaction. As part of this process, customer play, duration and spend is monitored and customer interactions are triggered to ensure play remains responsible.

25. Following a customer interaction, customers may be offered a variety of self-help measures, where appropriate, such as the Playright App to control and monitor spend and time spent gambling, time outs, information regarding gambling support services and self-exclusion. For customers deemed to be at risk who do not agree to self-exclusion we reserve the right to bar customers, should the need arise. Staff members are provided detailed training to ensure that interaction is completed in a sensitive manner whilst ensuring that the Company's policies and procedures are effectively implemented.
26. Cashino Gaming Limited has undergone Gambling Commission inspection and Company training and compliance policies and procedures comply with the Licence Conditions and Codes of Practice attached to the Company's Operating Licence.
27. Examples of some of Cashino Gaming Limited's responsible gambling information have been provided in the supporting documents.
28. As part of Cashino Gaming Limited's continuing commitment to high standards of staff training and compliance, the Company has engaged the services of YGAM (Young Gamers & Gamblers Education Trust). The charity will work in partnership with another charity, Betknowmore, to develop and provide additional training and resources for venue and area managers. Training will be designed to complement our existing face to face training and will be City and Guilds accredited.
29. Cashino Gaming Limited promotes the use of the customer self-help tool called Playright. All venues have the capability for customers to sign up to the App and staff are fully trained and able to advise on its use. This responsible gambling tool enables customers to set time limits on their machine play. Subject to the customers' set permissions, the system has the ability to send an alert to the venue should the customer enter at a time they have chosen not to gamble. This alert would then trigger a customer interaction.
30. All Cashino Gaming Limited's bingo premises are adult only and operate a strict Think 25 policy. Age verification procedures are embedded in Company training platforms and responsible gambling policies. Age verification test purchasing and mystery shopper visits are frequently carried out by third party companies (Check Policy and Store Checker) and test results can be provided to the Licensing Authority upon request.
31. Extracts of Cashino Gaming Limited's Compliance and Social Responsibility policy have been included with our hearing documentation, which highlight the priority given to responsible gambling and the provision of responsible gambling information to our customers and staff members.

Proposed site location

32. A detailed local area risk assessment has been submitted designed in consideration of Doncaster Councils Gambling Licensing Policy, Gambling Local area Profile, local crime statistics, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder.
33. Local analysis is an invaluable tool to direct local resources and assists with the identification of potential risks and the development of local training and partnership to ensure that potential risks are mitigated and that gaming in Merkur Slots premises remains responsible.
34. Cashino Gaming limited operates in many large cities and towns that have higher levels of deprivation and are subject to potentially higher levels of footfall from Children and Young Persons. In our experience venues are not more susceptible to access by underage individuals due to the nature of our gaming services and customer demographics. The Company's partnership approach and high standard of staff training,

customer monitoring and interaction has continued to ensure that all potential risks are mitigated and the occurrence of incidents remains minimal.

35. As a result of the Company's commitment to responsible operation and the resources directed to responsible play, none of Cashino Gaming Limited's 190 premises licences have been subject to review proceedings or revocation.

Underage Gambling

36. Cashino Gaming Limited's detailed policies and procedures are designed to ensure that all gambling in Company premises remains responsible, controlled and that the Licensing Objectives are continually promoted.
37. By law, licensed bingo premises can permit under 18s on the premises and can also apply for a premises licence under the Licensing Act 2003. All Cashino Gaming Limited's premises are strictly adult only, operate Think 25 and none of our 90 high street bingo premises seek to obtain a licence under the Licensing Act 2003.
38. Unlike many other licensed operators, such as some licensed betting premises and adult gaming centres, the proposed Merkur Slots venue will apply our strict marketing and advertising policy, ensuring that advertising is not appealing to underage individuals and that line of site into the venue is restricted. This will ensure that children and young persons cannot see into the premises, preventing exposure to ambient gambling with all gaming activities hidden from view.
39. Merkur Slots customer demographics are up to 50% female with an average age over 30.
40. Staff training and company policy is designed to mitigate the potential risk of underage gambling and exposure to ambient gambling.

Crime and Vulnerability

41. Cashino Gaming Limited have considered local police crime statistics, the premises location, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder.
42. It is rare for our premises to be associated with anti-social behaviour or crime and disorder but our staff training procedures and security measures, including external CCTV, are designed to monitor customer behaviour and external areas for anti-social behaviour. Company policy ensures that appropriate steps are taken to minimise any risks and we record and report any incidents or concerns to Company management, for internal review and assessment, and local authorities.
43. Cashino Gaming Limited operates premises within other areas of the country with high crime statistics and manage their premises effectively and incidents relating to crime and disorder are rare. Cashino Gaming Limited are experienced operators which has proven history in operating premises in challenging areas.
44. All staff training is developed to consider local area characteristics and Merkur Slots operates on the basis that its controls and best practice are adopted at all times.
45. Cashino Gaming Limited's training scheme and control systems are proven to be effective across the Company's licensed estate but local premises management will always work with any local authorities, other authorities, trade groups and vulnerability support services to reinforce any local concerns and identify any emerging local risks within premises' training and operation.

Representation

46. The representation received identifies the potential for vulnerable persons from being harmed or exploited by gambling.
47. Following receipt of the representation, myself, Mr Ambrose and Mr Tipple attended a virtual meeting with Caroline Temperton, Public Health, and Chris Greatorex, Licensing, to discuss their concerns.
48. During the meeting Mr Greatorex noted that he has visited our other two venues licensed by Doncaster Council to undertake inspections, and both went well. We are pleased to see this and thankful for his feedback.
49. Cashino Gaming Limited undertake regular test purchases on all their sites to ensure compliance and over the past few years our two other venues have received 100% pass rates.
50. Cashino appreciate the comments made by Public Health and the particular deprivation of the area. Doncaster is listed as the 42 most deprived area within the country, and Cashino Gaming Limited operate premises in 26 of the 41 areas more deprived than Doncaster with little or no issues.
51. If the committee are minded to grant the application, Cashino Gaming Limited would be committed to work with all the local vulnerability groups outlined in the Local Area Risk Assessment, and any others which are brought to our attention, to ensure a working understanding is gained of the local demographic.
52. Cashino Gaming Limited implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.
53. Cashino Gaming Limited has completed a detailed local area risk assessment, reviewed local area statistics and demographics, consulted with the local police licensing team and reviewed the Council's detailed policies in order to effectively identify any potential risks to the proposed operation.
54. Cashino Gaming Limited will implement robust security policies and procedures to monitor customer behaviour both within the premises and immediately outside the venue, refuse service to individuals who may be under the influence of alcohol or drugs and assess the vulnerability of customers entering the premises.
55. Cashino Gaming Limited will work in partnership with all responsible authorities in the unlikely event that any incidents occur.
56. Cashino Gaming Limited operate a business-wide Anti-Money Laundering (AML) policy, which is reviewed annually, and provides that the risks of money laundering in these premises are considerably low. The premise layout is designed to allow customer supervision at all times. All machines within the premises are linked to a central machine data capture system, which allows the venues to individually analyse live transactional activity for money laundering. All AML incidents, rare as they are, are reported by the venue staff via a tablet which also provides an automated email alert to myself, as the dedicated AML manager.
57. The Company's detailed training procedures and evaluation tools have been designed to mitigate any local risk to the Licensing Objectives, with a particular focus on the protection of children and the vulnerable from harms associated with gambling. Having considered the concerns raised, we believe that the proposed licence conditions will mitigate any

perceived risk. The Company's training program incorporates the Bingo Association's 'Social Responsibility and Interaction training', which is accredited by GamCare.

58. Cashino Gaming Limited understands that local risk assessment and staff training is a live matter, which is regularly assessed and adapts to any emerging or changing risks in the locations in which it operates.
59. Due to the nature of the gaming that is provided at Cashino Gaming Limited venues, it is rare for customers to congregate outside, unlike betting premises, as there is no ongoing entertainment such as a sporting event. It is also rare for our venues to have significant customer numbers at any one time and customer dispersal rarely causes concern to our local neighbours throughout all hours of operation.
60. As part our Cashino Gaming Limited's Socially Responsible Gambling Policy, customers are continually monitored and interactions completed where concerns are identified. As part of the interaction process, customer play is assessed to trigger customer affordability and source of funds enquiries to ensure that all gaming remains controlled.

Premises Operation

61. The premises will be managed by an experienced shop manager who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role. Training focuses on the promotion of the Licensing Objectives and a copy our Policies and Procedures has been provided as part of our hearing bundle.
62. The Merkur Slots premises layout has been developed to facilitate customer observation and all staff members provide regular sweeps of the premises to ensure positive engagement with our customers and facilitate continuous observation and customer interaction.
63. Merkur Slots staff members are not restricted to counter positions that may be found in other licensed venues, such as betting premises. Our staff are actively encouraged to move throughout the premises and proactively engage with all customers, particularly on entry, not only to implement our Think 25 policy, but to build customer relationships and ensure effective identification of potentially vulnerable individuals.
64. All Cashino Gaming Limited's staff members actively monitor and manage the area immediately outside their premises and record all incidents should they occur. Reporting lines are set up with local police teams to ensure that any potential local issues are identified and addressed.
65. All Cashino Gaming Limited premises operate extensive CCTV throughout customer facing areas and also external areas to assist with monitoring customer behaviour and that of other individuals in the immediate vicinity of the premises. CCTV displays are appropriately situated to ensure that all customer areas are monitored.
66. It is very rare for our premises to employ dedicated SIA registered door staff as, in our experience, this is almost never necessary. We do not have SIA conditions on any of our bingo premises licences. However, staff numbers and rotas are continuously reviewed to adapt to customer numbers and cognisance is taken of police advice.

Conclusion

67. The business of Cashino Gaming Limited is the provision of safe and pleasant gaming environments. It remains crucial to the business that customers feel safe and welcome in Merkur Slots premises. This principle is fundamental to Company management strategy

from head office to premises level. It is a principle which as a company we have achieved in all of our venues, which provide safe, welcoming and congenial environments for our customers.

68. In the rare case that issues do arise, the resources and commitment are in place to ensure that they are speedily resolved. For obvious reasons, Cashino Gaming Limited does not wish to run licensed venues which cause regulatory issues, and the Company devotes a great deal of time and resources to ensuring that there are none.
69. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
70. In my experience I can state that it is rare for our premises to be the cause of, or otherwise associated with, crime, disorder or nuisance to nearby premises due to the nature of our gaming premises and our customer base.
71. Cashino Gaming Limited continues to take very seriously any issue which its presence creates, both out of respect for the local community and because its licence and commercial reputation depends upon it.

Ms Amanda Kiernan, Head of Compliance, Cashino Gaming Limited

Date: 8 March 2021

**Witness statement from Steve
Ambrose, Operations Director at
Cashino Gaming Limited**

LICENSING SUB - COMMITTEE HEARING – 19 MARCH 2021

SUPPLEMENTAL STATEMENT – STEVE AMBROSE

1. I am the Operations Director for Praesepe having held this position since December 2016 responsible for all day to day operations across our estate of Adult Gaming Centres, High Street Bingo premises and Bingo Halls.
2. I am a Director of the Bingo Trade Association "The Bingo Association" and the Vice Chairman of the Amusement Trade Association "BACTA" covering Adult Gaming Centres across Great Britain.
3. I started in the Gaming Industry in 1992 and have held a multitude of positions ranging from Customer Service Assistant right up to my present position of Operations Director, this experience has enabled me to gain an understanding of the complexities of operating in gaming businesses both big and small, in rural and city centre locations.
4. Through my years of working in the gambling industry I can state categorically that it is rare for Cashino Gaming Limited's venues, and specifically its high street bingo premises, to be associated with crime and disorder, anti-social behaviour or local nuisance.
5. Whilst I appreciate this may be different to perceived risks that may be associated with other licensed gambling venues, such as betting premises, I believe this reflects the type of gaming operated by Cashino Gaming Limited and its customer demographic, which is approximately 50% female with an average age of over 30.
6. Due to the nature of the gaming services provided at our high street bingo venues, customers do not congregate outside our venues, unlike betting premises that may show sporting events over long periods of time. In our high street venues, there is no 'event' taking place.
7. Across the high street bingo estate, average customer numbers at any one time remain relatively low, in single figures, and customer numbers between 5 and 10 at any one time, would be considered an exceptionally busy period.
8. Customer numbers do not vary significantly throughout the hours of premises operation and due to the relatively low numbers, later hours of operation are often sought, with the majority of Merkur premises operating into the early hours. Later hours of opening appeal to shift workers and employees of the late-night economy and Merkur Slots policies, procedures, safeguards, and security measures are designed to ensure that premises operate securely and safely at all hours of operation.
9. All our venues operate CCTV throughout, which is designed to not only assist with monitoring all customer facing areas but to cover the area immediately in front of our venues, which provides additional security in the high street areas in which we operate.
10. Our venue teams seek to form genuine relationships with local police, town centre groups, support services and Betwatch or Pubwatch schemes should they be available. Our staff are proud of the areas in which they live and work and do not wish to see any level of anti-social behaviour.
11. We set out to provide a comfortable and convivial atmosphere. Our premises are carpeted, well-appointed and spotlessly clean. Our staff are smart and friendly. They are not positioned behind a counter, but are present on the trading floor, circulating and interacting with customers and offering tea and snacks.

12. Staff levels are continually risk assessed to ensure that sufficient numbers are maintained not only to enable effective premises management but also to ensure that customers can be continually monitored and assisted where necessary.
13. Customer monitoring, interaction and any incidents including implementation of our Think 25 policy are recorded on electronic IHL tablets. This technology enables all recording to be logged whilst staff are present in customer facing areas and it is rare for staff to be called away to back office areas during their shifts. IHL tablets are linked through a central system so that Cashino Gaming Limited's independent audit team can regularly monitor all records.
14. The Company's audit department collates and evaluates monthly reports on venue operations and management to allow continued assessment of operational compliance, including monitoring self-exclusions, under-age checks and any untoward behaviour. The monitoring process allows venues to adapt to any emerging risks and staff training requirements.
15. Our venues operate a ticket in ticket out system, which minimises the need for cash handling on site during opening hours.
16. Machine emptying is only carried out when customer numbers are low and security systems implemented, which include activating the premises maglock and ensuring sufficient staff remain on duty.
17. Cashino Gaming Limited venues also operate time delay safes where keys are stored. All cash is retained within the GeWeTe change machine on the venue floor.
18. Venues are equipped with our staff guard system. The system allows direct communication with a central monitoring station through audio and CCTV. The central monitoring station would then contact the relevant emergency services in case of incident.
19. All of these features mean that our premises provide safe and congenial environments and do not impact on their localities. In my experience, while concerns are sometimes expressed by local residents and some authorities with regard to theoretical risks and the potential impact when applications are made, such concerns vanish once premises actually open.

Mr Steve Ambrose, Operations Director, Cashino Gaming Limited

Date: 8th March 2021

**Witness statement from Andy Tipple,
Head of Product at Cashino Gaming
Limited**

LICENSING SUB-COMMITTEE HEARING – 19 MARCH 2021
SUPPLEMENTAL STATEMENT - ANDY TIPPLE

Cashino Gaming Limited

1. Cashino Gaming Limited has reviewed Doncaster Councils Gambling Licensing Policy and the local area profile. A detailed local area risk assessment has been designed to identify all potential local risks and the measures that will be implemented to mitigate those risks.
2. The Company is committed to working in partnership with local Responsible Authorities and local groups, including those providing support services to vulnerable individuals. The Company will contact local organisations, to provide information regarding responsible play and self-help tools, and also request any information regarding any relevant or emerging matters which can then be incorporated, as appropriate, in our site protocols and training.
3. Cashino Gaming Limited operates over ~90 'High Street Bingo' premises, 5 bingo clubs, 5 Family Entertainment Centres and 87 Adult Gaming Centres throughout Great Britain.
4. The development of High Street Bingo has occurred because customers are decreasingly interested in attending large, sub-regional bingo halls and, even when they do, increasingly wish to play bingo with an electronic terminal rather than marking numbers off a card. Accordingly the High Street Bingo model has evolved, with a customer offer of live and automated bingo played on terminals together with gaming machines in accordance with the permission provided by a bingo premises licence.
5. The governing legislation provides strict limits on the types of gaming machines that may be made available in bingo premises, which is the same as that permitted in licensed Adult Gaming Centres.
6. Cashino Gaming Limited premises do not operate Fixed Odds Betting Terminals (FOBTs/category B2 gaming machines) unlike licensed betting premises.
7. High Street Bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to £2.
8. Across Cashino Gaming Limited's venues the average stake placed is between 30p and 40p. Only 20% of the machines may be category B3s. The remainder, being the category C gaming machines, have the same stake and prize levels as those offered in pubs.
9. Merkur Slots, Doncaster will not operate 'infill' gaming machines.
10. All Cashino Gaming Limited premises are sufficiently staffed to ensure effective implementation of the Company's Think 25 policy and all staff are fully trained on the three Licensing Objectives under the Gambling Act 2005, with particular focus on the protection of vulnerable persons from being harmed or exploited by gambling. Full written details of the training and the Company's operating procedures have been provided in the hearing bundle.

Mr Andy Tipple, Head of Product, Cashino Gaming Limited

Date: 8 March 2021

**Witness statement and appendixes
from Darrell Butterworth, Independent
Licensing Consultant**

WITNESS STATEMENT

(CJ Act 1967. s. 9, MC Act 1980, s.s.5A (3a) and 5B MC Rules 1981, r70)

Statement of: Darrell John Butterworth

Age if under 18: Over 18

Occupation: Licensing and Security
Compliance Manager

(if over 18 insert "over 18")

This statement (consisting of 12 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Dated the 1st March 2021

Signature: D J Butterworth

1. My name is Darrell John Butterworth and I currently operate as a self-employed Licensing and Security Authority Compliance Consultant. I have conducted this business since creating a company, Edmund Locard Licensing and Security Solutions, on the 1st January 2011. I make this statement in relation to an application for a Premises Licence by Merkur Slots at 37-39 St Sepulchre Gate Doncaster DN1 1TD ("The Venue").
2. This investigation was carried out during a national lockdown due to Covid-19 and therefore is restricted in relation to the actual operation of other venues in the area. Should this situation ease prior to the forthcoming hearing it is my intention to re-attend the area and update this report by way of a supplementary statement

Experience

3. Prior to taking up this role with Edmund Locard Ltd I completed 30 years' service with the Greater Manchester Police in a variety of uniform and non-uniformed roles. The longest period of attachment to a department was between 1998 and 2006 when I performed the role of Force Licensing Inspector. This role involved the supervision of 12 divisional licensing officers, tasking and management of a covert licensing unit comprising a sergeant and six constables, developing force policy and enforcement in relation to all licensed units and employment and briefing of a licensing solicitor to act on behalf of the force in more complex licensing hearings.

4. During the period as the Force Licensing Inspector I was responsible for the good conduct and compliance of premises operating under a variety of licences including outlets involved in selling alcohol but also those that provided gambling, betting and bingo facilities. I have represented Greater Manchester Police at Magistrates Court hearings, Crown Court Appeals, The High Court, The Court of Appeal and Council Licensing Committee hearings to oppose unsuitable applications and to take enforcement action against those premises whose standards had fallen below an acceptable level.
5. Throughout my period in the central licensing role Assistant Chief Constable Robert Taylor, also from the Greater Manchester Police, was the Association of Chief Police officers (ACPO) lead spokesman on Alcohol and Licensing matters. As a result of this connection I became secretariat to the ACPO National Licensing officers' group and National Licensing Forum (NLF).
6. During my time in charge of the Licensing Unit I worked very closely with David Thornton, the local Gambling Commission Inspector, conducting joint operations on both legal and illegal gaming establishments.
7. In 2006 on leaving the Central Licensing Unit I received a Chief Officers Commendation, recognising the contribution I had made to licensing enforcement across Greater Manchester, particularly in relation to my leadership and commitment shown in developing force policy and training in response to the Licensing Act 2003 and Gambling Act 2005.
8. Between 2006 and my retirement from the Greater Manchester Police in December 2010 I took up the role of Neighbourhood Inspector for the town of Heywood on the Rochdale division. This involved the supervision of over 50 police officers, community support officers and civilian support staff. Within my role as a Neighbourhood Policing Team Inspector I was required to conduct analysis of crime and incident trends to ensure that resources and tactics were deployed appropriately. The outcome of this analysis ensured that resources were deployed in the right numbers, in the right areas at the right time. On a monthly basis I also presented these statistics to the town's multi agency tasking group to ensure all agencies had the relevant information on crime trends.
9. In recent months I have continued my professional development regarding licensing knowledge by taking and passing the National Licensees Certificate and National Door Supervisors course. This enabled me to successfully apply for a Personal Licence and become approved by the Security Industry Authority (SIA) as a front line operative. In September 2011 I successfully applied to become a nominated tutor with the BII enabling me to carry out

training in the award for responsible alcohol retailing and award for personal licence holders. In October 2018 I attended a training course on Licensing Hearings and Appeals and in November 2019 I attended a seminar for Licensing Consultants

10. In March 2013 I spent 3 days in the London Borough of Newham visiting 111 different betting shop premises to observe customer usage and monitoring their compliance with the Gambling Objectives. In April 2013 I spent 7 days in the London Borough of Newham visiting 109 different betting shop premises to observe customer usage and monitoring their compliance with the Gambling Objectives. In May 2013 I spent 5 days in the London Boroughs of Brent and Haringey visiting 174 different betting shop premises and monitoring customer usage and their compliance with the Gambling Objectives.
11. In November 2013 I spent 2 days in the London Borough of Newham visiting 13 betting shop premises to observe customer usage and their compliance with the Licensing Objectives. In December 2013 I spent 4 days in the London Borough of Newham visiting 24 different betting shop premises to observe customer usage and their compliance with the Licensing Objectives. In April 2014 I lived in the Haringey area of London for a four-day period visiting several betting shop premises and conducting observations on criminal and antisocial behaviour.
12. In August 2018 I spent a day in the London Boroughs of Camden, Tottenham and Kilburn visiting Gambling Licensed Premises. In these areas similar concerns had been raised by local councillors and the Public Health Authority that the venues would lead to increased crime and disorder in the area and vulnerable people would be adversely affected. Whilst conducting these visits I did not observe any of the issues raised in the representations submitted in respect of that application.
13. In August 2020 I spent two days in the Rochdale and Droylsden suburbs of Manchester, conducting observations. The application subject of those observations received a number of representations from church leaders, residents and local councillors regarding the deprivation in the locality of the proposed venue, crime and disorder and the locality being located near to other gambling type and alcohol led premises. During my observations I found no evidence to support these representations and the licence was granted following a hearing.
14. In September 2020 I spent two days in the Harehills area of Leeds conducting observations in respect of an application for a new Gambling Premises licence.

The Harehills area is one of the most socially deprived in the City and is prominent in many of the indices used to measure social deprivation. In the same month I also attended the High Road, Tottenham visiting an Licensed Gambling Premises including 4 betting offices.

15. In October 2020 I spent two days in Blackpool conducting observations in respect of an application for a new gambling premises licence. Already in the area were 3 adult gaming centres and 3 betting shops. Also, in October 2020 I attended a zoom conference aimed at Licensing Consultants, Police officers, and local authorities when updates were given on amendments to the Gambling Act and amended guidance from the Gambling Commission.
16. At the end of October 2020 I spent two days in Newbury visiting Licensed Gambling Premises. In December 2020 I spent a day in the Acocks Green area of the West Midlands visiting Betting shops and gaming centres. In February 2021 I spent two days in the Worcester City Centre area conducting observations in respect of an application for a new Bingo licence.
17. In addition to acting on behalf of operators I have also conducted observations on behalf of residents and in September 2017 I conducted 2 days of investigations on behalf of the London Borough of Camden. It is important to stress that when conducting my observations, I act totally independently of those instructing me and record accurately what I observe. To ensure that my visits accurately reflect the true situation I always insist that local operators are not made aware of my visits taking place. I am informed by those instructing me that this was the case for the current investigation.

Terms of reference

18. I have been requested by Richard Bradley of Poppleston Allen solicitors to investigate a new Gaming Premises Licence application at 37-39 St Sepulchre Gate Doncaster DN1 1TD. The application has received representations from the Director of Public Health supported by the Licensing Authority, and the following terms of reference for the investigation have been agreed with those instructing me.
 - i. To visit the areas of the proposed site and conduct observations to verify the veracity, or otherwise of the statements made within the representations.
 - ii. To visit similar locations where Merkur Slots currently operate licences to assess the impact of those venues on the local communities.
 - iii. To analyse the current crime trends in the area to see what impact the existing premises have on Crime and Disorder.

19. To address my investigations to the matters of concern, I have seen and read the application, representations submitted and area impact assessment report. I ascertained that representations had been made on the following grounds:

- Protection of vulnerable people

20. The representation appears to be about the area and local community in which the proposed premises are to be located. However, no evidence has been provided to show that the current premises managed by the applicant since 2016 and located 200 yards from the application site creates any of the issues raised to the current application. In fact having a venue already operating in an area means that the staff employed already have a knowledge and can identify vulnerable members of the local community and can prevent them entering the venue or causing a problem to other customers.

23. In my experience the vulnerability issues created from premises licensed as a high street bingo premises are much lower than those created from a licence granted to a betting office. There are several reasons for this, including the fact that people tend to go to high street bingo venues on their own or in small numbers. Other than playing the machines there is no event taking place for customers to engage with each other, nor use the venues as a social meeting place. A group of young people attempting to enter and remain inside these types of premises would immediately be identified by staff. I have never encountered a situation during any of my extensive observations at these types of venues where young people sought to enter or remain inside.

24. The staff employed at a high street bingo premises are not engaged or distracted by taking or paying out on bets so they can spend more time on the “shop floor” observing customer behaviour and resolving any low level issues before they can escalate. The general environment of an high street bingo premises is also generally cleaner and tidier than ordinary bookmakers as there are no need for betting slips, newspapers and pens which often get discarded on the floor.

25. As a result of this less intimidating environment many of the managers of high street bingo premises are female and this was certainly the case in the high street bingo premises I have visited. A further difference between high street bingo premises and traditional betting offices are people tend to spend less time at a venue on each visit. They do not wait around the venue for an event to start or to finish. As a result of this, customers of high street bingo premises do not tend to loiter at a premise other than when playing the machines and do not smoke at the front of the venue between events taking place. I did not

observe any issues regarding customers congregating outside the high street bingo premises observed during this period of observations

26. As a result of the representations made regarding the area subject to the application, I decided to visit the area of the current application. Comparatively, I have also visited Rochdale where the applicant currently operates a bingo Centre, an area which I believe is more socially deprived than Worcester and equally as challenging to operate gambling premises in as The Cross location.

Friday 14th August 2020

Merkur Slots Yorkshire Street Rochdale

27. My observation commenced in the Yorkshire Street area of Rochdale from 12:30 pm and concluded at 14:50 that day. The Rochdale location was chosen as I have resided in the town all my life. I was also stationed as an Inspector on the Rochdale division from 1996-1998 and 2006-2010. I was aware that a Gaming Premises had been at this location for over 30 years and during my time as an Inspector I am unaware of any problems being raised by its presence.
28. As well as having a local knowledge of the area, in 2019 Rochdale town centre was deemed to be the most deprived area in Greater Manchester and 31stth most deprived area in the country.
Latest government figures show the LSOA (Lower-layer Super Output Area) which includes Rochdale town centre and parts of the neighbouring estates of College Bank and Lower Falinge is the 31st most deprived place in England.
29. On arrival on Yorkshire Street I noticed the regular presence of groups of street drinkers and a male sat on an old blanket begging. I photographed the Merkur Slots venue (exhibit reference letter DJB 1 refers). The unit advertised as being open 24/7. I then looked around the area for signs of local authority-controlled CCTV cameras which are often located in areas of high crime and disorder. One such dome camera was located immediately outside the premises at the junction of Yorkshire Street and New Bailey Street.
30. I then looked around the area for signs of residential accommodation which I could not find in the immediate vicinity. Two other gambling machine premises were located at 55 (LeisureTime) and 88 (Admiral) Yorkshire Street. A pawn brokers (H & T) was located opposite, William Hill next door but one, and Paddy Power and Betfred bookmakers diagonally opposite.
31. The nearest educational establishment was the Rochdale sixth form college on St Mary's gate and the nearest religious building was the parish church of St

Mary located in the Baum. The Regal Moon Weatherspoon's and Roebuck public houses were within 50 metres of the premises.

32. At 1244 I observed a dishevelled looking male searching through the rubbish bins on Yorkshire Street. 1 person was betting in Betfred, 9 customers in Paddy Power and 8 customers in William Hill. I then entered the Merkur Slots venue where 4 customers, wearing face masks were using the machines. A male and female member of staff was present, and I noted signage containing the Gambling Premises Licence, Challenge 25, responsible gambling and No alcohol. Face covering was mandatory and hand sanitisers were positioned in several locations around the premises. I later returned to the venue and took a photograph of the signage (exhibit reference DJB 2 refers).
33. I then visited the LeisureTime and Admiral premises. LeisureTime was advertised as opening from 0830 till late and had 11 customers. Admiral was advertised as opening until 11pm and did not have any customers inside. I then visited the Regal Moon public house which had approximately 90 customers, the majority of whom appeared to be consuming intoxicants.
34. I then positioned myself opposite the front of the Merkur Slots machine and conducted observations on the patrons entering and leaving and the passing pedestrians. Without exception the passing pedestrians appeared to be indifferent to the presence of the gambling premises. Customers entering and leaving the premises appeared to be aged 30+ and was 50% male and female. None of the street drinkers or beggars went near the premises, attempted to enter or harassed the customers entering or leaving. Between 1315 and 1330 315 people passed along Yorkshire Street past the front of the premises.
35. At 1333 two Rochdale Council refuse collectors entered the Merkur Slots premises and exited a few minutes later holding mugs of tea which they drank whilst enjoying the afternoon sunshine. At 1354 two males sat on the public benches opposite the shop and talked in loud voices about football and horse bets that they had put on.
36. At 1418 a male aged approx. 27 asks one of the males sat on the bench for a rizzla paper which is handed over. Neither of the males were customers of Merkur Slots. Between 1415 and 1430 407 pedestrians walk past the shop
37. At 1433 there were 4 customers in Betfred, 8 in Paddy Power and 5 in Merkur Slots. I then identified myself to the two members of staff in Merkur Slots to make a more detailed assessment of the unit. Both members of staff wore ID badges and a challenge 25 pin badge. Irene the assistant manager informed me that the premises had 67 machines. They did not feel that the premises were an intimidating place to work and infrequently they had to ask customers to prove their age. At 1448 I then left the premises and revisited

William Hill (9 customers), LeisureTime (12 customers) and Admiral (2 customers and two female members of staff). I then ceased my observations.

Liverpool Airport (Airside Departure Lounge)

38. On Friday 28th August 2020 I was travelling via Liverpool airport when I noted a gaming machine premises located in the airside departure lounge. The venue was in an adjoining unit to a children's play centre but did not appear to attract any attention from the young travellers passing through the airport. I took a photograph of the locality (exhibit reference DJB 3 refers). I have also seen similar set ups at other airports and in motorway service areas. The siting of these units does not appear to attract young people to gaming nor create crime and disorder issues.

Application premises, St Sepulchre Gate Doncaster

Saturday 27th February 2021

39. On my journey to Doncaster I had cause to stop at the Ferrybridge service area. On entering the building I noted a machine type premises located in the central area, which was clearly visible to everyone entering and leaving the premises. Unlike the proposed venue in Doncaster this site had no shop frontage to prevent anyone from observing the gambling by people inside. I took a photograph of the location to show how visible the activities inside would have been had the premises been able to open (exhibit reference letter DJB 4 refers).
40. I arrived in the Doncaster town centre area at 1130 on Saturday 27th February 2021 and my observations concluded at 1800 hours that same day. My observations were recorded into a notes document which I later transcribed into a record of observations log for the purpose of this report (exhibit refer letter DJB 5 refers).
40. I identified the former travel agents venue subject to the Premises Licence application on St Sepulchre Gate and noted that the Premises Licence notice was still prominently displayed in the ground floor window. I assessed the area has being predominantly business use with office and shop units at ground floor with further offices and a small number of residential apartments on the upper floors. Signage in the area indicated that parts of the town centre were covered by a Public Spaces Protection Order.
41. A large number of venues appeared closed and signage indicated that it was not due to the pandemic but that the unit was up for rent/sale. Immediately opposite the application premise is the Frenchgate shopping centre and the highway in between was pedestrianised with access only for vehicles after 5pm. A number of units did not have any additional window or door security

- shutters. Despite this no damage had been caused to any of the doors or windows. Graffiti in the area or damage to street furniture was also not extensive.
42. Immediately to the North elevation of the venue was the door way to a Coral betting office but the actual shop floor was not visible from the highway. Immediately to the South elevation of the application venue was a double fronted Café Nero and offices appeared to be on the upper floors. No public access could be gained to the rear of the site.
 43. I then looked around the area for signs of residential accommodation. The nearest residential accommodation identified, and those most likely to be impacted on by the activities at Merkur Slots, was at upper floor levels of The Burton Apartments at 21-27 St Sepulchre Gate. I then looked around the area for signs of local authority-controlled CCTV cameras. Two such cameras were located, St Sepulchre Gate/ West Laith Gate and St Sepulchre Gate and High Street. The former appeared to have a comprehensive line of sight to the applicant's venue.
 45. I then looked around the area for other gambling premises. I identified Coral on St Sepulchre Gate; Cashino (Merkur Slots), Bet Extra, MegaBet on the High Street; BetFred on the High Street and Cleveland Street; Ladbrokes Market Place and Printing Office Street; Jackpot Amusements on Duke Street; Admiral on Baxter Gate; Mecca Bingo East Laith Gate; William Hill and Paddy Power on Market Place.
 46. The nearest place of religious worship identified was the Priory Place Methodist Church on Cleveland Street. The nearest education establishments identified were Doncaster UTC a quarter of a mile away, and the Doncaster College on the opposite side of the town centre..
 47. During this period of observations I took footfall counts of pedestrians passing by the site of the proposed premises. every hour. Even though a national lockdown was in force at its peak more than 1,300 people an hour passed by and St Sepulchre Gate remained a busy thoroughfare through the town centre. After 1700 the number of pedestrians passing through the town reduced considerably.
 48. At 1313 a male was observed buying 3 lottery cards from WH Smith. At 1334 a beggar in a green hoody approached me and asked me for spare cash. At 1420 I observed a male in the West Street railway station car park drinking a can of Kronenbourg. The male, who said he was called Carl, engaged me in conversation and told me that he had travelled down from York on Friday and had stopped off at Doncaster on his way to London. At 1750 that day the male

was seen asleep in the corner of the station car park (photograph exhibit reference letter DJB 6 refers).

49. No other noteworthy incidents took place and at 1800 hours I concluded my observations and left the area.

Summary

52. The representation made uses statistical analysis that reflects the social context of Gambling in general in the Doncaster area with a particular emphasis on gambling by young people. It does not provide the gambling committee with any evidence that the manner in which Merkur Slots operates and manages its venues contributes in any way to these statistics anymore than, for example, the National Lottery does. Should the current Merkur Slots venue on the High Street Doncaster be significantly adding to these problems, such evidence would be made available to the committee. However, there appears to be no criticism from any of the Statutory Authorities or any other person of the manner in which their current premises is operated.
53. During my time spent in Doncaster town centre I saw limited signs of routine foot patrolling of the areas by police officers and police community support officers. Patrolling of the area was also carried out by private security officers predominantly from the Frenchgate Gate shopping centre. Non-aggressive begging was observed in the area and street drinking took place despite the public spaces protection order being in force.
54. The nature of the begging, street drinking and visible signs of deprivation and homelessness was not as evident as some of the areas that I have visited and where Merkur Slots operates successful businesses. I did not observe any physical nor social aspects of the Doncaster town centre which led me to consider that Merkur Slots should not be able to operate a successful second business in this location.
55. At paragraph 23, 24 and 25 above I outlined what I consider to be major differences between a betting office premises and a bingo premises. What I observed during these observations confirms and reinforces my experiences outlined above. In my experience the change of these premises from an empty unit to a bingo machine premises will improve the area for local residents and businesses and reduce the levels of crime, disorder and anti-social behaviour in Doncaster.

55. During the observations I did not observe any evidence of criminal damage or vandalism to property which I have often observed during visits to other towns and cities.
56. Another indication that a town centre suffers from irresponsible criminal behaviour is the security measures taken by stores. Shop frontages did not always have roller shutter security to prevent damage when closed or prevent unauthorised access out of hours. This was particularly noticeable as many venues have been closed for long periods due to lock down. Despite being empty for so long, shop windows remained intact and the street furniture appeared to be well maintained and undamaged.

Conditions proposed by the applicant

57. Although I did not see any serious crime and disorder in the area, I have seen the list of conditions that have been proposed by the applicant in support of this application. These conditions go above and beyond those attached to the Gambling premises currently operated in this area. I believe that these conditions demonstrate that the applicant is a responsible operator and goes beyond the minimum requirement needed to ensure they do not create the types of issues referred to in the representation.

Conclusion

58. Throughout my observations I saw no groups of people congregating outside the current betting offices and no breaches of conditions by any operator. No such conduct occurred in the vicinity of the application site, betting offices or the current Gaming venues observed. As a result, the only conclusion I can arrive at, is that the current gaming venues in the areas are not the source of crime and disorder: gambling is conducted in an open and fair way: and I saw no evidence that children and other vulnerable people are harmed by gambling.
59. In my experience of hearings in other areas no evidence has ever been produced to show that a machine type premises, as proposed in Doncaster, exacerbates the current levels of Gambling in an area or that the locating of a bingo licensed premises increases the risk to vulnerable people in a location.

Darrell Butterworth
1st March 2021

Exhibit reference letter DJB 1 Photograph of Merkur Slots site at Rochdale
Exhibit reference letter DJB 2 Photograph of Merkur Slots signage at Rochdale
Exhibit reference letter DJB 3 Photograph of machine premises Liverpool
Airport
Exhibit reference letter DJB 4 Photograph of slot machine venue Ferry Bridge
services.

Exhibit reference letter DJB 5 Observation log Doncaster 27th February 2021.

Exhibit reference letter DJB 6 Photograph of rough sleeper located Doncaster
station car park.

