



City of Westminster

# Committee Agenda

Title: **Licensing Sub-Committee (1)**

Meeting Date: **Thursday, 10th December 2020**

Time: **10.00 am**

Venue: **This will be a virtual meeting.**

Members: **Councillors:**  
Heather Acton (Chairman)  
Jim Glen  
Aziz Toki

If you require further information, please contact Kisi Smith-Charlemagne, Senior Committee and Governance Officer.

**Email:** [kscharlemagne@westminster.gov.uk](mailto:kscharlemagne@westminster.gov.uk)  
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**Corporate Website:** [www.westminster.gov.uk](http://www.westminster.gov.uk)

**Note for Members:** Members are reminded that officer contacts are shown at the end of each report and Members are welcome to raise questions in advance of the meeting. Regarding Item 2, guidance on Declarations of Interests is included in the Code of Governance. If Members and Officers have any questions, they should contact the Director of Law before the meeting please.

## **AGENDA**

### **PART 1 (IN PUBLIC)**

#### **1. MEMBERSHIP**

To report any changes to the membership.

#### **2. DECLARATIONS OF INTEREST**

To receive declarations by Members and Officers of the existence and nature of any pecuniary interests or any other significant interest in matters on this agenda.

#### **3. LICENSING APPLICATION FOR DETERMINATION**

##### **a) Merkur Cashino, 182-184 Road, London W2 2DS**

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<b>Ward CIA*</b>	<b>Site Name &amp; Address</b>	<b>Application Type</b>	<b>Licensing Reference No.</b>
Bryanston & Dorset Square	Merkur Cashino, 182-184 Edgware Road, London W2 2DS	New Premises Licence	20/08155/LIGN

\*Cumulative Impact Area

**Stuart Love  
Chief Executive  
2 December 2020**

In considering applications for premises licences under the Licensing Act 2003, the Sub Committee is advised of the following:

### **POLICY CONSIDERATIONS**

The Licensing Sub-Committee is required to have regard to the City of Westminster statement of Licensing Policy, effective from 7<sup>th</sup> January 2016.

### **GUIDANCE CONSIDERATIONS**

The Licensing Sub-Committee is required to have regard to any guidance issued by the Secretary of State under Section 182 the Licensing Act 2003. The most recent version was published in April 2018.

### **CORE HOURS WHEN CUSTOMERS ARE PERMITTED TO BE ON THE PREMISES**

(As set out in the Council's Statement of Licensing Policy 2016)

- For premises for the supply of alcohol for consumption on the premises:

Friday and Saturday:	10:00 to midnight
Sundays immediately prior to Bank Holidays:	Midday to midnight
Other Sundays:	Midday to 22:30
Monday to Thursday:	10:00 to 23:30.

- For premises for the supply of alcohol for consumption off the premises:

Monday to Saturday:	08:00 to 23:00
Sundays:	10:00 to 22:30

- For premises for the provision of other licensable activities:

Friday and Saturday:	09.00 to midnight
Sundays immediately prior to Bank Holidays:	09.00 to midnight
Other Sundays:	09.00 to 22.30
Monday to Thursday:	09.00 to 23.30.

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## **Procedure for virtual hearings held under the Licensing Act 2003**

The purpose of this procedure is to clarify how the Licensing Sub-Committee (“the Sub-Committee”) will conduct virtual licensing hearings made under the Licensing Act 2003 (as amended) and for licensing applications under other regimes. All hearings are conducted with due regard to the Council’s Constitution, relevant legislation and case law, regulations and guidance.

### **Accessing virtual hearings**

Virtual Licensing Sub-Committee hearings will be held on Microsoft Teams as a live Teams event. Each application will be dealt with by a separate Teams meeting. All applicants, responsible authorities and other persons (who have submitted a valid representation) (collectively called “Parties”) will be provided with a link to the meeting beforehand. **Only these parties will be able to participate in the hearing** (together with their adviser) provided they have registered, in advance, with the Licensing Authority, as specified below. A link for the general public to watch the meeting will be available on the Council’s website.

### **Final Submissions before the Hearing**

The parties (or their representatives) should use their best endeavours to ensure that all of their final submissions have been made so as to be included in the Sub-Committee report (typically **no later, than 5.pm, 5 working days** before the Sub-Committee hearing). This means by 5pm on the Thursday, the week before the Sub-Committee hearing is due to take place. Final submissions should set out the key points, policies and conditions that a party wishes the Sub-Committee to take account of in determining the application.

Any final submissions that a party wishes to make, (that have not been submitted so as to have been included in the report), **must** be submitted to the Licensing Service by **no later than 12 noon 3 working days** before the hearing is due to take place. The Licensing email address is: [Licensing@westminster.gov.uk](mailto:Licensing@westminster.gov.uk).

### **Rules during Licensing Hearings**

The following rules must be followed by all parties to ensure the virtual hearing can progress as successfully as possible:

- All parties wishing to participate in the hearing **must** register their wish to participate in the hearing and provide their email addresses to the **Licensing Service at [Licensing@westminster.gov.uk](mailto:Licensing@westminster.gov.uk)** no later than **12 noon on the Monday** before the Thursday hearing is scheduled to take place.
- All parties **should join the virtual hearing at least 15 minutes before the advertised start time** to ensure they are ready to start at the advertised start time. After the advertised start time has passed no registered parties will be allowed to join, except in exceptional circumstances, when permitted by the Chairman, as this could disrupt the meeting.
- All parties must only address the hearing when invited to do so by the Chairman.
- All parties must keep their microphones on mute unless they are speaking. The Chairman has the ability to mute all parties’ microphones.

- If a party wishes to interject, they should put their name in the messaging field. The chairman has the discretion to invite the party to make their comment at an appropriate stage in the hearing.
- All parties are asked to keep their comments as succinct as possible.
- If a party has a question for another party, this must be addressed to the Chairman who will have the discretion to ask the relevant party to respond.
- Parties wishing to make suggestions as to the conditions that may be imposed in the event of the application being granted should do so by reference to the schedule of proposed conditions set out in the Conditions Schedule annexed to the committee papers. In so doing, they should use the same numbering in that schedule. This is to ensure that there is ease of referencing the conditions by all the parties.
- To ensure the smooth running of hearings, a time limit will be placed on each party's submissions. This time limit must be adhered to but the Chairman has the flexibility to amend the time limit when it is considered appropriate to do so.
- When referring to the hearing papers, participants should give the page and paragraph number when appropriate.
- The Chairman has the discretion to amend these rules in any given case where they consider it is appropriate to do so.

### Procedure

1. The Chairman will open the meeting and introduce the members of the Sub-Committee and the other officers attending with the members, including the legal adviser, policy adviser and committee officer.
2. The Chairman will confirm the procedure that the hearing will follow.
3. The Sub-Committee members and officers will be asked to declare any interests they may have and any other procedural business will be transacted.
4. The presenting officer from the licensing service will introduce the application, giving a brief description of the application and introducing all the Parties in attendance for each application
5. Each party who has registered to speak, will be invited to make their representations and will be allowed **a maximum of 10 minutes each**. In order to ensure that the hearing is fair to all parties and is conducted in an orderly manner, the Chairman has the discretion to extend this time limit where it is appropriate for the determination of the application.
6. Parties will normally speak in the following order, (the order may change for other types of licensing applications):
  - a. The applicant
  - b. Responsible authorities
  - c. Other persons
7. The Chairman has the right to grant each party the opportunity to ask questions of each other for the purposes of clarification only where it is appropriate to do so. The Sub-Committee members will then be able to ask questions of the parties.

8. The legal adviser and/or policy officer may ask questions of the parties as they consider appropriate, including in relation to the conditions which should be attached to the application if the Sub-Committee is minded to grant the application.
9. Each party will have an opportunity to make a short closing submission each (not introducing any new evidence or case law) of no more than **5 minutes each**, in the following order:
  - a. Responsible authorities
  - b. Other persons
  - c. The applicant
10. The Chairman shall then **close the meeting** and all parties will leave the meeting. A Decision will not be announced at the end of the hearing unless there is a legal requirement to do so.
11. The Sub-Committee will deliberate in closed session and all parties will be advised of the outcome in a written Summary Decision. Unless otherwise required or permitted by Regulations, summary decisions will be made within a period of five working days of the last day of the hearing. The written summary of the decision (“Summary Decision”) will be sent to all the parties as soon as possible after the Decision has been made. The full Decision, setting out the reasons for the Decision, (Formal Notification) will be sent to the parties as soon as possible thereafter. The time limit for appealing will not commence until the Formal Notification has been sent to the parties.

Dated 15 April 2020

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Item No:	
Date:	10 December 2020
Licensing Ref No:	20/08155/LIGN - New Premises Licence
Title of Report:	Merkur Cashino 182-184 Edgware Road London W2 2DS
Report of:	Director of Public Protection and Licensing
Wards involved:	Bryanston and Dorset Square
Policy context:	Statement of Licensing Principles for Gambling
Financial summary:	None
Report Author:	Angela Seaward Senior Licensing Officer
Contact details	Telephone: 0207 641 6500 Email: aseaward@westminster.gov.uk

## 1. Application

1-A Applicant and premises			
<b>Application Type:</b>	New Gambling Premises Licence, Gambling Act 2005		
<b>Application received date:</b>	11 September 2020		
<b>Applicant:</b>	Cashino Gaming Limited		
<b>Premises address:</b>	Merkur Cashino 182-184 Edgware Road London W2 2DS	<b>Ward:</b>	Bryanston and Dorset Square
		<b>Cumulative Impact Area:</b>	Edgware Road
<b>Premises description:</b>	<p>According to the application, this premises plans to operate as bingo premises which include the provision of bingo tablets and Bingo Plus and Bingo Express terminals. Substantive facilities for non-remote bingo will also be made available.</p> <p>The application has been made under Section 187 of the Gambling Act 2005 (2005 Act).</p>		
<b>Premises licence history:</b>	This premises were previously licensed under the Gambling Act 2005 as a betting shop (licence number 12/02180/LIGV). A full licence history can be seen at <b>Appendix 4</b> of this report.		
<b>Premises in the vicinity</b>	<p>Edgware Road has a mix of venues including retail, restaurants, pubs and a casino. There are 11 licensed premises, 3 live gambling premises which consist of 2 casinos and 1 Adult Gaming Centre. There are also 124 residents within a 75 metre radius of the premises.</p> <p>There is also a Primary School located opposite the premises.</p>		
<b>Applicant submissions:</b>	<p>The applicant has submitted the following;</p> <ul style="list-style-type: none"> <li>• Local Area Risk Assessment</li> <li>• Cashino Gaming Ltd Operational Standards</li> <li>• Working Together Document.</li> <li>• CCTV Plan (confidential document)</li> </ul> <p>Following responses to the Licensing Authorities Representation the applicant has provided the following supporting documents;</p> <ul style="list-style-type: none"> <li>• G4 Certificate</li> <li>• Marketing Code of Practice</li> <li>• Safeguarding Children and Vulnerable Training</li> <li>• Cashino Money Laundering</li> <li>• Cashino Keeping Alcohol Out</li> <li>• Dealing with Aggressive Customer</li> <li>• Cashino Marketing and Promotional</li> <li>• Cashino Access to Gambling by Children and Young Persons</li> <li>• Cashino Customer Interaction</li> <li>• Cashino Self Exclusion</li> <li>• Extracts of Compliance Folder</li> </ul>		

## 2. Consultation

### Consultation procedures

2.1 The application was advertised in accordance with the Gambling Act 2005 (Premises Licence and Provisional Statement) Regulations 2007 both on the premises and in the local press. The 28 day consultation period started from the date the application was received.

2.2 Local residents and businesses within a 50 metre radius of the proposed premises were written to outlining the application and how they can make representations to the Authority within the statutory period.

2.3 Emails were also sent to each Ward Councillor whose wards are subject to this application advising them of the application.

