

**MERKUR SLOTS, 11 – 13 MARKET PLACE, NEWBURY, RG14 5AA**

**LICENSING SUB-COMMITTEE HEARING**

**MONDAY 9<sup>TH</sup> NOVEMBER 2020 AT 10:00**

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**LICENSING SUB - COMMITTEE HEARING –9<sup>TH</sup> NOVEMBER 2020**

**SUPPLEMENTAL STATEMENT – AMANDA KIERNAN**

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**Cashino Gaming Limited**

1. Cashino Gaming Limited operates a national estate of over 170 licensed bingo, adult gaming centre and family entertainment centre premises
2. Cashino Gaming Limited is a leading national operator of bingo premises with clear and proactive policies to promote the Gambling Licensing Objectives. We always endeavour to liaise with Responsible Authorities concerning the operation of our premises and pre-consult with the police prior to making new applications.
3. Cashino Gaming Limited has full authority to provide bingo facilities through the grant of an Operating Licence issued by the Gambling Commission, which has approved the measures which Cashino Gaming Limited has put in place to ensure that it implements effective anti-money laundering procedures, security procedures and trades responsibly in accordance with gambling legislation, the Licensing Objectives and the Licence Conditions and Codes of Practice.
4. Cashino Gaming has never had a review of a bingo premises licence.
5. Cashino Gaming Limited holds key positions within the Bingo Association and BACTA (the trade association for the amusement and gaming machine industry in the UK) Executive and Social Responsibility Committees, working closely with these groups to innovate and promote Compliance and Social Responsibility within the industry.
6. Cashino Gaming Limited has 50 Personal Management Licence Holders throughout its Operational structure, all of which are aware of their roles and responsibilities in regard to the Licence Conditions and Codes of Practice (LCCP). Legal obligations are placed upon personal licence holders to promote the Licensing Objectives whilst undertaking their respective duties.
7. Cashino Gaming Limited has appointed a dedicated team of compliance auditors that work independently of the Company's Operations Team to continually assess premises' compliance with the governing legislative standards and Company Policy and Procedure. The Company conducts a minimum of two compliance audits per year in each venue. Audits include Regulatory Compliance, Customer Interaction, Incidents, Self-exclusion breaches and Age Verification records. During the audits, premises staff are tested on their level of knowledge and understanding of all relevant criteria. Venues may be re-visited and any additional training needs addressed. Records of incidents, interactions, self-exclusion breaches and age verification checks are collated on a central hub, which is regularly reviewed and monthly reports are provided to Operations Teams.
8. Cashino Gaming Limited operates a strict marketing and promotional guidelines policy, which has been developed in accordance with the Gambling Commission's Licence Conditions and Codes of Practice and the Advertising Standards Authority's Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP) Codes. A copy of the Company's Marketing Code of Practice is attached (Exhibit AK1).
9. Venue window displays are designed in consideration of premises location, particularly in busy high street areas where Children and Young Persons may pass by, and maintain the Company's focus that all gambling should be carried out in a socially responsible manner. Direct line of sight into premises is blocked by appropriate window displays and

barriers adjacent to entrances, which minimise exposure of underage individuals to ambient gambling.

#### **Relationship with the Responsible Authorities and Interested Parties**

10. Cashino Gaming Limited takes its duty to operate safe and Gambling Act 2005 compliant premises seriously. To this end, the Company has always sought to maintain good relations with local police and licensing authority teams.
11. For the purposes of the current application the local Police Licensing team were initially consulted in June 2020.
12. Gary Clark of Thames Valley Police identified that there were some local concerns regarding general crime due to the busy town centre location albeit not associated with any gambling premises. Gary was encouraged that the premises would increase security in the area as a result of the extensive CCTV system that would be operated on site. The police were not aware of any concerns or issues during the premises prior operation under a betting (other) premises licence and did not raise any specific concerns regarding the bingo premises licence proposals. The police licensing team did not identify any concerns of crime or disorder associated with gambling premises.
13. Throughout the 28 day consultation period, none of the Responsible Authorities under the Gambling Act 2005, those of most relevance being the Licensing Authority, local Police, Gambling Commission, Environmental Health and Child Protection teams, have raised any concerns regarding Cashino Gaming Limited's bingo premises licence proposals. None have objected.
14. During the consultation period no trade body or organisation specialising in adult or child vulnerability support have raised any concerns regarding Cashino Gaming Limited's proposals for the new bingo premises.
15. No evidence has been provided to suggest that the grant of the new bingo premises licence would have a detrimental effect on the local population, with particular regard to vulnerability, and Cashino Gaming Limited's detailed policies and procedures are designed to ensure that all gambling in Company premises remains responsible, controlled and that the Licensing Objectives are continually promoted.
16. Cashino Gaming Limited has considered the police licensing team's comments, local police crime statistics and the premises location along with the Council's Statement of Licensing Principles. The Company has also considered the concerns raised by the Interested Parties and an amended local area risk assessment has been provided along with a number of proposed licence conditions.
17. Lines of communication will be maintained with the local police to ensure that local knowledge is continuously shared and that the premises adapt to any emerging risks or local concerns identified.
18. We have identified a number of local providers of vulnerability support services within the local area risk assessment including those that provide support to homeless individuals. Whilst none of those organisations have raised any concerns regarding the current proposals, the Company will contact organisations to offer information regarding responsible play and gambling addiction support services and will invite feedback on any local concerns that can be incorporated into premises training and evaluation.

#### **Cashino Gaming Limited Compliance – Protection of Children and Vulnerable**

19. Cashino Gaming Limited was selected by the Gambling Commission as one of the first



top 40 licensees to prepare an annual assurance statement due its size and scale of operation. Annual Assurance Statements enable an annual comprehensive review of the business, completed at Board level, in consideration of the effectiveness of the Company's governance and risk management arrangements designed to facilitate positive consumer protection, address gambling-related harm and crime prevention measures. This process ensures that the highest standards are implemented across the Company's estate from Board through to premises level.