Observations Log PRO FORMA Exh ref letter DJB 05

Premises

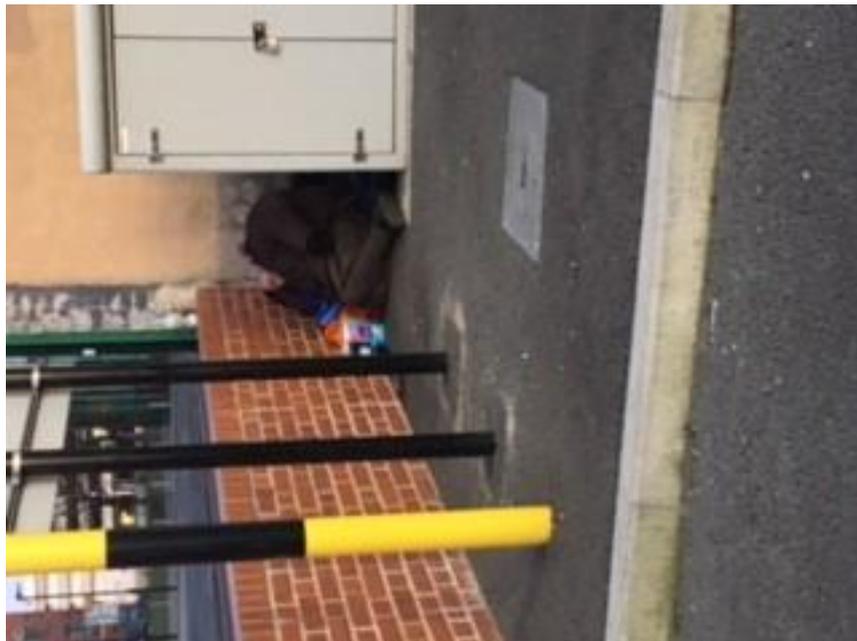
Name of premises	Merkur Slots
Address of premises	37-39 St Sepulchre Gate, Doncaster DN1 1TD
Day/ Date of visit	Saturday 27 th February 2021
Name of consultant conducting visit	Darrell Butterworth

Time	Comment
11.30	Arrived in Doncaster Town centre area. Located applicant premises on St Sepulchre Gate. Premises licence application still visible in the window. Business area with small amount of residential accommodation on higher floors. Police vehicle parked outside Peacocks. McDonald's open until 23:00 hrs. I identified Coral on St Sepulchre Gate; Cashino (Merkur Slots), Bet Extra, MegaBet on the High Street; BetFred on the High Street and Cleveland Street; Ladbrokes Market Place and Printing Office Street; Jackpot Amusements on Duke Street; Admiral on Baxter Gate; Mecca Bingo East Laith Gate; William Hill and Paddy Power on Market Place. The camera at Laith Gate appeared to give line of site to the proposed venue. Lots of empty shops up for let. Public places protection order signs in place.
12.45	Between 12.30 and 12.45 326 pedestrians walked past the site of the proposed premises.
13.13	Male buys 3 scratch cards in W H Smiths.
13.31	2 Police officers walk along St Sepulchre Gate
13.34	Approached by a male in a green top asking for spare change.
13.45	Between 13.30 and 13.45 265 pedestrians walked past the site of the proposed premises
14.20	Male drinking can of Kronenbourg in West Street Car Park of Doncaster station, second open can on the floor, bedding and bags behind car park wall. Male said he was called Carl and that he had travelled from York the previous day and had stopped off at Doncaster on his way to London.
14.45	Between 14.30 and 14.45 205 pedestrians walked past the site of the proposed premises
14.50	2 PCSOs cycle along St Sepulchre Gate West.
14.54	3 males drinking cans of beer in the grounds of Doncaster Minster.
14.55	2 males drink bottles of Peroni outside the Bucharest Supermarket on Nether Hall Road.
15.15	Police Vehicle travels along East Laith Gate with blue lights flashing.
15.34	2 private security officers walk along St Sepulchre Gate
15.38	Male in grey hoody begging on St Sepulchre Gate.
15.45	Between 15.30 and 15.45 130 pedestrians walked past the site of the proposed

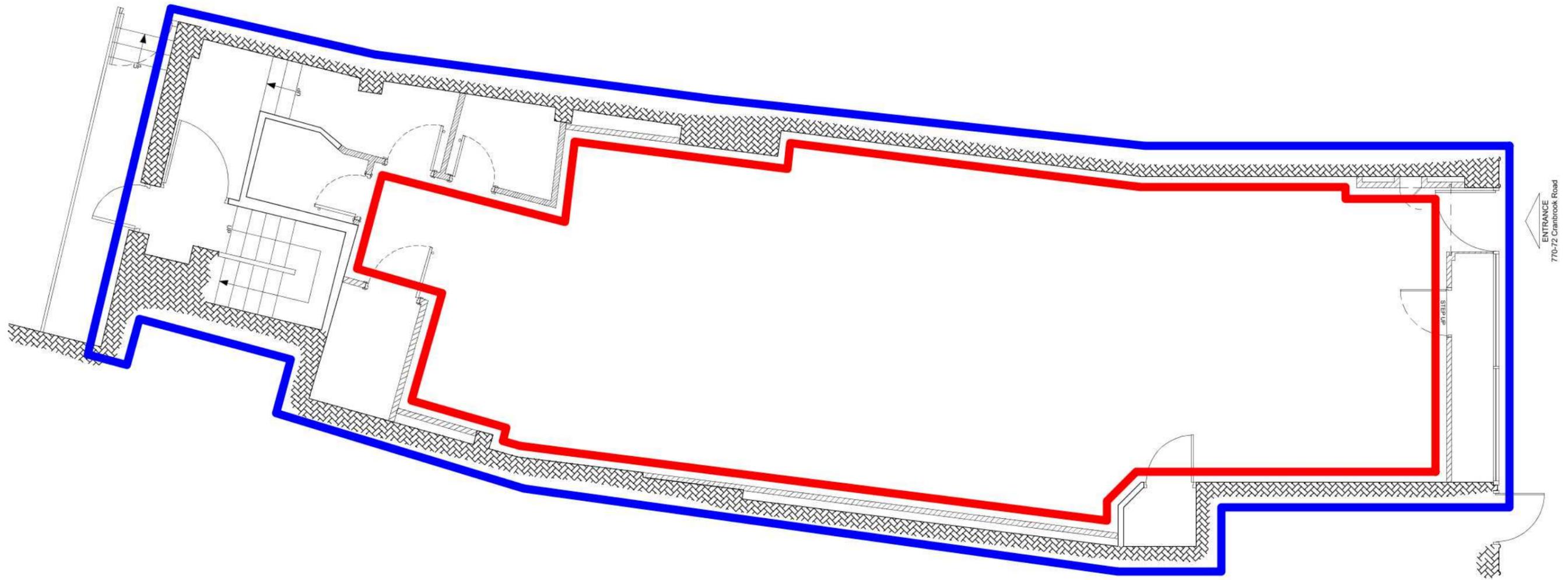
	premises.
15.48	2 Private security officers walk down the High Street.
16.26	Male walks along St Sepulchre Gate drinking from a bottle of Peroni. He sits on the Sepulchre Monument to finish his bottle.
16.37	Male in grey hoody continues begging along St Sepulchre Gate.
16.45	Between 16.30 and 16.45 97 pedestrians walked past the site of the proposed premises.
16.50	The male in the West Street Car Park is now asleep behind the wall. Second male on West Street asks me for money.
17.19	Male drinks from a bottle of beer outside Frenchgate Shopping Centre.
17.42	A group of 13 females and 4 males (Approx 16 years of age) walk noisily along St Sepulchre Gate, shouting and screaming, not social distancing. Security officers from Frenchgate move them on and they continue noisily towards Doncaster Railway Station. The group are dressed as if they are going out for the night.
17.45	Between 17.30 and 17.45 70 pedestrians (including the 17 youths) walked past the site of the proposed premises.
18.00	No further incidents of note, ceased observations and left the area.







Copy of Licensing plan of the premises



ENTRANCE
770-72 Cranbrook Road

LICENSE PLAN LEGEND	
LINE TYPE	LINE TYPE DESCRIPTION
	AREA IN WHICH FACILITIES WILL BE PROVIDED FOR GAMING.
	EXTENT OF PREMISES

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

REVISIONS
REV 01: Drawing updated to current template (13/11/20).

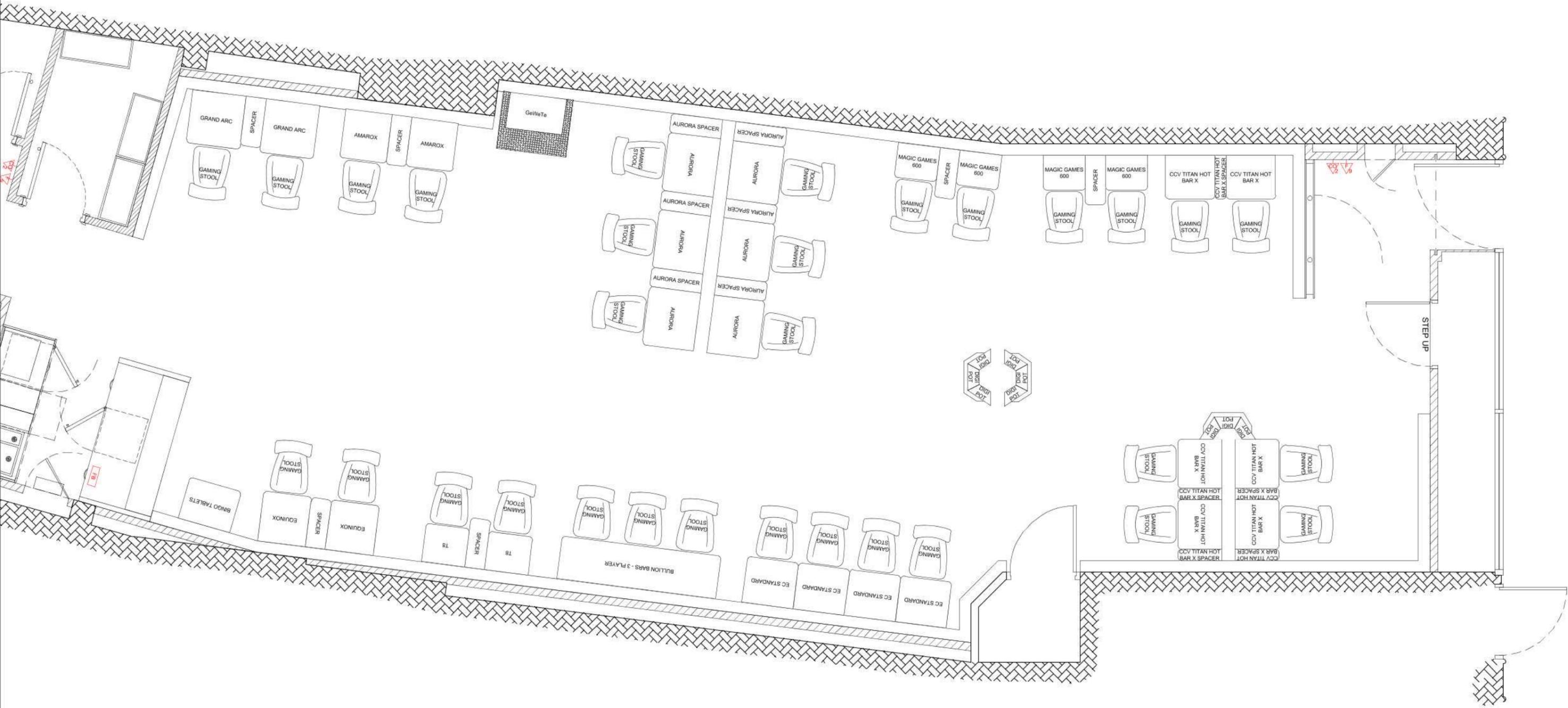
FIT OUT TYPE FUTURE VENUE
PROJECT MERKUR SLOTS 37-39 SEPULCHRE GATE DONCASTER DN1 1TD
DESCRIPTION PROPOSED LICENSE PLAN

REFERENCE DRAWINGS MEASURED SURVEY	
SCALE 1:75	
DRAWN BY MG	
DATE 13/11/20	
DRAWING No. 999-PR-07	REVISION 01



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Copy of Illustrative plan of the premises



REVISIONS
 REV 01: Drawing updated to current template
 (13/11/20).

FIT OUT TYPE
 FUTURE VENUE

PROJECT
MERKUR SLOTS
 37-39 SEPULCHRE GATE
 DONCASTER
 DN1 1TD

DESCRIPTION
 PROPOSED MACHINE PLAN

REFERENCE DRAWINGS
 MEASURED SURVEY

SCALE
 1:50

DRAWN BY
 S.R.B.

DATE
 13/11/20

DRAWING No.
999-PR-05

REVISION
01



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Copy of the Local Area Risk Assessment

Merkur Slots, 37/39 Sepulchre Gate, Doncaster, DN1 1TD

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	37/39 Sepulchre Gate Doncaster, DN1 1TD
Local Authority:	Doncaster Metropolitan Borough Council
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-024 (Cashino Gaming Ltd)
Company Details:	Praesepe Group, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Cashino Gaming Limited
Name and Title of Assessor:	Lisa Kennedy - Internal Audit Officer and Amanda Kiernan – Head of Compliance
Date of Assessment:	10th December 2020
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots a former Travel Agency, is situated on the pedestrianised Sepulchre Gate, directly opposite the Frenchgate Centre with other occupiers in the close vicinity including Cafe Nero, Savers, TK Maxx, Co-operative Bank, Nationwide Building Society and Tui Travel Agent. There are bus stops close to the property and Doncaster Train Station is a short walk away (0.02 miles). Merkur Slots Sepulchre Gate is located within the city center, with transport links to other areas/cities.
Establishments of note:	Two Bookmakers are on Sepulchre Gate, Coral and Bet Extra. There are a further eleven in the local area. The Frenchgate Shopping Center is opposite the premises and offers High Street Shopping chains, Restaurants and Coffee Bars, along with a wide variety of Bars & Restaurants. There are a number of Adult Gambling Centres in the town including Cashino, Admiral and Haynes. Two Public Houses - The Tut n Shive and The Little Plough are a short walk away; both operate late night opening until midnight at weekends. There are a number of late night Bars and Clubs in a separate part of the town centre around 10 minutes' walk away.
Adjoining premises:	Merkur Slots Doncaster is located between Coral Bookmakers and Café Nero
Crime statistics:	During October 2020 there were 141 crimes recorded on or around Sepulchre Gate within a 250m, radius. 41 incidents of violent crime, 27 incidents of shop lifting, 18 incidents of anti-social behavior, 18 public order offences, 8 incidents of burglary, 8 incidents of criminal damage/arson, 6 incidents other theft, 4 bicycle thefts recorded, 4 incidents relating to drugs, 4 incidents relating to the possession of weapons, 2 robberies and 1 vehicle crime. In the year ending June 2020, crime rates were down in Doncaster and down in the South Yorkshire force area, compared with the corresponding quarter in June 2019. Local Policing Priorities include, plain clothes operations and burglary prevention patrols, and patrols of hotspot areas including increased foot patrols in areas of high Anti-Social Behaviour incidents.
Population:	The population of Doncaster postcode area DN1 is 243,552. Compared to other areas, Doncaster has a lower percentage of 20-24 year olds, and a higher proportion of 55-64 year olds Over a quarter of Doncaster residents live in Single households. The accommodation in the area of Sepulchre Gate consist predominantly of terraced housing & purpose built flats. Most of the housing stock is rented from private landlords, with the main occupancy being one or two people. The Doncaster town population is 19,535 residents of which 21.8% are below the age of 18 yrs. (Doncaster Town Ward Profile 2015).
Culture:	The Doncaster town population ethnic make up is 81.83% White British, 11.6% Asian/ Asian British and the remaining from other ethnic backgrounds. 31% of residents own their own property. (Doncaster Town Ward Profile 2015).
Unemployment:	Merkur Slots Doncaster is in an area with an employment rate of 81%. 33.7% work in Senior Occupations, Directors & Managerial. 20.6% work in Administrative roles and skilled trades. 19.2% work in the Care, Leisure, sales & customer service and 26.5% work in factory & Machine production roles. Unemployment rate or full time students is at 19% compared to the average UK rate of 4%. Of the Doncaster town population 4.9% of working age residents are unemployed. (Doncaster Town Ward Profile 2015).
Deprivation:	The 2019 Indices of Multiple Deprivation show that since 2015 Doncaster's deprivation ranking relative to other areas has worsened, from 48 th most deprived to 41 st (out of 317). Ranking has improved for employment, income and the environment, but has worsened for housing, education, skills, training and crime. There are a number of premises occupied by organisations supporting homeless and vulnerable persons including a YMCA on the edge of the town centre and homeless people can be seen around the town centre.
Local Police:	South Yorkshire Police, Doncaster Central When contacted local Police had no concerns with proposals



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

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

Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into consideration Doncaster Council Local Authority Statement of Licensing Policy, Reference section 4.8 for Bingo premises and Doncaster Borough Profile 2011 and Doncaster Town Ward Profile 2015.

Environmental Factors

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

Licensing Objectives	Local Risks	Control Measures
Protecting children and other vulnerable people from being harmed or exploited by gambling	<p>Unemployment: Merkur Slots Doncaster is in an area with an employment rate of 81%. 33.7% work in Senior Occupations, Directors & Managerial. 20.6% work in Administrative roles and skilled trades. 19.2% work in the Care, Leisure, sales & customer service and 26.5% work in factory & Machine production roles. Unemployment rate or full time students is at 19% compared to the average UK rate of 4%. Of the Doncaster town population 4.9% of working age residents are unemployed. (Doncaster Town Ward Profile 2015).</p> <p>Deprivation: The 2019 Indices of Multiple Deprivation show that since 2015 Doncaster’s deprivation ranking relative to other areas has worsened, from 48th most deprived to 41st (out of 317). Ranking has improved for employment, income and the environment, but has worsened for housing, education, skills, training and crime. There are a number of premises occupied by organisations supporting homeless and vulnerable persons on the edge of the town centre and homeless people can be seen around the town centre.</p> <p>Schools and Education Doncaster UTC, College Road, DN1 3BF Atlas Academy, Prospect Place, DN1 3QP Hall Cross Academy, Thorne Road, DN1 2HY St Francis Xavier Catholic Primary School, Roberts Road, DN1 2JS Town field Primary School, Thorne Road, DN1 2JS</p>	<p>Age Verification <i>Ensuring Under 18’s do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18’s only).</p> <p>Gambling is an age restricted product and Praesepe operates a ‘Think 25’ policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18’s notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Sepulchre Gate Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p>

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	<p>Balby Central Primary Academy, Littlemore Lane, DN4 0LL</p> <p>Community Centres and Youth Centres Sikh Bhatra's Community Hall, 4175 Trafford Way, DN1 3AN Maridon Pastoral Centre 5 Nether Hall Road, DN1 2PH The Junction Community Advice Centre, 28 Urban Road, DN4 0BE Nether Hall Area CIC, 9-13 Highfield Road, DN1 2LA Hexthorpe Parish Hall, 12 Shady Side, DN4 0DN Doncaster Central Development Trust, Unit 1A The Church View Centre, Church View, DN1 1AF Doncaster Deaf Community Centre, Milton Walk, St James Street, DN1 3QG Expect Youth, The Point, S.Parade, DN1 2DR YMCA, 31 Wood Street, DN1 3LH Doncaster Childrens Services Trust, Colonnades House, Duke St, DN1 1ER Changing Lives, 2-5 Prince's Street, DN1 3NJ Doncaster Sea Cadets, 1 Chappell Drive,</p> <p>Parks, play grounds and sports/leisure facilities Westfield Park, Littlemoor Lane, DN4 0LN Town Fields, DN2 6BZ Regent Square, South Parade, DN1 2DR Playground, 61 Beechfield Road, DN1 2AJ Westfield Park Playground, 61 Balby Road, DN4 0RD Stirling Street Playground 147 Milton Walk, DN1 3QL St James Street Play Area, DN1 3RT Elmfield Park, DN4 5AP St Mary's Crescent Play Area, DN1 2NJ Doncaster Town Fields Sports Club, Bennetthorpe, DN2 6AA The Gym, Frenchgate Shopping Centre, DN1 1SW Boon Khwan Thai Boxing Camp, Civic Quarter, College Road, DN1 3JH Doncaster Martial Arts Centre, 76a, Baxter Avenue, DN1 2NN Active Doncaster, Waterdale, DN1 3BU</p> <p>Vulnerable and addiction support services Aspire Drug and Alcohol, 37 Thorne Road, DN1 2EZ Better Deal Young Persons Drug Service, 83 Thorne Road, DN1 2ES Project 3, East Laith Gate House, DN1 1JE</p> <p>Homeless shelters and food banks Food Bank, BME United 56-58 Beckett Road, DN2 4AJ Food Bank, Christ Church, Thorne Road, DN1 2HG Food Bank, Trussell Trust, Thorne Road, DN1 2HG</p>	<p>Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the Industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>Vulnerability Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Merkur Slots take 'know your customer' seriously including affordability checks, engaging with customer on products to enable an informed choice and take a risk-based approach to harm minimization.</p> <p>Merkur Slots, Sepulchre Gate will support the promotion of the NHS Northern Gambling Service within the premises and guide any vulnerable people or those at risk of harm from gambling towards this support service.</p> <p>Praesepe will incorporate reference to the NHS Northern Gambling Service in its employee Safeguarding Vulnerable People from Gambling Harm training modules.</p>
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	<p>Homeless Shelter – YMCA, 31 Wood Street, DN1 3LH</p> <p>Pawnbrokers and Loan Shops H&T Pawnbrokers, 23 High Street, DN1 1DW Antique & Bargain Stores Ltd, 28 Market Place, DN1 1NE Cash Shop, 19 French Gate, DN1 1PZ Ramsdens, 49 High Street, DN1 1BB Cash Converters, 11 Wood Street, DN1 3LH Doncaster Jewellers, 22 High Street, DN1 1DW Albemarle & Bond Pawnbrokers Ltd, 47 Sepulcher Gate, DN1 1TD Everyday Loans, 20-22 French Gate, DN1 1QQ Bad Credit History Loans, 11 East Laith Gate, DN 1 1JG Finance & Asset Leasing Ltd, 18 Thorne Road, DN1 2HS CEX, 21 Printing Office Street, DN1 1TJ Ramsdens, Frenchgate Shopping Centre, St Sepulchre Gate, DN1 1SW Herbert Brown 47 St Sepulchre Gate, DN1 1TD Re-Generate, 27 High St, DN1 1DW</p> <p>Medical Centres, Care Homes and Mental Health facilities The Medical Centre, 2 Francis Street, DN1 1JS Doncaster Health Centre, St Sepulchre Gate West, DN1 3AP The Flying Scotsman Health Centre, St Sepulchre Gate West, DN1 3AP The Mount Group Practice, 54 Thorne Road, DN1 2JP Mills Medical Services, Portland Place, DN1 3DF DRG Health Clinic, 9 Priory Place, DN1 1BL The Phoenix Medical Practice, Cavendish Road, DN1 2DJ Chequer Road Clinic, Chequer Road, DN1 2AD The Burns Practice, 4 Albion Place, DN1 2EG Tri Health, East Laith Gate House, DN1 1JE The St Vincent Practice, 77 Thorne Road, DN1 2ET St Mary's Nursing Home, Thorne Road, DN1 2JT Amphion View Residential Home, 17-19 Avenue Road, DN2 4AG Thorndene, 107 Thorne Road, DN2 5BE Hollybrook House, 3 Avenue Road, DN2 4AH Wycar Leys Doncaster Ltd, 4 Avenue Road, DN2 4AH Socratis Clinic, 1 Cavendish Court, South Parade, DN1 2DJ Rotherham, Doncaster, and South Humber NHS Trust, East Laith Gate, Cheswold Park Hospital, Cheswold Lane, DN5 8AR Wentbridge Centre, Cheswold Lane, DN5 8AR Yorkshire Counselling, 1st Floor, Danum House, DN1 2DY Rebound, 1 South Parade, DN1 2DY</p>	<p>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioral changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behavior, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behavior, such as the Playright App or Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Player Protection <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i> <i>Failure to provide information to customers on responsible gambling</i> <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p> <p>'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are in prominent locations within the premise and in private areas, such as customer toilets.</p> <p>Playright App available for customers to self-manage their play and spend and can send alerts to Merkur Slots Sepulchre Gate if the customer enters at a time, they have chosen not to play which instigates an interaction with the customer. Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling.</p>
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Gambling premises

Bet Extra, 1 Sepulchre Gate, DN1 1TD
 Admiral Casino, 25 Baxter Gate, Dn1 1LD
 Coral, 35 St Sepulchre Gate, DN1 1TD
 Paddy Power, 41 Market Place, DN1 1NH
 BetFred, 54 High Street, DN1 1BE
 Merkur Cashino, High Street, DN1 1BE
 Ladbrokes, 49 Market Place, DN1 1NJ
 William Hill, 8 Market Place, DN1 1LQ
 Ladbrokes, 39,47 Printing Office, DN1 1TP
 Coral, 154 Carr House Road, DN4 5AP
 Mecca Bingo, 1c East Laith Gate, DN1 1JG
 Hayes Family Amusements, The Colonnades, 14 Pells Close, DN1 3EG
 Jackpot Amusements, 46 Duke Street, DN1 3EA
 BetFred 31-33 Cleveland St, DN1 3DY

Public Houses and Alcohol Licensed Premise

Old Castle Hotel, 10 Market Place, DN1 1LQ
 Red Lion Hotel, Market Place, DN1 1NH
 Jazz Café, 5-7 Printing Office, DN1 1TJ
 Mallard, Unit 14, Frenchgate Shopping Centre, DN1 1SW
 The Grind, 25 High Street, DN1 1DW
 The Leopard, 2 West Street, DN1 3AA
 Sibella Shisha Bar, 12 Priory Walk, Dnm1 1TS
 Paris Gate, 76 Sepulchre Gate, DN1 1SD
 Number Fifteen, 21 High Street, DN1 1DW
 The White Swan, 34 French Gate, DN1 1QQ
 Zest Bar & Grill, 19-20 High Street, DN1 1DW
 The Queen Crafhouse & Kitchen, 1 Sunny Bar, DN1 1LY
 The Lord Nelson, 54 Printing Office, DN1 1TR
 Ballers Sports Bar, 14 Silver Street, DN1 1HQ
 Tut N Shive, 6 West Laith Gate, DN1 1SF
 Manana Manana, 7 Bradford Row, DN1 3NF
 Doncaster Brewery & Tap, 7 Young Street, DN1 3EL
 The Pad, 3 Priory Walk, DN1 1TS
 Debbie's Bar, 6 Silver Street, DN1 1HQ
 The Lockwood, 50 Hall Gate, DN1 3PB
 The Gate House, Priory Walk, DN1 1TS
 The Angel & Royal, Cleveland Street DN1 3EF
 St Leger Tavern, 8 Silver Street, DN1 1HQ
 Toast Bar, 10-12 Priory Place, DN1 1TS
 Corner Pin, 145 St Sepulchre Street, DN1 3AH
 Vintage Bar, 64-66 Silver Street, DN1 1HT

Socially Responsible messaging is implemented on all digital B3 and Cat C machines.

All machines display Gamble Responsibly stickers with helpline contact details.

Senior Management are members of the Bingo Association Executive and Socially Responsible Committees and BACTA Divisional and Socially Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.

Deprivation

Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm

Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.

Homelessness

Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.

Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.

Staff are trained how to manage situations with homeless people seeking refuge.

A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.

The Rum Rooms, 7 Market Road, DN1 1LS
 Hogan's Bar, 24-28 Silver Street, DN1 1HQ
 Yates Doncaster, 58 Hall Gate, DN1 3PB
 The Draughtsman Alehouse, Platform 3 Doncaster Railway Station, DN1 1PE
 Decades Doncaster, 10-12 Cleveland Street, DN1 3EH
 Relish Bar & Grill, 19 East Laith Gate, DN1 1JG
 Biscuit Billys, 8 Silver Street, DN1 1HQ
 Frank & Stein, 18-20 Silver Street, DN1 1HQ
 La Rustica Restaurant & Wine Bar, 5 Nether Hall Road, DN1 2PH
 Mambo, 14 Silver Street, DN1 1HQ
 The Mason Arms, 22 Market Place, DN1 1ND
 The Black Bull, 12 Market Place, DN1 1LQ
 The Social, 10-20 Lazarus Court, DN1 3NF
 Courtyard, 36 Market Place, DN1 1NE
 Modiva Tapas, 10 Priory Walk, DN1 1TS
 Horse & Groom, 3 East Laith Street, DN1 1JG
 Woolpack Live, 32 Market Place, DN1 1NE
 Flares Doncaster, 5 Hall Gate, DN1 3LU
 The Salutation, 14 South Parade, DN1 2DR
 The Saracens, 38-40 Cleveland Street, DN1 3DZ
 The Establishment, 1A Bradford Row, DN1 3NF
 Hallcross, 32 Hall Gate, DN1 3NL
 Magdalen 20 Market Place, DN1 1NE
 The Little Plough, 8 West Laith Gate, DN1 1SF
 Bentleys Gentleman's Club. 44 Hall Gate, DN1 3NR
 Shooters Shot Bar, 60 Hall Gate, DN1 3PB
 Market Place, Alehouse & Deli, 21 Market Place, DN1 1ND
 The Coach & Horses, 5 Scot Lane, DN1 1EW
 Banditos Bar, 12 Cleveland Street, DN1 3EH
 The Harewood, 28 Waterdale, DN1 3EY
 The Night Jar, 54 Silver Street, DN1 1HT
 The Railway, West Street, DN1 3AA
 Yorkshire Grey, 16 Hall Gate, DN1 3NA
 Rock-A-Hula Tiki Bar, 20 Hall Gate, DN1 3NG
 The Staff of Life, Princegate, DN1 3EN
 Angels Champagne Bar, 23 Hall Gate, DN1 3NG
 Boogie Bar, DN1 1HH
 Turkuaz Bar & Grill, 8b Nether Hall Road, DN1 2PW
 Barley Twist Table Table, High Fisher Gate, DN1 1QZ
 Doncaster Brewery, 7 Young Street, DN1 3EL
 Don Valley Tap, The Wool Market, DN1 1NG
 Utopia Bar & Restaurant, 8c Nether Hall Road, DN1 2PW

	<p>La Barraca, 56-60 Silver Street, DN1 1HT Slug & Lettuce, 53-54 Hall Gate, DN1 3PD Gallery Bar & Club, 34/36 Silver Street, DN1 1HQ Craft Gin Lounge & Gin Club, 6B Sunny Bar, DN1 1LY Anthony's, Danum Hotel, High Street, DN1 1DN Corporation Brewery Taps, 135 Cleveland Street, DN1 3AR La Familia, 41 Prince Gate, DN1 3EN Luxx Shisha Bar & Lounge, 14 Priory Walk, DN1 1TS The City Restaurant, 2 Kingsgate, DN1 3JZ</p> <p>Residential Areas The accommodation in the area consist predominantly of terraced housing & purpose built flats. Most of the housing stock is rented from private landlords, with the main occupancy being one or two people.</p> <p>Bus stops and other Transport links St Sepulchre Gate Doncaster Train Station (0.2mile)</p> <p>Locally Identified Premises French Gate Shopping Centre, St Sepulchre Gate, DN1 1SW McDonalds, 68 St Sepulchre Gate, DN1 1RX</p>	
<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p> <p>Page 115</p>	<p>Crime statistics: During October 2020 there were 141 crimes recorded on or around Sepulchre Gate within a 250, radius. 41 incidents of violent crime, 27 incidents of shop lifting, 18 incidents of anti-social behavior, 18 public order offences, 8 incidents of burglary, 8 incidents of criminal damage/arson, 6 incidents other theft, 4 bicycle thefts recorded, 4 incidents relating to drugs, 4 incidents relating to the possession of weapons, 2 robberies and 1 vehicle crime. In the year ending June 2020, crime rates were down in Doncaster and down in the South Yorkshire force area, compared with the corresponding quarter in June 2019 Local Policing Priorities include, Plain clothes operations and burglary prevention patrols, and patrols of hotspot areas. Increased foot patrols of high ASB areas.</p> <p>Local Police: South Yorkshire Police, Doncaster Central When contacted Local police had no concerns over the application.</p>	<p>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots Sepulchre Gate is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots Sepulchre Gate will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will</p>

Public Houses and Alcohol Licensed Premise

Old Castle Hotel, 10 Market Place, DN1 1LQ
 Red Lion Hotel, Market Place, DN1 1NH
 Jazz Café, 5-7 Printing Office, DN1 1TJ
 Mallard, Unit 14, Frenchgate Shopping Centre, DN1 1SW
 The Grind, 25 High Street, DN1 1DW
 The Leopard, 2 West Street, DN1 3AA
 Sibella Shisha Bar, 12 Priory Walk, Dnm1 1TS
 Paris Gate, 76 Sepulchre Gate, DN1 1SD
 Number Fifteen, 21 High Street, DN1 1DW
 The White Swan, 34 French Gate, DN1 1QQ
 Zest Bar & Grill, 19-20 High Street, DN1 1DW
 The Queen Crafthouse & Kitchen, 1 Sunny Bar, DN1 1LY
 The Lord Nelson, 54 Printing Office, DN1 1TR
 Ballers Sports Bar, 14 Silver Street, DN1 1HQ
 Tut N Shive, 6 West Laith Gate, DN1 1SF
 Manana Manana, 7 Bradford Row, DN1 3NF
 Doncaster Brewery & Tap, 7 Young Street, DN1 3EL
 The Pad, 3 Priory Walk, DN1 1TS
 Debbie's Bar, 6 Silver Street, DN1 1HQ
 The Lockwood, 50 Hall Gate, DN1 3PB
 The Gate House, Priory Walk, DN1 1TS
 The Angel & Royal, Cleveland Street DN1 3EF
 St Leger Tavern, 8 Silver Street, DN1 1HQ
 Toast Bar, 10-12 Priory Place, DN1 1TS
 Corner Pin, 145 St Sepulchre Street, DN1 3AH
 Vintage Bar, 64-66 Silver Street, DN1 1HT
 The Rum Rooms, 7 Market Road, DN1 1LS
 Hogan's Bar, 24-28 Silver Street, DN1 1HQ
 Yates Doncaster, 58 Hall Gate, DN1 3PB
 The Draughtsman Alehouse, Platform 3 Doncaster Railway Station, DN1 1PE
 Decades Doncaster, 10-12 Cleveland Street, DN1 3EH
 Relish Bar & Grill, 19 East Laith Gate, DN1 1JG
 Biscuit Billys, 8 Silver Street, DN1 1HQ
 Frank & Stein, 18-20 Silver Street, DN1 1HQ
 La Rustica Restaurant & Wine Bar, 5 Nether Hall Road, DN1 2PH
 Mambo, 14 Silver Street, DN1 1HQ
 The Mason Arms, 22 Market Place, DN1 1ND
 The Black Bull, 12 Market Place, DN1 1LQ
 The Social, 10-20 Lazarus Court, DN1 3NF
 Courtyard, 36 Market Place, DN1 1NE
 Modiva Tapas, 10 Priory Walk, DN1 1TS

regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.

General Crime and Disorder

To identify aggressive customers to prevent crime and disorder
Awareness of local crime issues in the local area

We have reviewed the Police.UK hot-spot mapping for Doncaster policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with Kent Police over reducing our involvement in any incident.

Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.

All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.

Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.

The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).

Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.

Merkur Slots Sepulchre Gate will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.

Anti-social behavior outside the premise

Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.

Horse & Groom, 3 East Laith Street, DN1 1JG
 Woolpack Live, 32 Market Place, DN1 1NE
 Flares Doncaster, 5 Hall Gate, DN1 3LU
 The Salutation, 14 South Parade, DN1 2DR
 The Saracens, 38-40 Cleveland Street, DN1 3DZ
 The Establishment, 1A Bradford Row, DN1 3NF
 Hallcross, 32 Hall Gate, DN1 3NL
 Magdalen 20 Market Place, DN1 1NE
 The Little Plough, 8 West Laith Gate, DN1 1SF
 Bentleys Gentleman's Club. 44 Hall Gate, DN1 3NR
 Shooters Shot Bar, 60 Hall Gate, DN1 3PB
 Market Place, Alehouse & Deli, 21 Market Place, DN1 1ND
 The Coach & Horses, 5 Scot Lane, DN1 1EW
 Banditos Bar, 12 Cleveland Street, DN1 3EH
 The Harewood, 28 Waterdale, DN1 3EY
 The Night Jar, 54 Silver Street, DN1 1HT
 The Railway, West Street, DN1 3AA
 Yorkshire Grey, 16 Hall Gate, DN1 3NA
 Rock-A-Hula Tiki Bar, 20 Hall Gate, DN1 3NG
 The Staff of Life, Princegate, DN1 3EN
 Angels Champagne Bar, 23 Hall Gate, DN1 3NG
 Boogie Bar, DN1 1HH
 Turkuaz Bar & Grill, 8b Nether Hall Road, DN1 2PW
 Barley Twist Table Table, High Fisher Gate, DN1 1QZ
 Doncaster Brewery, 7 Young Street, DN1 3EL
 Don Valley Tap, The Wool Market, DN1 1NG
 Utopia Bar & Restaurant, 8c Nether Hall Road, DN1 2PW
 La Barraca, 56-60 Silver Street, DN1 1HT
 Slug & Lettuce, 53-54 Hall Gate, DN1 3PD
 Gallery Bar & Club, 34/36 Silver Street, DN1 1HQ
 Craft Gin Lounge & Gin Club, 6B Sunny Bar, DN1 1LY
 Anthony's, Danum Hotel, High Street, DN1 1DN
 Corporation Brewery Taps, 135 Cleveland Street, DN1 3AR
 La Familia, 41 Prince Gate, DN1 3EN
 Luxx Shisha Bar & Lounge, 14 Priory Walk, DN1 1TS
 The City Restaurant, 2 Kingsgate, DN1 3JZ

Pawnbrokers and Loan Shops

H&T Pawnbrokers, 23 High Street, DN1 1DW
 Antique & Bargain Stores Ltd, 28 Market Place, DN1 1NE
 Cash Shop, 19 French Gate, DN1 1PZ
 Ramsdens, 49 High Street, DN1 1BB
 Cash Converters, 11 Wood Street, DN1 3LH

Staff are aware to monitor the outside of the premise and surrounding area for anti-social behavior and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.

Incidents of anti-social behavior are recorded on the IHL SMART Tablet Incident App.

Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behavior occurring in the vicinity and encourages a partnership approach with local authorities.

Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.

Money Laundering

Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.

Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML policies with clear escalation and reporting processes.

There are 15 pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behavior, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.

IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.

Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.

Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.

Adequate staff will always be maintained and subject to regular review and risk assessment.

Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 8pm until 6am.

Doncaster Jewellers, 22 High Street, DN1 1DW
 Albemarle & Bond Pawnbrokers Ltd, 47 Sepulcher Gate, DN1 1TD
 Everyday Loans, 20-22 French Gate, DN1 1QQ
 Bad Credit History Loans, 11 East Laith Gate, DN 1 1JG
 Finance & Asset Leasing Ltd, 18 Thorne Road, DN1 2HS
 CEX, 21 Printing Office Street, DN1 1TJ
 Ramsdens, Frenchgate Shopping Centre, St Sepulchre Gate, DN1 1SW
 Herbert Brown 47 St Sepulchre Gate, DN1 1TD
 Re-Generate, 27 High St, DN1 1DW

Gambling premises

Bet Extra, 1 Sepulchre Gate, DN1 1TD
 Admiral Casino, 25 Baxter Gate, Dn1 1LD
 Coral, 35 St Sepulchre Gate, DN1 1TD
 Paddy Power, 41 Market Place, DN1 1NH
 BetFred, 54 High Street, DN1 1BE
 Merkur Cashino, High Street, DN1 1BE
 Ladbrokes, 49 Market Place, DN1 1NJ
 William Hill, 8 Market Place, DN1 1LQ
 Ladbrokes, 39,47 Printing Office, DN1 1TP
 Coral, 154 Carr House Road, DN4 5AP
 Mecca Bingo, 1c East Laith Gate, DN1 1JG
 Hayes Family Amusements, The Colonnades, 14 Pells Close, DN1 3EG
 Jackpot Amusements, 46 Duke Street, DN1 3EA
 BetFred 31-33 Cleveland St, DN1 3DY

Residential Areas (impacted by Anti Social Behavior)

The accommodation in the area consist predominantly of terraced housing & purpose built flats. Most of the housing stock is rented from private landlords.

In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots will primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.

Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.

Merkur Slots Doncaster will operate TITo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.

As such staff are based predominately on the venue floor and have very little need to work in a back area, any back office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management.

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.

Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.