## 2. Representations

### 2-A Responsible Authorities

<b>Responsible Authority:</b>	Metropolitan Police Service (withdrawn)
<b>Representative:</b>	PC Bryan Lewis
<b>Received:</b>	30 September 2020

With reference to the above application, I am writing to inform you that the Metropolitan Police, as a Responsible Authority, object to this application as it is our belief that if granted this application would undermine the Licensing Objectives contained within the 2005 Gambling Act for the following reasons:

- More information is required to properly assess this application
- Insufficient conditions offered to support the licensing objectives

**Subsequent to the original representation the Metropolitan Police and applicants held discussions which satisfied their concerns. The conditions proposed by the Metropolitan Police Service and agreed by the applicant to form part of the operating schedule can be found at Appendix 5**

<b>Responsible Authority:</b>	The Licensing Authority
<b>Representative:</b>	Michelle Steward
<b>Received:</b>	28 September 2020

I write in relation to the application submitted on behalf of Cashino Gaming Limited for a new Bingo venue for the above mentioned premises under the Gambling Act 2005 (the Act).

As a responsible authority under section 157 of the Gambling Act the Licensing Authority has considered your application in full. The Licensing Authority has concerns relating to this application as minimal information has been provided that would show how this premises, if granted would promote the following 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, and
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.
- Location Policy

#### Vulnerability

The council's definition of vulnerable persons when considering applications of this types is that it relates to groups that include 'people who gambling 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 a mental impairment, alcohol or drugs'. It is noted that you have provided a document titled "Working Together". For the purposes of this application, it would be useful for the applicant to provide their definition of vulnerability and what it means to their operation.

#### Location and History of the Premises

Edgware Road has a mix of venues including retail, restaurants, pubs and a casino. The premises is situated at 182 to 184 Edgware Road which was previously licensed as a betting shop under the Gambling Act 2005. The premises remained a betting shop from 2007 to September 2019 when the licence was surrendered.

The premises is situated between Café Nero and McDonalds with office space above. Opposite the venue, the area is predominately retail with residential dwellings above. There are 3 casinos situated at Edgware Road. The Little Vic Casino is situated 74 metres away, Grosvenor Victoria Casino and the Poker Room are approximately 100 metres of the premises.

Attached is a Google Maps search of the area which is valid from April 2019 as Appendix 1 and Appendix 1a.

We carried out a 300 metre radius search of the premises and this has identified 4689 residents and 19 licences under the Gambling Act 2005. This includes 4 licensed betting shops, 3 Casinos, 1 AGC (Adult Gaming Centre) and 4 public houses with Gaming Machine Permits within a 300 metre radius of the above mentioned premises.

A further search on our GIS mapping system (marked Appendix 2 and attached) has revealed 4 Schools located within 300 metres from the premises, 3 hostels and 5 Faith Groups. Attached is Appendix 2 which captures this data.

#### Policy considerations

Policy LOC1 of Westminster's Statement of Licensing Principles for Gambling states that 'a sensitive location is defined as any premises which is within close proximity or on a main route to a school, educational institution, hostel or other sensitive locations where there is the potential for exposing children, young people or other vulnerable persons to gambling'. The proposed location of new bingo venue must be considered as part of this application due to the local area profile and its potential to impact upon the promotion of the 3 gambling objectives.

It is noted in your document "Working Together" that there are other sites operated by Casino Gaming Limited and the applicant is encouraged to provide details of those sites, ie how many and the where they are located? It would be useful for the applicant to provide further information into their operation of other licensed premises under the Gambling Act 2005 to obtain an understanding of their management and operation of such premises.

The Licensing Authority notes that within the "Working Together" document that the premises will have notices and leaflets promoting Be Watch, Play Right App and Be Game Aware; support groups for Gambling Addictions, the applicant is encouraged to provide information on the following points:

- Does the applicant have a referral scheme in place, in regards to self-exclusion?
- Is the onus on the individual to self exclude from a premises? If so, how does an individual go about this?
- What links does the premises have with local services to provide support?
- Will the applicant propose to advertise any promotional material associated with the premises? This could encourage the use of the premises by children or young people.
- How will the applicant control customers from bringing alcohol onto the premises to consume whilst gaming? Or entering the premises in an intoxicated state?

Paragraph 24.3 of the Westminster Statement of Licensing Principles for Gambling states that "Children and young persons are permitted in bingo premises, but may not participate in the bingo. If any category B or C machines are made available for use, these must be separated from areas where children and young people are allowed.

The Licensing Authority notes that within the "Working Together" and the "Operational Standards" documents that you do not allow under 18s in the premises at all and that there is a Think 25 policy in place. The applicant is encouraged to provide details on how this will be operated and checked. Will there be a member of staff at the entrance of the venue? Will there be SIA door staff present to conduct such checks?

Can the applicant provide further submissions as to the placement of signage on the windows and doors explaining that the venue does not allow under 18s and that it is visible from outside the premises and explain further what checks will be in place in terms of ID checks?

The applicant has stated in the "Operational Standards" that there will be 6 monthly training for staff. It would be useful for the applicant to provide details of what training staff will undertake in terms of identifying vulnerable people and providing sufficient and effective support to those people?

Due to the location of the premises being close to fast food premises which often provide cheaper food, the Licensing Authority expresses a concern of the possibility for the attraction of younger people and vulnerable people to the vicinity of the premises.

Policy OBJ1 states 'To prevent gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime, the Licensing Authority will apply the following criteria and take into account the following considerations, where relevant, in determining applications.

Paragraph 11.1 states 'Whether the premises make or will make a contribution to the levels of crime and disorder and whether the applicant has demonstrated that he has, or intends to, implement sufficient controls to prevent gambling from being a source of, and/or associated with crime or disorder, or being used to support crime, if the application is granted.'

Paragraph 11.1.1 states 'Where an area is known for high levels of crime the council will consider carefully whether gambling premises are suitable to be located there, and whether additional conditions may be necessary, such as the provision of CCTV, minimum levels of staffing and licensed door supervisors, etc.'

Paragraph 11.1.4 states 'Whether the layout, lighting and fitting out of the premises have been designed so as to minimise conflict and opportunities for crime and disorder.'

The Licensing Authority has reviewed the plans that were submitted with the application and would encourage the applicant to provide more detail and clarity to these plans with the questions below;

1. Where will the CCTV cameras be located?
2. Where are the locations of the gaming machines so that the Licensing Authority can be satisfied the applicant will have sufficient visibility of all gambling?

### Conditions

The Licensing Authority notes that the applicant has specified opening hours on the application as being as follows:

Sunday to Thursday 07:00 to 01:00  
Friday to Saturday 07:00 to 02:00

The Gambling Commission states in the default conditions the following:

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

The Licensing Authority raises concerns with the hours sought, how these hours will be managed (for what reason are these hours necessary), for example how many members of staff will be present to check ID and age verification especially being on a route to a school and with its location next to a fast food outlet. Would the applicant consider reducing the hours to the following:

Monday to Sunday 09:00 to 00:00

A list detailing all of the relevant mandatory and default conditions is attached for reference.

### Conclusion

The Licensing Authority submit this as a formal representation to this application and look forward to receiving further submissions from the applicant on the points raised above.

The Licensing Authorities supporting documents can be found in **Appendix 3**

### 3. The Gambling Act 2005

- 3.2 The Licensing Authority must under Section 153(1) of the Act exercise its functions relating to premises licensing with an aim to permit the use of the premises for gambling in so far as it thinks fit and in accordance with the relevant codes of practice, guidance, reasonably consistent with the licensing objectives and in accordance with the Council's Statement of Principles.
- 3.3 The Licensing Authority can take into account a representations relating to an application for a premises licence from either an interested party (a person living sufficiently close to the premises to be likely to be affected by the authorised activity or has a business interest that may be affected or represents persons in either of these two groups) or a responsible authority (Licensing Authority, Gambling Commission, Police, Fire Authority, Environmental Health and HM Revenue and Custom). Any representations must be relevant and not frivolous or vexatious.
- 3.4 Section 152 of the Act provides that a premises licence may not be issued in respect of premises if a premises licence already has effect in relation to the premises, except for a track premises licences. The Explanatory Notes for section 152 state "The general position for premises licensing is that premises may only be subject to one premises licence at a time... The effect of this requirement is to limit the principal activity on the premises to the provision of facilities for a particular type of gambling activity."
- 3.5 The Act, via regulations also imposes mandatory and default conditions that promote the licensing objectives. A list of these Mandatory and Default conditions are attached at **Appendix 5** to this report.
- 3.6 A premises licence issued by the Authority will be subject to the mandatory and default conditions for that licence type. However, paragraph 9.26 of the guidance states;
- Section 169 of the Act gives licensing authorities:
- "The ability to exclude from premises licences any default conditions that have been imposed under Section 168;" and •"The power to impose conditions on the premises licences that they issue."
- 3.7 As the applicants have proposed hours beyond those listed in the default condition for Bingo premises, the applicants have applied to disapply the following default condition.
- " No facilities for gambling shall be provided on the premises between the hours of midnight and 9 am".

#### 4. Policy & Guidance

The following policies within the City Of Westminster Statement of Licensing Policy apply:	
<b>Policy OBJ1 applies</b>	<p>To prevent gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime, the Licensing Authority will apply the following criteria and take into account the following considerations, where relevant, in determining applications and reviews:</p> <p><b>Considerations:</b></p> <ol style="list-style-type: none"> <li>1. Where an area is known for high levels of crime the council will consider carefully whether gambling premises are suitable to be located there, and whether additional conditions may be necessary, such as the provision of CCTV, minimum levels of staffing and licensed door supervisors, etc.</li> <li>2. Whether there is a history of crime or disorder associated with the premises or its use by those involved in crime to associate or dispose of the proceeds of crime.</li> <li>3. Whilst issues of nuisance are not included specifically in the gambling objectives, the council may consider, when making decisions on the applications for premising licenses, that extreme instances of public nuisance and persistent public nuisance may constitute disorder and criminal offences.</li> <li>4. Whether the layout, lighting and fitting out of the premises have been designed so as to minimise conflict and opportunities for crime and disorder.</li> <li>5. Whether sufficient management measures are proposed or are in place to prevent the premises being a source of, or associated with crime or disorder, or used to support crime either as a place of association or to avoid apprehension.</li> </ol>
<b>Policy OBJ2 applies:</b>	<p>To ensure that gambling is conducted in a fair and open way, the Licensing Authority will apply the following criteria and take into account the following considerations, where relevant, in determining applications and reviews:</p> <p><b>Considerations:</b></p> <ol style="list-style-type: none"> <li>1. Whether the layout, lighting and fitting out of the premises have been designed so as to ensure gambling is conducted in a fair and open way.</li> <li>2. Whether sufficient management measures are proposed or are in place to ensure that gambling is conducted in a fair and open way.</li> <li>3. Whether the management and operation of the premises is open and transparent.</li> <li>4. Whether the operators of the premises have been or will be fully</li> </ol>

	<p>cooperative with enforcement agencies.</p> <p>5. Whether the Commissions Codes of Practice have been complied with.</p>
<b>Policy OBJ3 applies:</b>	<p>To protect children and other vulnerable persons from being harmed or exploited by gambling, the Licensing Authority will apply the following criteria and take into account the following considerations, where relevant, in determining applications and reviews.</p> <p><b>Considerations:</b></p> <p>1. Has the operator a specific training programme for staff to ensure that they are able to identify children and vulnerable people and take appropriate action to be reasonably consistent with this objective to exclude them from the premises or parts of the premises.</p> <p>2. If the premises is an adult only environment has the operator taken effective measures to implement an appropriate proof of age scheme to ensure that no one under the age of 18 is admitted to the premises or restricted areas.</p> <p>3. Whether the layout, lighting and fitting out of the premises have been designed so as to not attract children and other vulnerable persons who might be harmed or exploited by gambling.</p> <p>4. Whether sufficient management measures are proposed or are in place to protect children and other vulnerable persons from being harmed or exploited by gambling.</p> <p>5. Whether any promotional material associated with the premises could encourage the use of the premises by children or young people.</p>
<b>Policy BGO1 applies:</b>	<p>Applications and reviews will be determined, subject to the relevant criteria in Policies OBJ1, OBJ2, OBJ3 and other policies within this statement.</p>
<b>Policy LOC1 applies:</b>	<p>Applicants for new or variation applications of premises licences within a sensitive location must include detailed information as to how the proposals will be reasonably consistent with the gambling objectives and policies OBJ1, OBJ2 and OBJ3 A sensitive location is defined as any premises which is within close proximity or on a main route to a school, other educational institution, hostel or other sensitive locations where there is the potential for exposing children, young people or other vulnerable persons to gambling.</p>