20. In August 2020, Praesepe Limited, Cashino Gaming Limited's parent Company and Cashino Gaming Limited's Merkur brand premises obtained G4 Global Gambling Guidance Group accreditation (Exhibit AK2). G4 is a group of international experts in the field of problem gambling and responsible gambling and accreditation is awarded to responsible operators. Audit reports identified that 'Customer care is of an exemplary standard in all Merkur Venues, regulatory compliance policies and procedures are excellent...and provide a strong foundation for consistent approaches to Responsible Gambling across the (Company's) estate'.
21. Cashino Gaming Limited operates training upon recruitment and then 6-monthly refresher training programmes for all employees. Training modules include 'The Essentials of Compliance and Social Responsibility' which covers the Gambling Act 2005, Licence Conditions and Codes of Practice, the Licensing Objectives under the Gambling Act 2005 and 'Safeguarding Children & Vulnerable People', which focus on assisting staff to recognise and respond to indicative behaviours of potential problem gambling and vulnerability and how to conduct effective customer interaction. Excerpts from the Company's training platform are provided at Exhibit AK3.
22. Cashino Gaming Limited have two National Training Centres where venue teams receive face to face training which includes identifying signs of potential problem gambling and other vulnerabilities such as homelessness. Staff are rigorously trained to take appropriate action, such as where to offer gambling control support including managing time spent playing (time outs), controlling stake limits, providing information on gambling support agencies such as GambleAware, offering participation in the Bingo Association's national self-exclusion scheme and refusing service where deemed necessary
23. Cashino Gaming Limited ensures that all staff continue to promote responsible gambling through customer behaviour observation and interaction. As part of this process, customer play, duration and spend is monitored and customer interactions are triggered to ensure play remains responsible.
24. Following a customer interaction, customers may be offered a variety of self-help measures, where appropriate, such as the Playright App to control and monitor spend and time spent gambling, time outs, information regarding gambling support services and self-exclusion. For customers deemed to be at risk who do not agree to self-exclusion we reserve the right to bar customers, should the need arise.
25. All Cashino Gaming Limited's training and compliance policies and procedures have been audited by the Gambling Commission and comply with the Operating Licence conditions.
26. As part of Cashino Gaming Limited's continuing commitment to high standards of staff training and compliance, the Company has engaged the services of YGAM (Young Gamers & Gamblers Education Trust). The charity is to develop and provide additional training and resources for venue and area managers. Training will be designed to complement our existing face to face training and will be City and Guilds accredited.
27. Cashino Gaming Limited promotes the use of the customer self-help tool called Playright. All venues have the capability for customers to sign up to the App and staff are fully

trained and able to advise on its use. This responsible gambling tool enables customers to set time limits on their machine play. Subject to the customers' set permissions, the system has the ability to send an alert to the venue should the customer enter at a time they have chosen not to gamble. This alert would then trigger a customer interaction.

28. All Cashino Gaming Limited's bingo premises are adult only and operate a strict Challenge 25 policy. Age verification procedures are embedded in Company training platforms and responsible gambling policies. Age verification test purchasing and mystery shopper visits are frequently carried out by third party companies (Check Policy and Store Checker).
29. Extracts of Cashino Gaming Limited's Compliance and Social Responsibility policy have been included with our hearing documentation, which highlight the priority given to responsible gambling and the provision of responsible gambling information to our customers and staff members.

### **Proposed site location**

30. An amended, detailed local area risk assessment has been submitted designed in consideration of West Berkshire Council's Statement of Principles under the Gambling Act 2005 (2019-2022), local crime statistics, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder.
31. Cashino Gaming Limited operates in many high street and other locations, which are subject to potentially higher levels of footfall from Children and Young Persons. Staff training and company policy is designed to mitigate the potential risk of underage gambling and exposure to ambient gambling.
32. Potential risks identified by analysis of local area vulnerability statistics have been incorporated in to the premises' local area risk assessment.
33. It is rare for our premises to be associated with anti-social behaviour or crime and disorder but our staff training procedures and security measures, including external CCTV, are designed to monitor customer behaviour and external areas for anti-social behaviour. Company policy ensures that appropriate steps are taken to minimise any risks and we record and report any incidents or concerns to Company management, for internal review and assessment, and local authorities.
34. All staff training is developed to consider local area characteristics and Merkur Slots operates on the basis that its controls and best practice are adopted at all times. Cashino Gaming Limited's training scheme and control systems are proven to be effective across the Company's licensed estate but local premises management will always work with any local authorities, other authorities, trade groups and vulnerability support services to reinforce any local concerns and identify any emerging local risks within premises' training and operation.
35. The representations received raise potential concerns regarding homeless and vulnerable adults in the vicinity of the premises and the potential for increased anti-social behaviour and crime and disorder should the Licensing Sub-Committee be minded to grant the current application. Cashino Gaming Limited has completed an updated, detailed local area risk assessment, reviewed local area statistics and demographics, and consulted with the local police licensing team in order to effectively identify any potential risks to the proposed operation. Cashino Gaming Limited will implement robust security policies and procedures to monitor customer behaviour both within the premises and immediately outside the venue, refuse service to individuals who may be under the influence of alcohol or drugs and work in partnership with the local police in the unlikely event that any incidents of crime or disorder occur. The Company's detailed training procedures and evaluation tools have been designed to mitigate any local risk to the

Licensing Objectives, with a particular focus on the protection of children and the vulnerable from harms associated with gambling. Having considered the concerns raised, Cashino Gaming Limited has proposed a number of licence conditions to further mitigate any perceived risk.

36. Due to the nature of the gaming that is provided at Cashino Gaming Limited venues, it is rare for customers to congregate outside, unlike betting premises, as there is no ongoing entertainment such as a sporting event. It is also rare for our venues to have significant customer numbers at any one time and customer dispersal rarely causes concerns to our local neighbors. However, in consideration of the concerns raised by the Interested Parties, Cashino Gaming Limited has prepared an Operational Management Plan, which includes details of customer signage and the premises approach to customer dispersal.

### **Premises Operation**

37. The premises will be managed by an experienced shop manager who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role. Training focuses on the promotion of the Licensing Objectives and a copy our Policies and Procedures has been provided as part of our hearing bundle.
38. The Merkur Slots premises layout has been developed to facilitate customer observation and all staff members provide regular sweeps of the premises to ensure positive engagement with our customers and facilitate continuous observation and customer interaction.
39. Merkur Slots staff members are not restricted to counter positions that may be found in other licensed venues, such as betting premises. Our staff are actively encouraged to move throughout the premises and proactively engage with all customers, particularly on entry, not only to implement our Challenge 25 policy, but to build customer relationships and ensure effective identification of potentially vulnerable individuals.
40. All Cashino Gaming Limited's staff members actively monitor and manage the area immediately outside their premises and record all incidents should they occur. Reporting lines are set up with local police teams to ensure that any potential local issues are identified and addressed.
41. All Cashino Gaming Limited premises operate extensive CCTV throughout customer facing areas and also external areas to assist with monitoring customer behaviour and that of other individuals in the immediate vicinity of the premises. CCTV displays are appropriately situated to ensure that all customer areas are monitored.
42. It is very rare for our premises to employ dedicated SIA registered door staff as in our experience this almost never necessary. We do not have SIA conditions on any of our bingo premises licences. However, staff numbers and rotas are continuously reviewed to adapt to customer numbers and cognisance is taken of police advice should any particular local concerns be identified. At present, the local police licensing team has not identified any particular concerns regarding crime and disorder in the vicinity of the proposed venue or its association with existing licensed gambling venues.
43. Cashino Gaming Limited premises are willing to actively participate in a local area Betwatch scheme, should it be setup in the future. This ensures that a partnership approach is taken, engaging with local residents, gambling operators, the alcohol licensed trade, other businesses and Responsible Authorities to assist with the identification and management of any local issues, which may not necessarily relate to gambling premises.