Alcohol and Drugs

Anti-social behavior caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.

'No Alcohol Allowed' signage on the door.

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

		<p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p>Marketing Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, Bingo Played here, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
<p>Other</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 120</p>	<p>Places of worship and Religious Buildings Priory Place Methodist Church, 20-26 Printing Office Street, DN1 1TR All Nations Living Springs Church, 77-70 Sepulchre Gate, DN1 1RX HallGate URC Church, 7B HallGate, DN1 3NG Doncaster Unitarian & Free Christian Church, 60 HallGate, DN1 3PB National Spiritualist Church, College Road, DN1 3JH St James Church, Sepulchre Gate West, DN1 3AQ The Minster Church of St George, 9 Church Street, DN1 1RD Jamia Mosque Doncaster, Bentinck Close, DN1 3ST</p>	<p>Ethnicity and Local Area Demographic Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training & Social Responsibility Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p>

		<p>Praesepe have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Praesepe work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice yearly.</p> <p>COVID 19 All staff receive training on COVID-19 guidelines.</p> <p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p> <p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p>
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Merkur Slots 37-39 Sepulchre Gate, Doncaster, DN1 1DT Premise Layout

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

Additional Comments

I have worked in the Gaming Industry for 16 years in operations as a Bingo Manager for 5 years and Internal Audit Officer for Praesepe for 11 years. I was requested to complete a Local Area Risk Assessment for the new Merkur Slots premises in Doncaster. My work area covers Merkur Slots, High Street Doncaster, and I usually visit at least twice a year, I have not encountered any issues during my visits, which have been during daylight hours and through the night. I have spent time driving and walking around the area to build the required information. I used this information, together with my own further research to put together the LARA. I am confident that a venue in this location would not present any particular risk.
(Lisa Kennedy – Internal Auditor)

I am a Chartered Institute of Internal Auditors (IIA) Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries. In 2011 I started working in the Gambling Industry occupying the role of Internal Audit Manager for Praesepe, responsible for all internal and external audit policies and procedures. During 2018 a merge of the Audit and Compliance departments created the role of Head of Compliance, I now hold this position and am responsible for Internal Audit, Risk/Fraud Management and the Regulatory Compliance of the Praesepe organization.
(Amanda Kiernan – Head of Compliance).

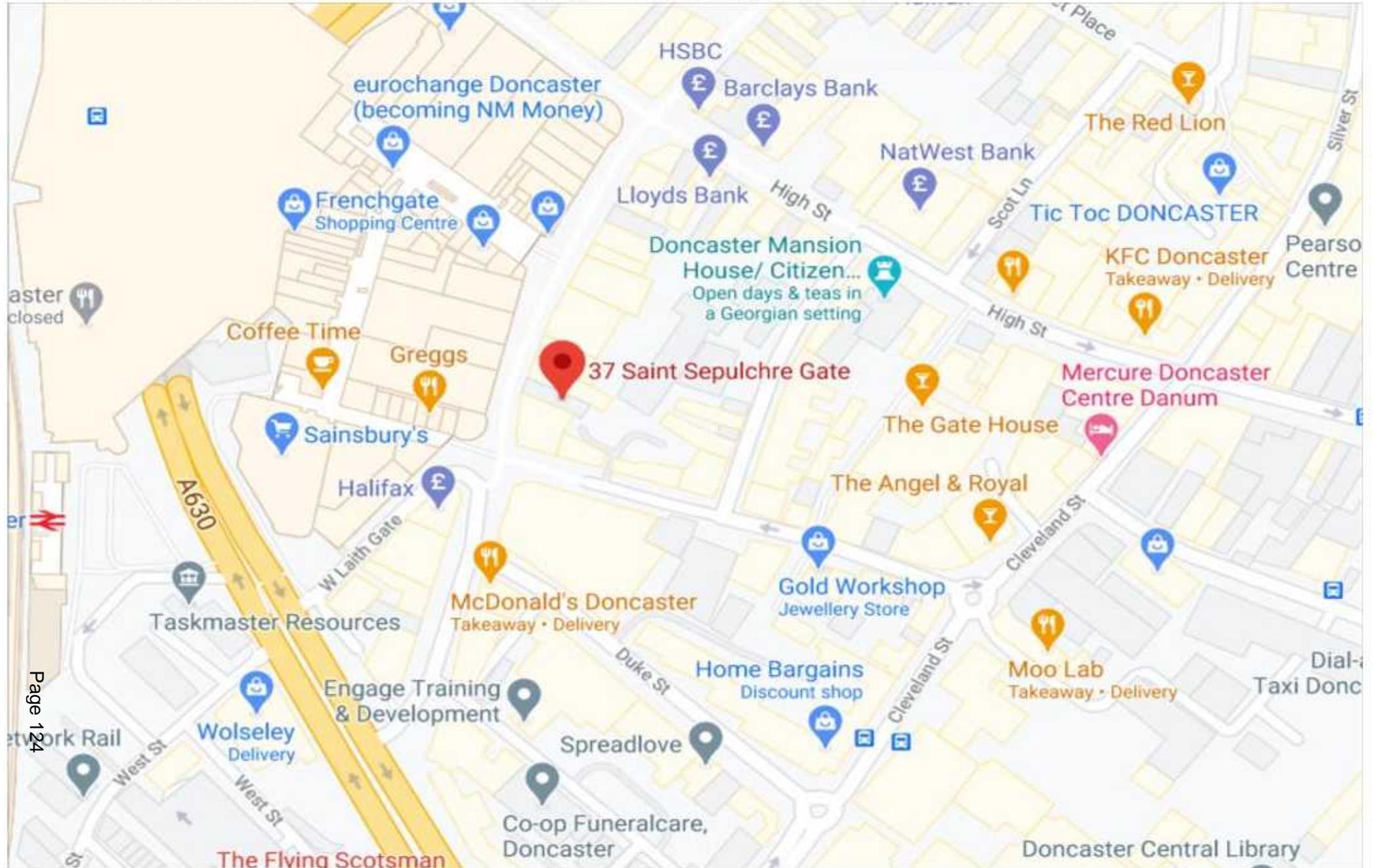
Praesepe Group already operate two other gambling premises under Doncaster Borough Council, Cashino Gaming, 52 High Street, Doncaster, DN1 1BB and Cashino Gaming, 96 High Street, Mexborough, S64 9AU and previously Cashino Gaming, 2 Queensgate, The Waterdale Centre, Doncaster, DN1 3JN (ceased trading 2018). These premises have been operated by Praesepe since 2017 and Have never been subject to a local authority or Gambling Commission review.

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

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

Assessors Name:	Lisa Kennedy - Internal Audit Officer and Amanda Kiernan – Head of Compliance
Signature:	
Date:	17.12.2020

Merkur Slots, 37-39 Sepulchre Gate, Doncaster, DN1 1DT



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Merkur Slots, 37-39 Sepulchre Gate, Doncaster, DN1 1DT – Shop frontage example



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**Annotated copy of UK Government
National Statistics report – Indices of
Deprivation 2019**

Local Authority District name (2019)	IMD - Average rank	IMD - Rank of average rank	IMD - Average score	IMD - Rank of average score	IMD - Proportion of LSOAs in most deprived	IMD - Rank of proportion of LSOAs in most deprived	IMD 2019 - Extent	IMD 2019 - Rank of extent	IMD 2019 - Local concentration
Blackpool	26765.29	1	45.039	1	0.4149	6	0.5766	5	32838.16
Manchester	26417.75	2	40.005	6	0.4326	5	0.5999	2	32509.62
Knowsley	26199.75	3	43.006	2	0.4694	3	0.5992	3	32740.28
Liverpool	25833.57	4	42.412	3	0.4866	2	0.6213	1	32684.97
Barking and Dagenham	25551.85	5	32.768	21	0.0364	139	0.4724	20	29391.87
Birmingham	25319.55	6	38.067	7	0.4131	7	0.5792	4	32208.16
Hackney	25312.57	7	32.526	22	0.1111	78	0.4319	25	30187.74
Sandwell	25276.49	8	34.884	12	0.1989	44	0.5349	10	31705.52
Kingston upon Hull, City of	25222.75	9	40.564	4	0.4518	4	0.5505	8	32621.01
Nottingham	24458.51	10	34.891	11	0.3077	15	0.5235	11	31909.18
Burnley	24400.26	11	37.793	8	0.3833	8	0.5357	9	32627.54
Newham	24138.70	12	29.577	43	0.0244	154	0.2884	67	28987.07
Hastings	23845.37	13	34.281	17	0.3019	17	0.4376	24	32432.12
Blackburn with Darwen	23819.60	14	36.013	9	0.3626	9	0.5519	7	32396.85
Stoke-on-Trent	23797.05	15	34.504	14	0.3208	12	0.5073	12	32056.84
Middlesbrough	23729.10	16	40.460	5	0.4884	1	0.5710	6	32726.13
Rochdale	23414.21	17	34.415	15	0.2985	20	0.4758	19	32295.70
Hyndburn	23297.52	18	34.333	16	0.2692	21	0.4796	17	32271.77
Wolverhampton	23274.95	19	32.102	24	0.2089	38	0.4828	16	31347.16
Salford	23233.56	20	34.210	18	0.3000	19	0.4720	21	32355.62
Bradford	23086.82	21	34.666	13	0.3355	11	0.4981	13	32399.09
Leicester	22857.96	22	30.877	32	0.2031	42	0.3713	37	31842.02
Tameside	22774.30	23	31.374	28	0.2057	40	0.4155	28	31859.28
Great Yarmouth	22767.13	24	33.097	20	0.2459	25	0.3926	33	32507.39
Hartlepool	22581.98	25	35.037	10	0.3621	10	0.4973	14	32560.44
South Tyneside	22573.29	26	31.509	27	0.2451	26	0.4508	23	31513.31
Tower Hamlets	22507.05	27	27.913	50	0.0139	175	0.3057	57	29011.42
Islington	22490.24	28	27.535	53	0.0488	126	0.2705	74	29301.65
Oldham	22460.10	29	33.155	19	0.3050	16	0.4790	18	32318.78
East Lindsey	22178.95	30	29.892	39	0.1605	55	0.3396	49	31945.71
Walsall	22152.64	31	31.555	25	0.2635	22	0.4844	15	31611.53
Tendring	22083.12	32	30.484	36	0.1798	48	0.3139	53	32305.16

Sunderland	21993.93	33	30.586	35	0.2270	34	0.3960	32	31950.32
Thanet	21985.10	34	31.314	30	0.2143	37	0.3642	42	32447.07
Lewisham	21959.25	35	26.661	63	0.0296	148	0.2464	84	28994.08
Pendle	21934.23	36	30.723	33	0.3158	14	0.4077	29	31652.21
Haringey	21887.62	37	27.956	49	0.0966	84	0.3210	52	30429.89
Barnsley	21850.19	38	29.933	38	0.2177	35	0.3838	35	31740.45
Halton	21746.16	39	32.325	23	0.3165	13	0.4678	22	32282.99
St. Helens	21635.55	40	31.518	26	0.2437	28	0.4011	30	32345.57
Doncaster	21613.33	41	30.289	37	0.2371	32	0.3984	31	31914.03
Lambeth	21351.38	42	25.422	81	0.0000	195	0.1949	108	28390.91
Southwark	21247.36	43	25.811	72	0.0301	147	0.2305	91	28758.95

**Highlighted copy of R v Manchester
Crown Court ex parte Dransfield (1982)**

**R v MANCHESTER CROWN COURT EX PARTE
DRANSFIELD NOVELTY COMPANY LIMITED**

Queen's Bench Division

Glidewell J

16 February 1982

Gaming Machines – Section 34 permits for amusement arcades – Relevance of grant of planning permission – Duty of professional judge to give reasons – Jurisdiction of High Court in judicial review – Findings of Crown Court, whether supported by evidence – Nature of evidence in licensing matters – Gaming Act 1968

Dransfield Novelty Company Ltd (the company) sought to open a leisure centre in Ashton-under-Lyne. It sought to distinguish between a leisure centre and an amusement arcade suggesting that leisure centres were aimed at older, more mature people, in particular those engaged in shopping. The local authority refused to grant a permit and the company appealed to the Crown Court. The Crown Court dismissed the appeal

The history of the premises was that the company had applied for planning permission, which had been turned down by the local authority on the ground that the proposed use would be 'out of character with the area'. Upon appeal the inspector allowed it stating that he was satisfied that the leisure centre was unlikely to have a materially adverse effect on the amenity and character of the adjoining shopping area.

Upon the application for a permit the licensing subcommittee of the local authority considered the matter in the absence of the parties and being mindful to refuse the application on moral grounds invited the applicant company to attend a committee meeting and make representations. The police raised no objection. The committee refused the application on the following grounds: the grant of a permit '(1) would encourage young persons to delinquency; (2) would encourage school children to truancy; (3) would be to the detriment of the Borough of Tameside; and (4) was not justified as the evidence provided by the applicant failed to prove that the proposals would not be socially undesirable'.

In preparation for the appeal the company sought an explanation of the third and fourth reasons but none was given. The Crown Court dismissed the appeal but did not give any reasons. Upon application for leave to apply for judicial review, Comyn J suggested that the Crown Court judge give the court's reasons and a statement of reasons was supplied about 6 months after the event. The Crown Court's reasons were: (a) the area concerned had fallen into decline and could barely be called a secondary shopping centre; (b) with adult shoppers becoming fewer operators might be tempted to resort to a youthful or teenage customer; (c) the grant of a licence in a less desirable area may inhibit the grant of a later application in a more desirable location; and (d) the question of 'need' was relevant to the exercise of discretion. Other reasons given related to the undesirability of such premises becoming teenage gambling places and local opinion being against the grant (evidence given by a local councillor).

The company applied for judicial review contending that: (1) the Crown Court failed to adopt or confirm either of the local authority's first two grounds for refusal; (2) there was no evidence to justify the Crown Court's conclusion; and (3) the first three reasons given by the judge dealt with the planning issues and were therefore irrelevant the matter having been determined by the inspector in the planning proceedings. At the hearing points were taken on jurisdiction and the Crown Court's failure to give reasons at the time of the hearing of the appeal.

- A** **Held** – dismissing the appeal –
- (1) Neither of the third and fourth reasons given by the local authority had a sensible meaning and had to be ignored.
- (2) Despite the wording of para 13 of Sch 9 to the Gaming Act 1968 ('The judgment of the Crown Court on the appeal shall be final.') the decision of the Crown Court on such an appeal was amenable to challenge by way of judicial review.
- (3) The Crown Court judge was wrong not to have given the reasons of the court for dismissing the appeal at the time when he announced the decision.
- B** (4) Whilst it was true that the Crown Court did not adopt or confirm expressly the grounds of the local authority, the main points in the appeal had concerned the likelihood of young people being attracted to the premises which is what the local authority's first two grounds were about.
- (5) The Crown Court must have some evidence before it upon which it can properly reach its conclusion. It cannot decide on no evidence. It cannot properly guess or simply make assumptions not founded on evidence. But if there is some evidence to support its decision the weight to be given to any particular piece of evidence is a pure matter of discretion for the Crown Court.
- C** (6) The nature of evidence called and accepted in licensing matters is not of the nature of evidence called, for instance, in the criminal courts. Licensing courts and authorities dealing with licensing matters are not bound by the strict rules of evidence, and they can therefore, and properly do, accept hearsay evidence and unproved documents. Again, what weight they attach to such evidence is a matter for them to consider. There was evidence in this case to support the Crown Court's findings.
- D** (7) A Crown Court is entitled to reconsider, and if it thinks right, to differ from an inspector who dealt with the planning issues. However, if an inspector in a matter of this sort has specifically dealt with a particular issue, and expressed his view or conclusion on that issue, it is clear that his view or conclusion must be given great weight by the local authority, and by the Crown Court on an appeal, and there would have to be good reason for rejecting that view or conclusion. In this case there was an overlap between the matters dealt with by the inspector and the Crown Court, but the Crown Court had not trespassed on the area with which the inspector had had to deal.
- E**

Statutory provisions considered

Gaming Act 1968, ss 30, 34, 54, Sch 7, Sch 9, paras 8, (2), 12, 13
Courts Act 1971, s 10

F

Cases referred to in judgment

R v Knightsbridge Crown Court ex parte International Sporting Club (London) Limited and Another [1981] 3 WLR 640, QBD

R v Medical Appeal Tribunal ex parte Gilmore [1957] 1 QB 574, [1957] 2 WLR 498, CA

Sagnata Ltd v Norwich Corporation [1971] 2 QB 614, [1971] 3 WLR 133, CA

G

Tehrani and Another v Rostron [1972] 1 QB 182, [1971] 3 WLR 612, CA

R.J. Harvey QC and *J. Ker-Reid* for the applicant
J. Hugill QC and *H. Singer* for the respondent

H

GLIDEWELL J: This is an application for judicial review of a decision made on 25 June 1981 at Manchester Crown Court by His Honour Judge Hardy and four justices dismissing an appeal to them against the refusal of the Tameside Metropolitan Borough Council to grant a permit under s 34 of the Gaming Act 1968 for premises in Ashton-under-Lyne. The relief sought comprises an order of certiorari to quash the decision, an order of mandamus requiring the court to rehear the appeal and associated declarations.

I start by saying something about the applicants and their application. The applicant company is a subsidiary of a group which manufactures and sells gaming machines on a large scale. The applicant company is concerned in the business of operating what are called leisure centres. At present the company has one such subsidiary in Leeds and one in Batley, and has planning permission for two others, also in Yorkshire. There is recognised in the trade a distinction between what is called a leisure centre and what is called an amusement arcade. This distinction, as I understand it, is based largely upon the nature of the machines which are installed in the respective institutions, and to an extent upon the way in which they are decorated and furnished. A leisure centre is intended to appeal to older people (by which I do not mean those who are necessarily of an age to draw the old age pension, but those certainly of maturer years) in particular to those who are engaged in shopping, which at any rate during the working week must largely mean housewives. A suitable location for a leisure centre is therefore thought by those concerned in running them to be a major shopping street or a shopping centre.

By contrast, an amusement arcade contains machines and entertainments some of which involve a good deal of noise, and I suppose also flashing lights, and it is set out and is expected to appeal much more to the younger members of society, particularly teenagers.

One of the ways in which the use of gaming machines on which prizes may be won may be rendered lawful is by the grant of a permit relating to premises under s 34 and Sch 9 of the Gaming Act 1968. Such a permit may relate either to premises in which another main trade is carried on, to which the machine or machines is or are an addition, as for instance is the case where one or two such machines are installed in a cafe; alternatively, the permit may relate to premises such as a leisure centre where the whole object of the enterprise is to provide facilities for playing these machines. The use of such premises therefore requires both a permit under s 34 and planning permission if, as is normally the case, the use in planning terms of the premises has previously been a different use.

For leisure centres the appropriate district council is normally both the planning authority and the licensing authority under s 54, a fact which imposes on the authority the obligation to make sure that it does not confuse its functions.

I turn to the history of the matter. On 25 November 1979 the applicant company (now the appellant company) made an application for planning permission for a change of use of premises at 212 Stamford Street, Ashton-under-Lyne as a leisure centre. On 5 March 1980 the Tameside Metropolitan Borough Council refused that application on the ground that the proposed use would be 'out of character with the area'. (That last phrase is a quotation.) The applicants appealed.

On 5 August 1980 the inspector who had heard the appeal allowed it, he being delegated to deal with the matter. In his decision letter he said his opinion was: 'The decision in this case turns firstly, on whether or not the proposal would have an adverse effect on the amenity and character of Stamford Street and secondly, whether it would prejudice the effectiveness of the retail trade in this locality'.

Having in his letter, in the usual way, summarised the cases presented, both by the appellant company and by the council, he came to his

A conclusions. On the first issue he said: 'I am satisfied ... that a leisure centre is unlikely to have a materially adverse effect on the amenity and character of the adjoining shopping area'. He also said: 'It is unlikely that it will attract congregations of people or an undesirable element of the population which would be likely to cause problems in Stamford Street'. Then he said, thirdly: 'The social and moral aspects of the proposal are matters for consideration by the appropriate licensing authority and are not material planning considerations'.

B He then turned to the second issue. He characterised Stamford Street as a secondary shopping area and said it was expected to continue as such. He said: 'I consider that the appeal proposal is unlikely to have an adverse effect on the shopping effectiveness of the street since a large percentage of its customers would be likely to be mature women shoppers who, during shopping hours, would find relaxation offered by the centre for short periods during a shopping trip'. He therefore decided to allow the appeal.

C On 9 October 1980 the company made an application for a permit under s 34 of the 1968 Act. On 21 November 1980 the Director of Administration of the Tameside Metropolitan Borough Council wrote to the appellants' solicitors telling them that the relevant committee had considered that application, that the committee had been told that planning permission had been granted, and the police had raised no objection, but he said: 'Following detailed consideration of the application during which Members expressed concern at the opening of this leisure centre within a shopping area and were mindful to refuse the application on moral grounds, it was resolved – that a decision upon the application be deferred until the next meeting to enable the applicant to attend'. The letter went on to invite them to do exactly that.

D So on 11 December 1980, which was the date of the next meeting of the committee, the applicants attended the committee meeting, represented by their solicitors, and I think by, counsel (but I am not entirely certain) and made representations to the committee which then considered the application having heard those representations. On 11 December 1980 the committee decided to refuse the application, and the refusal was notified to the applicants on 15 December 1980, by letter of that date. That gave the grounds of refusal, which were: 'The granting of such a permit: (1) would encourage young persons to delinquency; (2) would encourage school children to truancy; (3) would be to the detriment of the Borough of Tameside; (4) was not justified as the evidence presented to the Environmental Health and Control Committee by the applicant failed to prove to their satisfaction that the proposals would not be socially undesirable'.

E The applicants at once appealed to the Crown Court, but in addition, through agents they asked for an explanation or expansion of the third and fourth of those grounds of refusal. That information was not granted to them. It is fair, therefore, to say that neither of those third or fourth grounds of refusal, without expansion or clarification, can have a great deal of sensible meaning. The third ground, that the grant of a permit would be to the detriment of the Borough of Tameside, is of course a broad statement, but it is one that is quite impossible to rebut unless one knows in what respect it is said it would be to the detriment of the Borough of Tameside, and the question of the social undesirability was not expanded. Therefore it must be assumed, in my view, that it was the first two grounds that were really the

basic reasons for the committee's refusal, both relating to young people, namely, that young people might be encouraged to delinquency or to truancy. A

I should say, as Mr Harvey very properly and fairly acknowledged, that in having given the applicants advance warning that they were minded to stay their hand until the applicants had been heard, and giving them the opportunity to make representations, the borough council had in that respect acted entirely properly, and no complaint of the way in which they dealt with this matter can possibly be made. B

On the 25 June 1981 the Crown Court heard the appeal. There were called on behalf of the applicants two witnesses, Mr Jack Transport, who is the property and estate manager of the company, and Mr E. E. Taylor, a fellow both of the Royal Institution of Chartered Surveyors and of the Royal Town Planning Institute, and a distinguished figure in the field of town planning. Mr Taylor had given evidence for the applicants on the planning appeal. On behalf of the council one witness was called, a senior councillor, Councillor Hatton. C

At the conclusion of the hearing the bench retired, and when they returned to court, the circuit judge announced that the appeal was dismissed. He said he did not intend to give any reasons for the dismissal.

Application was made for leave to move for judicial review, and Comyn J, who heard that application, suggested, I am informed, that the learned judge should be invited in retrospect, so to speak, to give a statement of the Crown Court's reasons for the refusal of the appeal. His Honour Judge Hardy, in response to that suggestion, therefore supplied a statement of reasons dated 17 December 1981, almost 6 months after the hearing of the appeal. The point was made by Mr Harvey that the application for leave was heard and leave was granted on the 8 October of this year, and therefore that His Honour Judge Hardy received the invitation to give a statement of reasons shortly after that, which was somewhat nearer in date to the hearing of the appeal than was the date when he finally produced the statement of reasons. Of course that is correct, though it was still some 4 months after the hearing of the appeal. I make that comment because, not surprisingly, the learned judge in his statement, amongst other things says: 'I am fairly confident that I cannot now after several months recall all my own reasons nor the comparative weight that I attached to each of them for taking the view that the appeal should be dismissed'. Having said that, he went on to set out the reasons he could recall. In seeking to reconstruct the reasons for a decision given months before he has indeed my sympathy. D E F

I turn first to consider a matter relating to the jurisdiction of this court. The procedure for the application and the grant of permits under s 34 of the Gaming Act 1968 is set out in Sch 9 to that Act. Paragraph 8 of that Schedule makes two points: First, in relation to the grant of the permit, the grant is wholly at the discretion of the local authority, and so far as the statute is concerned that discretion is unlimited; secondly, when one comes to renewal, if a permit has been granted in the first place, it is made clear that renewal can only be refused on a number of grounds, which are very limited, putting it shortly. Paragraph 12 and the immediately following paragraphs deal with an appeal to the Crown Court. Those paragraphs make it clear, first, that the appeal is by way of rehearing secondly, that in hearing the appeal and coming to its decision the Crown Court has precisely the same discretion as the local authority had in the first instance; and thirdly, to quote G H

A the last words of para 13: 'The judgment of the Crown Court on the appeal shall be final'.

Despite those last words it has long been held that in certain respects the decision of the Crown Court on an appeal of this nature can be challenged by way of an application for judicial review, just as can the decision of a tribunal or body whose decision is said to be final. The discretion of the court, whilst statutorily unlimited, must be exercised judicially, and this court can and will interfere if it is satisfied that the discretion has not been so exercised.

B The authority to which I was referred in this respect is a decision of the Court of Appeal in *Tehrani and Another v Rostron* [1972] 1 QB 182, which was dealing with an analogous subject, that is to say, the registration of a gaming club under s 30 and Sch 7 of the 1968 Act, which contained similar provisions. At 187, Lord Denning, the Master of the Rolls, referred to the fact that Mr Harvey, who was leading counsel for the applicants in that matter, had drawn the court's attention to the provisions of Sch 7, saying that the judgment of Quarter Sessions (as it then was) was final, and went on to say: 'I must say at once that I do not think we should accede to this preliminary objection. Much has happened since those cases' – those are the earlier cases, to which he had referred – 'were decided. The courts have given more thought to the meaning of the legislature when it says that a decision of this or that tribunal is to be "final." The modern cases establish this principle: when Parliament says that a decision of an inferior tribunal is to be "final," it does so on the assumption that the tribunal will observe the law. Parliament only gives the impress of "finality" to the decision on the condition that it is reached in accordance with law: and the Queen's courts will see to it that this condition is fulfilled. Accordingly if a tribunal goes wrong in law and the error appears on the face of the record, the High Court will interfere by certiorari to quash the decision. It is not to be deterred by the enactment that the decision is "final." The decision may be final on the facts, but it is not final on the law. This was settled by [*R v Medical Appeal Tribunal ex parte Gilmore* [1957] 1 QB 574], where all the cases are collected'.

C Then a little lower down he said, at 188: 'Mr Harvey agreed that, in the present case, if Quarter Sessions went wrong in law the High Court would intervene by certiorari or a declaration'. Then he went on to deal with the question whether, as had been done in that case, it was proper to deal with the matter by way of case stated, a problem which does not concern me. Phillimore and Megaw LJ agreed with the learned Master of the Rolls.

D I comment that it is clear that the provisions of s 10 of the Courts Act 1971, which do provide that there cannot be an appeal by way of case stated from a decision of the Crown Court in this situation, have no bearing upon and do not inhibit the right of an applicant to apply for judicial review in these circumstances.

E My conclusion on jurisdiction, therefore, is that this court can interfere with the decision of the Crown Court if either (1) the Crown Court was wrong in law and this was apparent on the face of the record; or (2) the Crown Court took into consideration an irrelevant matter or failed to take into account a relevant matter in arriving at its decision; or (3) the decision was so perverse that no court, properly instructing itself on the law, could reasonably have reached that decision on the evidence. In this case the first

and third of those situations do not arise, but Mr Harvey, in his submission to which I now turn, relies on the second of those matters. He invites me to conclude that the Crown Court both took into account irrelevant considerations and failed to take into account a relevant consideration.

I turn to the judge's statement of reasons. In para 5 he sets out the principles of law which he explained to the justices. These were, shortly: 'That the appeal was a rehearing, and that evidence of the discussions of the Committee was not properly admissible'. I break off to say that he had indeed refused to allow evidence to be given as to what the committee had dealt with during its discussions. Secondly, the learned judge advised the magistrates that the grant was at the discretion of the appropriate authority and there was no guidance in the Act as to the exercise of the court's discretion; thirdly, that they should apply the dictum of Lord Goddard, approved by the Court of Appeal, 'to pay great attention to the fact that the duly constituted and elected local authority have come to their opinion' and that the function of a Crown Court was to exercise its powers when it was satisfied that the judgment below was wrong, not merely because it was not satisfied that the judgment was right. Finally, he advised them that if it was granted the permit would be for a period of 3 years, and if there was a breach of any undertaking given by the applicants that would not be a reason for refusal to renew, so that there was no sanction for the breach of such an undertaking.

There is no doubt that on the first three of those matters his instruction to the justices was immaculate. Mr Harvey is inclined to the view that in relation to the question of the breach of undertaking the learned judge went a little too far. He says it is arguable that the breach of an undertaking would be a ground for objection to the renewal of a permit, and thus for the refusal of a permit under para 8(2) of Sch 9 of the 1968 Act. Mr Hugill contended to the contrary. Certainly it is arguable that the learned judge was right.

The learned judge then went on in para 7 of his statement of reasons to set out what he described as the reasons which he could recall, and I think it right that I should read those in full. He said: 'The reasons I can recall are as follows: (a) The area, which I know, could now barely be called a secondary shopping centre; it was the main shopping street but a by-pass has cut it in two lengthways destroying it as an entity and a new shopping development elsewhere has accelerated its decline. There is no direct access by vehicle between the two halves and virtually it is true also for pedestrians. (b) The application was put forward as providing facilities for adult shoppers but unless something arrests the decline they will become fewer. I therefore took the view that the facilities would be better sited where the density of shoppers was greater and although the commercial viability is not the direct concern of a licensing court if the failure to attract the contemplated customers tempts the operators to resort to a youthful or teenage customer that might be undesirable. (c) The grant of a licence in a vicinity which the licensing court regards as less desirable than another nearby may inhibit the grant later in the latter location. Unless one took the view which I do not that the Act requires the grant of licences in unlimited numbers or without regard as to position or locations.

(d) Although (a) (b) and (c) above can have some similarity to planning considerations I took the view that there is an area of overlap between licensing and planning and that the two are not mutually exclusive. (e) I did

A not regard (b) (c) and (d) above as involving the "need" concept but if they did, they did not involve the need concept exclusively and the submission by the appellants on the authority of [*Sagnata Ltd v Norwich Corporation* [1971] 3 WLR 133] (at page 151/2 "the alternative facilities in the City is to be disregarded") that it was required to be excluded, I did not accept that the case did so require. That was an obiter dictum seemingly based on an admission to that effect. The report not disclosing why it was admitted. The question of "need concept" has always been commonplace for liquor licences and bingo although nowhere referred to in the Act and I do not accept that in an equally unfettered discretion granted by this part of the Gaming Act 1968 it should be as a matter of law excluded and even if that view is wrong and the matters in (b) (c) and (d) above should have played no part in my decision I would still have reached the same decision'.

C I do not propose to quote the rest of the reasons. I will summarise them. In (f) he said he accepted and agreed with Mr Taylor's evidence that 'the type of customers attracted to amusement centres depends upon management, the range of facilities provided and its location'. Then he commented that the appellant accepted that it was undesirable that premises should become a teenage gambling place and that the court had little control over management, as management policy might change. He said in (g) that Mr Taylor's evidence assumed there would be no change in management policy. He said, in effect, that he was critical of Mr Taylor as a witness, and 'I felt it necessary for that reason to suspect his conclusions expressed in general terms'.

E He referred to a report, which had been put in evidence (which was shown to me) to the Church's Council on Gambling, that report being by a Mr Taylor (of course another Mr Taylor) on amusements with prizes. He then said that Mr Hatton struck him as a witness who was not bigoted but was uneasy about the particular application and was not able to articulate his reasons very clearly. He went on to say he placed weight on Councillor Hatton's evidence and opinions by reason of the fact that local councillors are usually sensitive to and good barometers of local opinion. It was suggested to me, and I accept, that although he did not say this in terms, where Councillor Hatton and Mr Taylor had disagreed he was preferring the evidence of Councillor Hatton.

F I turn to the submissions. Mr Harvey made three main points: first, the judge did not adopt or confirm either of the local authority's first two reasons for refusal, that is, the likely encouragement of young persons to delinquency and/or truancy; secondly, there was no evidence to justify the Crown Court's conclusion; and thirdly, the Crown Court took into account planning considerations and/or disagreed with the inspector who heard the planning appeal and therefore took into account irrelevant considerations.

G Before I come to deal with those submissions and express my judgment on them I make a general point as to the giving of reasons by the Crown Court in an appeal of this sort. In *R v Knightsbridge Crown Court ex parte International Sporting Club (London) Limited and Another* [1981] 3 WLR 640, the Divisional Court was concerned precisely with this situation. The facts were somewhat different, in the sense that what had happened in that case was that the judge hearing the appeal had given a judgment which had been recorded and was available to the Divisional Court, but counsel for the Gaming Board objected to the Divisional Court consulting that judgment to

ascertain the judge's reasons, submitting that all they were entitled to do was to look to see whether there was an error of law on the face of the record, and the record was merely the record of the decision of the Crown Court, without reasons. The Divisional Court held that was wrong. It had been argued that the judge could direct that the judgment be made part of the order, and in that case it would become part of the record. At 648 Griffiths LJ said: 'It seems to us that it could be a scandalous state of affairs that, if having given a manifestly erroneous judgment, a judge could defeat any review by this court by the simple expedient of refusing a request to make his judgment part of the order. That would indeed be formalism triumphant. It may be said that the same end can be achieved by the court refusing to give any reasons, as Judge Friend said he was entitled to do in this case. However, it is the function of professional judges to give reasons for their decisions and the decisions to which they are a party. This court would look askance at the refusal by a judge to give his reasons for a decision particularly if requested to do so by one of the parties. It does not fall for decision in this case, but it may well be that if such a case should arise this court would find that it had power to order the judge to give his reasons for his decision'.

Then he reviewed some older authorities which were to the contrary effect, and he said: 'But the courts must adapt their procedures to modern conditions. In the last century the facilities available for recording spoken reasons were not comparable to those which exist today. Shorthand had only recently been invented and there was no electronic recording apparatus with which many courts are now equipped. This court can now rely with confidence upon a transcript of the oral judgment given by a lower court or tribunal as accurately setting out its reasons which may not have been the case 100 years ago'. At 649 he said: 'We, therefore, hold that the reasons contained in the transcript of the oral judgment of the Crown Court constitute part of the record for the purposes of certiorari and we are entitled to look at it to see if they contain errors of law'.

That judgment was given only a few days before His Honour Judge Hardy gave his decision in the Manchester Crown Court. I have been reminded that the judgment in the *International Sporting Club* case was reported in *The Times*, but the report, I am informed and accept, was mainly, if not entirely, concerned with the merits of the matter rather than with the question upon which I have quoted part of the judgment of Griffiths LJ. It seems most probable that His Honour Judge Hardy was therefore totally unaware of the decision of the Divisional Court in that matter when he came to deal with this appeal on 25 July. He was therefore following a practice which had been adopted in the past.

Following, and bound as I am, by the Divisional Court's decision I conclude that he was wrong to have adopted the course of not giving reasons for his decision at the time when he announced his decision. Nevertheless, for the reasons I have explained, he did not realise that the Divisional Court had already adverted to this matter. I do not want it to be thought that in any way I am being critical of him in adopting the course he did, but the fact is that if he had given his reasons there and then – not merely his reasons but the reasons of the court generally – they would undoubtedly have been reasons that were fresh in the minds of the members of the court, and secondly, it is possible that they might have been in somewhat different terms from the reasons which he was able to recollect some 6 months later.

A Mr Hugill for the respondent borough council accepted that it was desirable that the judge should have given his reasons. Indeed, he referred me to an earlier authority, *R v Medical Appeal Tribunal ex parte Gilmore* [1957] 1 QBD 574, a decision of the Court of Appeal, in which Denning LJ (as he then was) at 582 adverted to the possibility that the Divisional Court might require a lower court to give reasons if it were necessary for justice to be done.

B Taking these matters into account I am satisfied, as counsel was satisfied, that I am entitled to look at the reasons set out by the judge based on his recollection, the affidavits which had been filed on this application and the documents exhibited to the affidavits to establish what evidence was before the Crown Court, because that of course is the essential matter upon which Mr Harvey bases his complaint.

C I come back to deal with Mr Harvey's three submissions. As to the first of them, that the judge did not adopt or confirm either of the local authority's first two reasons for refusal, it is true that the Crown Court did not do so expressly, but first, I note that throughout the hearing before the Crown Court it was conceded by the appellants that it was undesirable, or would be undesirable, if young persons were attracted to the premises. Indeed, that was not an issue in the appeal. The main issue was whether they were likely to be attracted, and secondly, if so, whether the appellants could effectively prevent them from coming in by suitable measures of management. These must have been the main points, in my view, in the minds of the members of the court on 25 July.

D Secondly, the judge was therefore entitled to deal with the matter on the basis that it was not merely conceded but established that it would be undesirable if young people were attracted to the premises, and would be undesirable, for the two reasons given by the borough council as its first two reasons for refusal. The point is made in the judge's reasons not directly but by inference in my view, at both subpara (b) and (f) of para 7. I therefore find that Mr Harvey has not substantiated those points.

E I turn to the second submission, that there was no evidence to justify the Crown Court's conclusion. I make two general points about the nature of the evidence. First, I accept that the authorities establish that the Crown Court must have some evidence before it on which it can properly reach its conclusion. It cannot decide on no evidence. It cannot properly guess or simply make assumptions not founded on evidence. But on the other hand, if there is some evidence to support its decision, the weight to be given to any particular piece of evidence is a pure matter of discretion for the Crown Court. It is not a matter for me in this court. Secondly, the nature of the evidence called and accepted in licensing matters generally is not of the nature of evidence called, for instance, in the criminal courts. Licensing courts and authorities dealing with licensing matters are not bound by the strict rules of evidence, and they can therefore, and properly do, accept hearsay evidence and unproved documents. Again, what weight they attach to such evidence is a matter for them to consider.

F I turn to inquire what evidence there was on the major issue, that is to say, that young people might be attracted and be led into truancy and delinquency, and on the question of what steps the applicants could properly take to prevent them from being attracted. Mr Hugill submits, and I agree, that there was admissible evidence on these issues in, first, the evidence of

Councillor Hatton, who spoke, amongst other matters, of the increasing unemployment locally, of the nearness of schools to the premises in Stamford Street and of the difficulty of enforcing an age limit for entrance to the premises. Secondly, there was evidence contained in the report of Mr Taylor to the Church's Council, which was submitted to the Crown Court and which they were entitled to take into account; and thirdly, there was the evidence of Mr E. E. Taylor, who accepted the undesirability of young people being attracted to the centre. A major part of his evidence was concerned with the steps, and their efficacy, which could be taken to prevent them from doing so. I certainly therefore conclude that I cannot hold that there was no evidence on which the Crown Court could reach its decision, and I therefore cannot conclude that the Crown Court took into account an immaterial consideration.