## 5. Gambling Commission Guidance

- 5.1 The Gambling Commission have produced guidance for local authorities in relation to the 2005 Act. The information in this section of the report relates to the relevant points within the Guidance which members may wish to consider.
- 5.2 Bingo is not given a statutory definition in the Act although two types of bingo are commonly understood:
- cash bingo, where the stakes paid make up the cash prizes that are won
  - prize bingo, where various forms of prizes are won, not directly related to the stakes paid.
- 5.3 Cash bingo is the main type of bingo played in commercial bingo premises. They also offer prize bingo, largely as games played in the intervals between main stage games. This means that only premises with a bingo premises licence, or a large casino premises licence issued under the Act (where the operator holds a bingo as well as a casino operating licence), will be able to offer bingo in all its forms.
- 5.4 As well as commercial bingo premises, bingo can be found in other gambling premises. Prize bingo is traditionally a game played in arcades, especially seaside amusement arcades, or at travelling funfairs. For these operators, prize bingo is subject to the allowances for prize gaming in the Act. This means that, subject to limits on participation fees and prizes, adult gaming centres, licensed and unlicensed family entertainment centres, and travelling fairs, (or any premises with a prize gaming permit) are able to offer prize gaming, which includes prize bingo. In this form of gaming, the nature of the prize must not be determined by reference to the number of people playing the game, and the nature or the size of the prize must not be determined by reference to the amount paid for or raised by the gaming
- 5.5 Under the Act, children and young persons (anyone up to the age of 18) cannot be employed in providing any facilities for gambling on bingo premises, and children (under 16) cannot be employed, in any capacity, at a time when facilities for playing bingo are being offered. However, young persons, aged 16 and 17, may be employed in bingo premises (while bingo is being played), provided the activities on which they are employed are not connected with the gaming or gaming machines
- 5.6 Children and young people are allowed into bingo premises; however they are not permitted to participate in the bingo and if category B or C machines are made available for use these must be separated from areas where children and young people are allowed. Social Responsibility (SR) code 3.2.5(3) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises' in order to prevent underage gambling
- 5.7 S.172(7), as amended, provides that the holder of a bingo premises licence may make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines on the premises. For example, a premises with a total of 25 gaming machines available for use can make five or fewer category B3 gaming machines available on that premises. Premises that were licensed before 13 July 2011 are entitled to make available eight category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. There are no restrictions on the number of category C or D machines that can be made available. Regulations state that category B machines at bingo premises are restricted to sub-category B3 (SI 2007/2158: Categories of Gaming Machine Regulations 2007 ) (but not B3A) and B4 machines.

- 5.8 Equipment operated by a bingo operating licence for the purpose of playing bingo, for example what are currently known as mechanised cash bingo, electronic bingo terminal (EBTs) and video bingo terminals (VBTs), will be exempt from controls on gaming machines provided they comply with any conditions set by the Commission and, in the case of EBTs, do not hold gaming machine content.
- 5.9 An EBT that offers gaming machine content in addition to bingo content is considered to be a gaming machine and would count towards the total number of gaming machines or towards the offering of bingo. Any EBTs that do not offer gaming machine content would not count towards the number of gaming machines.
- 5.10 The Committee can, if it feels minded impose conditions on the premises licence. Paragraph 9.28 of the Guidance states that

“Licensing authorities should bear in mind their duty to act in accordance with the principles set out in Section 153. Since they should aim to permit the use of premises for gambling, they should not attach conditions that limit the use of premises for gambling except where it is necessary as a result of the requirement to act in accordance with the guidance, the Commissions codes of practice or the licensing policy statement; or in a way that is reasonably consistent with the licensing objectives.”

- 5.11 The guidance goes further to state that authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions. If the authority does decide that the only way to address a particular concern is through conditions it must be proportionate to the circumstances which they are seeking to address.
- 5.12 The guidance encourages licensing authorities to ensure that premises licence conditions are relevant to the need to make the proposed building suitable as a gambling facility, directly related to the premises and the type of licence applied for, or fairly and reasonably related to the scale and type of the premises and reasonable in all other respects (see paragraph 9.29 of the guidance).
- 5.13 Local authorities are also prevented from attaching conditions relating to certain matters. Paragraph 9.32 of the guidance sets out the relevant sections of the Act where conditions may not be imposed.

“...The relevant sections are:

- Section 169(4), which prohibits the authority from imposing a condition on the premises licence which makes it impossible to comply with an operating licence condition;
- Section 172(10), which provides that conditions may not relate to gaming machines categories, numbers, or method of operation;
- Section 170, which provides that membership of a club or body cannot be required by attaching a condition to the premises licence (the Act specifically removes membership requirements for casino and bingo and this prevents it from being reinstated); and
- Section 171, which prevents an authority imposing conditions in relation to stake, fee, winning or prizes.”

## **6. The Council’s Statement of Principles**

- 6.1 The Licensing Authority’s Statement of Principles set out the council’s policy considerations in relation to applications made under the Gambling Act. The Statement reemphasises the Authority’s position in relation to Section 153 of the Act and sets out the principles and policies that the Authority will adopt when considering and determining Gambling Act applications.

- 6.2 The Council's Statement of Principles location policy (LOC 1) sets out that the authority will pay particular attention to the suitability of a location for gambling activity in terms of the objective of the protection of children and vulnerable persons from being harmed or exploited by gambling. It is the authority's view that the applicant should establish if there are any sensitive premises or locations within close proximity to the proposed gambling premises. Applicants should, in addition to their application submit information as to how they plan to promote this objective. A plan showing the location of schools, places of religious worship and hostels within a 75 metre radius of the premises is attached to this report as **Appendix 6**.
- 6.3 The Council's Policy relating to Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime (OBJ1) sets out the criteria as to whether the premises make or will make a contribution to the levels of crime and disorder and whether the applicant has demonstrated that he has, or intends to, implement sufficient controls to prevent the premises being a source of, and/or associated with crime or disorder, or being used to support crime, if the application is granted".
- 6.4 The Council's policy relating to the Protection of children and other vulnerable people from being harmed or exploited (OBJ 3) sets out the criteria that the authority will consider when determining an application. The authority will have to be satisfied that the applicant has appropriate measures in place to protect children and other vulnerable persons from being harmed or exploited by gambling.
- 6.5 The Councils Policy relating to Bingo premises (BGO1) sets out the criteria that the authority will consider when determining an application. The policy states that a Bingo premises licence granted before the 13th July 2011 are entitled to make eight category B gaming machines, or 20% of the total number of gaming machines, whichever is greater. For Bingo premises licences granted after the 13th July 2011 are entitled to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines on the premises. There are no restrictions on category C or D machines that can be made available in any Bingo licence no matter when it was granted.
- 6.7 The policy is set out to avoid a situation where a premises holds a bingo premises licence primarily to benefit from the gaming machine allowance, the licensing authority will need to be satisfied that bingo can be played in any premises for which a premises licence is issued. Particular consideration will be given when the operator of an existing bingo premises applies to vary the premises licence to exclude an area of the existing premises and then applies for a new licence for the excluded area.
- 6.8 Given that children and young persons are permitted in bingo premises, the appropriate weight will be given to OBJ3. In addition, young persons, aged 16 and 30 17, may be employed in bingo premises provided their duties are not connected with the gaming or gaming machines. The licensing authority will not grant licences unless the applicant demonstrates how they intend to meet this licensing objective and identify appropriate measures they will take to protect young employees.

## **7. Options for Members**

- 7.1 When determining the application the Committee will need to consider the Gambling Act 2005, the relevant Guidance to Licensing Authorities, the policies contained within the Council's Statement of Principles and the licensing objectives.

- 7.2 Section 152 of the Act provides that a premises licence may not be issued in respect of premises if a premises licence already has effect in relation to the premises, except for a track premises licences. However, this section does not prohibit the Licensing Authority from determining the application.
- 7.3 Members need to be satisfied that if the application were to be granted there would be no breach of mandatory conditions and the granting of the application would not have a detrimental impact on the licensing objectives.

## 8. Equality Implications

The Council in its capacity as Licensing Authority has a duty to have regard to its public sector equality duty under section 149 of the Equality Act 2010. In summary, section 149 provides that a Public Authority must, in the exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- (c) foster good relations between persons who share a relevant protected characteristics and persons who do not share it.

Section 149 (7) of the Equality Act 2010 defines the relevant protected characteristics as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

## 9. Appendices

<b>Appendix 1</b>	Premises plans
<b>Appendix 2</b>	Applicant supporting documents
<b>Appendix 3</b>	Licensing Authority supporting documents
<b>Appendix 4</b>	Premises history
<b>Appendix 5</b>	Proposed conditions
<b>Appendix 6</b>	Residential map and list of premises in the vicinity

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**If you have any queries about this report or wish to inspect one of the background papers please contact the report author.**

**Background Documents – Local Government (Access to Information) Act 1972**

<b>1</b>	Gambling Act 2005	N/A
<b>2</b>	Statement of Principles for gambling in Westminster	31 January 2019
<b>3</b>	Gambling Act 2005 (Premises Licence and Provisional Statements) Regulations 2007	N/A
<b>4</b>	Guidance to Licensing Authorities 3rd Edition	May 2009
<b>5</b>	Gambling Commission Licence conditions and codes of practice	March 2011
<b>6</b>	Metropolitan Police Service Representation	30 September 2020
<b>7</b>	Licensing Authority Representation	28 September 2020
<b>8</b>	Betting Shop Licence (12/02180/LIGV)	

# FOR ILLUSTRATION PURPOSES ONLY

MACHINE'S LISTING	MACHINE CATEGORY	QUANTITY	REVISIONS
CAT B1		3	
CAT C		3	
CAT D		3	
DISPOS		3	
TRANK		3	
TABLER		3	
INTD		3	

FIT OUT TYPE	REFERENCE DRAWINGS
<b>FUTURE VENUE</b> PROJECT: <b>CASHINO</b> 182 - 184 EDGWARE ROAD LONDON W2 2DS PARTICIPATION: <b>PROPOSED MACHINE PLAN</b>	SCALE: 1:50 DRAWN BY: MG DATE: 11/08/20 DRAWING NO.: 999-PR-08 REVISION: 01

**MERKUR CASHINO**

CONTRACT 1, REVISION 01, DRAWING NO. 999-PR-08, DATE 11/08/20. THIS DRAWING IS THE PROPERTY OF MERKUR CASHINO. ALL RIGHTS RESERVED. ANY UNAUTHORIZED REPRODUCTION OR USE IS STRICTLY PROHIBITED. CONTACT: 020 8840 8840.





## 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            | <a href="https://www.citizensadvice.org.uk">https://www.citizensadvice.org.uk</a>       |
| ▪ Gamble Aware/GamCare        | <a href="https://www.begambleaware.org">https://www.begambleaware.org</a>               |
| ▪ GamesAid                    | <a href="https://www.gamesaid.org">https://www.gamesaid.org</a>                         |
| ▪ Gam-Anon                    | <a href="https://www.gam-anon.org">https://www.gam-anon.org</a>                         |
| ▪ Gamblers Anonymous          | <a href="https://www.gamblersanonymous.org.uk">https://www.gamblersanonymous.org.uk</a> |
| ▪ Gordon Moody Association    | <a href="https://www.gordonmoody.org.uk">https://www.gordonmoody.org.uk</a>             |
| ▪ Action for Children Charity | <a href="https://www.actionforchildren.org.uk">https://www.actionforchildren.org.uk</a> |
| ▪ National Debtline           | <a href="https://www.nationaldebtline.org">https://www.nationaldebtline.org</a>         |

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



## 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 31<sup>st</sup> 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](mailto: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.