## **Conclusion**

44. The business of Cashino Gaming Limited is the provision of safe and pleasant gaming environments. It remains crucial to the business that customers feel safe and welcome in Merkur bingo premises. This principle is fundamental to Company management strategy from head office to premises level. It is a principle which as a company we have achieved in all of our venues, which provide safe, welcoming and congenial environments for our customers.
45. In the rare case that issues do arise, the resources and commitment are in place to ensure that they are speedily resolved. For obvious reasons, Cashino Gaming Limited does not wish to run licensed venues which cause regulatory issues, and the Company devotes a great deal of time and resources to ensuring that there are none.
46. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
47. In my experience I can state that it is rare for bingo premises to be the cause of, or otherwise associated with, crime, disorder or nuisance to nearby premises due to the nature of our gaming premises and our customer base.
48. Cashino Gaming Limited continues to take very seriously any issue which its presence creates, both out of respect for the local community and because its licence and commercial reputation depends upon it.

Ms Amanda Kiernan, Head of Compliance, Cashino Gaming Limited

Date: 2<sup>nd</sup> November 2020

# MARKETING CODE of PRACTICE

A guide to getting our advertising and promotions right – every time !

The Marketing Department provides an annual programme of National promotions activity. All these communications and point-of-sale/display materials are legally compliant and present our customers with a fair and professionally managed image of a responsible gaming provider. HOWEVER, occasionally 'local' activity may need to be arranged by YOU – so use this guide to ensure your activity meets our code by always being...

## LEGAL - DECENT - HONEST - TRUTHFUL

1. All our advertising and promotions must be legally compliant and **MUST NOT** be misleading or indecent 
2. All our advertising and promotions must be socially responsible and **NOT** promote gambling for financial gain 
3. All our advertising and promotions must be **TRANSPARENT** and clearly state the offer and any requirements or conditions applied to obtaining it 
4. Any terms or conditions related to the offer, including offer end dates **MUST BE** displayed clearly at the point-of-sale and/or on any related printed literature or publicity materials 
5. Any printed literature, display or point-of-sale material **MUST** contain the company's approved compliance baseline (see example below) which includes the over 18 symbol and Gamble Responsibly statement alongside your business name, brand/logo 
6. Advertising and promotions **MUST NOT** be targeted at, or exploit children, or those vulnerable to gambling. The law states :  
Advertisements and Promotions should not be specifically and intentionally targeted towards people under the age of 18 through the selection of media, style of presentation, content or context in which they appear. All advertisers and gambling operators should already be aware that it is an offence under Section 46 of the Gambling Act 2005 to invite a child or young person to gamble.   
7. The use of models, photographic images or illustrations in advertising or promotions must look a minimum of 25 years of age 
8. **DO NOT** make purchase a condition of entry into a draw or raffle – buying a 'chance' of winning is a lottery, so always state **NO PURCHASE NECESSARY** (even if for charitable causes) 
9. **DO NOT** present offers which reward extended play or incentivise disproportionate stake levels 
10. **ALWAYS** communicate offers clearly in grammatically correct English, avoiding slang, expletives or abusive text. Avoid anything customers could perceive as offensive or discriminatory and remember the 4 key code words : 

SHORTEST SKIRT  
GUARANTEES WIN!

PLAY THIS & DOUBLE  
YOUR MONEY

YOU WILL WIN  
A FORTUNE!  
(no terms or conditions)

BEST BEFORE  
END 2020

OVER **18** ONLY



**18**

THINK **25** +

FREE TO  
ENTER?

PLAY LONGER  
WIN MORE

### 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)



18+

BeGambleAware.org®

PLAY  
**SENSIBLY**

PLAY  
**ENJOYABLY**

PLAY  
**AFFORDABLY**



# INTERNATIONAL CERTIFICATE OF ACCREDITATION



GLOBAL GAMBLING GUIDANCE GROUP

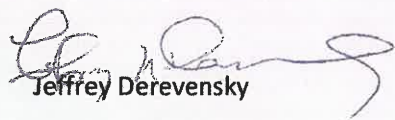
In accordance with the responsible  
gaming policies, procedures and  
standards set by the Global  
Gambling Guidance Group (G4),  
Amsterdam, the Netherlands,  
accreditation is hereby granted to:

**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



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.

The Challenge 25 scheme

**MUST** be operated by ALL staff and only recognised proof of age accepted (for example photo driving licence or passport; PASS cards)



Signage **MUST BE** prominently displayed at all points of entry regarding the prohibition of under 18's



Signage **MUST BE** displayed on machines highlighting age restrictions



## 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)

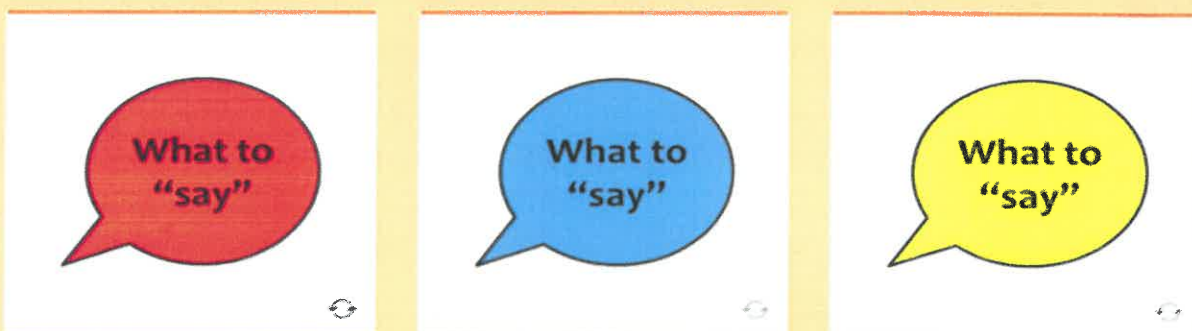
**Gambling becomes a problem when people are not in control. Staying in control is vitally important and is the ethos we at Cashino & Beacon all work too.**

**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



The Essentials of  
Compliance and  
Social  
Responsibility-  
Casino

Compliance booklet  
Available fully online Jan 2018



Age Verification

Age Verification Training Online



The Essentials of  
Compliance and  
Social  
Responsibility-  
Beacon

Compliance booklet  
Available fully online Jan 2018



PlayRIGHT

Playright available online  
for live venues

## 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:

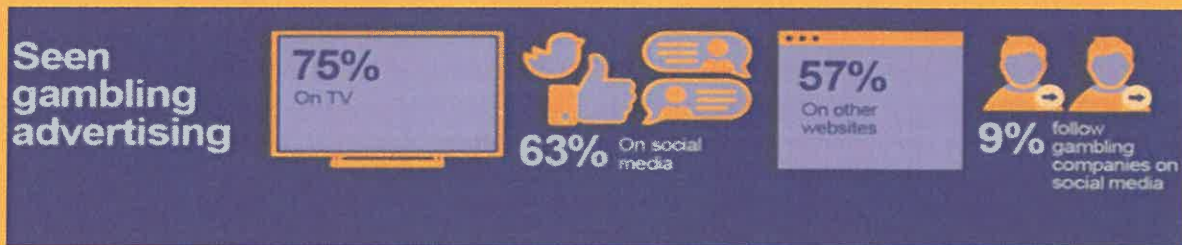
- Do not make threats you cannot carry through, such as threatening to remove the person.
- Do not be defensive or take it personally. What is being said may seem insulting and directed at you, but this is not really about you.
- Do not use humour unless you are sure it will help and you have a very 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