Thirdly, Mr Harvey submits that the judge's first three reasons deal with the planning issues and are thus irrelevant. Mr Hugill submits to the contrary, that the Crown Court is entitled to reconsider, and if it thinks right, to differ from the inspector who dealt with the planning issues. As a matter of law I think that Mr Hugill is correct. However, if an inspector in a matter of this sort has specifically dealt with a particular issue, and expressed his view or conclusion on that issue, it is clear that his view or conclusion must be given great weight by the local authority, and by the Crown Court on an appeal, and there would have to be good reason for rejecting that view or conclusion. However, it is unnecessary for me to express a concluded view about this because I am not satisfied that the Crown Court did disagree with the inspector.

The inspector's two issues, which I have already read out, related to the effect on the amenity and character of Stamford Street and whether the proposed development would prejudice the retail trade in the locality. On those specific issues the Crown Court made no finding. It is true that the inspector did go on to advert to the likelihood that the clientele of the premises would be largely mature women shoppers and that the applicants intended to seek to exclude young people, but those are not the fundamental matters with which he was concerned. Therefore, insofar as there was overlap – and I accept there was an overlap – between the area with which the Crown Court dealt and the area with which the inspector dealt on the planning appeal, the Crown Court was not trespassing on the area with which the inspector *had* to deal and upon which he had specifically based his decision on the appeal.

There is one other point which Mr Harvey made to which I must refer. The inspector had said, as I have already mentioned, that Stamford Street has become a secondary shopping street. The judge found that Stamford Street had declined as a retail area. Whether there is anything between those two I very much doubt, but if there is, then I cannot find it is a matter of such significance that of itself it would entitle me to say that the Crown Court's decision should be quashed. For those reasons I am not satisfied that the Crown Court was in breach of the principles I have endeavoured to set out relating to what is relevant and what can properly form the basis of its decision. The application therefore fails and it must be dismissed.

A *Appeal dismissed with costs.*

Solicitors: *Warren Murton and Co* for the applicant
Local authority solicitor

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KERRY BARKER
Barrister

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**‘Gambling: An evidence briefing paper
for Doncaster’ submitted by Public
health in response to the Planning
Permission application for Merkur
Slots, 37/39 St Sepulchre Gate,
Doncaster, DN1 1TD**



Doncaster
Council

Gambling:

An evidence briefing paper for Doncaster



Gambling: An evidence base briefing paper for Doncaster

1 Purpose

This paper provides an overview of gambling and the evidence in relation to the impact of problem gambling.

It must be noted that at the time of writing there is a lack of robust evidence concerning problem gambling, particularly local data and intelligence. This paper attempts to summarise useful evidence that will help us respond to the needs of problem gamblers in Doncaster.

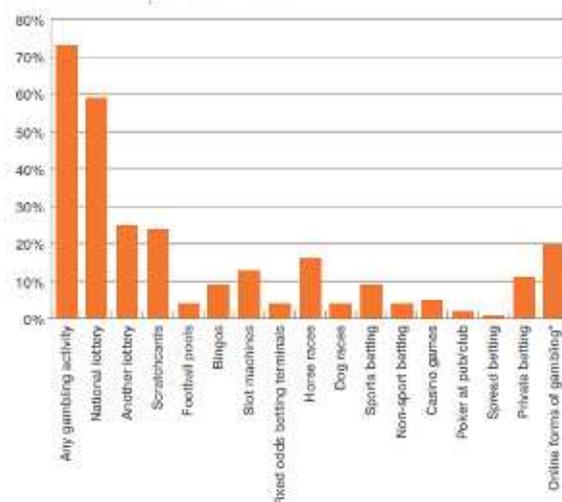
2 Background

There are numerous definitions of gambling and synonyms to describe gambling (e.g. gaming, wager, bet flutter). In essence gambling is the practice of playing games of chance or betting in the hope of winning money or, to stake or risk something of value on an event with an uncertain, or chance outcome.

Gambling has been described as being like alcohol, a legal activity on a continuum of harm (Best 2018). It has been suggested that there is a large number of people experiencing harm from gambling, and a small number of people that experience high levels of harm (Browne et al 2016).

Gambling is a common feature of everyday life for many people in Great Britain with up to three quarters of adults estimated to gamble to some degree each year. For the vast majority there are no significant negative consequences to gambling but it is estimated that 1 in every 90 adults in Great Britain is a problem gambler (Cards on the Table, Dec 2016); problem gambling is defined by the Royal College of Psychiatrists as gambling that disrupts or damages personal, family or recreational pursuits.

There are many different forms of gambling that people in Britain participate in. The illustration below shows the percentage of the British adult population that have participated in gambling activities over a 12-month period. Can the table be made bigger?



Source: British Gambling Prevalence Survey 2010 (BGPS 2011)
*Note: Online forms of gambling includes online bets on horse races, dog races, other sports or non-sports events with a sportsbook or betting exchange. Also includes using the internet to play the national lottery, other lotteries, bingo, football pools, casino games and online slot machines style games.

3 Gambling and the economy

Headline findings indicate areas of interest across the industry or within each sector, highlighting percentage changes and changes in trends.

£14.5bn

Total Gross Gambling Yield (GGY) of the Great Britain gambling industry
(Oct 2017 – Sep 2018) (0.6% decrease from Apr 2017 – Mar 2018)

£5.6bn

Total GGY for the remote sector
(Oct 2017 – Sep 2018) (2.9% increase from Apr 2017 – Mar 2018)

106,670

Total number of employees in the Great Britain gambling industry
(Sep 2018) (1.4% decrease from Mar 2018)

39%

Market share of the remote sector
(Oct 2017 – Sep 2018) (1.2% increase from Apr 2017 – Mar 2018)

8,423

Total number of betting shops in Great Britain
(Sep 2018) (1.5% decrease from Mar 2018)

183,813

Total number of gaming machines in Great Britain
(Oct 2017 – Sep 2018) (2.4% increase from Apr 2017 – Mar 2018)
(excludes those requiring only a local authority permit)

650

Total number of bingo premises in Great Britain
(Sep 2018) (1.1% decrease from Mar 2018)

£1.5bn

Contributions to good causes from The National Lottery
(Oct 2017 – Sep 2018) (0.2% increase from Apr 2017 – Mar 2018)

152

Total number of casino premises in Great Britain
(Sep 2018) (1 more than Mar 2018)

£314m

Contributions to good causes from large society lotteries
(Oct 2017 – Sep 2018) (5.1% increase from Apr 2017 – Mar 2018)

1,639

Total number of licensed arcades in Great Britain
(Sep 2018) (5.3% decrease from Mar 2018)

Gambling Commission Industry Statistics April 2016 to March 2018 Updated to include October 2017 to September 2018
<https://www.gamblingcommission.gov.uk/PDF/survey-data/Gambling-industry-statistics.pdf>

4 Gambling in the UK

The Gambling Commission* reports high levels of participation in gambling in the UK:

46% of people have gambled in the past four weeks

51% of men have gambled in the past four weeks

41% of women have gambled in the past four weeks

18% of people have gambled online in the past four weeks

Online gambling behaviour (year to Dec 2018)

96% of online gamblers gamble at home

45% of online gamblers gamble using a laptop

55% of online gamblers gamble using a mobile or tablet device

23% of online gamblers have bet in-play in the past four weeks

*Last accessed 20.3.19 <https://www.gamblingcommission.gov.uk/news-action-and-statistics/Statistics-and-research/Levels-of-participation-and-problem-gambling/Gambling-participation-and-problem-gambling.aspx>

The Gambling Commission's paper Young People and Gambling (2018) explores the gambling behaviours of young people aged between 11-16 years old in England, Scotland and Wales:

14% Percentage of 11-16 year olds that have gambled in the last week

66% Percentage of 11-16 year olds that have seen gambling advertising on TV

1.7% Percentage of 11-16 year olds that are defined as problem gamblers

26% Percentage of 11-16 year olds that have seen their parents gamble

13% Percentage of 11-16 year olds that have played online-gambling style games

12% Percentage of 11-16 year olds that follow gambling companies on social media

Last accessed 20.3.19 <https://www.gamblingcommission.gov.uk/news-action-and-statistics/Statistics-and-research/Levels-of-participation-and-problem-gambling/Young-persons-survey.aspx>

Gamcare, the national provider of free information, advice and support for anyone affected by problem gambling, highlights the indicative trends emerging from their 2017/18 data. These statistics are gathered from calls to the National Gambling Help Line and from the treatment services delivered across their network in England, Scotland and Wales. These statistics are not collected, nor do they have integrity as a dataset, for academic purposes. Key messages:

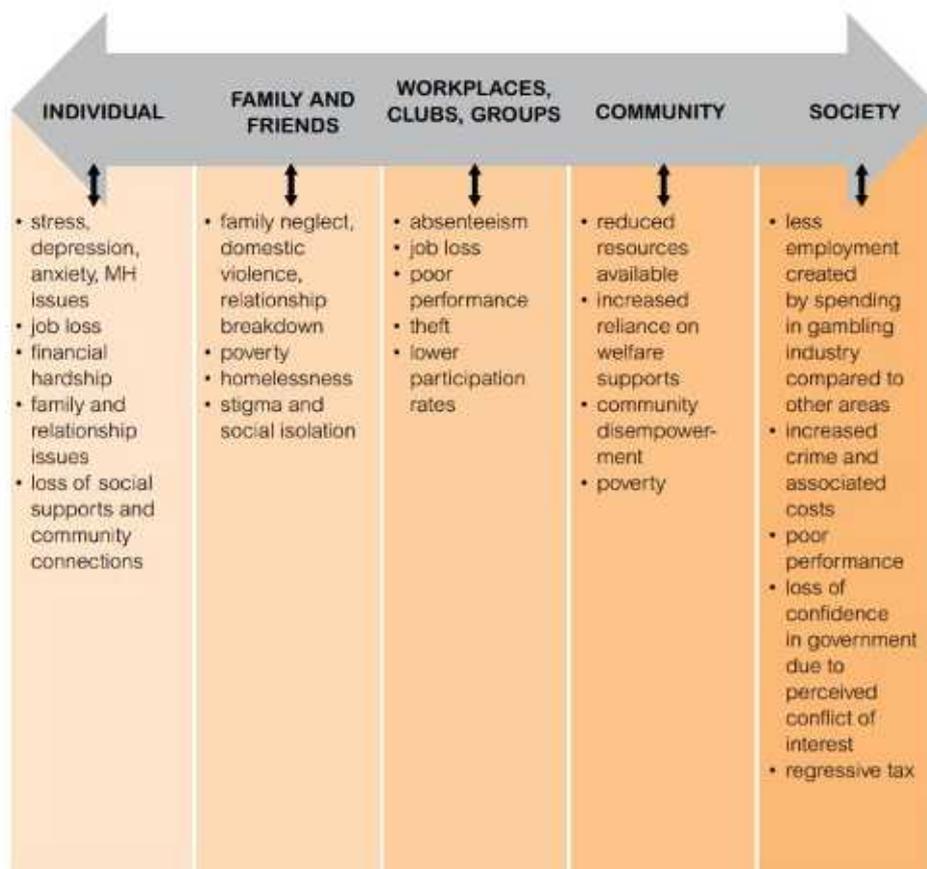
- Target calls from problem gamblers and affected others increased by 2% to 29,889
- Clients in treatment across Great Britain increased by 3% to 8,310
- Gamcare has seen a gradual increase in the number of callers to the National Gambling Help Line disclosing issues with online gambling, rising from 47% of callers in 2014/15 to 55% of callers in 2017/18.

- Similarly, more clients in treatment are disclosing issues with online gambling, rising from 38% in 2014/15 to 53% in 2017/18.
- Overall, 43% of callers mentioned impacts on their mental wellbeing last year, including anxiety, stress, depression, isolation, plus suicidal thoughts and feelings. Health problems include alcohol misuse, anxiety/stress, feeling isolated, general health and mental health.

There were also 2,289,469 unique visitors to the GamCare website during the year. Further detail can be found at: <https://www.gamcare.org.uk/app/uploads/2019/03/Briefing-Paper-GamCare-Annual-Statistics-2017-18.pdf>.

5 Levels of Harm from Problem Gambling

The consequences of problem gambling or gambling related harms can be far reaching, affecting not only the individual, their family and friends but also social networks and society.



Source: Health promotion resource guide for problem gambling prevention in Melbourne North¹²

Research commissioned from the Institute for Public Policy Research in 2016 estimated that the cost to government associated with people who are problem gamblers in Britain was between £260 million – £1.16 billion (based on problem gambling rates ranging from 0.4 to 1.1 per cent of the adult population). This was based on six identified specific costs covering primary and secondary health costs, hospital inpatient services, welfare and employment costs, housing costs and criminal justice costs.

<https://www.local.gov.uk/tackling-gambling-related-harm-whole-council-approach>

6 How gambling affects the population

Goodwin et al's (2017) best estimate is that a typical problem gambler affects six other people. Nash et al (2018) suggest that this figure could be 6 – 10 people.

There is growing evidence that the prevalence of problem gambling or the vulnerability to developing problem gambling may be higher within certain population sub-groups, particularly:

- Younger people, particularly men
- Those with other addictions (drugs, alcohol, nicotine)
- Those with mental health difficulties
- Unemployed, economically inactive, low socio-economic status, deprivation
- Some ethnic groups (e.g. new migrants)
- Children of problem gamblers

(Dowling et al. 2018; Shaffer et al. 1999, p1372; Petry et al. 2005; Cochrane collaboration 2012, p6; Geofutures, 2015; Responsible Gambling Strategy Board, 2016, p2; Cowlshaw et al. 2017 p277-8)

Studies screening offender populations have also found higher prevalence of problem gambling than would be expected in the general population. A pilot by the Beacon Trust, Cheshire Police, Mitie Care and Custody and Gamcare (November 2017) which screened using Lie/Bet identified problem gambling levels in the arrestee population in Cheshire at 13%.

<https://www.gamcare.org.uk/app/uploads/2017/11/HOWARD-LEAGUE-WINNER-CRIMINAL-JUSTICE-BROCHURE.pdf>

7 Who is at risk?

Vulnerable Groups (Geofutures 2015)

https://www.geofutures.com/file_exchange/gambling_risk_index/public/Phase2ReportWebVersionFinal9thFebruary2016.pdf

Demographics	Socio-economic	Poor judgement/impairment	Other
Youth	Unemployed	Low educational attainment	Poor mental health
Older people	Low income	Low IQ	Substance abuse/misuse
Women	Deprived areas	Under influence alcohol/drugs	Problem gamblers
Ethnic groups	Financial difficulties/debt	Learning disabilities	
	Homeless	Personality traits	
	Immigrants		
	Prisoners/probation		

8 Local Picture

Licensing objectives

In accordance with the Gambling Act 2005 Doncaster Council carries out its licensing functions with a view to promoting the following three licensing objectives:

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
2. Ensuring that gambling is carried out in a fair and open way;
3. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

It should be noted the Licensing Authority (Doncaster Council) is not involved in licensing remote gambling, which is regulated by the Gambling Commission via operating licences.

In January 2019 Doncaster Council updated its Statement of Licensing policy. Going forward the Director of Public Health will be consulted on any application received for a new license. Public Health will complete a risk profile of the area and submit it to the licensing department for consideration as part of the application process.

Links between deprivation and gambling have already been established; Doncaster is ranked as the 39th most deprived area in England and the 3rd most deprived area in the Yorkshire and Humber region.

Deprivation

The table below shows the deprivation rank of each ward area (1 being the worst and 21 the best). It also shows what % of the population live within 1km of a betting office.

2015 Ward Profiles <https://www.teamdoncaster.org.uk/Contents/Item/Display/83> shows that in the 10 most deprived wards in Doncaster over 80% of the population lives within a 1km of a betting shop.

Deprivation Rank	Ward	% of population within a 1km buffer of betting shop
1	Town	97.7
2	Hexthorpe	98.7
3	Mexborough	81.8
4	Conisbrough	89.3
5	Adwick	85.6
6	Wheatley	83.3
7	Stainforth	33.2
8	Thorne	91.4
9	Bentley	69
10	Balby South	71.6
11	Edlington	90.4

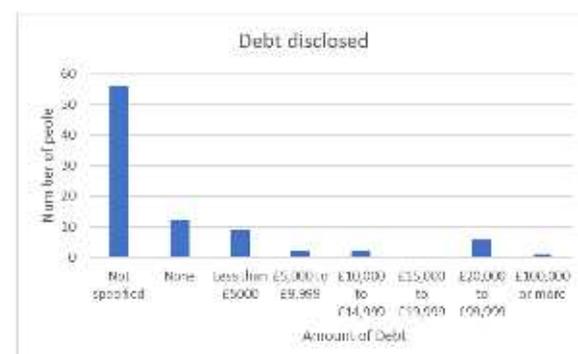
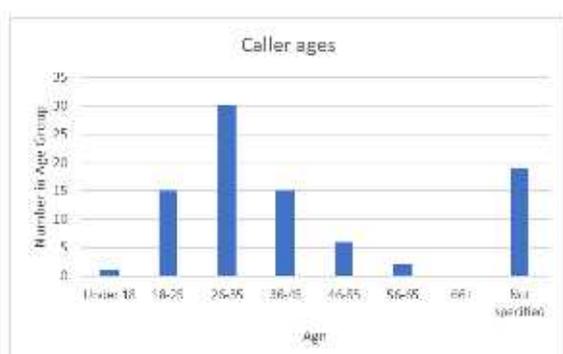
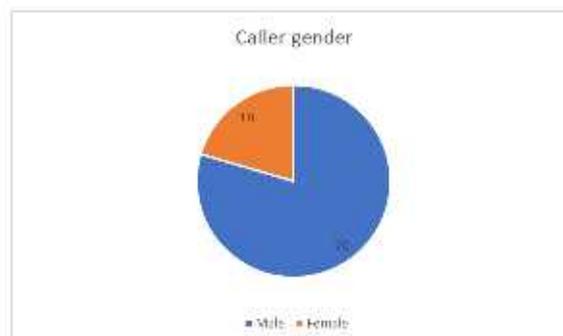
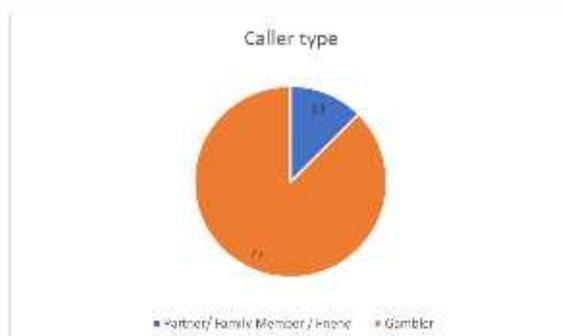
12	Rossington	81.5
13	Norton	43.9
14	Hatfield	47.7
15	Armthorpe	92.1
16	Bessacarr	53.6
17	Roman Ridge	90.9
18	Edenthorpe	0.4
19	Sprotbrough	2.9
20	Finningley	3.3
21	Tickhill	n/a

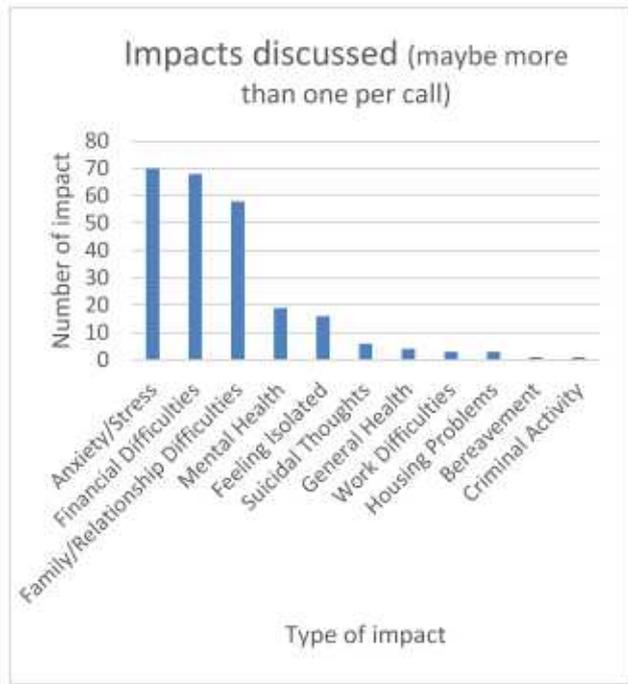
9 Gambling data for Doncaster

There is limited local data available as to how many problem or harmful gamblers there are in Doncaster. However, the following information does provide some useful insight:

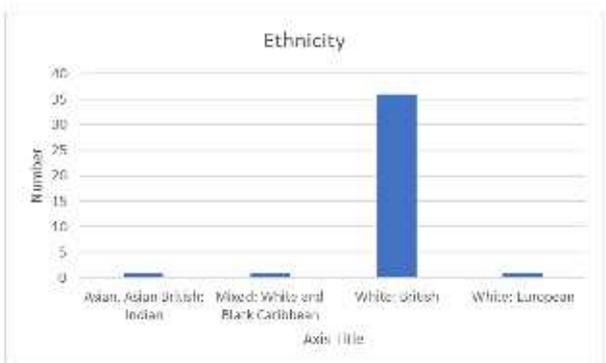
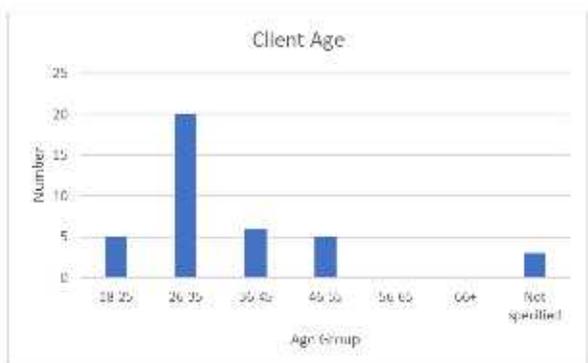
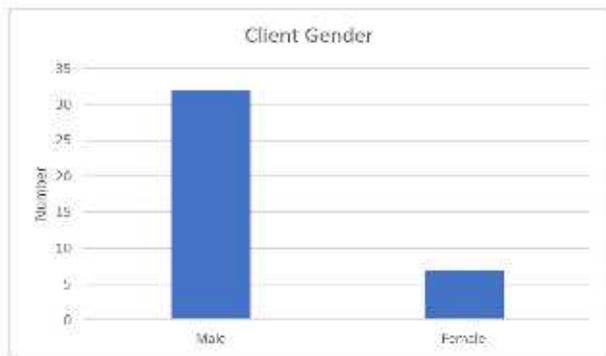
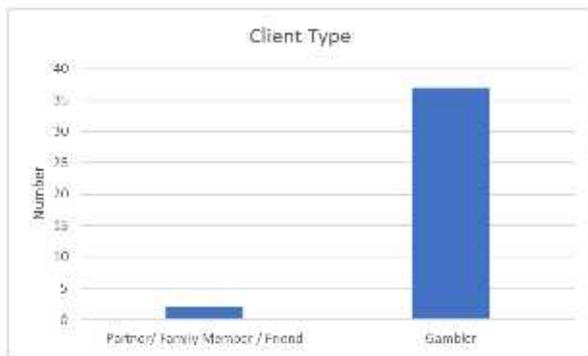
Doncaster's Gamcare Statistics 2018

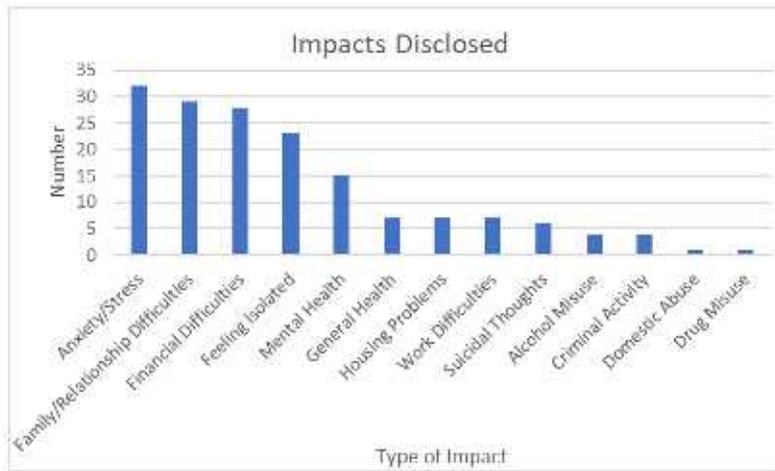
During the year 2017/2018 there were **88 telephone callers** to the Gamcare Helpline. The charts below show the demographic breakdown, the amount of debt disclosed and the impacts experienced.





In addition, **39 people** accessed local treatment and support. This could be face to face or via online courses.





Doncaster’s Pupil Lifestyle Survey

For the first time during school year 2018/19 the Doncaster Secondary School Pupil Lifestyle Survey asked the following questions in relation to gambling. This was to try to gain an understanding of young people’s behaviour locally in relation to gambling.

STAYING SAFE

Q How many people of your age in your school do you believe have taken part in gambling activities in the last 7 days?

- None
 Some
 Most of them
 Nearly all

Q Do you ever take part in any of the following gambling activities?

	No	Less than once a month	At least once a month	At least once a fortnight	At least once a week	More than 3 times a week
I play arcade games for fun	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I play arcade games to win money	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I buy lottery tickets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I play gambling games online (e.g. bingo, card games like poker)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I place bets online (e.g. horse races, sports results)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I place bets with my friends (e.g. horse races, sports results)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q Do you experience any of the following when taking part in these types of gambling activities?
(Tick one box on each row)

	No, never	Yes in the past	Yes, sometimes
I can forget about everything else when I'm playing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I find it hard to stop	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I always try and win all my money back	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q If you think you, or someone you know might have a gambling problem would you know how to get help?

Yes No

The results of the survey are as follows:

- 5% of pupils believe most or nearly all of their peers have taken place in gambling activity within the last 7 days. This is higher amongst Year 10s than Year 8s (7% vs 2%) and higher amongst boys than girls (8% vs 1%).
- 63% of pupils engage in activities related to gambling at least occasionally:
- 19% of pupils play arcade games for fun at least once a month. Of those, 6% play more than 3 times a week. 5% of all pupils play arcade games to win money at least once a month, with 2% playing more than 3 times a week. Boys have a slightly higher propensity to play for money (21%) than girls (17%) and although they equally play for fun (66% each), girls tend to do so less often.
- Overall, lottery tickets don't have a high uptake with 91% of pupils saying they never buy a ticket. 10% play online gambling games such as card games or bingo, which increases to 14% for those in Year 10. Boys are slightly more inclined to play online gambling games than girls, with 11% compared to 7%.
- 10% of pupils say they place bets online (e.g. horse races or sports results) and 14% bet with their friends. Pupils in Year 10 and boys more than girls are more likely to bet online and with friends.
- **8% say they find it hard to stop gambling. For 16% it offers an escape as they 'forget about everything else when playing' and 17% will always try to win their money back.**
- Overall 45% of pupils say they would know where to go if they or someone they know might have a gambling problem. Boys, who have expressed that they are more inclined to experience an emotional response to gambling than girls, are more likely to say they don't know where to get help (59% vs 53%).

St Leger Homes Website activity

St Leger Homes, the organisation that manages the council's 21,000 homes, has a page on its website where people can find information about support for gambling addiction.

During the five months leading up to 29 July 2019, data pulled from the website shows there have been 128 page views. The time spent on the page (03:37 minutes) is reasonable which suggests that people are most likely reading it rather than a quick look in and out of the page.

	Page Views	Unique Page Views	Avg. Time on Page	Entrances	Bounce Rate
	128 % of Total: 0.07% (178,603)	87 % of Total: 0.07% (123,810)	00:03:37 Avg for View: 00:01:17 (182,634)	82 % of Total: 0.12% (66,267)	0.00% Avg for View: 0.07% (-100.00%)
managing-money-problems/gambling-addiction/	128 (100.00%)	87 (100.00%)	00:03:37	82 (100.00%)	0.00%

The data below is from the website provider so does not exclude repeat IP addresses and also includes visits by SLHD/DMBC staff.

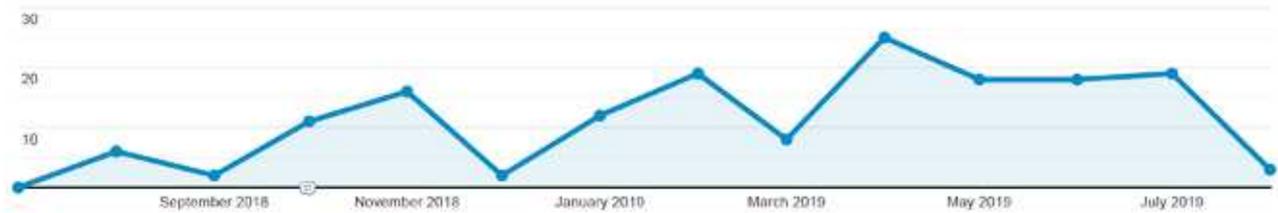
Page List

Page	Recent Hits	Hits Last Month	Hits This Year	Hits Last Year
/moneywise/energy/fuel-debts/	61	66	479	1154
/moneywise/food-banks/	355	332	2420	4207
/moneywise/managing-money-problems/	156	161	1047	2040
/moneywise/managing-money-problems/coping-with-debt/	75	55	426	1075
/moneywise/managing-money-problems/coping-with-debt/different-types-of-debt/	44	44	291	510
/moneywise/managing-money-problems/coping-with-debt/former-tenant-arrears/	58	64	362	599
★ /moneywise/managing-money-problems/gambling-addiction/	125	83	717	1313
/moneywise/managing-money-problems/life-changes/	49	44	312	724
/moneywise/managing-money-problems/life-changes/divorce-and-separation/	55	43	307	680
/moneywise/managing-money-problems/life-changes/having-children/	45	48	286	699

Similarly, the [Your Life Doncaster Website](#) has also seen a number of hits on its gambling information pages during the period July 2018 to August 2019.

Explorer

Pageviews



This data was filtered with the following filter expression: #4372

Page	Pageviews	Unique Pageviews	Avg. Time on Page	Entrances	Bounce Rate	% Exit	Page Value
	159 % of Total: 0.12% (135,896)	137 % of Total: 0.14% (101,167)	00:02:16 Avg for View: 00:00:47 (191.31%)	118 % of Total: 0.37% (32,316)	82.20% Avg for View: 62.86% (30.78%)	77.99% Avg for View: 23.78% (227.95%)	£0.00 % of Total: 0.00% (£0.00)
1. /s4s/whereilive/council?pageid=4372	159 (100.00%)	137 (100.00%)	00:02:16	118 (100.00%)	82.20%	77.99%	£0.00 (0.00%)

10 Licensing Requirements/Recommendations

There is a fine balance between creating a thriving economy and ensuring the environment encourages good population health. There are population groups in Doncaster that are likely to be at risk of problem gambling. The Licensing Committee is guided by three objectives and if those are met by the applicant then a license will be granted. However, there are ways to encourage safe gambling and identify problem gamblers and there are also conditions and mandatory requirements that are imposed as part of the operating license. These are:

- Leaflets offering assistance to problem gamblers should be available in gambling premises in a location that is both prominent and discreet, such as toilets.
- Training for staff members that focuses on, building an employee’s ability to maintain a sense of awareness of how much (e.g. how long) customers are gambling, as part of measures to detect persons that may be vulnerable.
- Trained personnel for the purpose of identifying and providing support to vulnerable persons.
- Self-exclusion schemes.
- Stickers or notices on gaming machines to identify the stakes/prizes.
- Operators should demonstrate their understanding of best practice issued by organisations that represent the interests of vulnerable people.
- Fixed Odds Betting Terminals should clearly display the odds.
- Positioning of ATM machines.

Actions:

- Establish a multi-agency Gambling and Financial Inclusion Group to co-ordinate appropriate action plan for Doncaster utilising the Gambling Harm Reduction Framework developed by the ADPH Regional Problem Gambling Working Group.
- Ensure all licensing conditions are utilised on new licensing applications.
- Endeavour to deter proliferation of gambling establishments in town and local centres utilising licensing and planning powers.
- Encourage Betting Office and Pub staff to undertake Making Every Contact Count on-line training.
- Facilitate Health Promotion campaigns targeting those most likely to be problem gamblers and those using remote gambling services.
- Encourage GPs/healthcare staff to give consideration to gambling participation when assessing a patient's situation (this could be the patient themselves or a family member presenting with related issues).
- Support front line staff/volunteers that are most likely to come into contact with people experiencing or at risk of problem/harmful gambling to access brief intervention training
- Promote services that support gamblers via community focussed websites e.g. the Your Life Doncaster, St Leger Homes and Gamcare
- Promote YGAM (Young Gamblers Education Trust) train the trainer programmes to relevant partners across the borough

**Planning Permission Decision for
Merkur Slots, 37/39 St Sepulchre Gate,
Doncaster, DN1 1TD**



Appeal Decision

Site visit made on 14 July 2020

by Edwin Maund BA (Hons) MSc Dip UP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 14th August 2020

Appeal Ref: APP/F4410/W/20/3250246

37-39 St Sepulchre Gate, Doncaster DN1 1TD

- 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 Praesepe Holdings Ltd against the decision of Doncaster Metropolitan Borough Council.
 - The application Ref 19/02976/COU, dated 6 December 2019, was refused by notice dated 3 February 2020.
 - The development proposed is Change of use of the ground and first floors to adult gaming and amusement centre with bingo (Sui Generis) at ground floor and ancillary staff area at first floor.
-

Decision

1. The appeal is allowed and planning permission is granted for the change of use of the ground and first floors to adult gaming and amusement centre with bingo (Sui Generis) at ground floor and ancillary staff area at first floor at 37-39 St Sepulchre Gate, Doncaster DN1 1TD, in accordance with the terms of the application, Ref 19/02976/COU, dated 6 December 2019 subject to the conditions set out in the schedule attached to this decision notice.

Procedural Matters

2. The Council in determining the application refused it on the basis of the current development plan, but in setting out their case in support of the appeal have made reference to the Emerging Local Plan. The Examination into the Local Plan is at a relatively early stage, and it is too early in the process to know what modifications may be made as the Examination hearings have yet to commence. In these circumstances, and in accordance with Paragraph 48 of the Framework, I consider only moderate weight can be given to the Emerging Local Plan and I have determined the appeal on this basis.

Main Issues

3. The main issues are;
 - The effect of the proposal on the vitality and viability of the Doncaster town centre and primary shopping frontage; and
 - The effect of the proposal on the health and wellbeing of residents living in the Town Ward of Doncaster.

Reasons

Vitality and Viability

4. The appeal property is a vacant shop unit on the eastern side of St Sepulchre Gate within the designated primary shopping frontage of Doncaster town centre. Located on a pedestrianised street, at the time I visited, early afternoon, mid-week, the centre was busy, and footfall was apparent in all directions, despite some ongoing restrictions due to Covid-19. I recognise this is just a snapshot in time, but from my observations the location appeared to be a healthy town centre shopping area.
5. A small number of premises were vacant, including the appeal site, nevertheless there was a good range of shops including national retail chains and other ancillary services which you would expect to find in a town centre location.
6. Along the same side of St Sepulchre Gate between High Street and Printing Office Street, I was able to view that despite being highlighted as a primary shopping frontage, this side of the road is broadly a 50/50 split between retail and non-retail uses, with several banks, two betting shops, and two cafes. With the appeal premises located between a betting shop and a café.
7. Policy TC6 of the Doncaster Unitary Development Plan (UDP) (1998) seeks to retain the predominant retail function of these frontages but supports the change from retail where that use contributes to the vitality and viability of the centre and does not seriously disrupt the continuity of the shopping frontage.
8. Policies CS7 and CS8 of the Doncaster Core Strategy (CS) (2012) highlight the importance of Doncaster town centre as the sub regional centre, sub criteria B) of CS7 advises that the vitality and viability of the borough's centres will be enhanced, by in part widening the range of uses and encouraging service and employment facilities to meet the day to day needs of residents.
9. I have been provided with information in respect of how the property has been marketed since October 2018, but this does not include whether the price sought reflected a realistic value in the current economic climate, nevertheless what information I do have is indicative of some of the challenges facing town centres and the retail sector.
10. I am also mindful of the forthcoming changes to the Use Classes Order that will come into effect on 1 September 2020 allowing greater flexibility for changes of use from retail within town centres. While this would not directly affect this proposal as the proposed use is sui generis it is a material consideration in respect of how it would affect the current policy and in particular the aims of retaining primary retail frontages.
11. The use proposed would comply with the aims of this policy by supporting the vitality and viability of the town centre and bring a vacant unit back into use, facilitating a use which could add to the footfall and increase the opportunity for shared trips. It would also add to the evening economy being a use that would be open up to 24 hours, and also subsequently increase employment opportunities.
12. The Council consider that the proposal would be in conflict with the Emerging Local Plan policy 24. I do not agree, the proposal is for none of the exclusions

identified in that it is adult gaming and amusement centre with bingo, not a betting shop, pay day loan unit or pawnbrokers. Even, if I were to agree with the Council's interpretation of the supporting text, the appellant has marketed this vacant property for in excess of 12 months with no success. The appeal proposes having an occupier within the building where there is an opportunity for additional footfall, and it would not result in a cluster or concentration of such uses, being the only such use in this immediate area.

13. In summary, I do not consider that the proposed use would be in conflict with policy TC6 of the UDP, or CS7 and CS8 of the CS which seek to ensure amongst other things, to maintain the vitality and viability of the town centre.

Health and wellbeing

14. The appeal site is located within Doncaster Town Ward. The Council identify that it is an area of deprivation relative to Doncaster Borough as a whole and Doncaster itself is relatively deprived. The Ward the Council consider has an over representation of residents that are susceptible to problem gambling, as such the appeal if allowed would exacerbate the situation and consequently have an adverse effect on public health.
15. Conversely, the updated report '*Gambling: An Evidence Briefing Paper for Doncaster*' accepts that there is a lack of robust evidence concerning problem gambling; and there is limited local data for Doncaster itself. Nor does it correlate that the proximity of a gambling establishment within a close proximity to residents' results in additional problem gambling.
16. There is an estimate that 1 in 90 adults in the UK are problem gamblers, with no further information on how this differs locally, if at all, or how, should the appeal be allowed, this might make matters worse, I do not agree therefore that the argument presented can be given significant weight, or that there is a clear link between the proposed use of the site and the concerns the Council identify.
17. I do not consider therefore that the proposal would adversely affect the health and wellbeing of residents in the Town Ward of Doncaster. I do not consider therefore that this would lead to a conflict with either the Framework or the Emerging Local Plan policy 51.

Other Matters

18. The site is located within the Doncaster High Street Conservation Area there is a duty therefore to pay special attention to the desirability of preserving or enhancing the character or appearance of the area. The effect on the Conservation Area has not been raised as an area of concern by the Council as no changes are proposed to the external façade of the building and a shop window display has been confirmed to be retained which can be controlled by a suitable condition, I consider the duty to preserve the Conservation Area would be achieved.
19. The appellant has pointed me towards their social responsibility policy, which is to be welcomed but it is not something which could be enforced through planning conditions so can be given limited weight in determining the appeal.
20. I have been referred to a series of other appeal decisions which were allowed relating to changes of use from retail (A1) to Adult Gaming Centres (Sui

Generis) in Croydon¹, Eastwood², and Hull³. Given that each of these appeals were in different localities and had differing policy backgrounds I do not draw significant conclusions from them and therefore they do not carry significant weight in my decision.

Conditions

21. I have considered the planning conditions that have been suggested by the Council against the tests in the Framework and the advice in the Planning Practice Guidance and have made such amendments as necessary to comply with those documents. To provide certainty a condition is necessary requiring that the development is carried out in accordance with the approved plans.
22. I have imposed a condition requiring the implementation and retention of a shop window display in the interests of the vitality and viability of the area and to preserve the character and appearance of the conservation area.
I have not imposed the condition limiting opening hours as this is a town centre site in a sub-regional centre where late night activities could be expected.