<b>Platonic</b>	Human beings tend to judge things they are familiar with as good and things not familiar as suspect.
<b>Instinctive</b>	The best defence is attack!
<b>Learned Behaviour</b>	Aggression is sometimes part of the behaviour we have learned from society.
<b>Energy Source</b>	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.
<b>Frustration Response</b>	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:

<b>Physical</b>	Such as Brain Damage, Drug Abuse, Alcoholism, Sexual Abnormalities, Pain, Hunger, Sleep Deprivation, Environmental Changes (weather), Appearance, Illness, Defence of Territory of Possessions, Age
<b>Psychological</b>	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.



## 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.



## 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 31<sup>st</sup> 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 6<sup>th</sup> 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.

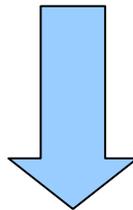
**If the customer does wish to continue gambling after the expiry of an exclusion period then a 24 hour cooling off period must be taken before gambling is resumed.**

**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**

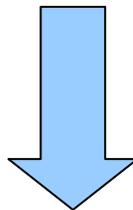
CUSTOMER:	Requests to be excluded.
AREA MANAGER/DUTY MANAGER/SUPERVISOR:	Goes through the implications, for a minimum period of not less than six months, nor more than 12 months, with the customer, upon request, having the option to extend one or more periods for at least a further six months each. Advises 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.



## 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:

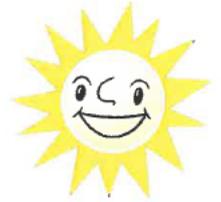
The staff guard and MPA fobs are carried by employees at all times as per policy. This increases the security of our employees and guests. Employees become more comfortable in their roles knowing they have methods of contacting assistance in emergency situations.

### 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**

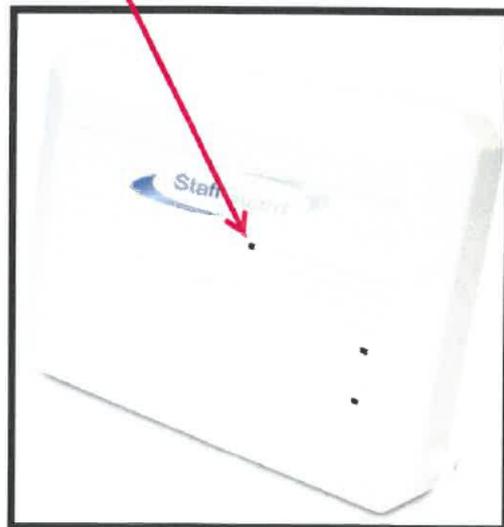
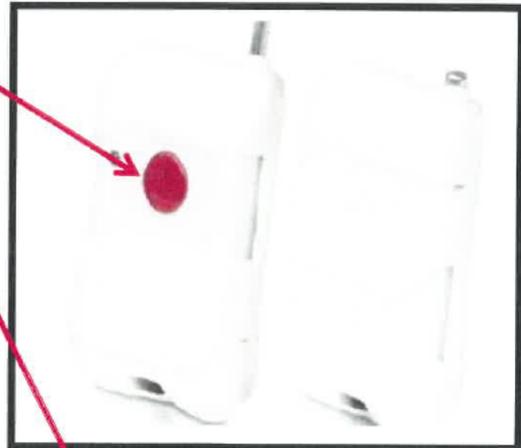
However, they will also call the police if they can hear that a crime is being committed, or anyone is in immediate threat.

#### 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





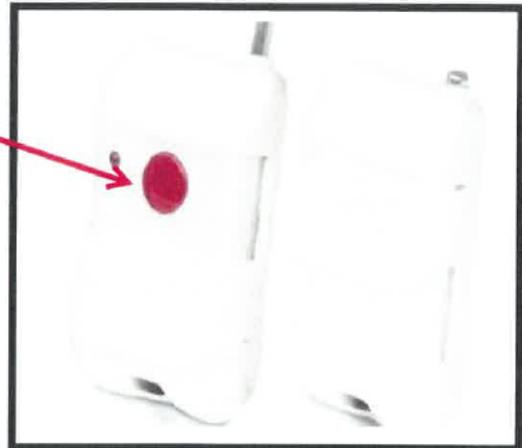
## How To Make A Test Call:

Once per week a test call must be made:

1. Press the fob (red button) and wait for a response. Say, "Just a test call" and give the password when asked.

The password is your venue name and number.

2. They will confirm the test and end the call



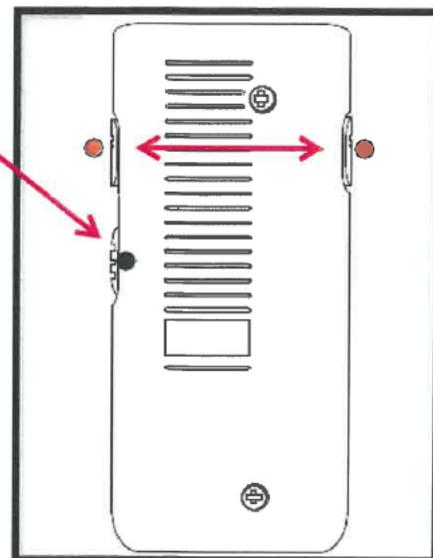
## Mobile Panic Alarms (MPA)

Mobile Panic Alarms are designed to offer staff the security of a personal attack alarm at all times whilst they are at work. The MPAs should be worn by staff members and key holders should be issued with one to keep with them at all times. MPAs are not to be taken off site and should not be taken home.

1. Slide the black button downwards to unlock the orange buttons
2. Press the two orange side buttons together

**The panic alarm does not work if you press only one button**

**The black button should be kept in the locked position to prevent false activations**





## How It Works

The MPA transmits a signal to a receiver on site. This signal is then transmitted INSTANTLY to an alarm control centre who inform the local Police. The Police will aim to attend site in less than 5 minutes when a MPA is activated as this is given priority over a normal 999 call.

**CAUTION** – The transmitter range will be affected by the condition of the MPA aerial, always ensure your MPAs are in good condition. If the MPA is defective or damaged, contact the Commercial Administrator to arrange a repair/replacement straight away.

## When To Use It

**MPA's should only be used when there is the threat of serious injury to staff or customers.**

Example of when to use;

- ✚ Any physical violence is carried out towards a member of staff or customer;
- ✚ When the threat of physical violence is considered imminent; or
- ✚ The site is subject to a robbery.

At all other times ring the police directly. The number is displayed on the office notice board.

## Problems

**Any** problems with the MPA should be addressed to your Line Manager or Area Manager who will inform the Commercial Administrator.



## How To Test Your MPAs

1. Call your alarm supplier, a list of numbers is provided below.
2. Tell the alarm operative you want to test your MPAs, give them your site name (Cashino Gaming), site address and site password.
3. The alarm operative will then tell you that they have disconnected the signaling, at which point you will be asked to activate each MPA in turn.
4. For example; you will press MPA 1 when instructed to by the alarm operative and they will tell you if a signal has been received, you will then move on to MPA 2 and the alarm operative will tell you if a signal has been received, you will then move on to MPA 3 etc. etc.
5. You will do this until all of your MPAs have been tested.
6. After each individual MPA test, the alarm operative will tell you if the signal has been received or not. If not, your MPA is faulty and will need to be repaired or replaced. In this instance, please report it to the Commercial Administrator straight away.
7. You will need to log that you have carried out an MPA test on your MPA Test Record Sheet, which should be maintained in your Premises Log in your Compliance Folder.

Alarm Provider	Contact
ASG	0121 358 1524
ADT	0344 800 1999 option 5
LSG	TO BE INSERTED
METRO	0115 983 3801
GEM	0844 879 1703
ABEL	0844 800 3022



## What To Do After Your MPA Test / Activation

When the MPA testing exercise has been completed the alarm company will reactivate the signaling and the police response will be reinstated.

You will then need to reset your alarm control panel.

If you have a fob operated system, press your fob against your keypad, as if you are going to set the system for closure. The keypad will ask you if you want to set the system. Press 'yes'. The system will start to arm, so immediately hold your fob up to the keypad once again to unset the system. Your system will now be reset.

If you have a code operated system, input your code, as if you are going to set the system for closure. The keypad will ask you if you want to set the system. Press 'yes'. The system will start to arm, so immediately input your code, as if you are opening and this will unset the system. Your system will now be reset



## 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 3<sup>rd</sup> 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:**

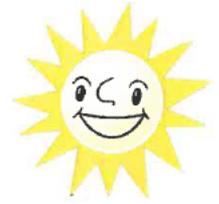
- Do not alert the suspect(s)
- Inform the duty manager who will telephone the police.
- Continue to watch the suspect(s) and try not to alert their attention that you have identified them

#### **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](mailto: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.



## 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.

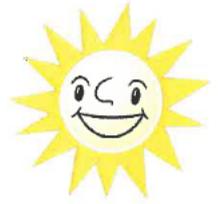
### Worst Result:

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

# INTERNATIONAL CERTIFICATE OF ACCREDITATION



GLOBAL GAMBLING GUIDANCE GROUP

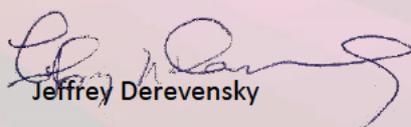
In accordance with the responsible  
gaming policies, procedures and  
standards set by the Global  
Gambling Guidance Group (G4),  
Amsterdam, the Netherlands,  
accreditation is hereby granted to:

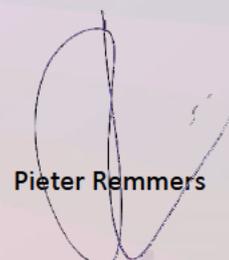
**Praesepe Group**  
Merkur Slots, Merkur Cashino & Beacon Bingo

*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 Remmers

Vincit qui se vincit

## Merkur Cashino, 182-184 Edgware Road, W2 2DS

### Local Area Risk Assessment

<b>Trading Name:</b>	Merkur Cashino
<b>Premise Address:</b>	182-184 Edgware Road, W2 2DS
<b>Local Authority:</b>	WESTMINSTER
<b>Premise Licence No:</b>	New application
<b>Operator Licence No:</b>	000-003266-N-103444-024 (Cashino Gaming Ltd)
<b>Company Details:</b>	Praesepe Group, 1a Seebeck House, Seebeck Place, Knowhill, Milton Keynes MK5 8FR Premise Licence Holder: Cashino Gaming Limited
<b>Name and Title of Assessor:</b>	Agnieszka Szczerkowska, Karolina White – Internal Compliance Auditors. Amanda Kiernan – Head of Compliance
<b>Date of Assessment:</b>	18/08/2020
<b>Review Date:</b>	On opening in conjunction with local staff