**ifeguarding**  
Safeguarding Children & Vulnerable People

Safeguarding  
Children &  
Vulnerable People

**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**

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**LICENSING SUB-COMMITTEE HEARING – 9<sup>TH</sup> NOVEMBER 2020**

**SUPPLEMENTAL STATEMENT - ANDY TIPPLE**

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**Cashino Gaming Limited**

1. Cashino Gaming Limited has reviewed the concerns raised by the Interested Parties and has prepared an amended, detailed local area risk assessment designed to identify all potential local risks and the measures that will be implemented to mitigate those risks.
2. In consideration of the concerns raised by the Interested Parties Cashino Gaming Limited has proposed a number of additional premises licence conditions.
3. The Company is committed to working in partnership with local Responsible Authorities and local groups, including those providing support services to vulnerable individuals. Whilst no such groups have raised any concerns regarding the Merkur Slots bingo premises proposals, the Company will contact local organisations to provide information regarding responsible play and self-help tools, and also request any information regarding any relevant or emerging matters which can then be incorporated, as appropriate, in our site protocols and training.
4. Cashino Gaming Limited operates 90 'High Street Bingo' premises, 5 bingo clubs, 5 Family Entertainment Centres and 87 Adult Gaming Centres throughout Great Britain.
5. The development of High Street Bingo has occurred because customers are decreasingly interested in attending large, sub-regional bingo halls and, even when they do, increasingly wish to play bingo with an electronic terminal rather than marking numbers off a card. Accordingly the High Street Bingo model has evolved, with a customer offer of live and automated bingo played on terminals together with gaming machines in accordance with the permission provided by a bingo premises licence.
6. The governing legislation provides strict limits on the types of gaming machines that may be made available in bingo premises, which is the same as that permitted in licensed Adult Gaming Centres.
7. Cashino Gaming Limited premises do not operate Fixed Odds Betting Terminals (FOBTs/category B2 gaming machines) unlike licensed betting premises.
8. High Street Bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to £2.
9. Across Cashino Gaming Limited's venues the average stake placed is between 30p and 40p. Only 20% of the machines may be category B3s. The remainder – the category C machines, have the same stake and prize levels as those offered in pubs.
10. Merkur Slots Newbury will not operate 'infill' gaming machines.

11. All Cashino Gaming Limited premises are sufficiently staffed to ensure effective implementation of the Company's Think 25 policy and all staff are fully trained on the three Licensing Objectives under the Gambling Act 2005, with particular focus on the protection of vulnerable persons from being harmed or exploited by gambling. Full written details of the training and the Company's operating procedures have been provided in the bundle.

Mr Andy Tipple, Head of Product, Cashino Gaming Limited

Date: 3<sup>rd</sup> November 2020



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## LICENSING SUB - COMMITTEE HEARING – 9<sup>TH</sup> NOVEMBER 2020

### SUPPLEMENTAL STATEMENT – STEVE AMBROSE

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1. I am the Operations Director for Praesepe having held this position since December 2016 responsible for all day to day operations across our estate of Adult Gaming Centres, High Street Bingo premises and Bingo Halls.
2. I am a Director of the Bingo Trade Association "The Bingo Association" and the Vice Chairman of the Amusement Trade Association "BACTA" covering Adult Gaming Centres across Great Britain.
3. I started in the Gaming Industry in 1992 and have held a multitude of positions ranging from Customer Service Assistant right up to my present position of Operations Director, this experience has enabled me to gain an understanding of the complexities of operating in gaming businesses both big and small, rural and city centre
4. Through my years of working in the gambling industry I can state categorically that it is rare for Cashino Gaming Limited's venues, and specifically its high street bingo premises, to be associated with anti-social behavior or local nuisance.
5. Whilst I appreciate this may be different to perceived risks that may be associated with other licensed gambling venues, such as betting premises, I believe this is a reflection of the type of gaming operated by Cashino Gaming Limited and its customer demographic, which is approximately 50% female with an average age of over 30.
6. Due to the nature of the gaming services provided at our high street bingo venues, customers do not congregate outside our venues, unlike betting premises that may show sporting events over long periods of time. In our high street venues there is no 'event' taking place.
7. Across the high street bingo estate average customer numbers at any one time remains relatively low, in single figures, and customer numbers between 5 and 10 at any one time would be considered an exceptionally busy period.
8. All our venues operate CCTV throughout, which is designed to not only assist with monitoring all customer facing areas but to cover the area immediately in front of our venues, which provides additional security in the high street areas in which we operate.
9. Our venue teams seek to form genuine relationships with local police, town centre groups and Betwatch or Pubwatch schemes should they be available. Our staff are proud of the areas in which they live and work and don't wish to see any level of anti-social behaviour.
10. We set out to provide a comfortable and convivial atmosphere. Our premises are carpeted, well-appointed and spotlessly clean. Our staff are smart and friendly. They are not positioned behind a counter, but are present on the trading floor, circulating and interacting with customers and offering tea and snacks.
11. Staff levels are continually risk assessed to ensure that sufficient numbers are maintained to not only enable effective premises management but to also ensure that customers can be continually monitored and assisted where necessary.
12. Customer monitoring, interaction and any incidents including implementation of our Challenge 25 policy are recorded on electronic IHL tablets. This technology enables all recording to be logged whilst staff are present in customer facing areas and it is rare for staff to be called away to back office areas during their shifts. IHL tablets are linked through a central system so that Cashino Gaming Limited's independent audit team can regularly monitor all records.

13. The Company's audit department collate and evaluate monthly reports on venue operations and management to allow continued assessment of operational compliance, including monitoring self-exclusions, under-age checks and any untoward behaviour. The monitoring process allows venues to adapt to any emerging risks and staff training requirements.
14. Our venues operate a ticket in ticket out system, which minimises the need for cash handling on site during opening hours. We also operate time delay safes to ensure that access to cash is minimised.
15. Venues are equipped with our staff guard system. The system allows direct communication with a central monitoring station through audio and CCTV. The central monitoring station would then contact the relevant emergency services in case of incident.
16. All of these features mean that are premises provide safe and congenial environments and do not impact on their localities. This is generally understood by responsible authorities. In my experience, while concerns are sometimes expressed by local residents about such impacts when applications are made, such concerns vanish once premises actually open.