Conclusions

23. The appeal is allowed.

Edwin Maund

INSPECTOR

Schedule of Conditions

- 1) The development hereby permitted shall begin not later than 3 years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans: 000-EX-01, 000-DR-01.
- 3) A shop window display in all ground floor windows fronting St Sepulchre Gate shall be installed before the use commences and retained for the lifetime of the use.

¹ Appeal Reference APP/L5240/W/19/3232831

² Appeal Reference APP/J3015/W/18/3212670

³ Appeal Reference APP/V2004/W/19/3233244

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Cashino Gaming Limited

Operational Standards

THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

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

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

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

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

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

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

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

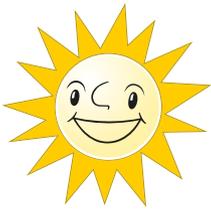
All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

The Praesepe Group

'Working Together' Document

WORKING TOGETHER





PART OF THE GAUSELMANN GROUP

A Strong Partner For More Than 60 Years



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

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



61% of employees are female

39% of employees are male



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



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



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

HIGH STREET BINGO



What is it?

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

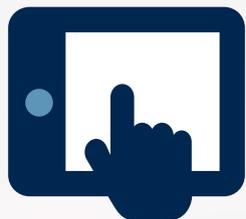
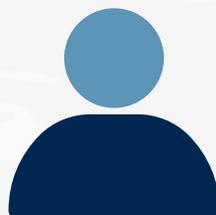


Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.



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

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



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



Bingo is available for play from 9am until midnight.

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



Bingo Terminals



Think 25

RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging



Players in Venue



We Are Not A Problem

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

GAMBLING COMMISSION

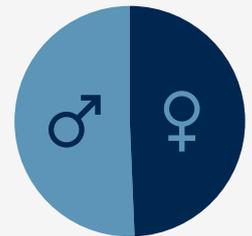
Praesepe is regulated by the
Gambling Commission and
Licensing Authorities



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



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



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



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



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

Page 170

SOCIAL RESPONSIBILITY MEASURES IN PLACE



In Venue

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



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



Dedicated Learning & Development Team and National training centres.

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



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



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

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



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

Compliance



Training Centre



PlayRight App



Online Training





Machine Messaging



Customer Interaction Training



SOCIAL RESPONSIBILITY MEASURES IN PLACE

All Levels

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



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



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

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



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



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

BENEFITS TO THE HIGH STREET



Benefits for your High Street Include:



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



Increased footfall to the high Street.



Linked trips with other shops helping to support other businesses.



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



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

COMMUNITY & CHARITY



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

Please contact us.

Praesepe PLC

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

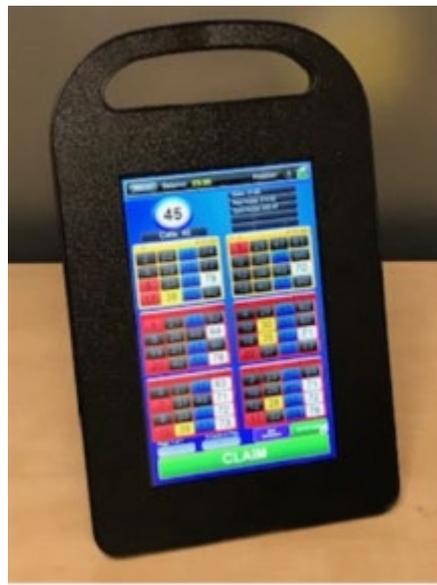
phone 01908 351200

email info@praesepeplc.com



G-TAB Bingo ‘Bringing Traditional Bingo to the High Street’

G-TAB Bingo



**Bringing Traditional Bingo
to the High Street**

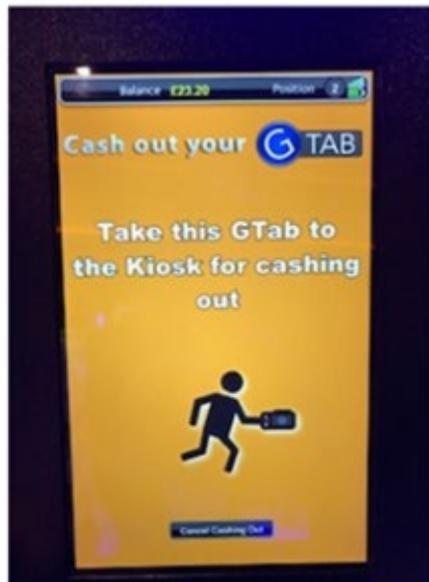
G-Tab is a multi-purpose gaming device offering live link Bingo Games, Bingo Variant Games and participation in the National Bingo Game which is played twice daily. Bingo tablets are bingo machines that provide games of both remote and non-remote bingo with remote bingo being the linked games operated via WiFi and the internet on licensed premises. Complies with the appropriate Gambling Commission Technical Standards and Machine Guidance.

Standalone Tablet Terminal

Bingo numbers announced and shown live on the top display



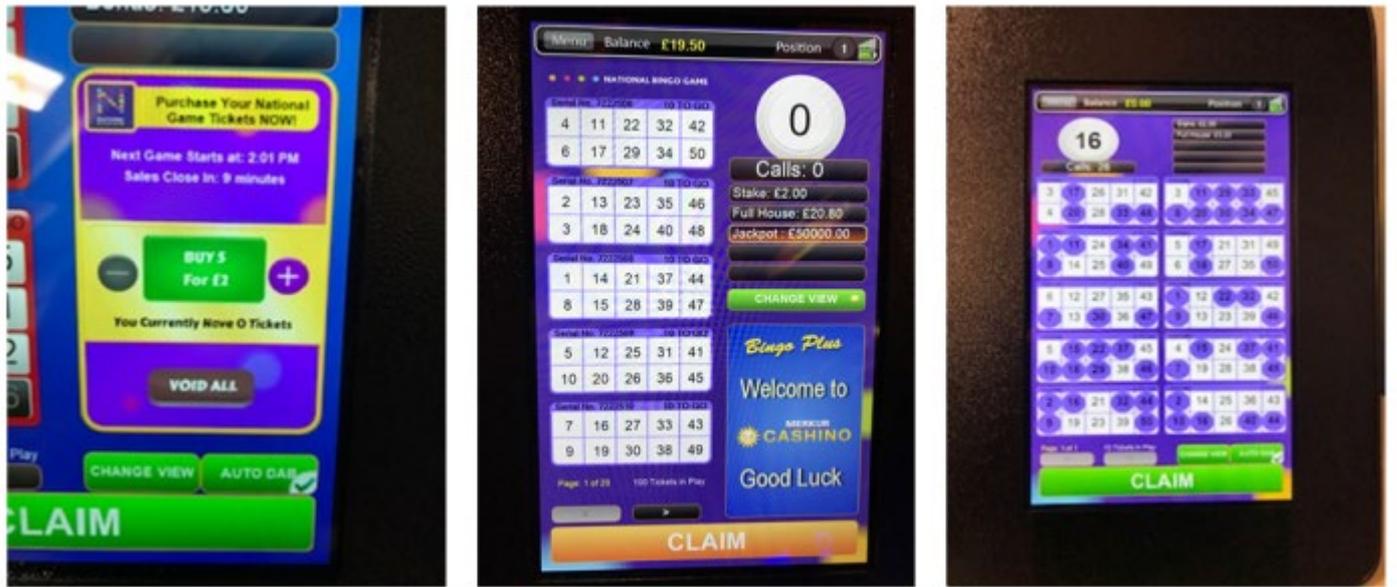
Charges to play clearly displayed



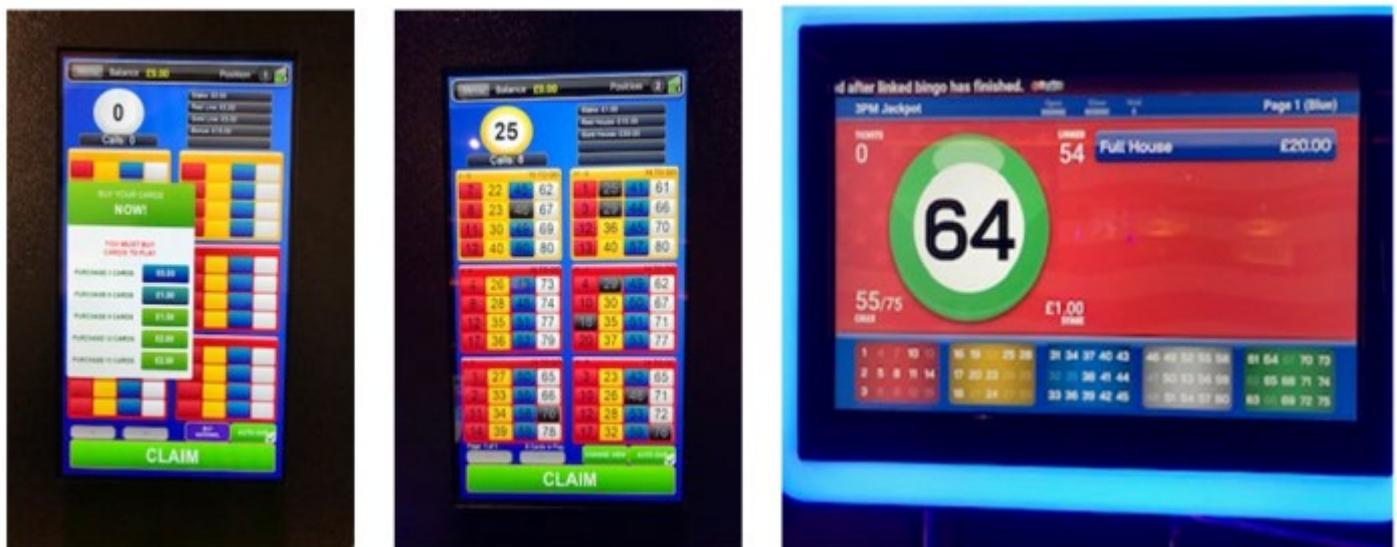
Customers cannot stake-up once game has commenced

“Making all traditional forms of Bingo like ‘Shutter Bingo’ played at the sea-side or ‘main-stage’ Bingo played in Clubs available”

National Bingo Game, linked to all Bingo Clubs (such as Mecca and Buzz) played twice daily (2pm and 7pm) at £2.00 for 5 tickets, maximum tickets 100 per position, making £40 maximum stake which is within the Bingo Association guidelines. Prize money including the National Jackpot is based on the number of cards in play, including bonus lines and is clearly displayed on the main display caller's unit, prior to the game commencing and on the individual tablets throughout the game.



Live Link Bingo played throughout the day from 50p for 3 cards, maximum 15 cards per position, making maximum stake of £2.50 per game. The prize money, based on number of cards in play, including bonus lines is clearly displayed on the main display caller's unit, prior to the game commencing, and on the individual tablet throughout the game.

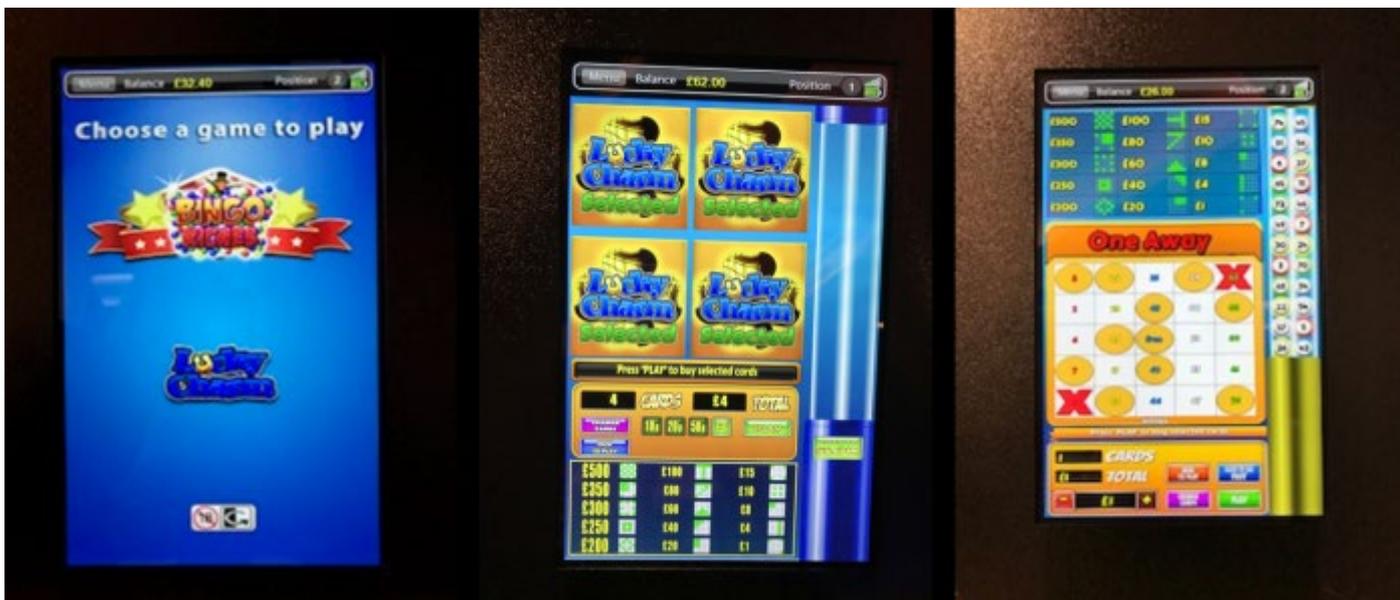


Bingo Variant (BV) Games are available 9:00 till midnight. The game of bingo stands alone on the tablet and does not connect via remote communication to a server or link to games across premises.

Bingo Riches: play from 10p (25p/50p/£1 options) per card, maximum 4 cards, so maximum stake £4 per game, with 24 bingo balls drawn and marked off various patterns to give a varied winplan, maximum prize £40 on 10p stake.



Lucky Charm: play from 10p (20p/50p/£1 options) per card, maximum 4 cards, so maximum stake £4 per game, with 24 bingo balls drawn and marked off various patterns to give a varied winplan, maximum prize £50 on 10p stake.



Low stake games:

The device also offers the player a choice of games which can be played from as little as 5p (maximum £1) a game all of which comply with Cat C technical standards.

**Merkur Cashino Compliance and Social
Responsibility Manual including
Gambling Commission's Licence
Conditions and Codes of Practice
applicable to non-remote bingo
licences**



COMPLIANCE

&

SOCIAL

RESPONSIBILITY



CASHINO COMPLIANCE FOLDER TABLE OF CONTENTS		
1. INTRODUCTION	UPDATED	VERSION
1.1 SOCIAL RESPONSIBILITY - STATEMENT OF INTENT	January 2019	V1.2
1.2 THE 3 LICENSING OBJECTIVES	January 2020	V1.2
1.3 GAMBLING COMMISSION – LICENCE CONDITIONS AND CODES OF PRACTICE (LCCP)	January 2020	N/A
1.4 POWERS OF THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS	June 2016	V1.0
2. CRIME & DISORDER		
2.1 MONEY LAUNDERING AND CASH HANDLING	January 2019	V1.0
2.2 KEEPING ALCOHOL OUT	June 2016	V1.0
2.3 DEALING WITH AGGRESSIVE CUSTOMERS	June 2017	V1.1
3. FAIR AND OPEN		
3.1 COMPLAINTS PROCEDURE & COMPLAINTS LEAFLET	January 2020	V1.3
3.2 MARKETING AND PROMOTIONAL GUIDELINES	January 2019	V1.2
4. CHILDREN AND OTHER VULNERABLE PEOPLE		
4.1 ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS	June 2017	V1.1
4.2 EMPLOYMENT OF CHILDREN AND YOUNG PERSONS	June 2017	V1.1
4.3 CUSTOMER INTERACTION & GAMBLING COMMISSION GUIDANCE	January 2020	V1.3
4.4 SELF EXCLUSION	July 2020	V1.2
4.5 SELF EXCLUSION FLOWCHART	June 2017	V1.1
4.6 SELF EXCLUSION REVIEW FORM	July 2016	V1.0
5. RECORDING REQUIREMENTS		
5.1 MONTHLY LOG CHECK SUMMARY & PAPER PREMISES LOGS	April 2019	V1.6
6. TRAINING		
6.1 COMPLIANCE TRAINING LOG G	April 2019	V1.6

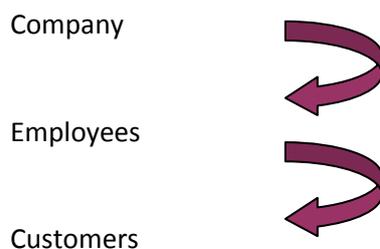
SOCIAL RESPONSIBILITY POLICY

1. STATEMENT OF INTENT

The responsibility for an individual's gambling is their own. The responsibility to exercise a duty of care is that of the operator. Cashino Gaming recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

WHAT IS SOCIAL RESPONSIBILITY?

Social responsibility is about going above and beyond what is called for by the law. Ideally, proactively identifying signs of problem behaviours is better than reacting to a problem. We apply our social responsibility through three levels:



Social responsibility is being responsible to people, for the actions of people, and for actions that affect people. Cashino Gaming has clear policies, procedures and codes of practice which outline and support the development of the way in which staff intervene where there is a suspected problem and the Company then monitors and supports the development of the awareness and knowledge of its staff in dealing with such interventions.

The idea of being responsible to customers has actually long been embedded in the ethics of business, treating a customer with respect, attention and genuinely caring about what the customer wants and needs. As a Company we understand our responsibility to help people.

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on three licensing objectives. These are to:

- Keep crime out of gambling
- Ensure that gambling is conducted in a fair and open way; and
- Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling.



It is our responsibility to ensure that we comply with these licensing objectives at all times.

COMPANY

Our Statement of Intent is published and available to all our employees.

To support the licensing objectives and in addition to our Social Responsibility Policy we also have: -

- Sensible gambling procedures including Self Exclusion
- 'Think 25' policy

EMPLOYEES

The Company ensures that all employees are inducted responsibly into our organisation through: -

- Induction checklist
- Employee Handbook
- Reviews and sign off at 4,8,12 weeks

The above documentation includes comprehensive coverage of the following: -

- Social Responsibility Policy
- Sensible gambling procedures
- 'Think 25' policy

Ongoing training is available to all our employees and we provide a Customer Care training programme, that specifically trains our staff about problem gambling and how to interact with customers who may be affected (including arrangements for self exclusion), whilst also covering the following areas:

- Customer care
- Conflict management
- Social responsibility

In addition employees will receive refresher training every 6 months.



CUSTOMER

Information is clearly provided to the customer to enable them to understand the machine/game they are playing and the percentage returns that apply on all games.

The customer is made aware of and given advice on problem gambling through appropriate advertising, notices, information and Staying In Control leaflets on site. Further information including sources of help and support is available via the following organisations: -

- | | |
|-------------------------------|---|
| ▪ Citizen's advice | https://www.citizensadvice.org.uk |
| ▪ Gamble Aware/GamCare | https://www.begambleaware.org |
| ▪ GamesAid | https://www.gamesaid.org |
| ▪ Gam-Anon | https://www.gam-anon.org |
| ▪ Gamblers Anonymous | https://www.gamblersanonymous.org.uk |
| ▪ Gordon Moody Association | https://www.gordonmoody.org.uk |
| ▪ Action for Children Charity | https://www.actionforchildren.org.uk |
| ▪ National Debtline | https://www.nationaldebtline.org |

The implementation of the following policies and procedures and through Customer Care Training ensures that this is consistent throughout the Company: -

- Social Responsibility Policy
- Sensible gambling Procedure
- 'Think 25' policy

.....
Stefan Bruns
Chief Executive Officer
January 2019

THE 3 LICENSING OBJECTIVES

1. Keeping crime out of gambling

Whilst crime is considered 'low/medium risk' in our business, we have to be mindful of the fact crime still exists and our venues could be considered as a target for money laundering gained from the proceeds of crime and terrorist financing, i.e. drug money, TITO technology to conceal 'fake notes', life style and spending habits.

2. Ensuring gambling is conducted fairly and openly

We have to ensure the terms we offer with regards to our business practices are fair and transparent to our customers and as Licensees we must comply with the Consumer Rights Act 2015. This means ensuring our machines and marketing are promoted in a fair and open way.

3. Protecting children and vulnerable people from being harmed or exploited by gambling

We have a duty of care to ensure children and young persons do not enter our premises, which are strictly for OVER 18's only. As a company we operate a 'Think 25' policy and ID checks are carried out if we suspect a person is under 18. Ensuring we protect people who may be 'at risk' from gambling and protecting them from harm, customer interaction and helpful advice is vital to ensure we promote our business in a socially responsible way.

GAMBLING COMMISSION

Conditions and codes of practice applicable to Gaming machine general: Adult gaming centre licences Gaming machine general: Family entertainment centre licences

Including sector-specific extract of
LCCP January 2020

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If using an electronic version of this document, please click on the headings to move to the relevant section or provision.

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General introduction

1 This document sets out the Gambling Commission's general licence conditions and associated code of practice provisions (LCCP) under the Gambling Act 2005 (the Act) which are applicable to the specified sector(s).

2 The LCCP document sets out:

Part I: (in black) statutory conditions attached by virtue of the Act

Part II: (in orange) the suite of general conditions attached to operating licences

Part III: (in blue) the principal code of practice, distinguishing between 'social responsibility' provisions and 'ordinary' provisions (the social responsibility provisions are in shaded boxes within the text).

3 An [index](#) to the provisions is provided at the end of this document, and if using an electronic version of this document, links are provided from both the contents and index pages to aid navigation.

4 Copies of LCCP can be obtained from the Commission's website: www.gamblingcommission.gov.uk or by writing to:

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP
T 0121 230 6666
F 0121 230 6720
E info@gamblingcommission.gov.uk

5 The Commission also produces sector-specific extracts of LCCP and these will be made available on the website. Further information about the history of LCCP (such as the results of completed consultations) and potential future amendments to LCCP can also be found on the website.

6 This extract of LCCP comes into force on **1 January 2020**.

7 Relevant requirements of the conditions and code provisions were notified in draft to the European Commission in accordance with Directive (EU) 2015/1535.

Part I: Statutory conditions attached by virtue of the Act

Social responsibility

This licence is subject to a condition that the licensee ensures compliance with any relevant social responsibility provision of a code of practice issued by the Commission. The social responsibility provisions that are relevant to the activities authorised by this licence are set out in the section entitled Codes of Practice (Part III).

(Sections 24 and 82(1) Gambling Act 2005)

Return of stakes to children: AGC

The following condition applies to gaming machine general: adult gaming centre operating licences only

This licence is subject to a condition that if the licensee (or anyone employed by the licensee to perform an operational function within the meaning of section 80 of the Act) becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, the licensee:

- (a) must return any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person as soon as is reasonably practicable; and
- (b) may not give a prize to the child or young person.

This condition does not apply to use of a Category D gaming machine.

(Section 83(1))

Return of stakes to children: FEC

The following condition applies to gaming machine general: family entertainment centre operating licences only

This licence is subject to a condition that if the licensee (or anyone employed by the licensee to perform an operational function within the meaning of section 80 of the Act) becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, the licensee:

- (a) must return any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person as soon as is reasonably practicable; and
- (b) may not give a prize to the child or young person.

This condition does not apply to use of a Category D gaming machine, or equal chance gaming.

(Section 83(1))

Part 1: Suite of general condition to operating licences under Section 75 of the Gambling Act 2005 (the Act)

1 Qualified persons and personal licences

1.1 Qualified persons

Licence condition 1.1.1

Qualified persons – qualifying position

All operating licences, except ancillary remote licences, issued to small-scale operators

- 1 In this condition the terms ‘small-scale operator’, ‘qualifying position’ and ‘qualified person’ have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
- 2 Schedule X¹ lists those individuals notified to the Commission as qualified persons.
- 3 If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act for amendment of the details of the licence set out in Schedule X¹.
- 4 An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
- 5 In this condition ‘qualified person’ has the same meaning as in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

¹ The schedules mentioned here will be attached to individual licences.

1.2 Personal licences

Licence condition 1.2.1

Specified management offices – personal management licences

All casino, bingo, general and pool betting, betting intermediary, gaming machine general, gaming machine technical, gambling software and lottery managers licences, except ancillary remote licences

- 1** Subject to **6** and **7** below, licensees must ensure:
 - a** that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter ‘a personal management licence’); and
 - b** that at least one person occupies at least one of those offices
- 2** The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:
 - a** the overall management and direction of the licensee’s business or affairs
 - b** the licensee’s finance function as head of that function
 - c** the licensee’s gambling regulatory compliance function as head of that function
 - d** the licensee’s marketing function as head of that function
 - e** the licensee’s information technology function as head of that function in so far as it relates to gambling-related information technology and software
 - f** oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area
 - g** in the case of casino and bingo licences only, oversight of the day to day management of a single set of premises licensed under Part 8 of the Act.
- 3** The person responsible for the licensee’s gambling regulatory compliance function as head of that function shall not, except with the Commission’s express approval, occupy any other specified management office.
- 4** Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder’s personal management licence.
- 5** Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual’s work and any requirements of the Commission in respect of such matters applicable during the period of the review.
- 6** Paragraphs **1** to **5** above shall not apply to a licensee for so long as the licensee is a ‘small-scale operator’ as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 (‘the Regulations’).
- 7** During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs **1** to **6** above shall apply subject to the proviso that the phrase ‘each individual’ in paragraph **1a** shall not include any individual who was a ‘qualified person’ (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

4 Protection of customer funds

4.2 Disclosure to customers

Licence condition 4.2.1

Disclosure to customers

All operating licences, except gaming machine technical, gambling software, host, ancillary, remote bingo, and ancillary remote casino licences

- 1 Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
- 2 Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
- 3 In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
 - b winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and
 - c any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

5 Payment

5.1 Cash and cash equivalents, payment methods and services

Licence condition 5.1.1

Cash and cash equivalents

All operating licences except gaming machine technical, gambling software and host licences

- 1 Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (eg bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
- 2 Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

6 Provision of credit by licensees and the use of credit cards

6.1 Provision of credit

Licence condition 6.1.1

Provision of credit

All gaming machine general operating licences for adult gaming centres and family entertainment centres

- 1 Licensees must neither:
 - a provide credit themselves in connection with gambling; nor
 - b participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

7 General 'fair and open' provisions

7.1 Fair and transparent terms and practices

Licence condition 7.1.1

Fair and transparent terms and practices

All operating licences except gaming machine technical and gambling software licences

- 1 Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015. Licensees must comply with those terms.
- 2 The contractual terms on which gambling is offered and any notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
- 3 Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes before they come into effect.
- 4 Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008, at any stage of their interactions with consumers.

12 Anti-money laundering

12.1 Prevention of money laundering and terrorist financing

Licence condition 12.1.1

Anti-money laundering

Prevention of money laundering and terrorist financing

All operating licences except gaming machine technical and gambling software licences

- 1 Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
- 2 Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
- 3 Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

14 Access to premises

14.1 Access to premises

Licence condition 14.1.1

Access to premises

All operating licences

- 1 Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

15 Information requirements

15.1 Reporting suspicion of offences

Licence condition 15.1.1

Reporting suspicion of offences etc - non-betting licences

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences

- 1 Licensees must as soon as reasonably practicable provide the Commission or ensure that the Commission is provided with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.

15.2 Reporting key events and other reportable events

Licence condition 15.2.1

Reporting key events

All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, or ensure the Commission is notified, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence¹.

Operator status

In the case of licensees which are companies, a petition being presented for their winding up or the winding up of any group company of theirs, or they or any group company being placed in administration or receivership or their directors proposing to creditors a composition in satisfaction of its debts or a scheme of arrangement of its affairs.

In the case of licensees which are bodies corporate, but not companies, any event substantially equivalent to those listed at 1 above.

In the case of a licensee who is an individual (or a partner in a partnership licensee) their being presented with a petition for their bankruptcy or sequestration or their entering into an individual voluntary arrangement.

Relevant persons and positions

In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.

Any investment in a licensee which is not by way of subscription for shares.

The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.

The entering into an arrangement whereby a third party provides services to, or grants any licence concession or permission to, the licensee other than for full value: full details of the arrangements must be supplied.

The appointment of a person to, or a person ceasing to occupy, a 'key position': a 'key position' in relation to a licensee is:

- a** in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
 - b** in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c** a position the holder of which is responsible for the licensee's anti-money laundering procedures, including suspicious activity reporting
 - d** any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)
- 9** Any change to the structure or organisation of the licensee's business which affects a 'key position' or the responsibilities of its holder.

Financial events

- 10 Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
- 11 Any breach of a covenant given to a bank or other lender.
- 12 Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
- 13 Any court judgments (in whatever jurisdiction) against the licensee or, where the licensee is a body corporate, a group company, remaining unpaid 14 days after the date of judgment.
- 14 Where the licensee is required to have their accounts independently audited, any qualification to an auditors' report; and any unplanned change of auditor including a change prompted by a dispute or resulting from auditors being unable or unwilling to sign an unqualified audit report.
- 15 Any change in the licensee's arrangements for the protection of customer funds in accordance with the general licence condition 4 relating to the protection of customer funds (where applicable).
- 16 Where the licensee holds customer funds in a separate bank account, any deficit on reconciliation of such bank account.
- 17 Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

Legal or regulatory proceedings or reports

- 18 The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
- 19a Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities in relation to the licensed entity of a personal licence holder or a person occupying a qualifying position employed by them, where such an investigation could result in the imposition of a sanction or penalty which, if imposed, could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
- 19b Any criminal investigation by a law enforcement agency in any jurisdiction in relation to which:
 - the licensee is involved (including, but not limited to investigations of crimes allegedly committed against the licensee or involving the gambling facilities provided under the licence), AND
 - the circumstances are such that the Commission might reasonably be expected to question whether the licensee's measures to keep crime out of gambling had failed.Notification of the event must occur as soon as practicable after the licensee becomes aware of any such investigation in which the licensee is involved and measures may have failed.
- 20 The receipt of any report from a professional, statutory or other regulatory or government body (in whatever jurisdiction) of the outcome of a compliance assessment in relation to the gambling activity of the licensee or, where the licensee is a body corporate, of any group company in which at least one person who holds a key position in or in respect of the licensee holds a key position: a copy of the report should be provided where available to the licensee.

- 21** The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor) about the provision of facilities for gambling which are expressed (in whatever terms) as requiring attention as a high priority: a summary of the nature of the concerns must be provided.
- 22** The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
- 23** The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
- 24** The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

Gambling facilities

- 25a** Any breach in the licensee's information security that adversely affects the confidentiality of customer data or prevents customers from accessing their accounts for longer than 24 hours.
- 25b** Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
- 26** Any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
- 27** The reference of a dispute to an ADR entity other than one in respect of which contact details were given in accordance with the social responsibility code provision on complaints and disputes; the reason for selection of that ADR entity should be given.
- 28** In the case of remote gambling, the commencement or cessation of trading on website domains (*including mobile sites or mobile device applications*) or broadcast media through which the licensee provides gambling facilities.

In this condition:

'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof

- a** in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
- b** a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

¹ Key events can be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk Alternatively, for operators unable to access this system, you can report a key event by email to: key.events@gamblingcommission.gov.uk Alternatively, for operators unable to access this system, you can report a key event by email to: key.events@gamblingcommission.gov.uk

Licence condition 15.2.2

Other reportable events

All operating licences

- 1 Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, or ensure that the Commission is so notified, as soon as reasonably practicable of the occurrence of any of the following events¹:
 - a the conclusion of a dispute referred to an ADR entity and in such case providing the Commission with a copy of the decision or note of the outcome².
 - b any outcome adverse to the licensee of any proceedings taken against the licensee (in whatever jurisdiction) by a customer in relation to a gambling transaction; but excluding proceedings allocated to the County Court small claims track or equivalent in jurisdictions outside England and Wales.
 - c their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised or their becoming aware of a sustained or meaningful generation of the 3% / 10% threshold being exceeded by the group.

In this condition:

- a 'group company' has the same meaning as in condition 15.2.1; and
- b without prejudice to section 327 of the Act, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

¹ Events required to be notified to the Commission by 15.2.1 or 15.2.2 may be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk or by email to: key.events@gamblingcommission.gov.uk

² In respect of the referral of disputes to an ADR entity the licensee's attention is drawn to social responsibility code provision 6.

15.3 General and regulatory returns

Licence condition 15.3.1

General and regulatory returns

All operating licences

- 1 On request, licensees must provide the Commission with such information as the Commission may require about the use made of facilities provided in accordance with this licence, and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on, including in particular information about:
 - a the numbers of people making use of the facilities and the frequency of such use
 - b the range of gambling activities provided by the licensee and the numbers of staff employed in connection with them
 - c the licensee's policies in relation to, and experiences of, problem gambling.
- 2 In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit a Regulatory Return to the Commission containing such information as the Commission may from time to time require¹.

¹Regulatory returns can be submitted securely online at the Commission's website through our eServices system available at www.gamblingcommission.gov.uk

16 Responsible placement of digital adverts

16.1 Responsible placement of digital adverts

Licence condition 16.1.1

Responsible placement of digital adverts

All licences

- 1 Licences must:
 - a Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
 - b take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
 - c ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

Part III: Code of practice

Introduction

This is the Commission's principal code of practice, issued under section 24 of the Gambling Act 2005.

There are two types of code provisions in this document:

- social responsibility code provisions: compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution; these provisions are set out in shaded boxes
- ordinary code provisions: these do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner. Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty; these code provisions are in the unshaded boxes in this section.

Code provisions

1 General

1.1 Cooperation and responsibility

Ordinary Code Provision 1.1.1
Cooperation with the Commission
All licences

- 1 As made plain in its *Statement of principles for licensing and regulation*, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

Social responsibility code provision 1.1.2
Responsibility for third parties – all licences
All licences

- 1 Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
- 2 Licensees must ensure that the terms on which they contract with such third parties:
 - a require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

2 Financial requirements

2.1 Anti-money laundering

Ordinary code provision 2.1.2
Anti-money laundering – other than casino
All licences except casino licences

- 1 As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators)*.

3 Protection of children and other vulnerable persons

3.1 Combatting problem gambling

Social responsibility code provision 3.1.1
Combating problem gambling
All licences

- 1 Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.
- 2 Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

3.2 Access to gambling by children and young persons

Social responsibility code provision 3.2.3

Access to gambling by children and young persons – AGC SR code

All adult gaming centre licences

- 1 Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2 This must include procedures for:
 - a checking the age of apparently underage customers
 - b removing anyone who appears to be under age and cannot produce an acceptable form of identification
 - c taking action when there are attempts by under-18s to enter the premises.
- 3 Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 4 Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.
- 5 In premises restricted to adults, service must be refused in any circumstances where any adult is accompanied by a child or young person.
- 6 Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and the legal requirements on returning stakes and not paying prizes to underage customers.
- 7 Licensees must only accept identification which:
 - a contains a photograph from which the individual can be identified
 - b states the individual's date of birth
 - c is valid
 - d is legible and has no visible signs of tampering or reproduction.
- 8 Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission.

Ordinary code provision 3.2.4

Access to gambling by children and young persons – AGC ordinary code

All adult gaming centre licences

- 1** The Commission considers acceptable forms of identification to include any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2** Licensees should put into effect procedures that require their staff to check the age of any customer who appears to them to be under 21.
- 3** Licensees should consider permanent exclusion from premises for any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.
- 4** Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission and the police, and making available information on problem gambling.
- 5** Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
- 6** In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Social responsibility code provision 3.2.5

Access to gambling by children and young persons – bingo and FEC SR code

All non-remote bingo and family entertainment centre licences

- 1** Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2** This must include procedures for:
 - a** checking the age of apparently underage customers
 - b** refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c** taking action when there are unlawful attempts to enter the adult-only areas.
- 3** Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 4** Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
- 5** Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a** all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b** the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c** procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
- 6** Licensees must only accept identification which:
 - a** contains a photograph from which the individual can be identified
 - b** states the individual's date of birth
 - c** is valid
 - d** is legible and has no visible signs of tampering or reproduction.
- 7** Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission.

Ordinary code provision 3.2.6

Access to gambling by children and young persons – bingo and FEC ordinary code All non-remote bingo and family entertainment centre licences

- 1** The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2** Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
- 3** Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
- 4** Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission and the police, and making available information on problem gambling to the child or young person concerned.
- 5** Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
- 6** Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
- 7** In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

3.3 Gambling management tools and responsible gambling management information

Social responsibility code provision 3.3.1

Responsible gambling information

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences

- 1 Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
- 2 The information must cover:
 - a any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
 - b timers or other forms of reminders or 'reality checks' where available
 - c self-exclusion options
 - d information about the availability of further help or advice.
- 3 The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
- 4 For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

Ordinary code provision 3.3.2

Responsible gambling information – foreign languages

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

- 1 Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
 - a the information on how to gamble responsibly and access to help referred to above
 - b the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
 - c the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

3.4 Customer interaction

Social responsibility code provision 3.4.1

Customer interaction

All licences, except non-remote lottery, gaming machine technical, gambling software and host licences

- 1** Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a** identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b** interacting with customers who may be at risk of or experiencing harms associated with gambling
 - c** understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
- 2** Licensees must take into account the Commission's guidance on customer interaction

3.5 Self-exclusion

Social responsibility code provision 3.5.1

Self-exclusion – non-remote and trading rooms SR code

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences

- 1** Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
- 2** Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
- 3** Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
- 4** This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
- 5** Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
- 6** Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a** a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b** photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c** staff training to ensure that staff are able to administer effectively the systems; and
 - d** the removal of those persons found in the gambling area or attempting to gamble from the premises.
- 7** Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.
- 8** Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

Ordinary code provision 3.5.2

Self-exclusion – non-remote ordinary code

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences

- 1** Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
- 2** Individuals should be able to self-exclude without having to enter gambling premises.
- 3** Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
- 4** Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
- 5** Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
- 6** Customers should be given the opportunity to discuss self-exclusion in private, where possible.
- 7** Licensees should take steps to ensure that:
 - a** the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b** any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c** a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
 - d** at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e** where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f** notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
- 8** The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
- 9** Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
- 10** Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.
- 11** Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
- 12** In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

Social responsibility code provision 3.5.6

Self-exclusion – multi-operator non-remote SR code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1** Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

Ordinary code provision 3.5.7

Self-exclusion – multi-operator non-remote ordinary code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1** Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).

3.6 Employment of children and young persons

Ordinary code provision 3.6.5

Employment of children and young people – AGCs

All adult gaming centre licences

- 1** Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
 - a** to employ them to provide facilities for gambling;
 - b** if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
 - c** to employ them to carry out any other function on adult gaming centre licensed premises while any gambling activity is being carried on in reliance on the premises licence.
- 2** As to **1b**, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3** Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a** children and young persons are never asked to perform tasks within **1a or 1b**, above
 - b** all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4** Licensees should consider adopting a policy that:
 - a** children and young persons are not employed to work on adult gaming centre licensed premises at any time when the premises are open for business
 - b** gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

Ordinary code provision 3.6.6
Employment of children and young people – FECs
All family entertainment centre licences

- 1 Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
 - a to employ them to provide facilities for gambling; and
 - b if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time.
- 2 As to 1b, it should be noted that in the Commission’s view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3 Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a children and young persons are never asked to perform tasks within 1a or 1b, above; and
 - b all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4 Licensees should consider adopting a policy that:
 - a children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place; and
 - b gaming machines sited in adult-only areas are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

3.8 Money lending between customers

Ordinary code provision 3.8.2
Money-lending – other than casinos
All non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences

- 1 Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

4 ‘Fair and open’ provisions

4.1 Fair terms

Social responsibility code provision 4.1.1
Fair terms
All licences, except gaming machine technical and gambling software licences

- 1 Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

5 Marketing

5.1 Rewards and bonuses

Social responsibility code provision 5.1.1

Rewards and bonuses – SR code

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

- 1** If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
 - a** the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
 - b** neither the receipt nor the value or amount of the benefit is:
 - i** dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - ii** altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
 - c** if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
 - d** if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.