### Local Area Profile Risk Factors

<b>Local Risk Profile:</b>	<p>Merkur Cashino Edgware Road is located on a busy high street within central London congestion charge area. The most common recorded business type in this area are shops and communication stations. The premises on the road include convenience stores, coffee shops, restaurants, takeaways, banks, fresh food suppliers, supermarkets, hair and beauty salons, betting shops, phone shops, pawnbrokers, pharmacies, travel and property agencies. There is a few pubs in close proximity.</p> <p>Two doors away from Merkur Cashino Edgware Road there is Waitrose supermarket. The Little Vic Casino (Grosvenor Casino) is only 80 yards away with Argos collection store in the same building on the corner on the ground floor. There are a few bookmakers in the vicinity: William Hill, Ladbrokes, Coral, Paddy Power and Reel Time Adult Gaming Centre.</p> <p>Merkur Cashino Edgware Road is located between Café Nero and McDonalds. Above there is a solicitors office and offices to let on the first floor. On the second and third floor are residential flats.</p> <p>Edgware Road, Westminster, W2 2DS is within the Hyde Park policing neighbourhood, under the Metropolitan Police Service force area. In the year ending June 2019, the crime rate in City of Westminster was higher than the average crime rate across similar areas like Islington, Camden or Kensington and Chelsea. There is a slight decrease in number of detailed crimes in the area since July 2019.</p> <p>14 crimes have been reported on Edgware Road in June 2020 (Anti-social behaviour (10), Criminal damage and arson (1), Violence and sexual offence (3)). 648 took place within half a mile of the centre of W2 2DS. Crime incidents predominantly consisted of Anti-social behavior (254), Violence and sexual offences (111), Other theft (47) and Public Order (41). There are no current policing priorities recorded for this area.</p>
<b>Establishments of note:</b>	
<b>Adjoining premises:</b>	
<b>Crime statistics:</b>	
<b>Population:</b>	<p>Edgware Road area has a population of 1557 residents. Dominating age groups are 30-44 (30%) and 25-29 (22%). 13% of local population is underage. In the immediate vicinity of M16 ONY street residents are predominantly single- 57% of local residents, which is higher than national average of 35%. Edgware Road and surrounding area has a larger than average concentration of residents that are degree educated or similar - 58% of the resident population (compared to 27.1% national average).</p>
<b>Culture:</b>	<p>Edgware Road, Westminster can be considered more ethnically diverse than UK as a whole. Only 49% of local residents describes themselves as White compared to 86% UK average. Other sizable ethnic groups include: Chinese and Other Asian (12%), Mixed Ethnicity (7%), Pakistani (5%), Indian (5%), Black African and Caribbean (5%) and Other ethnicity (16%). In this area, only 29% of the residents were born in England, so there is a high concentration of migrants, mainly from Europe, Middle East of Asia and North America or Caribbean. Dominating religion is Christianity - 36% which is significantly lower than UK average of 59.3%. A sizeable portion of the local population describe themselves as Muslim (30%) and 27% claim to have no religion or didn't state their religious views.</p>
<b>Unemployment:</b>	<p>Merkur Slots Edgware Road is in an area with an employment rate of 60.3%. Unemployment rate at 4.3% is lower than 7.4% national average. There is higher than average concentration of student residents (19% of the resident population) compared to UK average (9.2%). Majority of employees work on higher and intermediate managerial, administrative, or professional positions. There is also a high volume of workers on supervisory, clerical, and junior managerial positions. Dominating employment industry is Financial Services.</p>
<b>Deprivation:</b>	<p>Index of Multiple Deprivation for Edgware Road area in 2019 was ranked 18,296 out of 32,844, where 1 is the most deprived. This is amongst 50% least deprived neighbourhoods in the country. There is a significant improvement since 2015 when IMD was ranked 9,897 out of 32,844. The main area of concern is crime deprivation which is affecting living environment of local population (both indices ranked within 20% most deprived areas in UK).</p>
<b>Local Police:</b>	<p>W2 2DS is within the Hyde Park policing neighbourhood, under the Metropolitan Police Service force area - awaiting response re application</p>

**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 account London Borough of Barnet local authority Statement of Gambling Principles, reference 10.12 Bingo Centres and London Borough of Barnet Profile 2019-2022.

**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 have an effect on footfall. We have set out below our position on risk in this area:

Licensing Objectives	Local Risks	Control Measures
<p>Protecting children and other vulnerable people from being harmed or exploited by gambling</p>	<p><b>Unemployment</b>                      Merkur Slots Edgware Road is in an area with an employment rate of 60.3%. Unemployment rate at 4.3% is lower than 7.4% national average. There is higher than average concentration of student residents (19% of the resident population) compared to UK average (9.2%).                      Majority of employees work on higher and intermediate managerial, administrative, or professional positions. There is also a high volume of workers on supervisory, clerical, and junior managerial positions.                      Dominating employment industry is Financial Services.</p> <p><b>Deprivation</b>                      Index of Multiple Deprivation for Edgware Road area in 2019 was ranked 18,296 out of 32,844, where 1 is the most deprived. This is amongst 50% least deprived neighbourhoods in the country. There is a significant improvement since 2015 when IMD was ranked 9,897 out of 32,844. The main area of concern is crime deprivation which is affecting living environment of local population (both indices ranked within 20% most deprived areas in UK).</p> <p><b>Schools and Education</b>                      Reach 2 Academy Trust Within Minerva Academy, 157 Edgware Rd, W2 2HR                      Edgware, 205 Edgware Rd, W2 1ES                      International Community School, 21 Star St, W2 1QB                      Exam School Ltd, 23 Southwick St, W2 2QF</p>	<p><b>Age Verification</b>  <i>Ensuring Under 18's do not have access to licensed premises</i>                      All Merkur Cashino venues are strictly adult only (over 18's only).                      Gambling is an age restricted product and Praesepe operates a 'Think 25' policy.                      Age verification is embedded in training platforms and responsible gambling policies.                      Over 18's notices are displayed on the entrance.                      Think 25 advertising is prominently displayed throughout the premise.                      Merkur Cashino Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.                      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).                      Merkur Cashino 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.                      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</p>

<p>Paint Pots Montessori School Hyde Park, St Johns Church, Hyde Park Cres, W2 2QD</p> <p>Connaught House School, 47 Connaught Square, W2 2HL</p> <p>Marylebone Boys' School, N Wharf Rd, W2 1QZ</p> <p>School, 13 Nutford Pl, Marylebone, W1H 5HA</p> <p>St. James &amp; St. John Cofe Primary School, 4 Craven Terrace, Bayswater, W2 3QD</p> <p>Hope Montessori Nursery School, 11 S Wharf Rd, Paddington, W2 1JB</p> <p>Russian Education Centre Dar, St John's, Hyde Park Cres, W2 2QD</p> <p>Hampden Gurney C Of E Primary School, 13 Nutford Pl, Marylebone, W1H 5HA</p> <p>ASD Music Lessons London Music Box at Jacques Samuel Pianos, Edgware Rd, W2 2DZ</p> <p>Micky Star Nursery &amp; Pre-School, 58 - 61 St Michael's St, W2 1QR</p> <p>Naveen, Call Centre, 69 Praed St, W2 1NS</p> <p>Bright Horizons Hyde Park Day Nursery and Preschool, St. James Church, 6 Gloucester Terrace, W2 3UD</p> <p>Mehrat Ltd, 61 Praed St, W2 1NS</p> <p>Merchant Square Day Nursery Paddington, 13 Harbet Rd, W2 1AU</p> <p>Great Beginnings Montessori Nursery School, 39 Brendon St, W1H 5JE</p> <p>Miss Daisy's Nursery School, Hyde Park, The Long Garden, Albion St, St George's Fields, W2 2AX</p> <p>Committee Room, Medical School Building, 8 Norfolk Pl, W2 1QL</p> <p>L'Ecole Bilingue Elementary, St David's, Welsh Church, St Mary's Terrace, W2 1SJ</p> <p>Phileas Fox Nursery School, St Mary's Square, W2 1SE</p> <p>Hyde Park Village Nursery, 35 Craven Terrace, Bayswater, W2 3EL</p> <p>St Mary's Bryanston Square Primary School, Enford St, W1H 1DL</p> <p>Wetherby Preparatory School, Bryanston Square, W1H 2EA</p> <p>Museo delle cere Londra, Craven Rd, Paddington, W2 3QB</p> <p>Ark King Solomon Academy - Younger Years Site, 10 Crompton St, W2 1ND</p> <p>Wetherby School, 133 George St, Marylebone, W1H 7HB</p> <p>Halcyon London International School, 33 Seymour Pl, W1H 5AU</p> <p>Sudanese Supplementary School, 37 Chapel St, Marylebone, NW1 5DP</p> <p>Les Trois Oursons Bilingual Nursery, 170 Gloucester Terrace, W2 6HS</p> <p>Dance Art, 1 Chilworth Mews, Paddington, W2 3RG</p> <p>St Marylebone School, 64 Marylebone High St, W1U 5BA</p> <p>Bright Horizons, St James's Church, Sussex Gardens, W2 3UD</p> <p>Abercorn School, 248 Marylebone Rd, Marylebone, NW1 6JF</p> <p>The Shaftesbury Academy, 3 Queen's Gardens, Bayswater, W2 3BA</p> <p>Portman Nursery School, Broadley St, Marylebone, NW8 8DN</p> <p>Christ Church Bentinck C of E Primary School, 39 Cosway St, NW1 5NS</p>	<p>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><b>Vulnerability</b> Training and guidance is given to Merkur Cashino 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><b>Customer Interaction</b> Merkur Cashino 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 behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p>
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<p>ICS Summer School, 78 Wyndham Pl, W1H 1PN  London Qur'an School, 64 Marylebone High St, W1U 5BA  St Edward's Catholic School, Lisson Grove, NW1 6UH  King Solomon Academy, Penfold St, NW1 6RX  Sylvia Young Theatre School, 1 Nutford Pl, W1H 5YZ  London Ballroom Studio, 1 Chilworth Mews, W2 3RG  Marylebone Kindergarten, 34 Crawford St, W1H 1LT  New Horizons London, 2 Eastbourne Terrace, W2 6LG  Saint Marylebone Church of England School, 19 Marylebone Rd, NW1 5LT  Gateway Academy, Gateway Academy, 4 Capland St, NW8 8LN</p> <p><b>Community Centres and Youth Centres</b>  Almogran Centre, Gilbert Sheldon House, Edgware Rd, St John's Wood, W2 1BX  Greenside Community Centre, 24 Lilestone St, Marylebone, NW8 8SR  Church Street Neighborhood Centre, Church St, NW8 8HN  Penfold Community Hub, 60 Penfold St, NW8 8PJ  The Fourth Feathers Youth &amp; Community Centre, 12 Rossmore Rd, NW1 6NX  Marble Arch, 21 Portsea Pl, St George's Fields, W2 2BL  The Fourth Feathers Youth &amp; Community Centre, 12 Rossmore Rd, NW1 6NX</p> <p><b>Parks, play grounds and sports/leisure facilities</b>  Hyde Park, Rangers Lodge, W2 2UH  Kensington Gardens, London W2 2UH  Oxford Square, 12 Oxford Square, W2 2PB  Connaught Square, Tyburnia, London W2  Rembrandt Gardens Little Venice, 6 Warwick Ave, Little Venice, W2 1XB  Hyde Park Square, 2 Hyde Park Square, W2 2JT  Westbourne Green Open Space, 157 Bourne Terrace, W2 6PB  Floating Pocket Park, Paddington, W2 1JX  Talbot Square Gardens, Talbot Square, W2 1TR  Sussex Gardens Open Space, 227 Sussex Gardens, W2 2RL  Buckhill Playground, Hyde Park Gardens, W2 2LY  Hyde Park Playground, W2 2AR  Seymour Leisure Centre, Seymour Pl, W1H 5TJ</p> <p><b>Vulnerable and addiction support services</b>  Addiction Services Ltd, Crawford St, W1H 2HL  Recovery Circle, 104 York St, W1H 4QL</p> <p><b>Homeless shelters and food banks</b></p>	<p>Staff are trained to monitor and record customer behaviour, 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 behaviour, 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><b>Player Protection</b>  <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i></p> <p><i>Failure to provide information to customers on responsible gambling</i></p> <p><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 offer advice to 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 located 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 is able to send alerts to Merkur Casino Edgware Road if the customer enters at a time they have chosen not to play which instigates an interaction with the customer.  Merkur Casino will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p> <p>Senior Management are members of the Bingo Association Executive and Social Responsible Committees and BACTA Divisional and Social Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives</p>	
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<p>WLM (West London Mission), 134-136 Seymour Pl, W1H 1NT</p> <p><b>Pawnbrokers and Loan Shops</b>  H&amp;T Pawnbrokers, 63 Praed St, W2 1NS  Suttons &amp; Robertson Pawnbrokers London, 199 Edgware Rd, W2 1ES  Pawnbrokers London, 28-30 New Cavendish St, W1G 8TZ  New Bond Street Pawnbrokers, 5 Blenheim St, W1S 1LD</p> <p><b>Medical Centres, Care Homes and Mental Health facilities</b>  Lancaster Gate Medical Centre, 20-21 Leinster Terrace, W2 3ET  Paddington Green Health Centre, 4 Princess Louise Ct, W2 1LQ  H R Chinese Medicine Centre, 155 Edgware Rd, W2 2HR  Marble Arch MED Centre, 217 Edgware Rd, W2 1ES  Little Venice Medical Centre, 2 Crompton St, W2 1ND  Private Medical Services, 73 Edgware Rd, St George's Fields, W2 2HZ  Belgaum Medical Centre, 6 Bendall Mews, Marylebone, NW1 6SN  Crompton Medical Centre, 1 Crompton St, W2 1ND  MR Therapy Centre, Clarence Wing Basement, St Mary's Hospital, Praed Street, W2 1NY  The Medical &amp; Surgical Centre, 19 Edgware Rd, W2 2JE  The London Bariatric Centre, The Lindo Wing, St Mary's Hospital, Praed St, W2 1NY  London Medical, 49 Marylebone High St, W1U 5HJ  London Breast Pain Clinic, 516 S Wharf Rd, W2 1JB  Dr A Dodi - Bayswater Medical Centre, 46 Craven Rd, W2 3QA  Roodlane Medical part of HCA Healthcare UK - Baker St Clinic, 53-55 Baker St, W1U 8EW  London Obesity Clinic, 242 Marylebone Rd, NW1 6JQ  Cavendish Health Centre, 53 New Cavendish St, W1G 9TQ  Nightingale Hospital, 11-19 Lisson Grove, NW1 6SH  North Westminster Centre for Psychological Wellbeing, 11 Praed St, W2 1NJ</p> <p><b>Gambling premises</b>  William Hill, 95 Edgware Rd, W2 2HX  Ladbroke, 113, 115 Edgware Rd, St George's Fields, W2 2HX  William Hill, 181 Praed St, W2 1RH  Paddy Power, 242 Edgware Rd, W2 1DS  Coral, 395 Edgware Rd, St John's Wood, W2 1BT  Ladbroke, 382 Edgware Rd, Greater, W2 1EB  Coral, 9 Praed St, W2 1NJ  Ladbroke, 13 London St, W2 1HL  William Hill, 95, 97 Baker St, W1U 6RN</p>	<p>including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> <p><b>Deprivation</b>  Whilst the premise may be near or in an area of relative deprivation, Merkur Cashino 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 Cashino operates on the basis that its controls and best practice is adopted at all times, therefore it is not a question of degrees of vigilance being implemented in different areas.</p> <p><b>Homelessness</b>  Some premises are used by the homeless for warmth and company. Merkur Cashino 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 and YMCA to provide social responsibility information.</p>
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Ladbroke, 14-16 Great Central St, NW1 6JH  
 Bedford, 28 Baker St, W1U 3DP  
 William Hill, St James S Court, 75 Gloucester Terrace, W2 3DH  
 Bedford, 107 Baker St, W1U 6RP  
 Ladbroke, 14, 16 Great Central St, NW1 6JH  
 Ladbroke, 11A Thayer St, W1U 5LE  
 Ladbroke, 11A Thayer St, W1U 3JW  
 Ladbroke, 128 Gloucester Pl, NW1 5AD  
 William Hill, 21 James St, W1U 1DS  
 Mainstage Bingo, 233-237 Old Marylebone Rd, NW1 5QT  
 Grosvenor Casino, The Little Vic, 156 Edgware Rd, W2 2DS  
 Reel Time, 212 Edgware Rd, W2 1DH  
 Sportsman Casino, 16 Old Quebec St, W1H 7AF  
 Reel Island, 233, 237 Old Marylebone Rd, NW1 5QT  
 Grosvenor Casino, The Barracuda, 1 Baker St, W1U 8ED