Mr Steve Ambrose, Operations Director, Cashino Gaming Limited

Date: 2<sup>nd</sup> November 2020



## WITNESS STATEMENT

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

Statement of: Darrell John Butterworth

Age if under 18: Over 18

Occupation: Licensing and Security  
Compliance Manager

*(if over 18 insert "over 18")*

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

Dated the 2<sup>nd</sup> November 2020

Signature: *D J Butterworth*

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1. My name is Darrell John Butterworth and I currently operate as a self-employed Licensing and Security Authority Compliance Consultant. I have conducted this business since creating a company, Edmund Locard Licensing and Security Solutions, on the 1<sup>st</sup> January 2011. I make this statement in relation to an application for a Premises Licence by Merkur Slots at 11-13 Market Place Newbury RG14 5AA ("The Venue").

### Experience

2. Prior to taking up this role with Edmund Locard Ltd I completed 30 years' service with the Greater Manchester Police in a variety of uniform and non-uniformed roles. The longest period of attachment to a department was between 1998 and 2006 when I performed the role of Force Licensing Inspector. This role involved the supervision of 12 divisional licensing officers, tasking and management of a covert licensing unit comprising a sergeant and six constables, developing force policy and enforcement in relation to all licensed units and employment and briefing of a licensing solicitor to act on behalf of the force in more complex licensing hearings.
3. During the period as the Force Licensing Inspector I was responsible for the good conduct and compliance of premises operating under a variety of licences including outlets involved in selling alcohol but also those that provided gambling, betting and bingo facilities. I have represented Greater Manchester Police at Magistrates Court hearings, Crown Court Appeals, The High Court, The Court of Appeal and Council Licensing Committee hearings to oppose unsuitable applications and to take enforcement action against those premises whose standards had fallen below an acceptable level.

Signature *D J Butterworth*

4. Throughout my period in the central licensing role Assistant Chief Constable Robert Taylor, also from the Greater Manchester Police, was the Association of Chief Police officers (ACPO) lead spokesman on Alcohol and Licensing matters. As a result of this connection I became secretariat to the ACPO National Licensing officers' group and National Licensing Forum (NLF).
5. During my time in charge of the Licensing Unit I worked very closely with David Thornton, the local Gambling Commission Inspector, conducting joint operations on both legal and illegal gaming establishments.
6. In 2006 on leaving the Central Licensing Unit I received a Chief Officers Commendation, recognising the contribution I had made to licensing enforcement across Greater Manchester, particularly in relation to my leadership and commitment shown in developing force policy and training in response to the Licensing Act 2003 and Gambling Act 2005.
7. Between 2006 and my retirement from the Greater Manchester Police in December 2010 I took up the role of Neighbourhood Inspector for the town of Heywood on the Rochdale division. This involved the supervision of over 50 police officers, community support officers and civilian support staff. Within my role as a Neighbourhood Policing Team Inspector I was required to conduct analysis of crime and incident trends to ensure that resources and tactics were deployed appropriately. The outcome of this analysis ensured that resources were deployed in the right numbers, in the right areas at the right time. On a monthly basis I also presented these statistics to the town's multi agency tasking group to ensure all agencies had the relevant information on crime trends.
8. In recent months I have continued my professional development regarding licensing knowledge by taking and passing the National Licensees Certificate and National Door Supervisors course. This enabled me to successfully apply for a Personal Licence and become approved by the Security Industry Authority (SIA) as a front line operative. In September 2011 I successfully applied to become a nominated tutor with the BII enabling me to carry out training in the award for responsible alcohol retailing and award for personal licence holders. In October 2018 I attended a training course on Licensing Hearings and Appeals and in November 2019 I attended a seminar for Licensing Consultants
9. In March 2013 I spent 3 days in the London Borough of Newham visiting 111 different betting shop premises to observe customer usage and monitoring their compliance with the Gambling Objectives. In April 2013 I spent 7 days in

Signature *D J Butterworth*

the London Borough of Newham visiting 109 different betting shop premises to observe customer usage and monitoring their compliance with the Gambling Objectives. In May 2013 I spent 5 days in the London Boroughs of Brent and Haringey visiting 174 different betting shop premises and monitoring customer usage and their compliance with the Gambling Objectives.

10. In November 2013 I spent 2 days in the London Borough of Newham visiting 13 betting shop premises to observe customer usage and their compliance with the Licensing Objectives. In December 2013 I spent 4 days in the London Borough of Newham visiting 24 different betting shop premises to observe customer usage and their compliance with the Licensing Objectives. In April 2014 I lived in the Haringey area of London for a four-day period visiting several betting shop premises and conducting observations on criminal and antisocial behaviour.
11. In August 2018 I spent a day in the London Boroughs of Camden, Tottenham and Kilburn visiting venues operated as Adult Gaming Centres. In these areas similar concerns had been raised by local councillors and the Public Health Authority that the venues would lead to increased crime and disorder in the area and vulnerable people would be adversely affected. Whilst conducting these visits I did not observe any of the issues raised in the representations submitted in respect of that application.
12. In August 2020 I spent two days in the Rochdale and Droylsden suburbs of Manchester, conducting observations. The application subject of those observations received a number of representations from church leaders, residents and local councillors regarding the deprivation in the locality of the proposed venue, crime and disorder and the locality being located near to other gambling type and alcohol led premises. During my observations I found no evidence to support these representations and the licence was granted following a hearing.
13. In September 2020 I spent two days in the Harehills area of Leeds conducting observations in respect of an application for a new Gambling Premises licence. The Harehills area is one of the most socially deprived in the City and is prominent in many of the indices used to measure social deprivation. In the same month I also attended the High Road, Tottenham visiting an Adult Gaming Centre and 4 betting offices.
14. In October 2020 I spent two days in Blackpool conducting observations in respect of an application for a new gambling premises licence. Already in the area were 3 adult gaming centres and 3 betting shops.

Signature *D J Butterworth*

15. Also, in October 2020 I attended a zoom conference aimed at Licensing Consultants, Police officers, and local authorities when updates were given on amendments to the Gambling Act and amended guidance from the Gambling Commission.
16. In addition to acting on behalf of operators I have also conducted observations on behalf of residents and in September 2017 I conducted 2 days of investigations on behalf of the London Borough of Camden. It is important to stress that when conducting my observations, I act totally independently of those instructing me and record accurately what I observe. To ensure that my visits accurately reflect the true situation I always insist that local operators are not made aware of my visits taking place. I am informed by those instructing me that this was the case for the current investigation.