Ordinary code provision 5.1.2

Proportionate rewards

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

- 1** Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

Social responsibility code provision 5.1.6

Compliance with advertising codes

All licences, except lottery licences

- 1** All marketing of gambling products and services must be undertaken in a socially responsible manner.
- 2** In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
- 3** The restriction on allowing people who are, or seem to be, under 25 years old (ie: those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

Ordinary code provision 5.1.8
Compliance with industry advertising codes
All licences

- 1 Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

Social responsibility code provision 5.1.9
Other marketing requirements
All licences

- 1 Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
- 2 Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
- 3 The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

Ordinary code provision 5.1.10
Online marketing in proximity to information on responsible gambling
All licences

- 1 Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

Social Responsibility code provision 5.1.11
Direct electronic marketing consent
All licences

- 1 Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

6 Complaints and disputes

6.1 Complaints and disputes

Social responsibility code provision 6.1.1

Complaints and disputes

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences

- 1** Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
- 2** Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
- 3** The services of any such ADR entity must be free of charge to the customer.
- 4** Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
- 5** Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
- 6** Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
- 7** Licensees should keep records of customer complaints and disputes in such manner as the Commission may from time to time specify in advice or guidance. They must provide information to the Commission about customer complaints, disputes, the outcomes of disputes referred to ADR, and court proceedings adverse to the licensee, also in such manner as the Commission may from time to time specify.

In this code, 'ADR entity' means

- a** A offering alternative dispute resolution services whose name appears on the list person maintained by the Gambling Commission in accordance with the 'Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and information) Regulations 2015, and
- b** Whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

7 Gambling licensees' staff

7.1 Gambling licensees' staff

Social responsibility code provision 7.1.2

Responsible gambling information for staff

All licences, including betting ancillary remote licences, but not other ancillary remote licences

- 1 Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

8 Information requirements

8.1 Information requirements

Ordinary code provision 8.1.1

Information requirements – ordinary code

All licences

- 1 As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
- 2 Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence²:
 - a any material change in the licensee's structure or the operation of its business
 - b any material change in managerial responsibilities or governance arrangements
 - c any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

¹ These matters can be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk

Alternatively, for operators unable to access this system, you can these events by email to: key.events@gamblingcommission.gov.uk

² Events which **must** be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

10 Assessing local risk

10.1 Assessing local risk

Social responsibility code provision 10.1.1

Assessing local risk

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.

- 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 policy¹.
- 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.

¹This is the statement of licensing policy under the Gambling Act 2005.

Ordinary code provision 10.1.2

Sharing local risk assessments

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

- 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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GAMBLING COMMISSION

Conditions and codes of practice applicable to Non-remote bingo licences

Including sector-specific extract of
LCCP January 2020

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General introduction

1 This document sets out the Gambling Commission's general licence conditions and associated code of practice provisions (LCCP) under the Gambling Act 2005 (the Act) which are applicable to the specified sector(s).

2 The LCCP document sets out:

Part I: (in black) statutory conditions attached by virtue of the Act

Part II: (in orange) the suite of general conditions attached to operating licences

Part III: (in blue) the principal code of practice, distinguishing between 'social responsibility' provisions and 'ordinary' provisions (the social responsibility provisions are in shaded boxes within the text).

3 An [index](#) to the provisions is provided at the end of this document, and if using an electronic version of this document, links are provided from both the contents and index pages to aid navigation.

4 Copies of LCCP can be obtained from the Commission's website: www.gamblingcommission.gov.uk or by writing to:

Gambling Commission
Victoria Square House
Victoria Square
Birmingham B2 4BP
T 0121 230 6666
F 0121 230 6720
E info@gamblingcommission.gov.uk

5 The Commission also produces sector-specific extracts of LCCP and these will be made available on the website. Further information about the history of LCCP (such as the results of completed consultations) and potential future amendments to LCCP can also be found on the website.

6 This extract of LCCP comes into force on **1 January 2020**.

7 Relevant requirements of the conditions and code provisions were notified in draft to the European Commission in accordance with Directive (EU) 2015/1535.

Part I: Statutory conditions attached by virtue of the Act

Social Responsibility

This licence is subject to a condition that the licensee ensures compliance with any relevant social responsibility provision of a code of practice issued by the Commission. The social responsibility provisions that are relevant to the activities authorised by this licence are set out in the section entitled Codes of Practice (Part III).

(Sections 24 and 82(1) Gambling Act 2005)

Return of stakes to children

The following condition applies to all remote operating licences except remote pool betting operating licences restricted to football only

This licence is subject to a condition that if the licensee (or anyone employed by the licensee to perform an operational function within the meaning of Section 80 of the Act) becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, the licensee:

- (a) must return any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person as soon as is reasonably practicable; and
- (b) may not give a prize to the child or young person.

This condition does not apply to use of a Category D gaming machine.

(Section 83(1))

Credit

This licence is subject to a condition that the licensee may not:

- give credit in connection with gambling; or
- participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

But this condition shall not prevent the licensee from permitting the installation and use on their licensed premises of a machine enabling cash to be obtained on credit from a person (the “credit provider”) provided that:

- the licensee has no other commercial connection with the credit provider in relation to gambling;
- the licensee neither makes nor receives any payment or reward (whether by way of commission, rent or otherwise) in connection with the machine; and
- any conditions about the nature, location or use of the machine which may be attached to this licence by the Commission or by virtue of regulations by the Secretary of State are complied with.

(Section 81(2))

Part 1: Suite of general condition to operating licences under Section 75 of the Gambling Act 2005 (the Act)

1 Qualified persons and personal licences

1.1 Qualified persons

Licence condition 1.1.1

Qualified persons – qualifying position

All operating licences, except ancillary remote licences, issued to small-scale operators

- 1 In this condition the terms ‘small-scale operator’, ‘qualifying position’ and ‘qualified person’ have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
- 2 Schedule X¹ lists those individuals notified to the Commission as qualified persons.
- 3 If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act for amendment of the details of the licence set out in Schedule X¹.
- 4 An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
- 5 In this condition ‘qualified person’ has the same meaning as in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.

¹ The schedules mentioned here will be attached to individual licences.

1.2 Personal licences

Licence condition 1.2.1

Specified management offices – personal management licences

All casino, bingo, general and pool betting, betting intermediary, gaming machine general, gaming machine technical, gambling software and lottery managers licences, except ancillary remote licences

- 1** Subject to **6** and **7** below, licensees must ensure:
 - a** that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter ‘a personal management licence’); and
 - b** that at least one person occupies at least one of those offices
- 2** The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:
 - a** the overall management and direction of the licensee’s business or affairs
 - b** the licensee’s finance function as head of that function
 - c** the licensee’s gambling regulatory compliance function as head of that function
 - d** the licensee’s marketing function as head of that function
 - e** the licensee’s information technology function as head of that function in so far as it relates to gambling-related information technology and software
 - f** oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area
 - g** in the case of casino and bingo licences only, oversight of the day to day management of a single set of premises licensed under Part 8 of the Act.
- 3** The person responsible for the licensee’s gambling regulatory compliance function as head of that function shall not, except with the Commission’s express approval, occupy any other specified management office.
- 4** Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder’s personal management licence.
- 5** Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual’s work and any requirements of the Commission in respect of such matters applicable during the period of the review.
- 6** Paragraphs **1** to **5** above shall not apply to a licensee for so long as the licensee is a ‘small-scale operator’ as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 (‘the Regulations’).
- 7** During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs **1** to **6** above shall apply subject to the proviso that the phrase ‘each individual’ in paragraph **1a** shall not include any individual who was a ‘qualified person’ (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

2 Technical standards, equipment specification, remote gambling equipment and gambling software

2.3 Technical standards and equipment specifications

Licence condition 2.3.3

Casino equipment specifications

Non-remote casino operating licences and casino ancillary remote licences

- 1 Licensees must comply with the Commission's specifications for casino equipment.

4 Protection of customer funds

4.2 Disclosure to customers

Licence condition 4.2.1

Disclosure to customers

All operating licences, except gaming machine technical, gambling software, host, ancillary, remote bingo, and ancillary remote casino licences

- 1 Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
- 2 Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
- 3 In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
 - b winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and
 - c any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

5 Payment

5.1 Cash and cash equivalents, payment methods and services

Licence condition 5.1.1

Cash and cash equivalents

All operating licences except gaming machine technical, gambling software and host licences

- 1 Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (eg bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
- 2 Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

7 General 'fair and open provisions'

7.1 Fair and transparent terms and practices

Licence condition 7.1.1

Fair and transparent terms and practices

All operating licences except gaming machine technical and gambling software licences

- 1 Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015. Licensees must comply with those terms.
- 2 The contractual terms on which gambling is offered and any consumer notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
- 3 Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes to terms before they come into effect.
- 4 Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008, at any stage of their interactions with consumers.

9 Types and rules of casino and other games

9.1 Casino and bingo games

Licence condition 9.1.2

Prohibited bingo prize games

All non-remote bingo operating licences

- 1 Licensees must not offer or permit to be played prize gaming games that appear on any list of games prohibited by the Commission.

12 Anti-money laundering

12.1 Prevention of money laundering and terrorist financing

Licence condition 12.1.1

Anti-money laundering

Prevention of money laundering and terrorist financing

All operating licences except gaming machine technical and gambling software licences

- 1 Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
- 2 Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
- 3 Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

14 Access to premises

14.1 Access to premises

Licence condition 14.1.1

Access to premises

All operating licences

- 1 Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

15 Information requirements

15.1 Reporting suspicion of offences

Licence condition 15.1.1

Reporting suspicion of offences etc - non-betting licences

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences

- 1 Licensees must as soon as reasonably practicable provide the Commission or ensure that the Commission is provided with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.

15.2 Reporting key events and other reportable events

Licence condition 15.2.1

Reporting key events

All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, or ensure the Commission is notified, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence¹.

Operator status

- 1 In the case of licensees which are companies, a petition being presented for their winding up or the winding up of any group company of theirs, or they or any group company being placed in administration or receivership or their directors proposing to creditors a composition in satisfaction of its debts or a scheme of arrangement of its affairs.
- 2 In the case of licensees which are bodies corporate, but not companies, any event substantially equivalent to those listed at 1 above.
- 3 In the case of a licensee who is an individual (or a partner in a partnership licensee) their being presented with a petition for their bankruptcy or sequestration or their entering into an individual voluntary arrangement.

Relevant persons and positions

- 4 In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.
- 5 Any investment in a licensee which is not by way of subscription for shares.
- 6 The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.
- 7 The entering into an arrangement whereby a third party provides services to, or grants any licence concession or permission to, the licensee other than for full value: full details of the arrangements must be supplied.
- 8 The appointment of a person to, or a person ceasing to occupy, a 'key position': a 'key position' in relation to a licensee is:
 - a in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
 - b in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c a position the holder of which is responsible for the licensee's anti-money laundering procedures, including suspicious activity reporting
 - d any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)
- 9 Any change to the structure or organisation of the licensee's business which affects a 'key position' or the responsibilities of its holder.

Financial events

- 10 Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
- 11 Any breach of a covenant given to a bank or other lender.
- 12 Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
- 13 Any court judgments (in whatever jurisdiction) against the licensee or, where the licensee is a body corporate, a group company, remaining unpaid 14 days after the date of judgment.
- 14 Where the licensee is required to have their accounts independently audited, any qualification to an auditors' report; and any unplanned change of auditor including a change prompted by a dispute or resulting from auditors being unable or unwilling to sign an unqualified audit report.
- 15 Any change in the licensee's arrangements for the protection of customer funds in accordance with the general licence condition 4 relating to the protection of customer funds (where applicable).
- 16 Where the licensee holds customer funds in a separate bank account, any deficit on reconciliation of such bank account.
- 17 Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

Legal or regulatory proceedings or reports

- 18 The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
- 19a Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities in relation to the licensed entity of a personal licence holder or a person occupying a qualifying position employed by them, where such an investigation could result in the imposition of a sanction or penalty which, if imposed, could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
- 19b Any criminal investigation by a law enforcement agency in any jurisdiction in relation to which:
 - the licensee is involved (including, but not limited to investigations of crimes allegedly committed against the licensee or involving the gambling facilities provided under the licence), AND
 - the circumstances are such that the Commission might reasonably be expected to question whether the licensee's measures to keep crime out of gambling had failed.Notification of the event must occur as soon as practicable after the licensee becomes aware of any such investigation in which the licensee is involved and measures may have failed.
- 20 The receipt of any report from a professional, statutory or other regulatory or government body (in whatever jurisdiction) of the outcome of a compliance assessment in relation to the gambling activity of the licensee or, where the licensee is a body corporate, of any group company in which at least one person who holds a key position in or in respect of the licensee holds a key position: a copy of the report should be provided where available to the licensee.

- 21** The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor) about the provision of facilities for gambling which are expressed (in whatever terms) as requiring attention as a high priority: a summary of the nature of the concerns must be provided.
- 22** The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
- 23** The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
- 24** The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

Gambling facilities

- 25a** Any breach in the licensee's information security that adversely affects the confidentiality of customer data or prevents customers from accessing their accounts for longer than 24 hours.
- 25b** Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
- 26** Any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
- 27** The reference of a dispute to an ADR entity other than one in respect of which contact details were given in accordance with the social responsibility code provision on complaints and disputes; the reason for selection of that ADR entity should be given.
- 28** In the case of remote gambling, the commencement or cessation of trading on website domains (*including mobile sites or mobile device applications*) or broadcast media through which the licensee provides gambling facilities.

In this condition:

'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof

- a** in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
- b** a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

¹ Key events can be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk Alternatively, for operators unable to access this system, you can report a key event by email to: key.events@gamblingcommission.gov.uk Alternatively, for operators unable to access this system, you can report a key event by email to: key.events@gamblingcommission.gov.uk

Licence condition 15.2.2

Other reportable events

All operating licences

- 1 Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, or ensure that the Commission is so notified, as soon as reasonably practicable of the occurrence of any of the following events¹:
 - a the conclusion of a dispute referred to an ADR entity and in such case providing the Commission with a copy of the decision or note of the outcome².
 - b any outcome adverse to the licensee of any proceedings taken against the licensee (in whatever jurisdiction) by a customer in relation to a gambling transaction; but excluding proceedings allocated to the County Court small claims track or equivalent in jurisdictions outside England and Wales.
 - c their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised or their becoming aware of a sustained or meaningful generation of the 3% / 10% threshold being exceeded by the group.

In this condition:

- a 'group company' has the same meaning as in condition 15.2.1; and
- b without prejudice to section 327 of the Act, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

¹ Events required to be notified to the Commission by 15.2.1 or 15.2.2 may be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk or by email to: key.events@gamblingcommission.gov.uk

² In respect of the referral of disputes to an ADR entity the licensee's attention is drawn to social responsibility code provision 6.

15.3 General and regulatory returns

Licence condition 15.3.1

General and regulatory returns

All operating licences

- 1 On request, licensees must provide the Commission with such information as the Commission may require about the use made of facilities provided in accordance with this licence, and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on, including in particular information about:
 - a the numbers of people making use of the facilities and the frequency of such use
 - b the range of gambling activities provided by the licensee and the numbers of staff employed in connection with them
 - c the licensee's policies in relation to, and experiences of, problem gambling.
- 2 In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit a Regulatory Return to the Commission containing such information as the Commission may from time to time require¹.

¹Regulatory returns can be submitted securely online at the Commission's website through our eServices system available at www.gamblingcommission.gov.uk

16 Responsible placement of digital adverts

16.1 Responsible placement of digital adverts

Licence condition 16.1.1

Responsible placement of digital adverts

All licences

1 Licences must:

- a** Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
- b** take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
- c** ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

Part III: Code of practice

Introduction

This is the Commission's principal code of practice, issued under section 24 of the Gambling Act 2005.

There are two types of code provisions in this document:

- social responsibility code provisions: compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution; these provisions are set out in shaded boxes
- ordinary code provisions: these do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner. Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty; these code provisions are in the unshaded boxes in this section.

Code provisions

1 General

1.1 Cooperation and responsibility for third parties

Ordinary Code Provision 1.1.1

Cooperation with the Commission

All licences

- 1 As made plain in its *Statement of principles for licensing and regulation*, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

Social responsibility code provision 1.1.2

Responsibility for third parties – all

licences All licences

- 1 Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
- 2 Licensees must ensure that the terms on which they contract with such third parties:
 - a require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

2 Financial requirements

2.1 Anti-money laundering

Ordinary code provision 2.1.2

Anti-money laundering – other than casino

All licences except casino licences

- 1 As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators)*.

3 Protection of children and other vulnerable persons

3.1 Combating problem gambling

Social responsibility code provision 3.1.1

Combating problem gambling

All licences

- 1 Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.
- 2 Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

3.2 Access to gambling by children and young persons

Social responsibility code provision 3.2.5

Access to gambling by children and young persons – bingo and FEC SR code

All non-remote bingo and family entertainment centre licences

- 1** Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
- 2** This must include procedures for:
 - a** checking the age of apparently underage customers
 - b** refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c** taking action when there are unlawful attempts to enter the adult-only areas.
- 3** Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
- 4** Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
- 5** Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a** all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b** the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c** procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
- 6** Licensees must only accept identification which:
 - a** contains a photograph from which the individual can be identified
 - b** states the individual's date of birth
 - c** is valid
 - d** is legible and has no visible signs of tampering or reproduction.
- 7** Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission.

Ordinary code provision 3.2.6

Access to gambling by children and young persons – bingo and FEC ordinary code All non-remote bingo and family entertainment centre licences

- 1** The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
- 2** Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
- 3** Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
- 4** Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission and the police, and making available information on problem gambling to the child or young person concerned.
- 5** Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
- 6** Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
- 7** In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

3.3 Gambling management tools and responsible gambling management information

Social responsibility code provision 3.3.1

Responsible gambling information

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences

- 1 Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
- 2 The information must cover:
 - a any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
 - b timers or other forms of reminders or 'reality checks' where available
 - c self-exclusion options
 - d information about the availability of further help or advice.
- 3 The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
- 4 For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

Ordinary code provision 3.3.2

Responsible gambling information – foreign languages

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

- 1 Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
 - a the information on how to gamble responsibly and access to help referred to above
 - b the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
 - c the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

3.4 Customer interaction

Social responsibility code provision 3.4.1

Customer interaction

All licences, except non-remote lottery, gaming machine technical, gambling software and host licences

- 1** Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a** identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b** interacting with customers who may be at risk of or experiencing harms associated with gambling.
 - c** understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
- 2** Licensees must take into account the Commission's guidance on customer interaction.

3.5 Self-exclusion

Social responsibility code provision 3.5.1

Self-exclusion – non-remote and trading rooms SR code

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences

- 1** Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
- 2** Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
- 3** Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
- 4** This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
- 5** Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
- 6** Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a** a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b** photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c** staff training to ensure that staff are able to administer effectively the systems; and
 - d** the removal of those persons found in the gambling area or attempting to gamble from the premises.
- 7** Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.
- 8** Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

Ordinary code provision 3.5.2

Self-exclusion – non-remote ordinary code

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences

- 1** Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
- 2** Individuals should be able to self-exclude without having to enter gambling premises.
- 3** Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
- 4** Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
- 5** Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
- 6** Customers should be given the opportunity to discuss self-exclusion in private, where possible.
- 7** Licensees should take steps to ensure that:
 - a** the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b** any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c** a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
 - d** at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e** where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f** notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
- 8** The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
- 9** Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
- 10** Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.

- 11 Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
- 12 In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

Social responsibility code provision 3.5.6

Self-exclusion – multi-operator non-remote SR code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1 Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

Ordinary code provision 3.5.7

Self-exclusion – multi-operator non-remote ordinary code

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

- 1 Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).

3.6 Employment of children and young persons

Ordinary code provision 3.6.2

Employment of children and young people – bingo

All non-remote bingo licences

- 1 Licensees who employ children under (under-16-year-olds) and young persons (those aged 16 or 17) should be aware that it is an offence:
 - a to employ them to provide facilities for playing bingo;
 - b for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine; and
 - c to employ a child to perform any function on premises where, and at time when, facilities are being provided for playing bingo.
- 2 As to **1b**, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
- 3 Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a children and young persons are never asked to perform tasks within 1a or 1b, above
 - b all staff, including those who are children and young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
- 4 Licensees should consider adopting a policy that:
 - a children are not employed to work on bingo licensed premises at any time when the premises are open for business
 - b neither children nor young persons are in any event asked to work in areas where gaming machines are situated.

3.8 Money lending between customers

Ordinary code provision 3.8.2

Money-lending – other than casinos

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

- 1 Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

4 'Fair and open' provisions

4.1 Fair terms

Social responsibility code provision 4.1.1

Fair terms

All licences, except gaming machine technical and gambling software licences

- 1 Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

4.2 Display of rules and supervision of games

Social responsibility code provision 4.2.2

Display of rules - bingo

All non-remote bingo licences

- 1 In complying with any condition on a bingo premises licence or a 2005 Act large casino premises licence requiring the display of rules about gaming, licensees must ensure that the following are included:
 - a rules about each variant of bingo made available; and
 - b rules about any prize gaming made available.

5 Marketing

5.1 Rewards and bonuses

Social responsibility code provision 5.1.1

Rewards and bonuses – SR code

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

- 1 If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
 - a the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
 - b neither the receipt nor the value or amount of the benefit is:
 - i dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - ii altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
 - c if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
 - d if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.

Social responsibility code provision 5.1.3**Alcoholic drinks****All non-remote bingo and casino licences**

- 1 If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
- 2 Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

Social responsibility code provision 5.1.3**Alcoholic drinks****All non-remote bingo and casino licences**

- 3 If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
- 4 Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

Social responsibility code provision 5.1.6**Compliance with advertising codes****All licences, except lottery licences**

- 1 All marketing of gambling products and services must be undertaken in a socially responsible manner.
- 2 In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
- 3 The restriction on allowing people who are, or seem to be, under 25 years old (ie: those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

Ordinary code provision 5.1.8**Compliance with industry advertising codes****All licences**

- 1 Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

Social responsibility code provision 5.1.9**Other marketing requirements****All licences**

- 1 Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
- 2 Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
- 3 The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

Ordinary code provision 5.1.10**Online marketing in proximity to information on responsible gambling****All licences**

- 1 Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

Social Responsibility code provision 5.1.11**Direct electronic marketing consent****All licences**

- 1 Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

6 Complaints and disputes

6.1 Complaints and disputes

Social responsibility code provision 6.1.1

Complaints and disputes

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences

- 1** Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
- 2** Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
- 3** The services of any such ADR entity must be free of charge to the customer.
- 4** Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
- 5** Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
- 6** Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
- 7** Licensees should keep records of customer complaints and disputes in such manner as the Commission may from time to time specify in advice or guidance. They must provide information to the Commission about customer complaints, disputes, the outcomes of disputes referred to ADR, and court proceedings adverse to the licensee, also in such manner as the Commission may from time to time specify.

In this Code, 'ADR entity' means

- a** a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015, and
- b** whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

7 Gambling licensees' staff

7.1 Gambling licensees' staff

Social responsibility code provision 7.1.2

Responsible gambling information for staff

All licences, including betting ancillary remote licences, but not other ancillary remote licences

- 1 Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

8 Information requirements

8.1 Information requirements

Ordinary code provision 8.1.1

Information requirements – ordinary code

All licences

- 1 As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
- 2 Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence²:
 - a any material change in the licensee's structure or the operation of its business
 - b any material change in managerial responsibilities or governance arrangements
 - c any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

¹ These matters can be reported securely online at the Commission's website through our eServices system www.gamblingcommission.gov.uk

Alternatively, for operators unable to access this system, you can these events by email to: key.events@gamblingcommission.gov.uk

² Events which **must** be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

9 Gaming machines in gambling premises

9.1 Gaming machines in gambling premises

Social responsibility code provision 9.1.2

Gaming machines in gambling premises – bingo

All non-remote bingo operating licences

- 1 Gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises.
- 2 Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
- 3 Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.

10 Assessing local risk

10.1 Assessing local risk

Social responsibility code provision 10.1.1

Assessing local risk

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.

- 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 policy¹.
- 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.

¹This is the statement of licensing policy under the Gambling Act 2005.

Ordinary code provision 10.1.2

Sharing local risk assessments

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

- 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.

making gambling fairer and safer

www.gamblingcommission.gov.uk



POWERS OF THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS & OTHER OFFICERS

STATEMENT

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

The Company acknowledges its obligation to ensure that staff co-operate with the Gambling Commission's Enforcement Officers in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises.

- The Company must provide the Gambling Commission with any information that they suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a license condition or a code of practice provision having the effect of a license condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating License.
- The Company must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as: -
 - the numbers of people making use of the facilities and the frequency of such use.
 - the range of gambling activities provided by the licensee and the number of staff employed in connection with them.
 - the licensee's policies in relation to, and experience of, problem gambling.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.



RIGHTS OF GAMBLING COMMISSION ENFORCEMENT OFFICERS

- A constable, enforcement officer or authorised person under the Act may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed.
- A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed.
- Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating license or premises license is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating license.
- Entry may also be made to assess the likely effects of activity when application has been made for a premises license.
- The powers of the constable, enforcement officer or authorised person can include inspection of any part of the premises or any machine, anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions.
- The power of inspection must be exercised only at a reasonable time.
- The enforcement officer or authorised person must provide evidence of his identify and authority.
- A constable, enforcement officer or authorised person may use reasonable force to enter a premise.
- It is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

Please refer to the training section where you will find the Compliance Training document to be used for training purposes. Our online UPSKILL Training platform hosts Essential of Compliance & Social Responsibility workbook and online quiz to be completed every 6 months by all employees.

PROCEDURE

Visits by Gambling Commission Enforcement Officers may be pre-arranged or unannounced, however: -

In all circumstances the employee must ask for identification from the visitor to establish that they a Gambling Commission Enforcement Officer.

The Duty Manager must attend the Enforcement Officer without delay.

The visitor must also be requested to sign into the visitors log book.

Staff are to co-operate at all times with the Commission's Enforcement Officers in the proper performance of their compliance functions.

The Enforcement Officer may remove copies of documents as required.

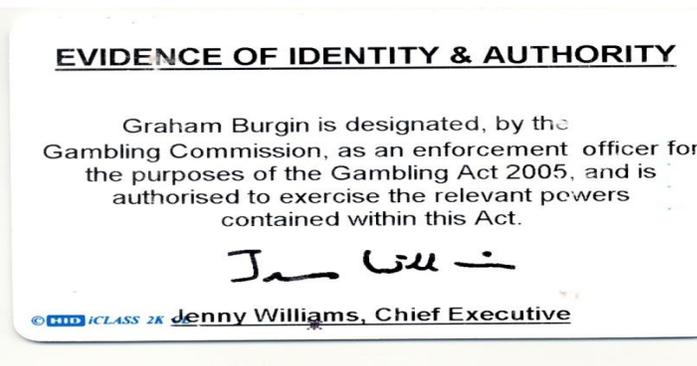
Gambling Commission Sample ID



Front Of Card

Contains the Following:

1. Officers Name
2. Photo ID
3. Serial Number
4. Date of Issue
5. Gambling Commission Contact Details



Back of Card

Contains the following:

1. Evidence of the Officers Identity
2. Signature of the Gambling Commission Chief Executive



MONEY LAUNDERING, CASH HANDLING AND SUSPICIOUS TRANSACTIONS

1. Introduction

This policy has been implemented in order to comply with the Money Laundering Regulations 2007 that requires processes to be adopted to avoid the possibility of money laundering.

New obligations in respect of money laundering were imposed by the Proceeds of Crime Act 2002 (the "POCA") and the Money Laundering Regulations 2007 ("the Regulations"). This legislation broadens the definition of money laundering and increases the range of activities caught by the statutory control framework. As of 31st October 2016 new money laundering regulations come into force. The regulations are applicable to the Licence Conditions & Codes of Practice (LCCP). Whilst our venues/sector is considered "Low Risk", this does not mean that there is "no risk" within our trading sectors.

As a result of this legislation Cashino Gaming is required to establish procedures to prevent the use of its services and resources for money laundering. Anti-Money Laundering is effective within our business by taking a "risk based" approach.

2. Money Laundering Definition

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. This definition of money laundering means that potentially any employee could contravene the Regulations if they were to become aware of or suspect the existence of criminal property and continue to be involved in a matter which relates to that property without reporting their concerns. In arcades, both Adult Gaming Centre (AGC) and Family Entertainment Centre (FEC), this is typically stained or dyed notes and foreign coins. We should also be mindful of significant increases in customer spending habits which may be an indicator of criminal spend. In practice this is the most likely area of potential money laundering within our venues.

3. Policy

Cashino Gaming is committed to ensuring that all necessary safeguards are in place with regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.

Cashino Gaming has appointed a designated Money Laundering Officer (MLO), Mrs. Amanda Kiernan.

Email: amandakiernan@praesepeplc.com



All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions. **All venues** need to report any suspicious cash transactions **of any** note denomination value, i.e. **one** stained/dyed note, and foreign coins to the value of **£50 during one machine empty or cash collection**. These incidents should be reported using the “(AML) ANTI MONEY LAUNDERING” app available on your IHL tablet. An automated alert will be sent to the Money Laundering Officer for the purpose of informing the relevant authorities.

4. Disclosure Procedure

Where it is suspected by a member of staff that money laundering activity is taking/has taken place, a disclosure must be made to the Money Laundering Officer as soon as possible. Because of the importance attached to the process, notification should normally take place immediately by telephone or, where that is not possible, by any other expedient means, including automated alerts of the “(AML) ANTI MONEY LAUNDERING” report available on your IHL tablet. Where there is suspicion of any type of potential money laundering incident CCTV images (if available and relevant) should be retained securely.

All incidents should be reported to your line Manager.

The Money Laundering Officer will maintain records of all notifications received detailing the method of verification used to identify the suspected person.

5. Cash Handling

Operating policies and procedures are in place with regard to accounting practices and record keeping in respect of: -

- Monetary stakes introduced to machines (gross takings where available)
- Money introduced to refloat machines
- Token transactions
- Customer refunds due to machine malfunctions
- Money removed from machines (net takings where available). Where gross takings and net takings information is not available the operation will provide an explanation to the Commission
- Ticket In Ticket Out (TITO) vouchers from machines in arcades can be used for money laundering. Vouchers can be cashed in at a later date and criminals will use a range of outlets to disguise the origin of funds

Members of staff, where appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to the effect retaining a copy for their future reference. The original is retained on the employee’s personnel file.



KEEPING ALCOHOL OUT

At Cashino Gaming we have clear rules and guidelines on the consumption and influence of alcohol.

INDIVIDUALS UNDER THE INFLUENCE OF ALCOHOL ON ENTRY

In all our sites individuals who are deemed to be under the influence of excessive alcohol should be prevented from entering any of our premises.

Procedure

When such a situation occurs the member of staff should politely refuse entry to the site on the grounds of being under the influence of alcohol and ask the individual to leave the premises.

Should the individual resist or refrain from leaving the premises in the first instance a Manager or Duty Manager should be called. They should also request that the individual leave the premises immediately. If an individual fails to leave the premises or becomes a nuisance that cannot be dealt with by the staff on duty the police should be called to assist.

All incidents should be recorded fully on the premises log.

ALCOHOL CONSUMPTION ON SITE

Dependent upon which type of site you are on depends on the rules that need to be applied.

Bingo Clubs

Customers may purchase alcoholic drinks on site within the licensing regulations of the premises; however customers must not bring alcohol onsite to be consumed.

AGC's

Under no circumstances should customers be served alcoholic drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed.

Betting

Under no circumstances should customers be served alcoholic drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed.

Customers should be approached to either leave the premises or stop drinking on site.

EXCESSIVE CONSUMPTION

Procedure

For sites where alcohol may be purchased and a customer consumes to excess to the extent that their behaviour becomes inappropriate or disruptive they should in the first instance be prevented from consuming any more alcohol and should be requested to behave appropriately or be asked to leave the premises, usually by a duty manager.

Where the individual refuses to leave the premises then the police should be contacted for further assistance.

DEALING WITH AN AGGRESSIVE CUSTOMER

Both violence and aggression are used to show distress, to gain dominance, and sometimes to maintain stability. As such they can be termed 'normal' if not always socially acceptable.

WHAT CAUSES AGGRESSION AND VIOLENCE?

There are many reasons why someone may behave in an aggressive or violent manner towards an individual or object. Below are some of the reasons in different situations.

Platonic	Human beings tend to judge things they are familiar with as good and things not familiar as suspect.
Instinctive	The best defence is attack!
Learned Behaviour	Aggression is sometimes part of the behaviour we have learned from society.
Energy Source	Natural release of pent-up instinctual energy - a pressure relief valve. Many of the activities socially acceptable are high forms of controlled aggression. The career drive in some people may be explained as an attempt to express instinctual aggression drive, but in a way society accepts and rewards.
Frustration Response	When frustration in an individual reaches certain levels the only option open may be a display of aggression.

WHAT ARE SOME OF THE CAUSES OF VIOLENCE?

There are two aspects to consider:

Physical	Such as Brain Damage, Drug Abuse, Alcoholism, Sexual Abnormalities, Pain, Hunger, Sleep Deprivation, Environmental Changes (weather), Appearance, Illness, Defence of Territory of Possessions, Age
Psychological	Such as Fear, Frustration, Humiliation, Inappropriate Assertiveness, Pain, Vulnerability, Threats (Defence of self), Age, Illness (affective disorders, schizophrenia), Oppression.

IDENTIFYING AN AGGRESSIVE OR VIOLENT CUSTOMER

There are tell tale signs so the key thing is to observe customer discreetly whilst going about your duties. This way you will spot a change in demeanour or behaviour.

These are some of the signs that can help in predicting the likelihood of imminent violence:

- Muscles tensed?
- Facial expression?
- Balanced to move?
- Fingers or eyelids twitching?
- Pacing about?
- Withdrawn on approach?
- Voice - change of pitch/tone; insults; obscenities, threats?
- Sweating?
- Breathing - increase in respiration?
- Tears?
- Offensive weapon carried or available?

PROCEDURE

Quite simply whenever there is an incident you should: -

- H Hear the customer – listen to their complaint or issues.
- E Empathise – see to understand the problem.
- A Acknowledge – ‘I hear what you are saying’, ‘I’m sorry you feel that way’.
- T Take Action – progress with whatever action is relevant to the situation.

Here are some further techniques which can help when responding to a customer behaving aggressively or violently: -

- Be alert and consider if you need further assistance.
- Avoid eyeball to eyeball confrontation.
- Relieve the tension by adopting a calm approach.
- Speak and stand calmly but always remain balanced and ready to move - stay on person's weak side where possible.
- Consciously lower pitch and volume of voice.

- Speak clearly and slowly and don't stop talking because the other person doesn't answer.
- Try to get the person talking.
- Listen to what the person says and how it is said.
- Try to identify the source of concern and help if possible.
- Try to distract the person from the immediate cause of concern by changing the course of conversation - buy time to think, to plan, to obtain assistance.
- Understanding and kindness, simple human values which are often overlooked in today's society, can have a marked effect on the outcome of such cases.
- Do not argue! You really cannot win because the other person does not have to be logical. If you lose the argument and have to back off, your position is weakened. You may get so involved, if you do not carefully measure your own response, that you might, in the end, lose some of your own self-control.
- Do not give orders!
- Never make promises you cannot keep.
- Do not disagree where it is not necessary.
- Do not make threats that cannot be carried out or offer rewards for what started out as unlawful or improper conduct.
- Control your behaviour in body language, feelings and expression.
- In conversation with the person being confronted use expressions such as:
 - "I know you have a problem", "I know you are upset", "I believe you when you say something is wrong". Keep your voice at a calm, even pace.

These expressions will show that you have some affinity with the person and his/her position.

- Always consider if you need further assistance from a colleague, if the person becomes abusive in their language or behaviour they should be asked to leave immediately (remember to refund their stake money). If they refuse to leave then assistance from management or the police should be sought.

PREVENTING STAFF FROM BEING ABUSED

Under no circumstances should a member of staff put themselves at risk with an abusive customer. If the following of the guidelines above has failed in calming a customer or the customer refuses to leave the premises when asked a manager should be called. If the customer is still aggressive and still refuses to leave the premises then the police should be called.

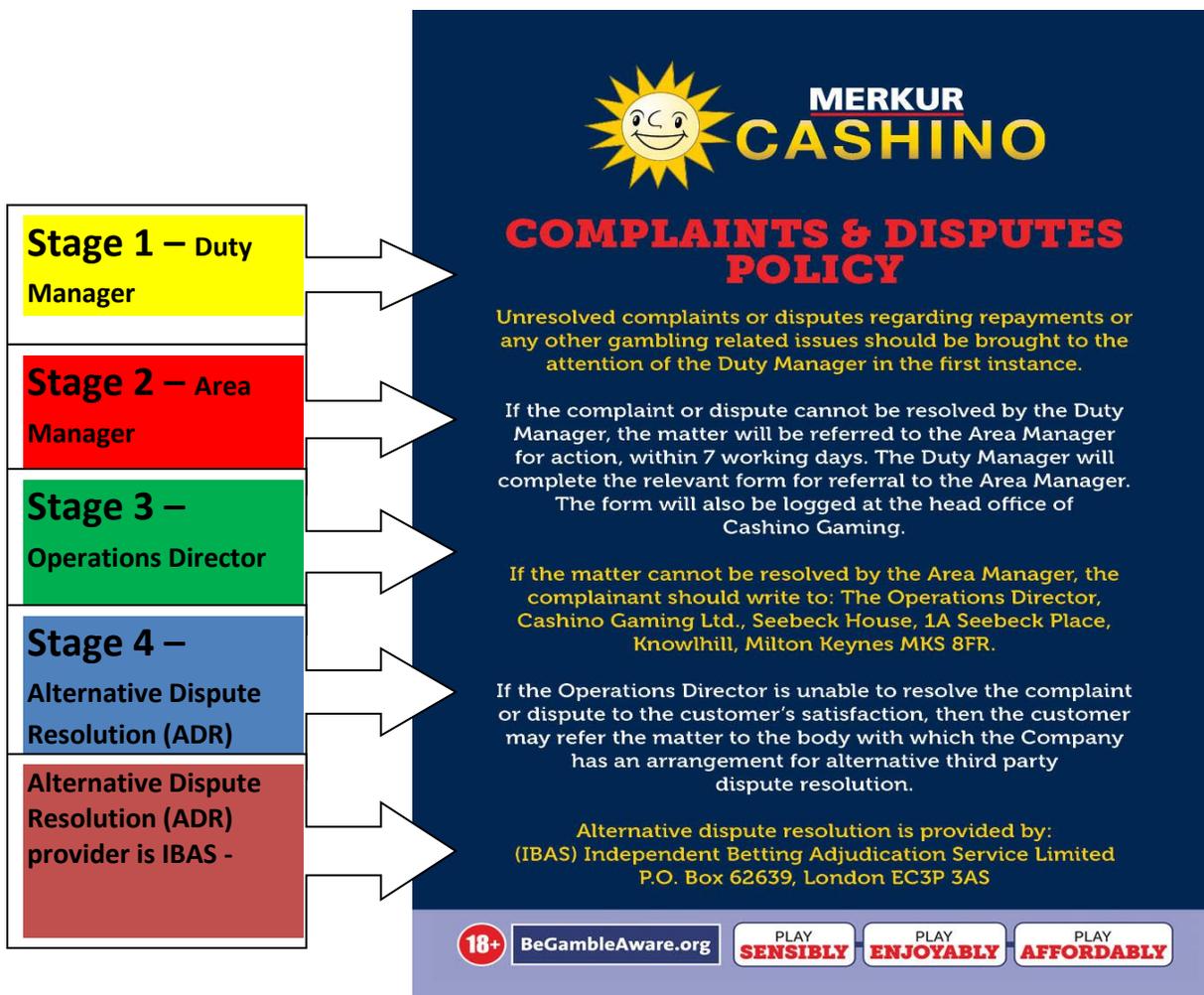
At no time should a member of staff intervene physically in the removal of an individual from a site.