**Residential Areas**

The area containing Edgware Road, Westminster, London consists predominantly of flats, mainly rented from private landlords (67%). 27% of properties are owned with or without a mortgage. Households are equally divided between single and multiple person's occupancy.

**Bus stops and other Transport links**

Bus stop, Burwood Place, W2 2DB  
 Edgware Road Station, London W2 1DX

**Locally Identified Premises**

Alexander Fleming Museum, 135a Praed St, W2 1QY  
 Madame Tussauds London, Marylebone Rd, NW1 5LR  
 The Park Gallery, 26 Connaught St, St George's Fields, W2 2AF  
 König London, 259 Old Marylebone Rd, NW1 5RA  
 Hai Gallery, 46A Harrowby St, W1H 5HT  
 Selma Feriani Gallery, 19 Connaught Square, St George's Fields, W2 2HJ  
 Serpentine Sackler Gallery, W Carriage Dr, W2 2AR  
 Lisson Gallery, 27 Bell St, NW1 5BY  
 Dellasposa Gallery, 2a Bathurst St, W2 2SD  
 The Peep Gallery, 46 Crawford St, W1H 1JT

**Public Houses and Alcohol Licensed Premise**

Sawyers Arms, 8 London St, W2 1HL  
 The Royal Exchange, 26 Sale Pl, W2 1PU  
 Fountains Abbey, 109 Praed St, W2 1RL  
 Urban Pubs and Bars, 40-42 Brendon St, W1H 5HE

	<p>Mitre Lancaster Gate, 24 Craven Terrace, W2 3QH  The Monkey Puzzle, 30 Southwick St, W2 1JQ  The Victoria, 10A Strathearn Pl, W2 2NH  Prince of Wales, 2 Cleveland Terrace, W2 6LH  The Mad Bishop &amp; Bear, 1st Floor, The Kiosk, W2 1HB  The Heron Bar and Restaurant, Norfolk Cres, W2 2DN  The Sussex Arms, 21 London St, W2 1HL  The Swan, 66 Bayswater Rd, W2 3PH  The Dickens Tavern, 25 London St, W2 1HH  The Globe Marylebone, 47 Lisson Grove, NW1 6UB</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><b>Crime statistics:</b>  Edgware Road, Westminster, W2 2DS is within the Hyde Park policing neighbourhood, under the Metropolitan Police Service force area. In the year ending June 2019, the crime rate in City of Westminster was higher than the average crime rate across similar areas like Islington, Camden or Kensington and Chelsea. There is a slight decrease in number of detailed crimes in the area since July 2019.  14 crimes have been reported on Edgware Road in June 2020 (Anti-social behaviour (10), Criminal damage and arson (1), Violence and sexual offence (3)). 648 took place within half a mile of the centre of W2 2DS. Crime incidents predominantly consisted of Anti-social behavior (254), Violence and sexual offences (111), Other theft (47) and Public Order (41).  There are no current policing priorities recorded for this area.</p> <p><b>Local Police:</b>  Awaiting update 05.06.20</p> <p><b>Public Houses and Alcohol Licensed Premise</b>  Sawyers Arms, 8 London St, W2 1HL  The Royal Exchange, 26 Sale Pl, W2 1PU  Fountains Abbey, 109 Praed St, W2 1RL  Urban Pubs and Bars, 40-42 Brendon St, W1H 5HE  Mitre Lancaster Gate, 24 Craven Terrace, W2 3QH  The Monkey Puzzle, 30 Southwick St, W2 1JQ  The Victoria, 10A Strathearn Pl, W2 2NH  Prince of Wales, 2 Cleveland Terrace, W2 6LH  The Mad Bishop &amp; Bear, 1st Floor, The Kiosk, W2 1HB  The Heron Bar and Restaurant, Norfolk Cres, W2 2DN  The Sussex Arms, 21 London St, W2 1HL  The Swan, 66 Bayswater Rd, W2 3PH</p>	<p><b>Premise Security and violence in the workplace</b>  <i>Poor security control measures which may increase vulnerability to crime</i></p> <p><i>Failure to protect employee and customers from harm during the hours of late night opening</i></p> <p>Merkur Cashino Edgware Road is subject to a separate security risk assessment, local factors are considered and proportionate control measures/physical security measures are installed.</p> <p>Merkur Cashino Edgware Road 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 regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p><b>General Crime and Disorder</b>  <i>To identify aggressive customers to prevent crime and disorder</i></p> <p><i>Awareness of local crime issues in the local area</i>  We have reviewed the Police.UK hot-spot mapping for Hyde Park 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 Metropolitan Police Service over reducing our involvement in any incident.</p>

<p>The Dickens Tavern, 25 London St, W2 1HH The Globe Marylebone, 47 Lisson Grove, NW1 6UB</p> <p><b>Pawnbrokers and Loan Shops</b> H&amp;T Pawnbrokers, 63 Praed St, W2 1NS Suttons &amp; Robertson Pawnbrokers London, 199 Edgware Rd, W2 1ES Pawnbrokers London, 28-30 New Cavendish St, W1G 8TZ New Bond Street Pawnbrokers, 5 Blenheim St, W1S 1LD</p> <p><b>Gambling premises</b> William Hill, 95 Edgware Rd, W2 2HX Ladbroke, 113, 115 Edgware Rd, St George's Fields, W2 2HX William Hill, 181 Praed St, W2 1RH Paddy Power, 242 Edgware Rd, W2 1DS Coral, 395 Edgware Rd, St John's Wood, W2 1BT Ladbroke, 382 Edgware Rd, Greater, W2 1EB Coral, 9 Praed St, W2 1NJ Ladbroke, 13 London St, W2 1HL William Hill, 95, 97 Baker St, W1U 6RN Ladbroke, 14-16 Great Central St, NW1 6JH Betfred, 28 Baker St, W1U 3DP William Hill, St James S Court, 75 Gloucester Terrace, W2 3DH Betfred, 107 Baker St, W1U 6RP Ladbroke, 14, 16 Great Central St, NW1 6JH Ladbroke, 11A Thayer St, W1U 5LE Ladbroke, 11A Thayer St, W1U 3JW Ladbroke, 128 Gloucester Pl, NW1 5AD William Hill, 21 James St, W1U 1DS Mainstage Bingo, 233-237 Old Marylebone Rd, NW1 5QT Grosvenor Casino, The Little Vic, 156 Edgware Rd, W2 2DS Reel Time, 212 Edgware Rd, W2 1DH Sportsman Casino, 16 Old Quebec St, W1H 7AF Reel Island, 233, 237 Old Marylebone Rd, NW1 5QT Grosvenor Casino, The Barracuda, 1 Baker St, W1U 8ED</p> <p><b>Residential Areas (Impacted by Anti-Social Behaviour)</b> The area containing Edgware Road, Westminster, London consists predominantly of flats, mainly rented from private landlords (67%), 27% of properties are owned with or without a mortgage. Households are equally divided between single and multiple person's occupancy.</p>	<p>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.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p> <p>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.</p> <p>Merkur Cashino Edgware Road 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.</p> <p><b>Anti-social behaviour outside the premise</b> Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Cashino 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.</p> <p>Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p> <p>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.</p>	<p>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.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p> <p>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.</p> <p>Merkur Cashino Edgware Road 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.</p> <p><b>Anti-social behaviour outside the premise</b> Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Cashino 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.</p> <p>Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p> <p>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.</p>
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There was a high volume of anti- social behavior incidents reported in this area in June 2020. 10 on Edgware Road and 254 within half a mile.

**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 Cashino has a designated Anti Money Laundering Officer (AMLO) and AML polices with clear escalation and reporting processes.

There are 4 pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, 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 be maintained at all times and subject to regular review and risk assessment.

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

Merkur Cashino Edgware Road 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 machines and change machines.

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.