#### **Terms of reference**

17. I have been requested by Richard Bradley of Poppleston Allen solicitors to investigate a new Gaming Premises Licence application at 11-13 Market Place Newbury RG14 5AA. The application has received representations from several interested parties, and the following terms of reference for the investigation have been agreed with those instructing me.
  - i. To visit the areas of the proposed site and conduct observations to verify the veracity, or otherwise of the statements made within the representations.
  - ii. To visit similar locations where Merkur Slots currently operate licences to assess the impact of those venues on the local communities.
  - iii. To analyse the current crime trends in the area to see what impact the existing premises have on Crime and Disorder.

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

- Crime and disorder.
- Anti-social behaviour
- Protection of vulnerable people

#### **Crime and Disorder**

19. In my experience, it is unusual for an application to receive representations based on current crime, disorder or anti-social behaviour, or anticipated issues likely to be created by the granting of a licence without an objection from the local neighbourhood policing team. None of the representations that have been submitted seek to criticise the operator or the way they operate

Signature *D J Butterworth*

other venues in other more challenging locations. The representations appear to be about the area and local community in which the proposed premises are located. However, no evidence has been provided to show that the current Gaming Centres operated on Northbrook Street creates any of the issues raised to the current application.

20. In my experience the crime, disorder and anti-social behaviour issues created from premises licensed as high street Bingo premises are much lower than those created from a licence granted to a betting office. There are several reasons for this, including the fact that people tend to go to high street Bingo premises on their own or in small numbers. Other than playing the machines there is no event taking place for customers to engage with each other, nor use the venues as a social meeting place.
21. The staff employed at high street Bingo premises are not engaged or distracted by taking or paying out on bets so they can spend more time on the “shop floor” observing customer behaviour and resolving any low level issues before they can escalate. The general environment of high street Bingo premises is also generally cleaner and tidier than an ordinary bookmakers as there are no need for betting slips, newspapers and pens which often get discarded on the floor.
22. As a result of this less intimidating environment many of the managers of high street Bingo premises are female and this was certainly the case in the similar venues I have visited. A further difference between high street Bingo premises and traditional betting offices are people tend to spend less time at a venue on each visit. They do not wait around the venue for an event to start or to finish. As a result of this, customers of high street Bingo premises do not tend to loiter at a premises other than when playing the machines and do not smoke at the front of the venue between events taking place. I did not observe any issues regarding customers congregating outside the Gaming Centres observed during this period of observations
23. As a result of the representations made regarding the area subject to the application, and that there appeared to be no criticism regarding the manner that the applicant operated elsewhere, I decided to visit the area of the current application and Rochdale where the applicant currently operates a bingo Centre, an area which I believe is more socially deprived than Newbury and equally as challenging to operate gambling premises in as the Market Place location.

**Friday 14<sup>th</sup> August 2020**

**Merkur Slots Yorkshire Street Rochdale**

Signature *D J Butterworth*

24. My observation commenced in the Yorkshire Street area of Rochdale from 12:30 pm and concluded at 14:50 that day. The Rochdale location was chosen as I have resided in the town all my life. I was also stationed as an Inspector on the Rochdale division from 1996-1998 and 2006-2010. I was aware that a Gaming Premises had been at this location for over 30 years and during my time as an Inspector I am unaware of any problems being raised by its presence.
25. As well as having a local knowledge of the area, in 2019 Rochdale town centre was deemed to be the most deprived area in Greater Manchester and 31st<sup>th</sup> most deprived area in the country.  
*Latest government figures show the LSOA (Lower-layer Super Output Area) which includes Rochdale town centre and parts of the neighbouring estates of College Bank and Lower Falinge is the 31st most deprived place in England.*
26. On arrival on Yorkshire Street I noticed the regular presence of groups of street drinkers and a male sat on an old blanket begging. I photographed the Merkur Slots venue (exhibit reference letter DJB 1 refers). The unit advertised as being open 24/7. I then looked around the area for signs of local authority-controlled CCTV cameras which are often located in areas of high crime and disorder. One such dome camera was located immediately outside the premises at the junction of Yorkshire Street and New Bailey Street.
27. I then looked around the area for signs of residential accommodation which I could not find in the immediate vicinity. Two other gambling machine premises were located at 55 (LeisureTime) and 88 (Admiral) Yorkshire Street. A pawn brokers (H & T) was located opposite, William Hill next door but one, and Paddy Power and Betfred bookmakers diagonally opposite.
28. The nearest educational establishment was the Rochdale sixth form college on St Mary's gate and the nearest religious building was the parish church of St Mary located in the Baum. The Regal Moon Weatherspoon's and Roebuck public houses were within 50 metres of the premises.
29. At 1244 I observed a dishevelled looking male searching through the rubbish bins on Yorkshire Street. 1 person was betting in Betfred, 9 customers in Paddy Power and 8 customers in William Hill. I then entered the Merkur Slots venue where 4 customers, wearing face masks were using the machines. A male and female member of staff were present, and I noted signage containing the Gambling Premises Licence, Challenge 25, responsible gambling and No alcohol. Face covering was mandatory and hand sanitisers were positioned in several locations around the premises. I later returned to the venue and took a photograph of the signage (exhibit reference DJB 2 refers).

Signature *D J Butterworth*

30. I then visited the LeisureTime and Admiral premises. LeisureTime was advertised as opening from 0830 till late and had 11 customers. Admiral was advertised as opening until 11pm and did not have any customers inside. I then visited the Regal Moon public house which had approximately 90 customers, the majority of whom appeared to be consuming intoxicants.
31. I then positioned myself opposite the front of the Merkur Slots machine and conducted observations on the patrons entering and leaving and the passing pedestrians. Without exception the passing pedestrians appeared to be indifferent to the presence of the gambling premises. Customers entering and leaving the premises appeared to be aged 30+ and was 50% male and female. None of the street drinkers or beggars went near the premises, attempted to enter or harassed the customers entering or leaving. Between 1315 and 1330 315 people passed along Yorkshire Street past the front of the premises.
32. At 1333 two Rochdale Council refuse collectors entered the Merkur Slots premises and exited a few minutes later holding mugs of tea which they drank whilst enjoying the afternoon sunshine. At 1354 two males sat on the public benches opposite the shop and talked in loud voices about football and horse bets that they had put on.
33. At 1418 a male aged approx. 27 asks one of the males sat on the bench for a rizzla paper which is handed over. Neither of the males were customers of Merkur Slots. Between 1415 and 1430 407 pedestrians walk past the shop
34. At 1433 there were 4 customers in Betfred, 8 in Paddy Power and 5 in Merkur Slots. I then identified myself to the two members of staff in Merkur Slots to make a more detailed assessment of the unit. Both members of staff wore ID badges and a challenge 25 pin badge. They did not feel that the premises were an intimidating place to work and infrequently they had to ask customers to prove their age. At 1448 I then left the premises and revisited William Hill (9 customers), LeisureTime (12 customers) and Admiral (2 customers and two female members of staff). I then ceased my observations.