All incidents should be fully recorded on the incident reports log.

COMPLAINTS PROCEDURE

The Company's written complaints procedure is available as a separate leaflet. Cashino venues operate a 4 stage complaints procedure as below.

If you receive a visit from the Gambling Commission/Local Authority they may ask you who our **Alternative Dispute Resolution** (ADR) provider is so ensure you know the answer – see details below.





MARKETING AND PROMOTIONAL GUIDELINES

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

COMPLIANCE

All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

We adopt the general principles that our advertising is:

- legal, decent, honest and truthful.
- prepared with a sense of responsibility to consumers and to society.
- respectful to the principles of fair competition generally accepted in business.
- not intended to bring advertising into disrepute.

Specifically we ensure that:

- advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise.
- advertisements and promotions are socially responsible and do not encourage excessive gambling.
- care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable.
- advertisements are not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear. No medium is used to advertise gambling if more than 20% of its audience is under 18 years old.
- persons shown gambling are not, nor do they appear to be, under 25 years of age.
- there is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer.
- advertising and promotional material carries a reference for the need to keep gambling under control.
- it is never suggested or implied that gambling is a means of getting out of financial difficulty.



MARKETING AND PROMOTION

Any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or other advantage (including the discharge in whole or in part of any liability (the benefit)) the scheme is designed to operate, and be operated, in such a way that neither the receipt nor the value or amount of the benefit is: -

- a) dependent on or calculated by reference to the length of time for or the frequency with which the customer gambles or has at any time gambled.
- b) dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency.

If the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases. Incentives and rewards are proportional to the type and level of the customer's gambling.

Procedure

All Marketing and Promotions must be compliant.

All Marketing and Promotional activities must be approved by one of the following Managers relevant to the site.

For Bingo Sites

- Operations Director
- General Manager
- Marketing Manager

For AGC's

- Operations Director
- Marketing Manager

For Betting

- Operations Director
- Marketing Manager



ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. It is illegal for any person who is under 18 years of age to be permitted entry to any Licensed Premises.

PROCEDURE

- It is a matter of gross misconduct if a member of staff knowingly allows entry by any person who is under the age of 18 years to our Licensed Premises.
- Any person known to be under 18 years of age will be refused entry.
- Any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry or when it comes to the attention of staff. Members of staff are trained to 'think 25'.
- If the person admits to being under the age of 18, they are refused entry.
- Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and has to be provided before entry is allowed. If at any time there is suspicion of forged documents these incidents will be recorded and reported.
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction. Acceptable forms of identification include those that carry the PASS logo (e.g. Citizen card, Validate and the Government's own Connexions card); a driving licence (including a provisional licence) with photograph, or a passport and military identification cards.
- Where there is still doubt and the person cannot produce proof of age, they are advised that they will not be permitted to enter until such time as they provide such proof.
- They will be shown, have explained to them, and be given a 'proof of age card' application form or offered an explanation on how to apply for a card.
- Should the person then refuse to leave, they are advised that the age restriction is a legal requirement.

- If they still will not leave, the Duty Manager is immediately contacted to take over the situation.
- Any attempts by under-18s to enter the premises or designated area(s) are brought to the attention of the Duty Manager immediately and recorded as an entry on a log retained on the premises. Details of entry to include date, time, identity of the individual if known - or detailed description if unknown – member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence. The Log is to be countersigned by the Duty Manager.
- Service is refused in all circumstances where any adult is accompanied by a child or young person.
- All gaming machines, other than category 'D' machines, are inscribed with a notice prohibiting play by persons under the age of 18 years.
- Stakes are returned to under-18s attempting to gamble in an adult-only environment, and under-18s are not allowed to retain any prize.
- Consideration will be given to permanently excluding from our Licensed Premises any adult who has previously and repeatedly attempted to gain entry when accompanied by a child or young person or, should entry have been gained, if the offence was committed knowingly or recklessly. Notwithstanding, that adult shall be required to stop gambling immediately and told to leave the premises.
- In instances where a child or young person repeatedly attempts to gamble on premises or in designated area(s) restricted to adults, or where repeated oral warnings have been issued, consideration will be given to reporting the matter immediately to the Gambling Commission and, where appropriate, police or local education welfare department.
- Consideration is to be given to reminding customers of their parental responsibilities and to assess whether there is a need to develop procedures for dealing with young or otherwise vulnerable children left unattended in the vicinity of our premises.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log.

EMPLOYMENT OF CHILDREN AND YOUNG PERSONS

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

COMPLIANCE

It is an offence for children (under-16s) and young persons (those aged 16 and 17) to be engaged, or permitted to be engaged in: -

- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on the Licensed Premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence. All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.

IT IS STRICT COMPANY POLICY THAT: -

- Children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place.
- Gaming machines sited in Licensed Premises are turned off if children and/or young persons are working on the premises outside the hours when the premises are open for business.
- Due diligence is given to verifying the age of all new members of staff where there is reason to doubt authenticity of birth dates supplied.



CUSTOMER INTERACTION

**REMEMBER reporting an Interaction is NOT the same as reporting an Incident.
An Interaction is a Gambling related issue with a customer.**

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice listed under the Social responsibility code provision 3.4.1.

The Company makes use of all relevant sources of information to ensure effective customer interactions in particular, to identify at-risk customers who may not be displaying obvious signs of problem gambling.

If members of staff have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager should be informed at the earliest available opportunity.

The Duty Manager is required to observe the individual and make a judgment as to whether it is appropriate to suggest to the customer that they might want to be provided with information regarding where they can seek professional advice about the nature of their gambling activity, or to discuss other options.

New Customer interaction – formal guidance was introduced by the Gambling Commission 31st October 2019. A copy is available to read in this section of your Compliance folder. Customer interaction consists of the following 3 parts;

PROCEDURE

PART 1; Identify and observation – behavior or activity you have spotted or something the customer tells you.

PART 2; Interact and take action - contact to prompt the customer to think about their gambling, for you to find out more, and an opportunity for you to offer information or support.

PART 3; Evaluate and record the outcome – what you or the customer did next. In some cases, you may need to monitor the customer's gambling to spot any change which may prompt further action.

The above 3 parts include the following;

- Behaviours may include intense mood swings, aggression, hysteria, remorse, excessive ATM use, time and money spent, damage to property, violence or the threat of violence to staff or other customers.

- The Duty Manager may give consideration to refusing service or barring the customer from the premises and, in extreme situations, contacting police for assistance. Whenever police are called to the premises for assistance in handling any incident, a log entry will be made whether police attend or not. [SmartINCIDENT app on IHL tablet]
- Staff are aware of where customers can be directed for confidential advice should they be approached by them for help. This includes the Staying in Control information leaflet which includes GamCare Helpline details.
- Members of staff are trained to deal with the process of self-exclusion if they consider a customer is at risk and/or where a customer requests self-exclusion information, this will be fully explained for consideration.
- All venue staff should be aware of those customers that are frequent visitors or deemed to be "high value" players. Monitoring and interaction will take place with every customer during every visit. It is this interaction that may lead the Duty Manager to intervene or take appropriate action, possibly via the Machine Administration Reconciliation System (MARS), which is able to monitor the spend of particular customer on specific machines, who may be deemed "high value", and therefore potentially more at risk. Appropriate action would then be taken on a player by player basis.
- If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts the staff or other customers in potential danger, the Duty Manager will implement the Company's procedures for dealing with antisocial situations.
- Notwithstanding any other action that may have to be taken immediately to prevent an incident from worsening, the Duty Manager will log all such reports which may result in customer interaction on an appropriate future occasion. The interaction will be conducted between the Duty Manager and the customer in a confidential and meaningful manner.
- Members of staff are trained as part of their 3 month induction process in the understanding of, and the strict adherence to this policy and accompanying logs.



SELF EXCLUSION

POLICY

Whilst most customers are able to enjoy and control their gambling, Cashino Gaming recognises its duty of care to those who cannot. Accordingly we provide a self – exclusion facility for those customers to request their exclusion for a fixed period of time, which is for a minimum of not less than 6 months, nor more than 12 months, with the customer, on request, having the option to extend one or more periods for a further 6 months each.

New regulations were implemented by the Gambling Commission and as from 6th April 2016, all gaming operators have to be part of a multi operator self-exclusion scheme, referred to as MOSES.

IF A CUSTOMER WISHES TO SELF-EXCLUDE IMMEDIATELY, WITHOUT MEETING WITH THE AREA MANAGER/DUTY MANAGER/SUPERVISOR OR WITHOUT A FURTHER VISIT TO OUR PREMISES, THEN THEIR DECISION MUST BE RESPECTED. THE DUTY MANAGER OR SUPERVISOR SHOULD ASSIST THE CUSTOMER IN THE COMPLETION OF A SELF EXCLUSION REQUEST IMMEDIATELY, SO THAT THE CUSTOMER NEED NOT MAKE A FURTHER VISIT TO THE GAMING PREMISES. PLEASE NOTE: YOU WILL NEED A WIFI CONNECTION IN ORDER TO ACCESS THE IHL HUB AND THE SmartEXCLUSION PAGE ON THE TABLET.

PROCEDURE – using the SmartEXCLUSION tablet

When a customer has requested that they be refused entry to our premises, the customer and the Area Manager/Duty Manager/Supervisor will formally acknowledge and document their request on the SmartEXCLUSION tablet, available at all Cashino venues. For further information please refer to the “SmartEXCLUSION User Guide” available at the venue.

Self-exclusion is sector specific:-

- **AGC LICENSED PREMISES** - 0.25km – 1km exclusion zone.
- **BINGO LICENSED PREMISES** – Traditional Bingo Clubs eg Beacon, Mecca and Gala plus High Street Bingo’s – National exclusion zone
- **Please Note: the staff member dealing with the self exclusion process should make the customer aware that if they self-exclude from a Cashino Venue with a Bingo Licence, they will be self excluded from ALL High Street Bingo’s and Traditional Bingo clubs in the UK.**
- Therefore you need to know what type of Premises Licence you hold at your venue. It will either be ADULT GAMING CENTRE PREMISES LICENCE (AGC) or BINGO PREMISES LICENCE. The tablet is set up to select your sector type by default, either AGC or BINGO. You will need to explain to ALL CUSTOMERS who wish to self-exclude, that it is sector specific and that they need to visit other establishments in your local area if they frequent premises operating Bingo, AGC, Licensed Betting Shops and Casinos licenses in order for them to self-exclude from **ALL gambling premises.**



The customer will be asked to assist us in applying the exclusion by allowing you to take an up-to-date photograph. The SmartEXCLUSION tablet has a built in web cam for this purpose. You will be prompted by the on-screen instructions when to take a photo of the customer during the self-exclusion process. **A photo is a mandatory requirement. The photo should be taken of head and shoulders only.**

The Area Manager/Duty Manager/Supervisor will confirm the customer's exclusion for a minimum period of not less than six months, nor more than 12 months.

The exclusion will apply to all Adult Gaming Centre (AGC) venues within a radius of 0.25km – 1 km, if your venue holds an AGC license and ALL Bingo licensed premises – Traditional and High Street if your premises hold a Bingo License.

It must be made clear to the customer that they may not revoke the self-exclusion during this time.

Once the customer has entered their electronic signature on the tablet and the self-exclusion is confirmed, the information will be retained on the tablet at the venue and electronic notification sent out to other similar licensed premises, nationally for Bingo licensed premises and within a 0.25km – 1km radius for AGC licensed premises.

A photo gallery is available to view for ease of identifying customers who have self-excluded in the local area and includes your venue within the selected radius. Milton Keynes Head Office will automatically be notified of all self-exclusions.

Please note on the photo gallery,

- Exclusions which are live have no coloured border.
- Exclusions which are in the 6 month 'cooling off' period have a **RED** border. These photos will remain on the tablet for 6 months. If the customer does not return to gambling within the 6 months period, photo will automatically disappear and be archived.
- Exclusions in the 24 hour 'cooling off period have a **BLUE** border. This will be visible for customers who have reinstated and wish to resume gambling and will disappear after the 24 hour period.

If a customer tries to enter gaming premises during a self-exclusion period, this is classed as a breach and details should be recorded on the tablet by selecting the customer photo and selecting the Report Breach button 

When the self-exclusion period ends, a customer has the option to return to gambling. **The customer should return to the venue where they originally self-excluded from to complete the re-instatement process on the tablet.** This button will be visible on the tablet only after the end date of the self-exclusion period .



If a customer wishes to extend their self-exclusion period for a further 6 months, they may do so by selecting the  button on the tablet.

PLEASE NOTE: For staff training purposes follow the instructions on the tablet and enter the following details on New Exclusion – Contact Details page:

First Name: **dummy**

Last Name: **test**

You **do not** need to take a photo of a person, just point the camera to the floor and take the photo. All test entries will automatically get archived once a week from the database.

As of 6th April 2016 you no longer need to add any self-exclusions **completed on the tablet** to 'LOG E – Self Exclusion' as the new SmartEXCLUSION tablet acts as the electronic log. (See details below for old style paper Self Exclusions).

PROCEDURE – using the old paper Self Exclusion Request Forms which have yet to expire

PLEASE NOTE: You will need to retain any previous paper copies of SELF EXCLUSION REQUEST FORMS on file, until such time they have expired and the 'END DATE' is reached. This could be up to 2020. **Do not throw them away as they are proof that a customer self-excluded prior to 6th APRIL 2016, when the regulations changed.** You will also need to retain the paper copy of the SELF EXCLUSION REVIEW FORM. This form will need to be completed if a customer wishes to return to our premises and resume gambling. **You will only need to use this form for paper copies of self-exclusions which are not on the tablet.**

PLEASE NOTE: For old style paper self-exclusions you have in your Compliance folder, which are still active, (see 'end date'), the Duty Manager or any other authorised person and the customer will review the request and record the process on a self-exclusion review form and attach this to the original self-exclusion request form. If the customer wishes to extend their self-exclusion, this will need to be completed on the tablet as a new entry for a minimum period of 6 months.

You will need to record on LOG E, any actions for old style paper Self Exclusion Request Forms you still have on file i.e. customer breach, customer review/resume gambling and 24 hour cooling off period.

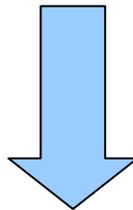
If the customer does wish to continue gambling after the expiry of an exclusion period then a 24 hour cooling off period must be taken before gambling is resumed.

Paper self-exclusion request forms should be destroyed 6 months after the end date due to the data protection act.

PLEASE NOTE: Self-exclusion social responsibility code provision 3.5.1 is a condition of our Licence Conditions and Codes of Practice – (LCCP)

SELF EXCLUSION PROCEDURE FLOWCHART

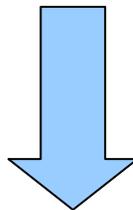
CUSTOMER:	Requests to be excluded.
AREA MANAGER/DUTY MANAGER/SUPERVISOR:	Goes through the implications, for a minimum period of not less than six months, nor more than 12 months, with the customer, upon request, having the option to extend one or more periods for at least a further six months each. Advises the customer of the GamCare Self-Assessment test (on tablet) before self-excluding.
CUSTOMER AND AREA MANAGER/DUTY MANAGER/SUPERVISOR:	Completes the customer exclusion request using the SmartEXCLUSION tablet and follows the on screen instructions.
CUSTOMER:	Must allow a photograph to be taken using the built in webcam using the SmartEXCLUSION tablet.
AREA MANAGER/DUTY MANAGER/SUPERVISOR:	Explains to customer the exclusion is sector specific and applies to other similar operating premises in the locality within the default 0.25km – 1 km radius.
CUSTOMER:	Once customer has electronically signed and Duty Manager confirmed the self-exclusion on the SmartEXCLUSION tablet, the customer must now leave the site.



MANAGER:

Checks the SmartEXCLUSION tablet and photo gallery includes the customer in question. Informs Team Members and any regular relief staff. Make new starters aware if they start during the exclusion period.

MANAGER/DUTY STAFF



Must record a breach on the Smart EXCLUSION tablet when a customer who has elected to self-exclude themselves tries to enter the premises.

AFTER THE END OF THE EXCLUSION PERIOD:

Customers will be offered support and advice should they wish to resume gambling. They should return to the venue where they originally self-excluded from to complete the re-instatement process. If this is the case a 24 hour cooling off period is put in place. Information will also be provided on how to extend the self-exclusion period should they wish to do so.

See above instructions for old style paper self-exclusion request forms which have expired and reached the end date and the process to follow.

Full operating instructions for your SmartEXCLUSION tablet are available at all venues. Please refer to the SmartEXCLUSION User Guide available at your venue.



SELF EXCLUSION REVIEW FORM

Please note: this form should only be used for old style paper self-exclusions on file. You do not need to use this form for self-exclusions on the SmartEXCLUSION tablet.

Company:
Site Name:
Site Address:
Post Code:

Customer Name:
Customer Date of Birth:
Customer Address:
Post Code:
Self-Exclusion agreement start date:End Date:.....

Customer's Decision:
.....

Request to resume access and gambling following the self-exclusion period.

I confirm that I voluntarily no longer wish to be self-excluded from this site and other venues in the locality to which the agreement applies; that all options have been explained to me by the Company.

Signature: (Customer) Date:.....Time.....

Signature: (Appointed Manager) Date:.....Time.....

I have experienced a "cooling off" period of 24 hours and can resume gambling as of:

Date:.....Time:.....

Please note: if the customer wishes to be reinstated on the Membership database, a copy of this form needs to be emailed to Tracey Chapman – (Memberships) at Cashino Head Office, Milton Keynes.

Email: traceychapman@praesepeplc.com

Please note: Log E needs to be updated with these details in your Compliance folder for old style paper self-exclusion forms only pre 6th April 2016.

Please retain this form on file for your records for a further 12 months from date signed.

SOCIAL RESPONSIBILITY & CODES OF PRACTICE PREMISES LOGS

The Log Book contains the following:

- NEW:** Venue Monthly Compliance Log Check Summary
- LOG A:** Attempts By Children And Young Persons To Access Adult Areas – (recorded electronically using **Age Verification app** on tablet as of 9th July 2018)
- LOG B: 1** Customer Interaction - Gambling Related “At Risk” Customers – (recorded electronically using the **SmartINTERACTION app** on tablet as of 8th April 2019)
- LOG B: 2** Customer Incidents – Not Gambling Related – (recorded electronically using **SmartINCIDENTS app** on tablet as of 1st October 2018)
- LOG C:** Customer Complaints and Disputes (paper Log)
- LOG D:** Customer Incidents Requiring Police Assistance – (recorded electronically using **SmartINCIDENT app** on tablet as of 1st October 2018)
- LOG E:** Self-Exclusion Log - to be used for old paper Self Exclusions Forms which are not on the tablet and retained in Compliance Folder
- LOG F:** Incidents Relating To Aggressive Customers and Alcohol – (recorded electronically using **SmartINCIDENT app** on tablet as of 1st October 2018)
- LOG G:** Staff Training Summary – paper log to be signed and dated every 6 months by **all staff**, when they complete “Essentials of Compliance” training module. **Venue Managers** to check the log is up to date at the end of the month and sign the Log Check Summary to verify the log is correct.
(this will remain as a paper Log and will not be on the tablet)

NOTE: You can download and print these Premises Logs on Upskill > Knowledge Base > Categories > Cashino Compliance Folder Content

(Cashino Premises Logs – section 5 - Updated April 2019 – V1.6)

Venue Monthly: Compliance Log Check Summary

Venue Name		Month and Year	
Log	Description	Total No.	Comments
A	Attempts by children and young persons to enter venue [Age Verification app on tablet as of 9th July 2018]		
B 1	Customer Interactions related to Problem Gambling [SmartINTERACTION app on tablet as of 8th April 2019]		
B 2	Customer Incidents not related to Problem Gambling [SmartINCIDENT app on tablet as of 1st October 2018]		
C	Customer Complaints and Disputes [paper log]		
D	Customer Incidents Requiring Police Assistance [SmartINCIDENT app on tablet as of 1st October 2018]		
E	Paper Self-Exclusions , Attempts to enter, Attempts to Gamble [complete for any paper self- exclusion forms you have on file] further information on log sheet		
F	Incidents Relating to Aggressive Customers and Alcohol [SmartINCIDENT app on tablet as of 1st October 2018]		
G	Summary of Staff Training : Essentials of Compliance Only (EOC) [paper log to be completed & signed by <u>ALL STAFF</u> for EOC training]	NA	NOTE: Please check at the end of each month training dates on Log G correspond with Upskill EOC dates

Document to be completed checked and signed monthly by Venue Manager or designated person at the end of each month.

Area Manager check and sign every 8 weeks.

Signed Venue Manager		Date	
Signed Area Manager		Date	Comments
Signed Auditor/Compliance Manager		Date	Comments

(Regulatory reports to the Gambling Commission are for the period 1st April to 31st March each year)



SITE ADDRESS and NUMBER :

Month/Year:.....

LOG C : CUSTOMER COMPLAINTS AND DISPUTES

Date	Time	Details of Incident	Outcome/Action Taken – Complaint Resolved?	Duty Manager
Page 280				

SITE ADDRESS and NUMBER :

Month/Year:.....

LOG E : SELF-EXCLUSION LOG

Name	DOB	Photo Yes	Start Date	Attempts to Enter Date(s)	Attempts to Gamble Date(s)	Preventative Measures	End Date	'Cooling Off'	Resumed Gambling Y/N

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1. This form needs to be completed only for **old paper self-exclusion requests forms** you still have on file which have yet to reach the “End” date. This could be up to 5th April 2020!
2. If a customer wishes to return to gambling, a **Self Exclusion Review Form** (copy in Compliance folder) needs to be completed and signed by you and the customer. You also need to complete the last 2 columns on this form.
3. This form needs to be completed if a customer who is self-excluded on old paper request form enters & attempts to gamble in the venue. This would be classed as a **“BREACH”**. Name of Customer and date/time and measures you took need to be recorded

SITE ADDRESS and NUMBER :

LOG G : SUMMARY OF STAFF TRAINING – Page 1

TO BE COMPLETED SIGNED AND DATED BY ALL EMPLOYEES EVERY 6 MONTHS FOR UPSKILL – ESSENTIALS OF COMPLIANCE TRAINING (EOC) AND QUIZ

Management and staff have declared that they have read and understood the following training documents and are fully aware of Company policy and procedures relating to them:

1. Access to Gambling by Children and Young Persons	6. Money laundering and Proceeds of Crime Act 2002
2. Access to Premises by the Gambling Commission’s Enforcement Officers	7. Self-Exclusion
3. Advertising Standards and Marketing	8. Customer Interaction for “At Risk” customers
4. Fair and Open Practice and Alternative Dispute Resolution/IBAS	9. Incidents relating to Aggressive Customers and Alcohol
5. Information on how to Gamble Responsibly and Help for Gamblers with problems	10. Employment of Children and Young Persons

Name	Position in Company	Training Date EOC Quiz	Staff Signature	Next Training Date Due in 6 months	Leaving Date	1	2	3	4	5	6	7	8	9	10
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Page 282						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

SITE ADDRESS and NUMBER :

LOG G : SUMMARY OF STAFF TRAINING – Page 2

TO BE COMPLETED SIGNED AND DATED BY ALL EMPLOYEES EVERY 6 MONTHS FOR UPSKILL – ESSENTIALS OF COMPLIANCE TRAINING (EOC) AND QUIZ

Name	Position in Company	Training Date EOC Quiz	Staff Signature	Next Training Date Due in 6 months	Leaving Date	1	2	3	4	5	6	7	8	9	10
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Page 283						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
						✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Extracts of Merkur Cashino Operations Manual:

- a. *Compliance Policy;*
- b. *Staff Guard Policy;*
- c. *CCTV Policy;*
- d. *Machine Fraud Policy*
- e. *Machine Ratio Check Policy;*
- f. *Smoking/Vaping Policy*
- g. *Marketing Code of Practice and sample window displays*
- h. *G4 Global Gambling Guidance Group accreditation*
- i. *excerpts from the Company training platform*
- j. *examples of the Company's responsible gambling information*



6. Compliance



Compliance Policy

Why:

The responsibility for an individual's gambling is their own. The responsibility to exercise a duty of care is that of the operator. Cashino Gaming recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

Best Result:

All employees are fully aware of the importance of following policy and processes in regards to compliance and social responsibility. The business is run in line with the license conditions and codes of practice at all times and all employees work together to ensure the 3 licensing objectives are met.

Worst Result:

Employees are not aware of the policy and processes in regards to compliance. The company is not operated in line with the 3 licensing objectives and the license conditions and codes of practice. The business is put at risk of its license being lost.

The 3 licensing objectives:

- **Keep crime out of gambling**
- **Ensure that gambling is conducted in a fair and open way**
- **Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling**





What:

- Employees must complete compliance training before being able to work with customers in any venue
- It is the responsibility of the venue manager to ensure that all employees are correctly trained and up to date with compliance training
- It is the responsibility of employees to check that they have completed all relevant compliance training on their inform people/upskill account regularly
- Employees must always follow the policies and processes in regards to compliance which are found in the Compliance and Social Responsibility folder

When:

- The policies and processes which form compliance and social responsibility apply at all times of operation.

Who:

- All employees have a responsibility to ensure that the business is operated in a way which is compliant at all times.

Related / supporting documents:

- The compliance and social responsibility folder.

Order of who to contact if in need of help / advice:

- Venue Manager
- Area Manager
- Compliance Manager



Staff Guard / P.A. Policy / Static Alarm

Why:

The security of employees is of the upmost importance; therefore personal alarm systems and the staff guard system have been installed to help deter aggressive incidents and give employees a way of contacting help when required.

Best Result:

The staff guard and MPA fobs are carried by employees at all times as per policy. This increases the security of our employees and guests. Employees become more comfortable in their roles knowing they have methods of contacting assistance in emergency situations.

Worst Result:

The staff guard and MPA fobs are not carried by employees which reduces the safety of employees and guests. During events when emergency assistance is needed, it is not acquired.

What:

- Employees should always carry a mobile panic alarm (MPA) or staff guard fob on their person while at work. (ideally both should be carried)
- Activation of staff guard should be prioritised over using the MPA in circumstances which do not require immediate police attention.
- Staff guard should be tested at least once per week (Note: it is recommended to test the system during times of higher customer numbers, as it makes the customers aware that staff have a communication link to a security service)
- **Employees should not be hesitant to use staff guard** – This is a service which we pay for, there are no issues with false alarms or over usage. Use as often as necessary.
- Employees should be more thoughtful about using the MPA system, and should only activate it in times of imminent physical threat or robbery, or anything which police would usually be called for. This is a system which is linked directly to police. Inappropriate use of this device may lead to the venue losing the right to use it altogether.
- Staff guard and the MPA system should only be used if it is safe to do so – never endanger colleagues or customers during a situation arising when it would not be safe to active either system.
- For Static alarms ensure that the reset key is available at all times.



When:

- The staff guard unit should be tested once per week.
- The staff guard unit should be activated whenever staff are feeling uncomfortable or threatened.
- The MPA system should be used only when immediate police assistance is required

Who:

- The MPA unit and/or Staff guard fob should be carried by employees at all times.
- All venue employees should have access to these devices
- All venue employees should have received training on how to use these devices.

Related / supporting documents:

- N/A

Order of who to contact if in need of help / advice:

- Area Manager
- Commercial administrator
- For any technical issues regarding staff guard call: 01623 649013 (This is a 24hr line but it's best to call during normal business hours Out of hours, the number transfers straight to an engineer so he may be woken by the call Do not press the fob if you have maintenance issues – dial this number as directed)



How:

To Operate The Staff Guard Unit

1. Slide cover up on fob and press the red button – this dials Staff Guard.
2. A blue light will flash on the unit which shows that it's dialing.
3. The red light appears/will stay on continuously after a few seconds meaning the call has connected and someone is listening. They will not speak for the first 10 seconds.

IF YOU ARE IN IMMEDIATE DANGER SAY:

CALL THE MANAGER - This is our pass phrase that tells them to call for **IMMEDIATE POLICE ASSISTANCE**

However, they will also call the police if they can hear that a crime is being committed, or anyone is in immediate threat.

If you say: **"Stand By"**

They will stay online and listen to whatever is happening so you can use this as a safety measure if you feel a situation could escalate. Again, they will call the appropriate authorities if required.

They will say **"Standing by"** every few minutes to assure/remind you that they are still there.

Say: **"Stand down"** once you no longer need





CCTV Policy

Why:

CCTV is an essential tool to help prevent crime and capture those responsible for breaking the law. In a business where cash is being transferred continuously between customers, machines and employees, it is important for the safety of employees and customers that all areas of the venue area covered by CCTV at all times.

Best Result:

The CCTV system is only accessed by those with authority to do so. Camera angles are never changed without the correct authority. The security of the venue is increased

Worst Result:

The CCTV is accessed by those who should have no access, data is lost. Cameras are moved without authorization causing a loss of coverage of key areas. The security of the venue is compromised

What:

- The CCTV system should be switched on and recording at all times.
- Any faults with the CCTV System should be communicated to your Area Manager immediately.
- CCTV should always cover: The front and rear exits, All machines, The offices and The GeWeTe
- The CCTV should be checked daily to ensure its working correctly and the time and date are all correct.
- Information in regards to the CCTV should never be disclosed to any 3rd parties.
- Placing and adjusting of the cameras should only be completed by the Area Manager or Operations Director (or another with authorisation from AM/OD)
- Records should be kept to show who has access to the CCTV password and username.
- Decorations should be not placed in areas which obscure the CCTV monitors
- The CCTV should be in a security cabinet
- The key to the Security Cabinet to be locked in the Key Cabinet

When:

- The CCTV should be checked daily to ensure correct function.

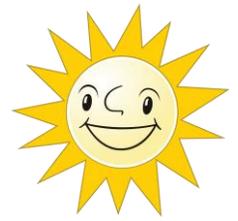


Who:

- The venue manager has responsibility for the CCTV system being checked and fully functional.

Order of who to contact if in need of help / advice:

- Area Manager.
- Commercial Administrator



Machine Fraud Policy

Why:

Machine fraud is a threat which is ever present. Employees should be aware of the ways in which fraud can take place and what to do in the event of spotting a “customer” defrauding a machine.

Best Result:

All employees are aware of the policy in regards to machine fraud and what to look out for. Machine fraud is reduced and the income for the business protected.

Worst Result:

Employees fail to identify fraud taking place resulting in loss of income. Further venues are targeted. The employees responsible may be subject to disciplinary processes.

What:

- The venue floor should never be left unattended.
- Employees should be thoughtful in regards to customers who they are not familiar with
- Employees should be given access to photos of known fraudsters by the manager
- Known fraudsters shall be asked to leave immediately upon entrance with no explanation needed to be given
- Following any machine being defrauded, at the earliest opportunity the duty manager must send an email to the security address with as much evidence and information as possible
- Employees are not to endanger themselves or customers at any time when dealing with a fraudster.

When:

Fraud may be taking place when

- Machines are being played with large amounts of credit. Normally people do not play with large credit in the machine (be aware that some customers may have won a jackpot and have that credit sitting in their balance)
- Machines going empty regularly or a large succession of tickets being collected.
- Suspicious activity – Large amounts of customers coming into the venue and dispersing or trying to distract employees.
- Customers with their hands over the coin mech, display or pay out tray.
- Large amounts of coins (one pounds and ten pence coins) being separated into denominations in the payout tray.

- Customers leaving the venue with machines still having money left in the bank.

Who:

- All employees have a responsibility for protecting the business from machine fraud.
- The manager should provide employees with photos of known fraudsters
- The duty manager should inform the security email address following machine fraud taking place

Order of who to contact if in need of help / advice:

- Venue Manager
- Area Manager
- Income Protection.

How:

If you suspect that machine fraud is taking place either:

- Activate staff guard and ask the customer to leave the venue if you feel comfortable to do so

Or:

- Do not alert the suspect(s)
- Inform the duty manager who will telephone the police.
- Continue to watch the suspect(s) and try not to alert their attention that you have identified them

Following a fraud

1. Information should be gathered from the CCTV and stored on a memory stick.
2. This information should be provided by email to security@praespeplc.com as soon as possible to prevent another venue being targeted in the local area
3. The Area Manager should be contacted to inform them of the event.
4. Income protection should be informed.



Machine Ratio Check Policy

Why:

The quantity of B3 Machines which a venue is permitted to have is limited, in general to 20% of its total machines. Checks need to be completed to ensure that at all times every venue operates within its correct ratio.

Best Result:

The Machine Ratio Check policy is completed and the venue complies with legislation and operates within the legal ratio for B3 Machines

Worst Result:

The Machine Ratio Check policy is not completed and the venue operates more B3 machines than it is legally allowed.

What:

- MC105 should be completed
- Completed MC105 should be emailed to Incomeprotection@praesepeplc.com

When:

- After any Machine Move.
- When any Machine or Tablet is reported as out of order and not repaired on the next visit by the Service Engineer.

Who:

- The Duty Manager at the time of the move/removal.

Related / supporting documents:

- MC105 Machine Ratio Check Record.



Order of who to contact if in need of help / advice:

- Area Manager
- Income protection
- Gaming Machines.

How:

Complete the MC 105 Machine Ratio Check Record

MACHINE RATIO CHECK RECORD

Venue Name <input style="width: 90%;" type="text"/>	Venue No <input style="width: 90%;" type="text"/>
Date of Move <input style="width: 90%;" type="text"/>	Week No <input style="width: 90%;" type="text"/>
Name <input style="width: 90%;" type="text"/>	Signature <input style="width: 90%;" type="text"/>

AREA 1 - MAIN	AREA 2 - SUB DIVISION																																
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Total number of B3 Machines (b) actual count	<input style="width: 50px;" type="text"/> c																																
Total number of actual B3 (c) must not exceed number allowed																																	

This form must be emailed to IncomeProtection@praesepeplc.com

If your B3 actual total exceeds the allowed legal ratio you must contact your Area Manager immediately and email this form to gamingmachines@praesepeplc.com

Confirm action taken:

MC105-V1

Walk around the venue and complete all the relevant sections with the correct number of machines in the main area of the venue

Email Completed document

Complete all relevant sections with correct number of machines if the venue has a 2nd licensed area



Smoking / Vaping Policy

Why:

The smoke free laws passed on 1st July 2007 prevent smoking in work places and other public places. Therefore to remain compliant with the law smoking should only be permitted in designated areas for employees and customers alike.

Best Result:

All employees and customers observe the smoke free policy and only smoke in areas in which smoking is permitted. We are compliant with the law.

Worst Result:

Employees and customers do not observe the smoking policy, the customer experience is negatively affected and we are not compliant with the law. Employees found smoking inside the premises may face disciplinary action.

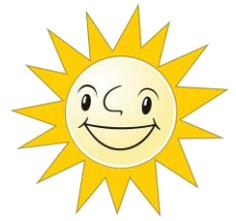
What:

- Smoking is strictly prohibited within venues
- Customers should not be allowed to smoke inside doorways or toilets
- Where possible there should always be a place to dispose of finished cigarettes
- Should the venue have no smoking area at the back of the venue, there should be steps taken to keep the front of the venue looking presentable at all times
- Vaping is allowed within our venues however these devices should not produce excess vapour
- Employees are not permitted to vape while on shift and therefore must take designated breaks to vape as smokers do. Employees must not vape in the venue.
- Employees who smoke / vape must cover their uniform while smoking and when possible smoke separately from customers
- No smoking signs should be clearly displayed

When:

- It is illegal for anyone to smoke inside the premises at any time.
- This policy is applicable at all times.





Who:

- This policy relates to both employees and customers.
- All employees are responsible for ensuring that this policy is followed at all times.

Order of who to contact if in need of help / advice:

- Venue manager
- Area manager
- Customer service manager



MARKETING CODE of PRACTICE

A guide to getting our advertising and promotions right – every time !

The Marketing Department provides an annual programme of National promotions activity. All these communications and point-of-sale/display materials are legally compliant and present our customers with a fair and professionally managed image of a responsible gaming provider. HOWEVER, occasionally 'local' activity may need to be arranged by YOU – so use this guide to ensure your activity meets our code by always being...

LEGAL - DECENT - HONEST - TRUTHFUL

- | | | |
|--|---|---|
| 1. All our advertising and promotions must be legally compliant and MUST NOT be misleading or indecent |  |  |
| 2. All our advertising and promotions must be socially responsible and NOT promote gambling for financial gain |  |  |
| 3. All our advertising and promotions must be TRANSPARENT and clearly state the offer and any requirements or conditions applied to obtaining it |  |  |
| 4. Any terms or conditions related to the offer, including offer end dates MUST BE displayed clearly at the point-of-sale and/or on any related printed literature or publicity materials |  |  |
| 5. Any printed literature, display or point-of-sale material MUST contain the company's approved compliance baseline (see example below) which includes the over 18 symbol and Gamble Responsibly statement alongside your business name, brand/logo |  |  |
| 6. Advertising and promotions MUST NOT be targeted at, or exploit children, or those vulnerable to gambling. The law states :
Advertisements and Promotions should not be specifically and intentionally targeted towards people under the age of 18 through the selection of media, style of presentation, content or context in which they appear. All advertisers and gambling operators should already be aware that it is an offence under Section 46 of the Gambling Act 2005 to invite a child or young person to gamble. |   |  |
| 7. The use of models, photographic images or illustrations in advertising or promotions must look a minimum of 25 years of age |  |  |
| 8. DO NOT make purchase a condition of entry into a draw or raffle – buying a 'chance' of winning is a lottery, so always state NO PURCHASE NECESSARY (even if for charitable causes) |  |  |
| 9. DO NOT present offers which reward extended play or incentivise disproportionate stake levels |  |  |
| 10. ALWAYS communicate offers clearly in grammatically correct English, avoiding slang, expletives or abusive text. Avoid anything customers could perceive as offensive or discriminatory and remember the 4 key code words : | |  |

LEGAL - DECENT - HONEST - TRUTHFUL

IMPORTANT: If you are unclear or unsure whether your local activity complies with this code, please firstly consult or present your proposals to the Marketing Department on: 07880 570585 (Simon Coombes) - 07584 706892 (Sharon Lewis) - 07557 561795 (Jay Bhatti)



BeGambleAware.org

PLAY **SENSIBLY**

PLAY **ENJOYABLY**

PLAY **AFFORDABLY**

AKI

Think

25

If you are lucky enough to look under 25 years of age,
we need to check your ID.

Please do not be offended.