	<p>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.</p> <p><b>Alcohol and Drugs</b></p> <p>Anti-social behaviour 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.</p> <p>'No Alcohol Allowed' signage on the door.</p> <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 behaviour, any such incident will be logged on the IHLSMART 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><b>Money Lending</b></p> <p>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><b>Bingo/Gaming Machine and Supervision</b></p> <p>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.</p> <p><b>Customer Complaints</b></p> <p>Failure to prevent customers complaints and disputes regarding gambling within our premises</p>

	<p><i>Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Cashino operate a clear customer complaints policy both within venues and via a customer complaints link on the 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 management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p> <p>Complaints portal used to collate and manage responses.</p> <p>4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints.</p> <p>Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p><b>Marketing</b></p> <p>Merkur Cashino promote responsible gambling and social responsibility throughout all marketing campaigns.</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>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><b>Ethnicity and Local Area Demographic</b></p> <p>Merkur Cashino 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 Cashino takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p><b>Places of worship and Religious Buildings</b></p> <p>Central London Seventh-day Adventist Church, Crawford Pl, W1H 5JE  Adventist Church Seven Days, 39 Brendon St, W1H 5JE  St Mary's Church, 255 Old Marylebone Rd, NW1 5QT  St Mary's Church, Little Venice, St Mary's Square, W2 1NB  South England Conference of Adventist, 37-39 Brendon St, W1H 5JE  St James's Church, Sussex Gardens, Sussex Gardens, W2 3UD  Igreja Adventista do Sétimo Dia , 39 Brendon St, W1H 5HD  Father's Michael Church, 209 Old Marylebone Rd, NW1 5QT</p>

<p>Merkur Cashino 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><b>Training &amp; Social Responsibility</b></p> <p>Merkur Cashino take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</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><b>COVID 19</b></p> <p>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>	<p>CELP - Conselho Europeu de Lingua Portuguesa, 39 Brendon St, W1H 5HD</p> <p>St Mary's Churchyard, Paddington Green, W2 1NB</p> <p>St John's Church, 18 Hyde Park Cres, W2 2QD</p> <p>Christ Church of England, 35 Cosway St, NW1 5BT</p> <p>St Mary's Church London, Wyndham Pl, York St, W1H 1PQ</p> <p>Eleventh Church of Christian Scientists, 91 Seymour Pl, W1H 5TG</p> <p>Saint David's Welsh Church, 2 St Mary's Terrace, W2 15F</p> <p>Church of the Annunciation of the Virgin Mary, 5 Craven Hill, W2 3EN</p> <p>Abrar Foundation, 45 Crawford Pl, W1H 4LP</p> <p>The Swedish Church in London, 6 Harcourt St, W1H 4AG</p> <p>Annunciation Marble Arch, Bryanston St, Marble Arch, W1H 7AH</p> <p>Central Pentecostal Church, 141 Harrow Rd, W2 1JP</p> <p>Repossession Saviour, 94-96 Seymour Pl, W1H 1NB</p> <p>St Mary's, Bryanston Square, 38 Crawford St, W1H 1HA</p> <p>St Paul's Church, 5 Rossmore Rd, NW1 6NJ</p> <p>St Marylebone Parish Church, 17 Marylebone Rd, NW1 5LT</p> <p>St James' Roman Catholic Church, 22 Spanish Pl, George St, W1U 3QY</p> <p>Tyburn Convent and Church, 8-9 Hyde Park Pl, W2 2LJ</p> <p>Greek Orthodox Archdiocese of Thyateira and Great Britain, Thyateira House, 5 Craven Hill, W2 3EN</p> <p>Masjid Salahuddin, 1 Norfolk Pl, W2 1QN</p> <p>Prayer Room Mosque, 432 Edgware Rd, W2 1EG</p> <p>Malaysia Hall Prayer Room, 30-34 Queensborough Terrace, W2 3ST</p>	
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**Merkur Cashino Edgware Road Premise Layout**

<b>Premise level:</b>	Merkur Cashino Edgware Road is a ground floor premises.
<b>Premise frontage:</b>	Merkur Cashino Edgware Road will be a property 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)
<b>Counter Position:</b>	Merkur Cashino Edgware Road will have a floor layout will be designed to avoid blind spots to 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.
<b>Floor layout:</b>	Merkur Cashino Edgware Road 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.
<b>Machine Positions:</b>	Merkur Cashino Edgware Road 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.
<b>Hidden Areas:</b>	Merkur Cashino Edgware Road 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**

We were required to complete a Local Area Risk Assessment for the new Merkur Casino premises in Edgware Road. We have researched the area and then visited it before completing this assessment. We have both worked in the Gaming Industry for many years. Over the past 10-15 years we have gained experience working first in operations within numerous Adult Gaming Centres across London, including Ealing, Acton, Southall, Wembley, Shepherds Bush, Holloway and more. Karolina White has also worked as a deputy manager in Gala Bingo in Basingstoke and Enfield, London. We have spent a number of years working as part of an Income Protection team, carrying out cash collections in the London area and many towns and cities all over the country. In 2019 we both joined the Audit and Compliance department and are responsible for conducting audits across all areas of the operation including, Regulatory Compliance, Internal Procedural Audits, Risk Assessments and Investigations.

We fully understand how some neighbourhoods could prove challenging due to different levels of deprivation and ethnic diversity and how important it is to have safety measures in place to, as an operator, to minimize the risk to potential customers and employees. (Internal Compliance Auditors).

Praesepe Group already operate one other premise under London Borough of Barnet Local Authority, Beacon Bingo, Cricklewood Broadway, NW2 3DU. This premise has 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 a number of 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 premises 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 taken into account 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 behaviour; even where particular groups are identified through research at being at greater risk of gambling-related harm.

<b>Assessors Name:</b>	Agnieszka Szczerkowska, Karolina White – Internal Compliance Auditors
<b>Signature (Reviewer):</b>	
<b>Date:</b>	21/08/20

# Merkur Cashino, 182-184 Edgware Road, W2 2DS



# 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 <b>MUST NOT</b> be misleading or indecent  | SHORTEST SKIRT<br>GUARANTEES WIN!   |    |
| 2. All our advertising and promotions must be socially responsible and <b>NOT</b> promote gambling for financial gain  | PLAY THIS & DOUBLE<br>YOUR MONEY  |    |
| 3. All our advertising and promotions must be <b>TRANSPARENT</b> and clearly state the offer and any requirements or conditions applied to obtaining it  | YOU WILL WIN<br>A FORTUNE!<br><small>(no terms or conditions)</small>   |    |
| 4. Any terms or conditions related to the offer, including offer end dates <b>MUST BE</b> displayed clearly at the point-of-sale and/or on any related printed literature or publicity materials   | BEST BEFORE<br>END 2020   |  |
| 5. Any printed literature, display or point-of-sale material <b>MUST</b> 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  | OVER  ONLY   |  |
| 6. Advertising and promotions <b>MUST NOT</b> be targeted at, or exploit children, or those vulnerable to gambling. The law states :<br>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   | THINK  +   |  |
| 8. <b>DO NOT</b> make purchase a condition of entry into a draw or raffle – buying a 'chance' of winning is a lottery, so always state <b>NO PURCHASE NECESSARY</b> (even if for charitable causes)  | FREE TO<br>ENTER?   |  |
| 9. <b>DO NOT</b> present offers which reward extended play or incentivise disproportionate stake levels  | PLAY LONGER<br>WIN MORE   |  |
| 10. <b>ALWAYS</b> 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)





### 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.



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 <b>MUST</b> be operated by ALL staff and only recognised proof of age accepted (for example photo driving licence or passport; PASS cards)</p> 	<p>Signage <b>MUST BE</b> prominently displayed at all points of entry regarding the prohibition of under 18's</p> 	<p>Signage <b>MUST BE</b> 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**

# 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?

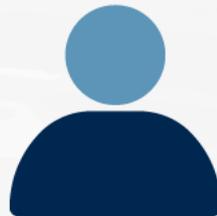
Bingo is one of the UK's favourite pastimes and Praesepe is one of the UK's largest operators of licensed bingo and arcade premises. Our High Street Bingo Venues:



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

## Think 25 Messaging



## Players in Venue



# RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

## 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

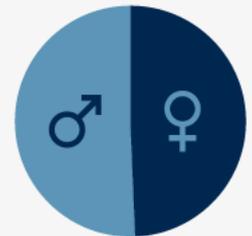
Praesepe is regulated by the  
Gambling Commission and  
Licensing Authorities



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.

page 87

## 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.

**Praesepe PLC**

Seebeck House

1A Seebeck Place

Knowlhill

Milton Keynes

MK5 8FR

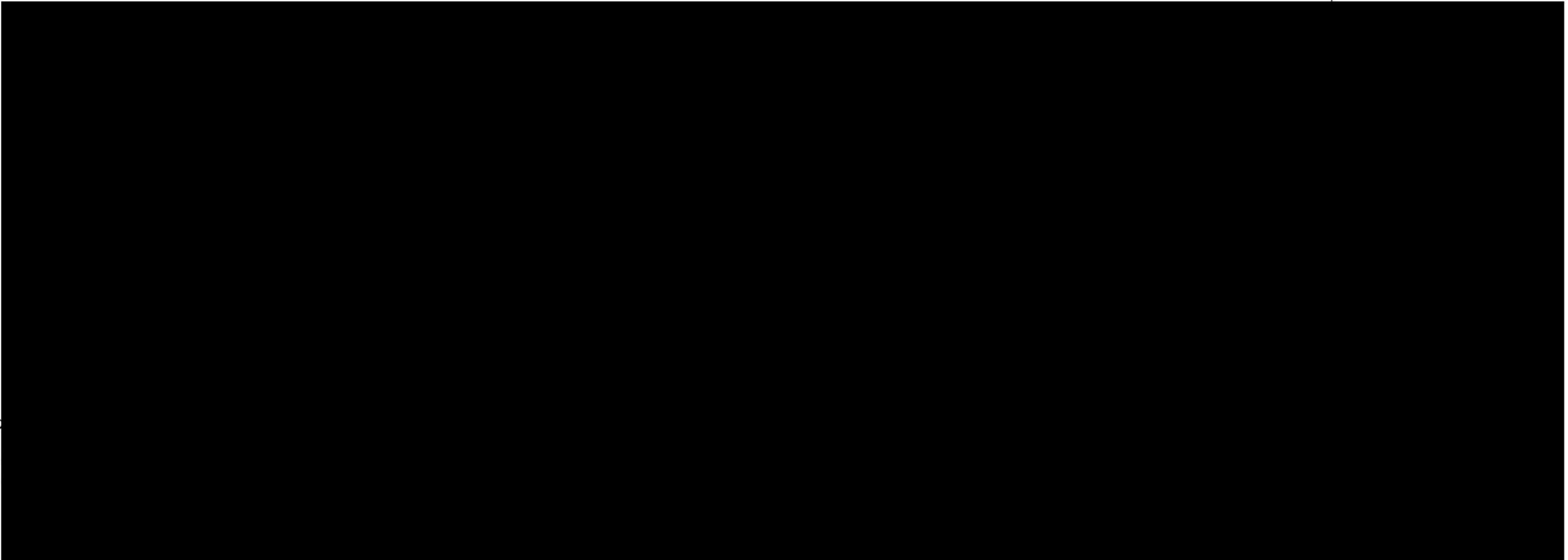
**phone** 01908 351200

**email** [info@praesepeplc.com](mailto:info@praesepeplc.com)



**Please contact us.**

# CCTV – Ground Floor



Site Address:

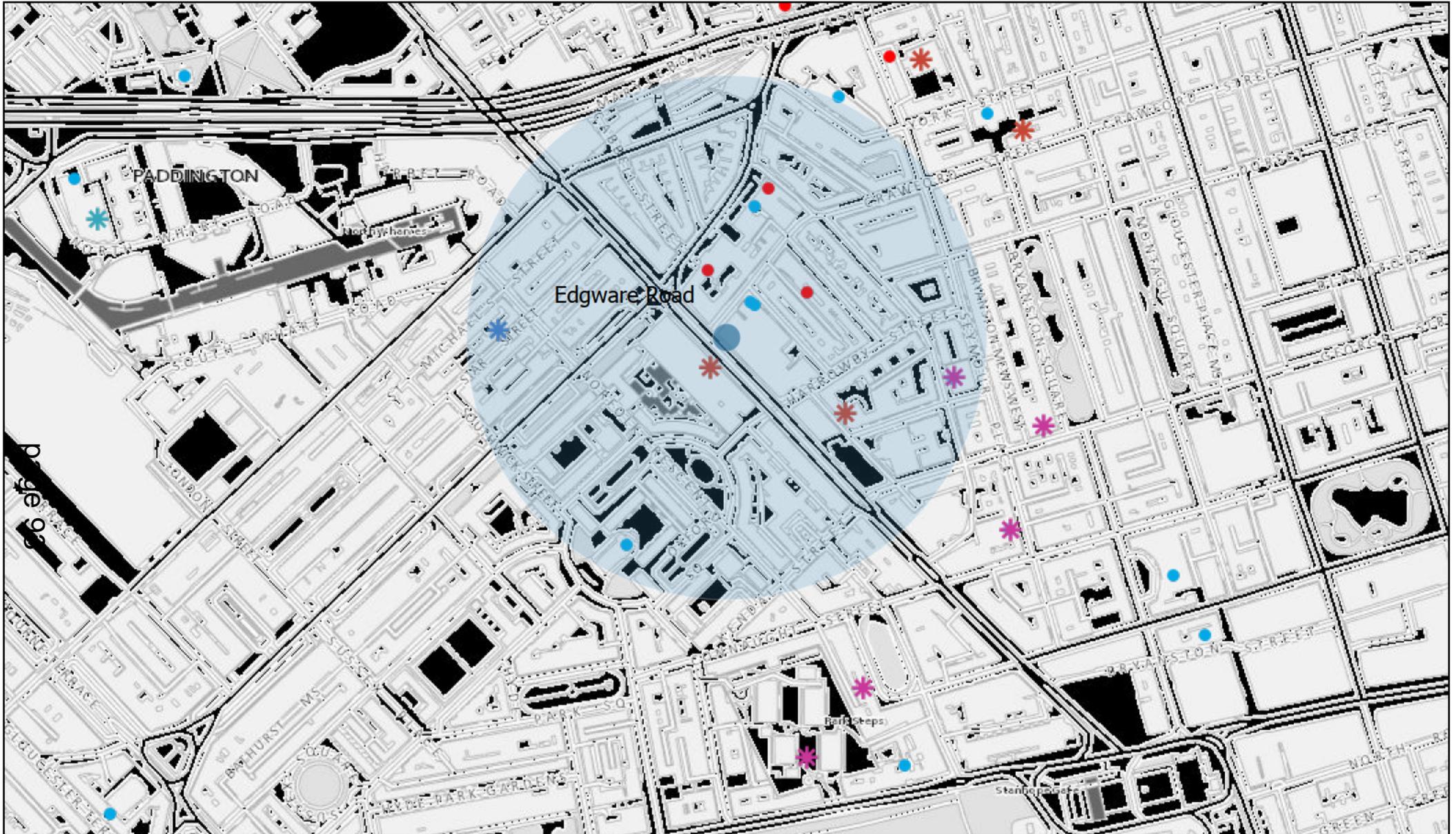
Cashino Edgware Road  
182-184 Edgware Road  
London  
W2 2DS

Drawing Number: EGD-CG-01

Date: 15/10/2020

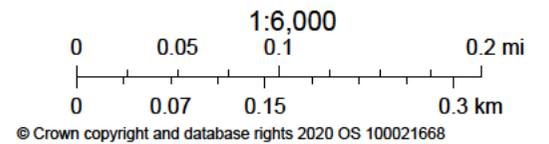


# Merkur Cashino



22/09/2020 13:48:23

- Hostels - Special Needs Schemes
- Faith Groups
- Schools
- ★ Others
- ★ Academy
- ★ Primary
- ★ Free School
- ★ Secondary
- ★ Special
- ★ Independent
- ★ Nursery





Street View of 182-184 Edgware Road London – Appendix 1

<b>Licence Number</b>	<b>Application Type</b>	<b>Date Determined</b>	<b>Decision</b>
07/05902/LIGCF	Application for a New Betting Shop	31 August 2007	Granted under delegated authority
12/02180/LIGV	Application to vary the Betting Shop Licence	12 December 2012	Granted by Magistrates Court following an appeal
12/02180/LIGV		29 August 2019	Licence Surrendered

## CONDITIONS CONSISTENT WITH THE OPERATING SCHEDULE AND CONDITIONS PROPOSED BY A PARTY TO THE HEARING

When determining an application for a new premises licence under the provisions of the Gambling Act 2005, the licensing authority must, unless it decides to reject the application, grant the licence subject to the conditions which are indicated as mandatory in this schedule.

At a hearing the licensing authority may, in addition, and having regard to any representations received, grant the licence subject to such conditions which are consistent with the operating schedule submitted by the applicant as part of their application, or alter or omit these conditions, or add any new condition to such extent as the licensing authority considers necessary for the promotion of the licensing objectives.

This schedule lists those conditions which are consistent with the operating schedule, or proposed as necessary for the promotion of the licensing objectives by a responsible authority or an interested party as indicated. These conditions have not been submitted by the licensing service but reflect the positions of the applicant, responsible authority or interested party and have not necessarily been agreed

### Mandatory Conditions

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.

#### **Default conditions attaching to bingo premises licences**

7. Subject to paragraph 2, no facilities for gambling shall be provided on the premises between the hours of midnight and 9am.

#### **The applicant has requested to disapply this condition**

8. The condition in paragraph 1 shall not apply to making gaming machines available for use.

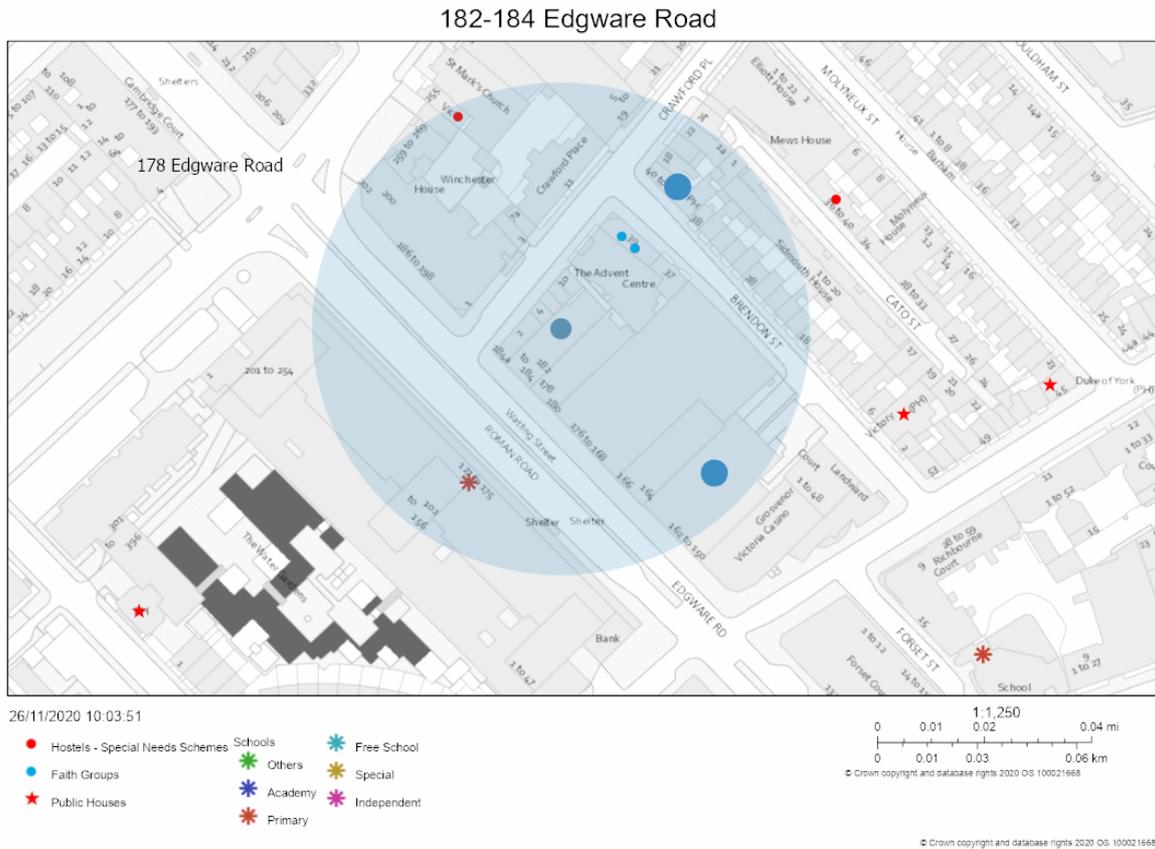
#### **Conditions proposed by the Police and agreed by the applicant to form part of the operating schedule**

9. The premises shall install and maintain a comprehensive CCTV system as per the minimum requirements of the Westminster Police Licensing Team. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises and will include the external area immediately outside the premises entrance. 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 throughout the entire 31-day period.

10. A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises is open. This staff

member must be able to provide a Police or authorised council officer copies of recent CCTV images or data with the absolute minimum of delay when requested.

11. Notices shall be prominently displayed within the premises stating that CCTV is in operation.
12. An incident log shall be kept at the premises and made available on request to an authorised officer of the Licensing Authority or the Police. Details to include:
  - a. all crimes reported to the venue
  - b. all ejections of patrons
  - c. any complaints received concerning crime and disorder
  - d. any incidents of disorder
  - e. all seizures of drugs or offensive weapons
  - f. any visit by a relevant authority or emergency service.
  - g. any attempts by children and young persons to gain access to the premises to gamble
  - h. any Challenge 25 Refusals
  - i. Any faults with the CCTV system
13. 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.
14. Signage advertising the aforementioned proof of age scheme shall be prominently displayed throughout the premises.
15. There shall be no pre-planned single staffing at the premises from 12:00 until closing and no single staffing from 20:00 until closing.
16. There shall be a fully operational magnetic door locking system (Maglock) available for staff use at all times.
17. If trading past midnight the Maglock will always be in use.
18. Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises.
19. The licensee shall participate in local Betwatch or similar scheme, where available, to promote knowledge sharing within the local industry, with particular regard to local risk but also to promote best practice.
20. The licensee shall take reasonable steps to prevent nuisance directly outside the Premises.
21. Notices will be prominently displayed in the premises requesting customers to leave quietly and respect the residential nature of the area.
22. Clear and legible notices must be prominently displayed at any area used for smoking requesting customers to respect the needs of local residents and use the area quietly.



Resident Count: 121

Licensed Premises				
Licence Number	Trading Name	Address	Application Type	Premises Type
10/09311/LIPRW	Salwa Takeaway	4 Crawford Place London W1H 5NB	Takeaway food outlet	Monday to Sunday; 07:00 - 05:00
16/06140/LIPT	McDonald's	178 - 180 Edgware Road London W2 2DS	Restaurant	Monday to Sunday; 05:00 - 00:00
19/11644/LIPDPS	Waitrose	168 - 176 Edgware Road London W2 2DS	Shop	Monday to Sunday; 08:00 - 23:00
09/05903/LIPV	Melur Malaysian Restaurant	175A Edgware Road London W2 1ET	Restaurant	Monday to Sunday; 12:00 - 04:00
15/04057/LIPN	Raging Ball Sports Club (Basement)	Raging Ball Snooker Club 159 - 163 Edgware Road London W2 2HR	Snooker hall or club	Monday to Sunday; 00:00 - 00:00

19/11257/LIPT	Tarboush	143 Edgware Road London W2 2HR	Restaurant	Monday to Saturday; 10:00 - 01:30   Sunday; 12:00 - 00:00
16/08626/LIPRW	Fratelli La Bufala	161 Edgware Road London W2 2HR	Restaurant	Monday to Sunday; 11:00 - 01:00
19/06024/LIPDPS	Lord Wargrave	40-42 Brendon Street London W1H 5HE	Public house or pub restaurant	Monday to Saturday; 10:00 - 23:30   Sunday; 10:00 - 23:00
20/02574/LIPV	The Coffee Shop	150 - 162 Edgware Road London W2 2DT	Large Casino	Monday to Sunday; 00:00 - 00:00
20/02616/LIPV	The Poker Room	Second Floor 150 Edgware Road London W2 2DT	Casino or gambling club	Monday to Sunday; 00:00 - 00:00
20/02611/LIPV	Grosvenor Victoria Casino	150 - 162 Edgware Road London W2 2DT	Casino or gambling club	Monday to Sunday; 00:00 - 00:00
20/02639/LIGV	The Poker Room	150 - 162 Edgware Road London W2 2DT	Casino or gambling club	Monday to Sunday; 00:00 - 00:00
20/02608/LIGV	Grosvenor Victoria Casino	150 - 162 Edgware Road London W2 2DT	Casino or gambling club	Monday to Sunday; 00:00 - 00:00
20/01617/LIGV	The Little Vic Casino	156 Edgware Road London W2 2DS	Adult Gaming Centre	