#### **Liverpool Airport (Airside Departure Lounge)**

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

Signature *D J Butterworth*

**Thursday 29 October 2020**

**Application premises, Market Place, Newbury**

36. Whilst travelling to the Newbury area I had cause to stop at the Warwick Service Station on the M40 motorway. On entering the main shopping area I immediately noticed an adult gaming centre named GameZone situated directly inside the main car park entrance door which was clearly visible to all customers entering and exiting. This venue appeared to operate without causing any nuisance or issues to the general public using the site.
37. I visited the Newbury Town Centre area from 1930 hrs Thursday 29<sup>th</sup> October until 22.00 hrs on Saturday 31<sup>st</sup> October 2020. My observations were recorded into a notes document which I later transcribed into a record of observations log for the purpose of this report (exhibit refer letter DJB 4 refers). I identified the location of the application premises in Market Place which was formally a William Hill betting shop. Next door but one was a Coral bookmaker which advertised as closing at 20.30 hrs.
38. I then looked around the area for signs of local authority-controlled CCTV cameras. Two such cameras were located, one at the Kennet Shopping Precinct and one at the junction of Wharf Street and Market Place. Both these cameras appear to have line of sight to the applicant's premises.
39. I then looked around the area for signs of residential accommodation likely to be impacted on by the granting of a licence in the area. The nearest residential accommodation appeared to be in apartments immediately above the application venue. Other betting offices identified in the area were Ladbrokes (no customers at 21:02 hrs) on Northbrook Street and Megabet on Bridge Street. The nearest place of worship identified appeared to be St Nicholas Church on Bridge Street.
40. Four betting offices (Coral Market Place, Ladbrokes Northbrook Street, MegaBet Bridge St and MegaBet Bartholomew Street) were located in the Town Centre area and one machine premises (In2Win) on Northbrook Street. All the gambling premises were located near to alcohol licensed premises.
41. All the business premises in the area appeared to close at 22.00 hrs apart from take away venues. At 22.30 hrs I noticed a group of 6 males standing under the clock tower at the junction of London Road and The Broadway consuming alcohol. My observations on this evening ceased at 22.40 hrs when I returned to my accommodation.

**Friday 30<sup>th</sup> October 2020**

Signature *D J Butterworth*



## **Application Premises, Market Place Newbury**

42. My observations in Newbury continued and were recorded fully in my record of observations log (Exhibit reference letter DJB 4 refers). The area appeared similar to my previous night's observations; however, more retail shops had opened. All 4 betting shops in the area were visited. No crime, disorder or anti-social behaviour was witnessed in or around any of the venues. Whilst patrolling the town centre area I noted a further religious building, Newbury Baptist Church and St Nicholas Junior School near to Newbury Railway Station.
43. At 21.16 2 males are seen in the graveyard of St Nicholas Church drinking cans of lager and using one of the raised memorials as a bar top. In2Win closed at 22.05. At 22.15 all venues in Market Place had closed except Kebab Korner which appeared to be offering a takeaway service. At 22.30 I ceased my observations and returned to my accommodation.

### **Saturday 31<sup>st</sup> October 2020**

44. I continued my observations in Newbury Town centre which were recorded on a notes document and transferred into my record of observations log (exhibit reference letter DJB4). The area appeared similar to my 2 previous days visits, however, on this day a small market stall area had been erected in Market Place. I visited and took observations outside all the gambling premises in the town centre and did not observe any crime, disorder or antisocial behaviour occurring inside or outside them. At 12.10 a police vehicle with its blue lights flashing and siren sounding travelled along Cheap Street but did not stop.
45. I entered the In2Win gambling premises at 15.37 and exited at 16.32. The customers observed inside were all aged 30+, the oldest being a female aged 75+. As I left the venue, I was engaged in conversation with a customer who was smoking outside. The male, aged around 60 years old, asked me if I had had any luck and then went on to tell me that since his wife had died he visited the venue regularly and although he had a machine and internet gaming at home he preferred the social interaction of visiting the shop.
46. At 18.10 a female uniformed police officer walked through Market Place which was the first time I had seen any routine foot patrolling during these observations in Newbury town centre.
47. At 19.29 a police vehicle passed along Oxford Street with its blue lights operating but did not come down Northbrook Street or stop in the vicinity. At 20.23 a group of 14 teenagers (under 18) walked down Albert Street past Newbury Methodist Church. In2Win closed at 22.03 and a sole female member of staff locked up the premises.

Signature *D J Butterworth*

48. I returned to Market Place where all the licensed venues appeared closed and around 50 departing customers remained in the area. Kebab Korner remained open with 5 customers outside waiting for Takeaways. A uniformed police officer and 3 Street Pastors were present outside the learning centre. As I exited the square along Bear Lane, I passed 5 uniformed police officers walking towards Market Place. As the Coral betting office in the square had closed at 8.30pm I can only assume that they were going to deal with the remaining departing customers from the alcohol licensed premises. My observations ceased at 22.30 and I left the area.

### **Summary**

49. During these periods of observations, I did not observe any conduct outside any of the gambling premises which came close to the comments made within some of the representations in respect of the application. No criminal conduct was observed during this period of observations. The most serious incident of anti-social behaviour observed was the two males drinking cans of alcohol in the graveyard of St Nicholas church, but this conduct had no connection with any of the nearby gambling premises.

50. During my time spent in Newbury I saw limited signs of routine foot patrolling of the areas by police officers and police community support officers. None of the gambling premises engaged door security officers or needed to use magnetic door locks to keep out unwanted customers; only a few of the licensed venues required the support of door security staff; conduct often associated with areas of high incidence of Crime and Disorder. Single working by staff employed at the current gambling premises also appeared to be the normal routine, a further indication that the current venues do not suffer from unusual levels of crime and disorder

51. At paragraph 20, 21 and 22 above I outlined what I consider to be major differences between a betting office premises and a Gaming Centre. What I observed during these observations confirms and reinforces my experiences outlined above. In my experience the change of use of these premises from a betting shop to a bingo machine premises will improve the area for local residents and businesses and reduce the levels of crime, disorder and anti-social behaviour in Market Place.

### **Crime and Disorder in the area**

52. In my experience it is unusual for objections to be made to an application based on the area that the premises are operated in without a representation from the Police as custodians of intelligence reports, incidents and crime records.

Signature *D J Butterworth*

53. During this period of observations, I did not observe any Crime and disorder and very low levels of anti-social behaviour. In addition, I did not observe any of the current gambling premises having to take increased crime prevention measures to address any current problems. I did not observe any evidence of criminal damage to property or acts of drug taking which I have often observed during visits to other towns and cities.
54. Another indication that a town centre suffers from irresponsible criminal behaviour is the security measures taken by stores. Very few of the shop frontages had roller shutter security to prevent damage when closed or prevent unauthorised access out of hours. Shop windows remained intact and the street furniture appeared to be well maintained and undamaged.