Acceptable forms of ID are: Driving Licence, Passport or Citizen Card





MERKUR SLOTS



BINGO
PLAYED
HERE

Think
25



BeGambleAware.org
18+ SENSIBLE ENJOYMENT RESPONSIBLY

CLEANING & LAUNDRY
24 HOURS SERVICE

WEDDING
DRESS
Dry Cleaning





MERKUR
SLOTS



No Smoking



Over 18s Only



No Alcohol



CCTV

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:

Praesepe Group
Merkur Slots, Merkur Cashino & Beacon Bingo

audit dates: 5 – 10 August 2020

Certificate Number: EG - 00120
Original Approval: 10 August 2020
Current Certificate: 10 August 2020
Certificate Expiry: 10 August 2023

On behalf of the G4 Foundation:


Jeffrey Derevensky


Pieter Remmeis

Vincit qui se vincit



by Praesepe Training

(Excerpts from training platform – six monthly refresher training)

Safeguarding Children & Vulnerable People

Our suite of Compliance training seeks to ensure you understand the Gambling Act and its 3 main objectives and that you follow the businesses defined processes to ensure we operate within the law.

Within the Gambling Act we have a duty to protect children and vulnerable people.

Safeguarding is the responsibility of everyone in our business and this session explains why its so important and how you can play your part.

What is Safeguarding *(Lesson 1)*

Safeguarding is a term usually associated with children; it makes us think about the protection of children, social services, abuse and the mistreatment of children. As a socially responsible operator, Praesepe and its operating businesses take a different view on Safeguarding and what it means:

The term actually means:

something that serves as a protection or defence or that ensures safety

For most of our customers gambling is an enjoyable hobby and a social event, however; we must be aware of players that may become addicted to gambling.

When a Customers gaming changes from enjoyment/social to a problem or addiction we **MUST** safeguard. Safeguarding is very much an action required within our business.

We should:

- ✓ Train staff on how to recognise and respond to indicators of concern
- ✓ Train staff to know how to protect their own safety if customers behave aggressively
- ✓ Make information and advice about gambling responsibly generally and discretely available, and provide contact details about where to get help
- ✓ Interact with customers to spot warning signs of a problem
- ✓ Offer/explain the Play Right App to help control time spent playing
- ✓ If the customer opts to self exclude make sure you provide the right information and follow the process for self exclusion (detailed in Compliance training)
- ✓ Encourage customers to register or become members so we have a point of contact

Children (Lesson 2)

The protection of children is vitally important to us as a business. We have a separate and detailed training module dedicated to this area (Age Verification) as well as the Essentials of Compliance training.

<p>The Challenge 25 scheme MUST be operated by ALL staff and only recognised proof of age accepted (for example photo driving licence or passport; PASS cards)</p> 	<p>Signage MUST BE prominently displayed at all points of entry regarding the prohibition of under 18's</p> 	<p>Signage MUST BE displayed on machines highlighting age restrictions</p> 
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Vulnerable People (Lesson 3)

The **Gambling Commission** puts a high priority on the social responsibilities operators have to **protect** vulnerable adults from the harm associated with gambling and policies must be in place to support the protection of vulnerable adults.

It's is not possible to tell who is at risk by looking at them. Most customers are **in control and enjoy the **social** element of gambling**

Safeguarding means we have to look a little deeper and think about **those at risk of developing a problem.**

It's about the **signs and signals we **see and hear** whilst our customers are in our premises.**

Social responsibility/Safeguarding is about using your eyes and ears to understand who is vulnerable.

Click on the + signs to understand more about those people at risk:

Risks Factors: Developing a problem	+
Risk Factors: Impact	+
Managing The Risks	+

The Stages of Change (Lesson 4)

Gambling becomes a problem when people are not in control. Staying in control is vitally important and is the ethos we at Cashino & Beacon all work too.

When someone starts to change their gambling behaviour, there are often different stages of awareness that they move through. These include:

Stage One - No problem	+
State Two - Awareness	+
Stage 3 - Wanting to Make a Change	+
Stage 4 - Take Action	+
Stage 5 - Sticking to it	+
Stage 6 - Final Stage - Self Exclusion	+

Often the person who's gambling doesn't think that he or she has a problem; they don't see the subtle changes. Sometimes **YOU** will spot the problem first, because the customer might be convincing him/herself that everything is fine when really it isn't. It's important to use positive communication rather than being confrontational or critical. It's also important to be genuine and talk to the customer in a natural way.

For example:



Once you've started the conversation, listen carefully to what they have to say in response and be patient. Don't jump in or cut them off mid sentence, as this might drive them back into their shell or make them turn defensive. Being calm and caring is really important as is knowing what advice and support we can offer

Ultimately we as a business have a responsibility

Taking Action (Lesson 5/Observation module 6)

As a business we have several processes and tools in place to ensure we are promoting responsible gambling. These include:

- 1 Think 25 Policy
- 2 PlayRight App
- 3 Gamcare Information and Leaflets
- 4 Complaints Procedure and ADR (Alternative Dispute Resolution)
- 5 Responsible advertising
- 6 Self Exclusion Policy and Process
- 7 and most importantly - **YOU; OUR EMPLOYEES**

These processes and interventions only work if our employees know and understand them and to ensure you do we have the following training modules which refresh every 6 months to keep you up to date and trained to the latest standards



Dealing with Anger & Aggression (Lesson 7)

It is true that when Customers start to lose control of their gambling they may become agitated or upset and get angry and perhaps become confrontational; remember - this is a sign of a problem and rather than ignore it we have to deal with the situation and help the customers.

Things to avoid:

- Do not make threats you cannot carry through, such as threatening to remove the person.
- Do not be defensive or take it personally. What is being said may seem insulting and directed at you, but this is not really about you.
- Do not use humour unless you are sure it will help and you have a very good relationship with the customer
- Do not use sarcasm or humiliate the customer
- Do not put yourself at risk; use **staffguard** if you are alone and feel vulnerable

Advertising Responsibly (Lesson 8)

Whilst we do all we can to safeguard children and vulnerable people in our premises; we need to be aware of the messages that are reaching them outside of venues and clubs

Earlier we referred to the research on underage gambling undertaken on behalf of the Gambling Commission. in terms of advertising the figures are far reaching

(click to enlarge):



% of 11 - 15 year olds seeing promotional materials/advertising

When we run promotions locally we must adhere to the marketing code of conduct to ensure that we are safeguarding children and vulnerable people when we promote and advertise our business. Please read the code of conduct attached below. This is available as a printable poster in Knowledge base.

Marketing Code of Practice 2018.pdf

GamCare/Support (Lesson 9)

Our role is to be **aware** and provide **support** to any customer at risk. The industry has strong links to **organisations** that can help anyone who **thinks** they have a **problem with gambling**. It is our duty to provide this information readily and freely:



Every Venue and Club has Staying in Control Leaflets

Make sure you know where they are, the information in them and do not hesitate to share this information with customers who feel they need to make a change.

It's our responsibility to provide this information and support customers in their decision making.

Behaviours Quiz (Lesson 10)

Lesson 10 of 11

Behaviours



What behaviours should YOU our employees adopt in order to safeguard?

Look at the words on each card. Each word describes either a positive behaviour and is what we should be doing or a negative behaviour and what we should NOT be doing

THINK 25

LISTEN

NEGATIVE BEHAVIOURS



You have completed Part 1: Training
You now need to complete Part 2;
Knowledge Check

REMEMBER:

- **Listen, Observe, Interact and Break Play**
- **Follow the Think 25 policy**
- **Provide support and information to Customers at Risk**
- **Be Gamble Aware**

Let's all do our bit to be Socially Responsible

Please now complete Part 2 - Knowledge Check in order to finish your training

ALC

INFORMATION



CODE OF PRACTICE

Persons under the age of 18 years are prohibited from entering the premises.

The management reserve the right to refuse entry on these premises.

No more than two persons per machine.

Stools are provided for player use only - restricted to one stool per machine.

Dogs are not allowed on these premises (except guide dogs).

Alcoholic beverages or take-away food cannot be consumed on these premises.

The management reserve the right to alter or withdraw promotions without prior notice or due to circumstances beyond their control.

Please note, closing times must be adhered to, so please ensure that all credits are played off as refunds are not permitted.

An attendant must be called to witness bank payments. Failure to do so can result in delay or refusal of payment. Manager's decision is final.

Please check your charge before leaving the Cash Desk as mistakes cannot be rectified later.

Please note: tokens cannot be exchanged for cash.

Prizes will be awarded on these premises as recorded.

All Prize Draws conducted on these premises are necessary to participate in any other company activities.

Dress code should be appropriate at all times.

Managers will conduct business in a manner which complies with all relevant Gambling Commission codes of practice.

Complaints and Disputes Policy

Unresolved complaints or disputes regarding repayments, or any other retail issues, should be brought to the attention of the Duty Manager in the first instance.

If the issue cannot be resolved by this procedure, the customer will be given a copy of the report document and advised how to make an official complaint in writing to: The Operations Manager, Casino Gaming, Seaback House, 3a Seaback Place, Knowlhill, Banbury, CV35 9EF. All formal responses will follow.

Please ask a member of staff for a copy of our Complaints and Disputes leaflet.

BINGO RULES

Before play

- The commencement of each game, the following information will be announced:
 - Which game is in play, line/full house/bonus and
 - Which line/line or full house (or any other combination) has to be completed to win.

During Play

- When play begins each number will be selected at random by means of the Random Number Generator in the full view of the majority of players. Members must be present at the time the number is called. The number is clearly legible to be easily checked beyond dispute.
- In the event of a discrepancy between a number announced by the Caller and that illuminated on the Indicator board, the actual number produced by the Random Number Generator shall prevail.

Stopping the Game

- The point at which the next number is deemed to have been called will be the moment the Caller has commenced that number in any degree. Once a number has been called and is to be completed and that number will become the last number called. The winning card/board must contain the last number called as part of the combination.
- No further claims will be accepted for a line, or two lines (or other combination) once the next number has been called. No further claims will be accepted if the next reset button has been activated and the Random Number Generator set for the next game.
- If a player fails to call the game before the next number is called, no member of staff will be allowed to accept that responsibility on behalf of a Member.

Claiming the Prize

- If the books/tickets are being used then these must be intact upon checking a claim.
- When a claim is being checked the following items will be announced/displayed:
 - the serial number;
 - the colour and type of card;
 - the other numbers on the card.
- The Caller will then decide on the claim and announce their decision. If they do not allow the claim they will endeavour to obtain the player's agreement to that decision. The reason why the claim has not been allowed will be announced.

Multiple Winners

Should a card be a multiple winner for a prize, each card played by the Operator, the Caller will announce before the game the procedure to be adopted in the event of more than one winner claiming the prize. In the event of more than one winner of a cash prize, all prizes will be equally shared between the winners.

- Employees of Casino are not permitted to play at any Casino venue.
- The Venue Manager's decision will be final in all matters.

SOCIAL MEDIA

The group will often take photographs on site and post them on our website, on-line or on social media. If you do not wish to be included in any of our advertising campaigns, please let us know in advance of your visit.

GAMBLING ACT 2005

The Three Identifying Objectives

- Preventing gambling from becoming a source of crime or disorder, being associated with crime or disorder or being used to support crime - we operate our business with integrity and have systems in place such as cash handling to minimise the risk of crime.
- Ensuring that gambling is conducted in a fair and open way. Gambling machines comply with the Commission's technical standards and exhibit safe and proper levels, and the Commission's rules are fair and gaming rules are easily understood by customers.
- Protecting children and other vulnerable persons from being harmed or exploited by gambling - policies prevent under age gambling and we contribute to the responsibility in Gambling Trust for the treatment of problem gambling.

STAYING IN CONTROL

The Golden Rules of Always Four Machines

- Playing machines is buying fun. NOT investing money
- Only play with money you can AFFORD to lose
- Set LIMITS on how much you will spend
- Playing within your means can be FUN and exciting
- Spending outside your means can create PROBLEMS for yourself and others

A single card more, instead of a standard 4 card, is available from 12pm, keep your eyes on the time and play within your limits. If you have a problem, call the free GambleAware helpline.

GamCare:
0800 8020 133

0800 8020 133 is a free helpline for people who are concerned about their gambling. It is available 24 hours a day, 7 days a week. For more information, visit www.gamcare.org.uk

GamCare.org.uk
It's about time

GambleAware

FOOD HYGIENE RATING
AWAITING INSPECTION

FOOD ALLERGENS AND INTOLERANCES
If you require further information regarding food served on these premises please speak to a member of staff who will advise you accordingly.

BINGO ASSOCIATION

BINGO PRICES AND CHARGES

PUBLIC LIABILITY

PREMISES LICENCE

THINK 25
If you are lucky enough to look under 25, years old we need to check your ID

NO ALCOHOL
It is against the law to consume alcohol on these premises

18+
STRICTLY OVER 18s ONLY

NO SMOKING
It is against the law to smoke on these premises

18+ **BeGambleAware.org** **GamCare**

CUSTOMER CARE
Please either call 0800 808 5335 or email cashinocustomers@praesepepic.com

STAYING IN CONTROL

The Golden Rules of playing Fruit Machines

- **Playing machines is buying fun, NOT investing money**
- **Only play with money you can AFFORD to lose**
- **Set LIMITS on how much you will spend**
- **Playing within your means can be FUN and exciting**
- **Spending outside your means can create PROBLEMS for yourself and others**

A leaflet with more guidance is available here. If you feel you are in difficulty with your gambling or know someone who is and would like help, call the free GamCare helpline.

GamCare:
0808 8020 133

GAMCARE is the national centre for information, advice and practical help regarding the social impact of gambling. Their helpline is run by trained staff, who can offer counselling, information and advice to problem gamblers, family members and to friends of gamblers.



G GamCare.org.uk
f t @GamCare

Funded by

GambleAware[®]

GamCare: A Charitable Company Registered in England No.3297914
Charity No. 1060005



BeGambleAware[®].org

Highlighted Extracts of the Gambling Commission's Guidance to Licensing Authorities

Other provisions and legislation

- 4.7** Conditions on premises licences should relate only to gambling, as considered appropriate in light of the principles to be applied by licensing authorities under s.153 of the Act. Accordingly, if the Commission's *Licence Conditions and Codes of Practice* (LCCP) or other legislation places particular responsibilities or restrictions on an employer or the operator of premises, it is not necessary or appropriate to impose similar conditions on a premises licence issued in accordance with the Act.
- 4.8** Similarly, where other legislation confers powers on inspection and enforcement agencies in relation to separate activities or concerns, the Act does not affect the continued use of such powers, for example, the powers of an environmental health officer in respect of statutory nuisance under the Environmental Protection Act 1990.

Licensing authority decisions

- 4.9** S.153 provides that licensing authorities shall aim to permit the use of premises for gambling in so far as they think it is:
- a. in accordance with any relevant code of practice under s.24
 - b. in accordance with any relevant guidance issued by the Commission under s.25
 - c. reasonably consistent with the licensing objectives (subject to a and b above)
 - d. in accordance with the licensing authority's statement of licensing policy (statement of policy) (subject to a to c above).
- 4.10** Therefore, a licensing authority has no discretion in exercising its functions under Part 8 of the Act, to grant a premises licence where that would mean taking a course which it did not think accorded with the Guidance contained in this document, any relevant Commission code of practice the licensing authority's own statement of policy or were reasonably consistent with the licensing objectives.

Delegations

- 4.11** The decision making powers of licensing authorities may be delegated, as set out in s.154 of the Act for England and Wales and s.155 for Scotland. Decisions that are delegated to a licensing committee, may be further delegated to a sub-committee, which may then arrange for the decision to be taken by an officer of the authority.
- 4.12** It is open to licensing committees to choose not to delegate decisions. An important consideration in determining whether any particular decision should be delegated will be whether delegation might give rise to a risk of judicial review challenge, particularly on the basis of appearance of bias.
- 4.13** The tables at Appendix G set out a summary of licensing authority delegations permitted under the Act for England and Wales, and for Scotland.

Part 5: Principles to be applied by licensing authorities

Licensing objectives

- 5.1 In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:
- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
 - ensuring that gambling is conducted in a fair and open way
 - protecting children and other vulnerable persons from being harmed or exploited by gambling.

- 5.2 It is expected that the licensing authority will have set out their approach to regulation in their statement of policy, having taken into account local circumstances. This is dealt with in more detail at Part 6.

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

- 5.3 Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6.
- 5.4 A licensing authority will need to consider questions raised by the location of gambling premises when:
- formulating its statement of licensing policy
 - receiving relevant representations to an application
 - dealing with applications as a responsible authority in its own right
 - considering applications before it.
- 5.5 In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.
- 5.6 Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.
- 5.7 Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003 / Licensing (Scotland) Act 2005, in which context they have wider powers to also take into account measures to prevent nuisance.

- 5.8** In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in Part 9 of this Guidance.
- 5.9** There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. Further information can often be found on the website of industry trade associations⁵.
- 5.10** Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

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

- 5.11** Generally the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness is likely to be a matter for either the way specific gambling products are provided and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. However, if licensing authorities suspect that gambling is not being conducted in a fair and open way this should be brought to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.
- 5.12** In relation to the licensing of tracks, the licensing authority's role will be different from other premises in that track owners will not necessarily have an operating licence. In those circumstances the premises licence may need to contain conditions to ensure that the environment in which betting takes place is suitable. Further information can be found in Part 20 of this Guidance.

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

- 5.13** In exercising their powers under s.153, licensing authorities should consider whether staff will be able to adequately supervise the gambling premises, as adequate staffing levels is a factor to consider regarding the prevention of underage gambling. The Commission would expect the operator and the licensing authority to work together to consider how any impediments to the supervision of premises might be most appropriately remedied. Supervision also applies to premises that are themselves not age-restricted (eg bingo and family entertainment centre (FEC) premises) but which make gambling products and facilities available.

⁵ For example, The Safe Bet Alliance's Voluntary Code of Safety and Security National Standards for Bookmakers

- 5.14** Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.
- 5.15** If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.
- 5.16** In relation to casinos, the Commission has issued a code of practice on access to casino premises by children and young persons, as provided for by s.176 of the Act. The code of practice is available as part of the [Licence Conditions and Codes of Practice](#) (LCCP) In accordance with s.176 of the Act, adherence to the code will be a condition of the premises licence. Further information can be found in Parts 9 and 17 of this Guidance.
- 5.17** The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define 'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.
- 5.18** Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority's statement of policy. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

S.153 principles

- 5.19** S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:
- a. in accordance with any relevant code of practice under s.24 (ie the LCCP)
 - b. in accordance with any relevant guidance issued by the Commission under s.25 (ie this Guidance)
 - c. reasonably consistent with the licensing objectives (subject to a and b above), and
 - d. in accordance with the licensing authority's statement of licensing policy (subject to a to c above).
- 5.20** Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this Guidance, any relevant Commission code of practice, its own statement of policy, and the licensing objectives.
- 5.21** In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this Guidance, and its own statement of policy or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission's codes and this Guidance take precedence.

- 5.22 In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should **not** have regard to:
- s.153 makes it clear that in deciding whether or not to grant a licence, a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application
 - s.210 (1) of the Act states that 'in making a decision in respect of an application...a licensing authority should not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with law relating to planning or building'.

5.23 A licensing authority is therefore afforded significant scope to exercise its powers under s.153 on the grounds that it does not encroach on the two principles set out above.

5.24 The requirements in s.153 are subject to the licensing authority's power under s.166 to resolve not to issue casino premises licences. This means that a resolution not to issue a casino premises licence applies regardless of the matters set out in s.153.

Codes of Practice

5.25 The LCCP sets out the Commission's general licence conditions and associated codes of practice provisions under the Act. The codes of practice are set out within Part II of the LCCP.

5.26 To assist licensing authorities in determining premises applications and inspecting premises, [all the codes of practice](#) are also available as a single document. The codes specify a number of requirements, many of which relate to social responsibility issues and these may be of particular interest where a licensing authority has concern about matters such as protection of the young and vulnerable. It should be noted that the codes also apply to situations in which the gambling being offered is not normally the responsibility of an operating licence holder. Examples include the *Code of practice for equal chance gaming* and the *Code for gaming machines in clubs and premises with an alcohol licence*.

Good practice in regulation

5.27 Under the Legislative and Regulatory Reform Act 2006, any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation⁶ in the exercise of the function. These provide that regulatory activities should be carried out in a way which is transparent, accountable, proportionate, and consistent and should be targeted only at cases in which action is needed. The Commission has regard to these principles in relation to its responsibilities and also has regard to the requirements of the Regulators' Code⁷. The purpose of the Code is to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on business.

5.28 The statutory principles of good regulation and the Regulators' Code also apply to local authorities, who are under a statutory duty to have regard to them when fulfilling their regulatory functions under the Act⁸.

⁶ Legislative and Regulatory Reform Act 2006, section 21

⁷ Regulators' Code (previously the Regulators' Compliance Code), Department of Business, Innovation and Skills, 2014, issued under section 23 of the Legislative and Regulatory Reform Act 2006

⁸ The Legislative and Regulatory Reform (Regulatory Functions) Order 2007, was amended by the Legislative and Regulatory Reform (Regulatory Functions) (Amendment) Order 2009, which, amongst other things, extended the application of the 2007 Order to local authorities in Wales and Scotland exercising regulatory functions under the Gambling Act 2005 - see Parts 3 and 7

5.29 Guidance produced by the Better Regulation Delivery Office seeks to assist local authorities in interpreting the requirements of the Regulators' Code, for example in developing their Compliance and Enforcement Policy⁹, and in delivering risk-based regulation in relation to age restrictions¹⁰.

Human Rights Act 1998

- 5.30** The Secretary of State has certified that the Act is compatible with the European Convention on Human Rights. In considering applications, and taking enforcement action under the Act, licensing authorities should bear in mind that they are subject to the Human Rights Act 1998 and in particular:
- Article 1, Protocol 1 – peaceful enjoyment of possessions. A licence is considered a possession in law and people should not be deprived of their possessions except in the public interest
 - Article 6 – right to a fair hearing
 - Article 8 – respect for private and family life. In particular, removal or restriction of a licence may affect a person's private life
 - Article 10 – right to freedom of expression.

Other considerations

- 5.31** Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 5.32** In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.
- 5.33** Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in Part 9.
- 5.34** Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

⁹ *Template: Compliance and Enforcement Policy*, Better Regulation Delivery Office. This template policy was developed by the Local Better Regulation Office, with local authorities, to assist local authorities in developing a policy that is in line with the requirements of the Regulators' Compliance Code, or to review their existing policy. It is available on the BRDO website at <http://www.bis.gov.uk/brdo/resources/risk-based-regulation/compliance-policy>

¹⁰ *Age restricted products and services framework / updated April 2014* sets out an agreed set of shared responsibilities and reasonable expectations for young people, their parents and carers, businesses, employees and regulators with regards to access to age restricted products and services. The document forms the foundations of the *Age restricted products and services: a code of practice for regulatory delivery / updated April 2014*

- 7.50** A licence application, and any licence subsequently issued, is not valid if the relevant notifications have not been made.

Application for Premises Variation (s.187): ‘material change’

- 7.51** Previous guidance from the Department for Culture, Media and Sport (DCMS) and the Commission has been that an application for a variation will only be required where there are material changes to the layout of the premises. What constitutes a material change will be a matter for local determination but it is expected that a common sense approach will be adopted. When considering an application for variations, the licensing authority will have regard to the principles to be applied as set out in s.153 of the Act.

Representations

- 7.52** In dealing with an application, licensing authorities are obliged to consider representations from two categories of person, referred to in the Act as ‘responsible authorities’ and ‘interested parties’. Representations from other parties are inadmissible. Further information on these categories can be found in Part 8 of this Guidance.
- 7.53** Having determined that the representation is admissible, the licensing authority must consider its relevance. Only representations that relate to the licensing objectives, or that raise issues under the licensing authority’s statement of policy, or the Commission’s Guidance or Codes of Practice, are likely to be relevant.
- 7.54** The licensing authority will also need to consider if representations are ‘frivolous’ or ‘vexatious’. This is a question of fact and licensing authorities are advised to seek help from their legal advisers in interpreting these phrases although relevant considerations may include:
- who is making the representation, and whether there is a history of making representations that are not relevant
 - whether it raises a ‘relevant’ issue
 - whether it raises issues specifically to do with the premises that are the subject of the application.
- 7.55** The Commission does not routinely make representations on premises licence applications. However, the fact that the Commission has not made a representation on a particular premises licence application should not be taken as indicating the Commission’s approval of that application. Exceptionally, where an application for a premises licence, or the operation of a current premises licence, raises matters of wider or national significance, the Commission will consider making representations or requesting a review.

Making a decision

- 7.56** As explained earlier, the licensing authority’s primary obligation under s.153(1) is to permit the use of premises in so far as it thinks that to do so is:
- a. in accordance with any relevant code of practice issued by the Commission
 - b. in accordance with any relevant guidance issued by the Commission
 - c. reasonably consistent with the licensing objectives (subject to a. and b. above), and
 - d. in accordance with the licensing authority’s statement of licensing policy (statement of policy) (subject to a. to c. above).

- 7.57** Further information and guidance as to the meaning and effect of s.153 is set out at paragraph 5.19 above.

- 9.28** Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this Guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 9.29** Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.
- 9.30** Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.
- 9.31** Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:
- relevant to the need to make the proposed building suitable as a gambling facility
 - directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
 - fairly and reasonably related to the scale and type of premises
 - reasonable in all other respects.

Conditions that may not be attached to premises licences by licensing authorities

- 9.32** The Act sets out certain matters that may not be the subject of conditions:
- s.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition
 - s.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation
 - s.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)
 - s.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.

**Extracts from Hansard Parliamentary
Debate discussing the inclusion of the
prevention of public nuisance as a
Licensing Objective**

Hansard Extract

On 9 November 2004 (Standing Committee B) there was a debate in the House of Commons over whether to amend the Licensing Objectives to include "the prevention of public nuisance.) Below are the relevant paragraphs from Hansard.

The amendment was withdrawn. The following are material extracts from Hansard:

Column Number: 012

Mr Foster - Amendment to include prevention of public nuisance in Licensing Objectives:

Why is it important that we deal with that in the objectives? The answer is simple. As the Bill stands, the local authority is unable to take account of effects that may occur not in a new casino or on gambling premises, but further afield, outside those premises. It is crucial that local authorities have the opportunity to do so. Indeed, the Local Government Association said when it wrote to all Members about the Second Reading debate that the prevention of public nuisance should be a licensing objective:

"The licensing objectives set out in Clause 1 of the Bill do not address potential problems of nuisance arising in the street outside gambling premises. This is particularly likely late at night and when alcohol has been consumed. While the Environmental Protection Act 1990 places a duty on local authorities to deal with statutory nuisances arising from the premises itself, and to investigate residents' complaints, it is not possible to use this legislation to deal with street nuisance, even where the problem is directly attributable to a particular venue."

Use of the Environmental Protection Act for such matters is therefore not possible. The LGA goes on to say:

"This omission will seriously hamper the ability of councils to ensure effective management of the environment around gambling premises and provides residents with little scope to make representations should street nuisance occur. The LGA believes that a new licensing objective of the prevention of public nuisance should be added to Clause 1."

Column Number: 037

The Minister for Sport and Tourism *Mr Richard Caborn, addressing the amendment*

Some gambling premises (casinos and bingo clubs) are allowed to serve alcohol to their customers, and the Bill will not stop that happening. Their entitlement does not spring from gambling laws: as one or two of my hon. Friends have said, it comes from the licensing law itself. Casinos and bingo clubs in England and Wales get their entitlement from the Licensing Act 1964. However, by the time the Bill is on the statute book, the Licensing Act 2003 will have come into force. The equivalent licensing laws govern casinos and bingo clubs in Scotland. The 2003 Act includes the prevention of public nuisance as a licensing objective, understandably so given the unfortunate connection between excess alcohol intake and bad behaviour. That was referred to by a number of hon. Members this morning.

The relevant risks associated with licensing of pubs, bars and other premises on which alcohol is sold include noise and antisocial conduct, particularly at night. That has been referred to in connection with Guildford. Accordingly, it will be open to licensing authorities, when considering applications for casinos and bingo halls to be licensed premises under the 2003 Act, to take account of the public-nuisance risk just as they do when considering any other application. If any casino were to put its alcohol licence at risk by allowing public nuisance, it would almost certainly put its continued existence and its licence at risk. Therefore, it is unnecessary in the case of casinos and bingo clubs to duplicate provisions that are already in licensing law.

There is no intention of allowing other gambling premises, such as betting shops and machine arcades, to sell alcohol, and there is no reason to apply to them a nuisance test over and above the

law on noise and other nuisance. There is no well-established association between betting and nuisance of the sort that unfortunately exists between alcohol and nuisance. We do not believe that there is any reason to single out betting shops for special treatment in contrast to grocery shops, newsagents or any other shop.

There are provisions in the general criminal and civil law on the control of public nuisance. If they are not thought to be adequate, I am not expressing a Government view on this, the solution is to strengthen the general law, not to adopt specific measures for gambling premises on the basis of no

Column Number: 038

evidence of need. In practice, all licensed gambling premises are more likely to conduct themselves responsibly than the general run of premises, if only because they will have to satisfy not just the local licensing authority concerning their present licence, but the powerful gambling commission in relation to their operating licence.

Amendment No. 1 would be regulatory overkill. The official Opposition, who continually badger us about red tape and over-regulation, should reflect on their amendments in the light of my explanation. Amendment No. 1 would only reinforce the apprehension in the gambling industry that local authorities will be over-zealous in regulating premises, and I do not believe that those fears are well grounded. It would impact significantly on the matters that could be taken into account by local authorities and would go beyond what is reasonable. I cannot advise the Committee to accept it.

<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/pm/41109s02.htm>
<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/am/41109s03.htm>

**Extracts of Paterson's Licensing Acts
2020: Part 8 Para 5.158 – Premises
Licences**

⁶ Standing Committee B, Thursday, 2nd December 2004 (Afternoon) Col 359.

Determination of application

[5.158]

In determining an application the licensing authority must hold a hearing¹ if:

- representations have been made by an interested party or responsible authority and have not been withdrawn;
- the authority intend to use their discretion under s 169(1) to attach a condition to a licence; or
- the authority intend to use their discretion under s 169 to exclude a default condition (ie a condition automatically attached to the licence under s 168 unless excluded by the authority in its discretion)².

A hearing may, however, be dispensed with if the applicant and any interested party or responsible authority who have made representations consents to this course³, or the authority think that the representations are vexatious or frivolous or will certainly not influence their determination of the application⁴. If the authority do propose to dispense with a hearing on these latter grounds they must as soon as is reasonably practicable notify the person who made the representations⁵, presumably to enable him to seek a remedy by way of judicial review if so advised.

Where the applicant for the premises licence is an applicant for an operating licence⁶ the authority cannot determine the application until the relevant operating licence has been issued⁷.

On considering an application for a premises licence (whether at a hearing or not) the licensing authority must either grant it or reject it⁸. In making that determination the licensing authority will be subject to the provisions of s 153 which sets out the principles to be applied by the authority in exercising all their functions under Part 8 GA 2005 (ie including, but not limited to, the grant or refusal of an application for a premises licence). Section 153(1) provides as follows:

“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 s 24,
- (b) in accordance with any relevant guidance issued by the Commission under s 25,
- (c) reasonably consistent with the licensing objectives (subject to paras (a) and (b)), and
- (d) in accordance with the statement published by the authority under s 349 (subject to paras (a) to (c)).”

The subsection starts by imposing a general duty on the authority to ‘aim to permit the use of premises for gambling’ and then sets out a series of four factors which may, in any individual case, qualify or override the general duty. The first point to note is that the provision imposes a duty on the licensing authority: it must, subject to the qualifying factors, aim to permit the use of premises for gambling. What is the scope of this duty? It is suggested that there are two elements: first, it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb ‘to aim’ is defined by the *OED*⁹ as meaning: ‘5. To calculate one’s course with a view to arriving (at a point); to direct one’s course, to make it one’s object to attain. Hence fig To have it as an object, to endeavour earnestly’. The *Shorter OED*¹⁰ defines it as: ‘3. Direct one’s course, make it one’s object to attain, intend, try’. A person who ‘aims’ to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling. The most obvious way in which the authority will be able to exercise their powers in this way will be by an imaginative use of their power to frame and impose conditions (see para 5.159 below) so as to overcome objections to the application which might, in the absence of suitable conditions, lead to the application being rejected. No doubt the authority could also, in a case where a licence application gave rise to issues which could not be addressed by suitably drafted conditions, seek to consider with the applicant whether amendments to the application might overcome the objections and enable it to be granted. However, it is also necessary to recognise that the language of s 153(1) stops short of being mandatory; ‘aim to permit’ provides a strong steer to look favourably on an application, but no more.

As to the list of qualifying factors, these are set out in s 153(1)(a)–(d). Section 153(1)(a) qualifies the duty to aim to permit use of premises for gambling to the extent that such use must be in accordance with any relevant code of practice issued by the Gambling Commission under s 24. That section requires the Gambling Commission to issue codes of practice about the manner in which facilities for gambling are to be provided (whether by the holder of a licence or by another person). In issuing a code of practice the Gambling Commission will be subject to a duty under s 22 to promote the licensing objectives. Accordingly any code of practice should be consistent with those objectives. Section 153(1)(b) qualifies the licensing authority’s duty to aim to permit the use of premises for gambling to the extent that such use must be in accordance with any relevant guidance issued by the Gambling

Section 1 Commentary

PART 8: PREMISES LICENCES

Commission under s 25. This section requires the Gambling Commission to issue guidance to local authorities¹¹ as to the manner in which they are to exercise their functions under the Act and the principles that they should apply in exercising those functions. Again the effect of s 22 is that in issuing such guidance the Commission will be under a duty to promote the licensing objectives, so again such guidance should be consistent with those objectives. The effect of all this is that any code of practice and any guidance to local authorities ought to promote the licensing objectives and no inconsistencies between the two should arise. On that basis codes of practice and guidance are placed (by s 153(1)(a) and (b)) as enjoying equal importance at the top of the hierarchy of factors set out in s 153(1)(a)-(d).

Next comes s 153(1)(c): this provides that the duty of the licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be reasonably consistent with the licensing objectives, but it goes on to provide that this condition is 'subject to paras (a) and (b)'. In principle there should, of course, be no conflict between (a) and (b) (which will both reflect the Gambling Commission's duty to promote the licensing objectives) and (c) (which will reflect the licensing authority's view of what the licensing objectives require). However the effect of the legislation appears to be that should there be any conflict between the two then the guidance set out in codes of practice or guidance emanating from the Gambling Commission will 'trump' any factors which the licensing authority themselves would otherwise have taken into account as relevant to the licensing objectives under s 153(1)(c).

Finally, s 153(1)(d) provides that the duty of a licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be in accordance with the authority's own statement issued under s 349. In preparing that statement the authority are not themselves expressly required to have regard to the licensing objectives, but they are obliged to have regard to guidance issued by the Gambling Commission under s 25 and such guidance deals, amongst other things, with the formulation by the authority of their licensing policy (see para AM5.6655). Since the s 25 guidance must itself promote the licensing objectives the effect should be that the authority's licensing policy will itself be consistent with those objectives so that it should not conflict with any code of practice or guidance issued by the Commission nor with the licensing objectives themselves. However, s 153(1)(d) provides that consideration of the licensing authority's own policy is 'subject to paras (a) to (c)' which appears to mean that in the case of an inconsistency a relevant Commission code of practice, relevant guidance or the licensing objectives themselves would 'trump' the authority's licensing policy.

In determining the application the authority may not have regard to the expected demand for the facilities which it is proposed to provide¹², nor may they have regard to the question whether or not the proposal is likely to be granted planning permission or building regulation approval¹³. Where the authority have resolved under s 166 not to issue casino premises licences an application for such a licence will, of course, necessarily fail and be rejected¹⁴.

Where the application is granted the authority must as soon as reasonably practicable give notice of the grant in the form prescribed to the applicant, the Commission, any person who made representations, the chief officer of police for any area in which the premises are wholly or partly situated and HMRC¹⁵ and must issue the licence to the applicant and must give him a summary of the terms and conditions in the prescribed form. If they have attached a condition to the licence under s 169(1)(a) or have excluded a default condition¹⁶ they must give their reasons¹⁷. If representations were made by an interested party or a responsible authority they must give their response to the representations¹⁸.

Where the application is rejected the authority must as soon as reasonably practicable give notice of the rejection in the form prescribed to the applicant and to the same parties as are entitled to be notified of a grant¹⁸. The notice must give the authority's reasons for rejecting the application¹⁹.

¹ As to procedure at hearings in relation to applications see SI 2007/173.

² GA 2005, s 162. See further para 5.159 below.

³ GA 2005, s 162.

⁴ GA 2005, s 162(3).

⁵ GA 2005, s 162(4).

⁶ Ie under GA 2005, s 159(3)(b).

⁷ GA 2005, s 163(2).

⁸ GA 2005, s 163(1).

⁹ *The Oxford English Dictionary* (2nd edn, 1989).

¹⁰ (5th Edn, OUP).

**The Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007: Schedule 2
Part 1 – Conditions attaching to bingo premises licences**

SCHEDULE 2

Regulations 10 and 11

Conditions attaching to bingo premises licences

PART 1

Mandatory conditions attaching to bingo premises licences

1. A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.

2. No customer shall be able to enter the premises directly from any other premises in respect of which one of the following permissions has effect—

- (a) a casino premises licence;
- (b) an adult gaming centre premises licence;
- (c) a betting premises licence other than a track premises licence; and

3.—(1) This paragraph shall apply where children or young persons or both are permitted by the licence holder to enter the premises, and Category B or C gaming machines are made available for use on the premises.

- (2) Any area of the premises to which category B and C gaming machines are located—
 - (a) shall be separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for the purpose;
 - (b) shall be supervised at all times to ensure children or young persons or both do not enter the area; and
 - (c) shall be arranged in such a way that ensures all parts of the area can be observed by the persons mentioned in sub-paragraph (3).
- (3) The reference to supervision in this paragraph means supervision by—
 - (a) one or more persons whose responsibilities include ensuring children or young persons or both do not enter the area; or
 - (b) closed circuit television which is monitored by one or more persons whose responsibilities include ensuring that children or young persons or both do not enter the area.

(4) A notice stating that no person under the age of 18 years is permitted to enter the area shall be displayed in a prominent place at the entrance to any area of the premises in which Category B or C gaming machines are made available for use.

4.—(1) In the case of a charge for admission to the premises, a notice of that charge shall be displayed in a prominent place at the principal entrance to the premises.

(2) In the case of any other charges in respect of gaming, a notice setting out the information in sub-paragraph (3) shall be displayed at the main point where payment for the charge is to be made.

- (3) The notice in sub-paragraph (2) shall include the following information—
 - (a) the cost (in money) of each game card (or set of game cards) payable by an individual in respect of a game of bingo;
 - (b) in respect of each game card (or set of game cards) referred to in paragraph (a) the amount that will be charged by way of a participation fee for entitlement to participate in that game; and

- (c) a statement to the effect that all or part of the participation fee may be waived at the discretion of the person charging it.
 - (4) The notice may be displayed in electronic form.
 - (5) A reference in this paragraph to a charge in respect of gaming does not include an amount paid for an opportunity to win one or more prizes in gaming to which section 288 of the 2005 Act (meaning of “prize gaming”) applies.
- 5.—**(1) The rules of each type of game that is available to be played the premises other than games played on gaming machines shall be made available to customers within the premises.
- (2) The condition in sub-paragraph (1) may be satisfied by—
 - (a) displaying a sign setting out the rules,
 - (b) making available leaflets or other written material containing the rules, or
 - (c) running an audio-visual guide to the rules prior to any bingo game being commenced.
- 6.** Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.

PART 2

Default conditions attaching to bingo premises licences

1. Subject to paragraph 2, no facilities for gambling shall be provided on the premises between the hours of midnight and 9am.
2. The condition in paragraph 1 shall not apply to making gaming machines available for use.

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