#### **Conditions proposed by the applicant**

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

#### **Conclusion**

56. Throughout my observations I saw no groups of people congregating outside the current betting offices and no breaches of conditions by any operator. No such conduct occurred in the vicinity of the application site, betting offices or the current Gaming Centres observed. As a result, the only conclusion I can arrive at, is that the current gaming venues in this area are not a source of crime and disorder: gambling is conducted in an open and fair way: and I saw no evidence that children and other vulnerable people are harmed by gambling in this area.
57. In my experience of hearings in other areas no evidence has ever been produced to show that a machine type premises, as proposed in Newbury, currently operating in an area creates the crime and disorder that those making representations fear.

#### **Appendix**

Exhibit reference letter DJB 1 Photograph of Merkur Slots site at Rochdale  
Exhibit reference letter DJB 2 Photograph of Merkur Slots signage at Rochdale  
Exhibit reference letter DJB 3 Photograph of machine premises Liverpool Airport

Signature *D J Butterworth*

Exhibit reference letter DJB 4 Observation Log Newbury

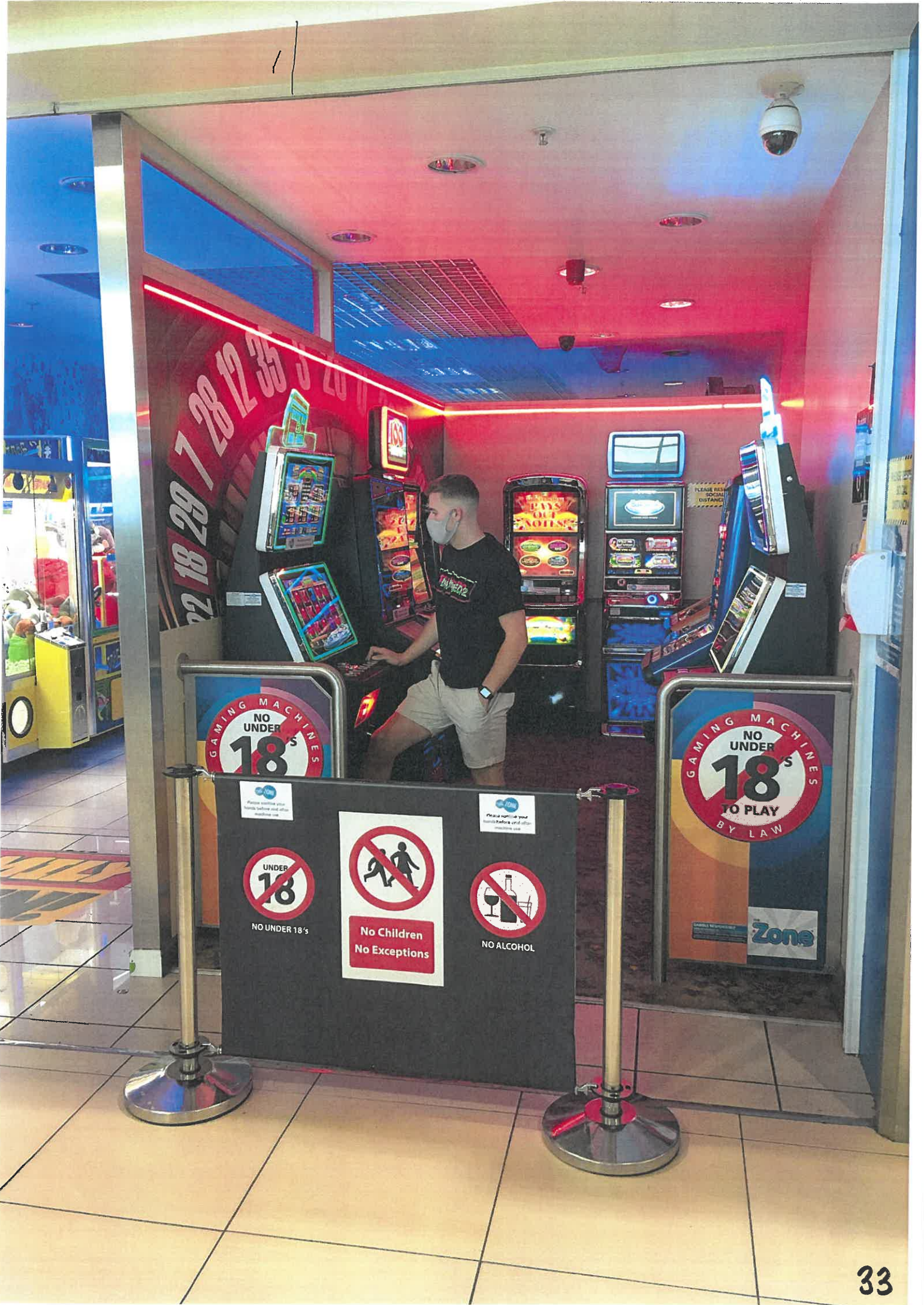
Signature *D J Butterworth*











**EDMUND LOCARD**  
**Licensing and Security Solutions**

**Observations Log PRO FORMA** Exh ref letter DJB 04

**Premises**

|                                     |  |
|-------------------------------------|--|
| Name of premises                    | Merkur Slots   |
| Address of premises                 | 11-13 Market Place Newbury RG14 5AA  |
| Day/ Date of visit                  | Thursday 29 <sup>th</sup> October – Saturday 31 <sup>st</sup> October 2020 |
| Name of consultant conducting visit | Darrell Butterworth  |

| Time            | Comment  |
|-----------------|--|
|                 | <b>Thursday 29<sup>th</sup> October 2020</b>   |
| 19.30           | Arrived Newbury Town Centre, identified premises in former William Hill betting shop, other bookmakers in the area Coral (next door but one to application premises) Ladbrokes Northbrook Street and Megabet Bridge Street. Megabet Bridge Street was directly opposite the entrance to St Nicholas Church. CCTV cameras located at the Kennet Centre and Wharf Street both appear to have line of site of the proposed premises. Residential accommodation identified immediately above the application premises. Other venues open in the area Coral, Sundaes Gelato, Catherine Wheel, One Stop, Elephant at the Market, Kebab Korner, Spare Wheel, Old Waggon and Horses, Hatchet Inn, Pizza Express, Sushi Maki Slug and Lettuce, Bill's . |
| 21:02           | Ladbrokes no customers, Megabet Bridge Street, 1 customer.   |
| 21.29           | Corn Exchange closes its doors.  |
| 21.32           | 2 males are on the steps of Newbury Town Hall, 1 drinking a bottle of Budweiser and the second drinking an unidentified can of lager.  |
| 21.15-<br>22.15 | 190 people walk past the site of the proposed premises. The majority of these having exited the nearby alcohol licensed premises in the area following their closure under Covid-19 restrictions, at 22.00 hrs.  |
| 22.25           | 1 male is sat on the benches outside Wetherspoons and 4 males wait outside kebab corner for takeaway meals.  |
| 22.30           | A group of 6 males are standing under the clock tower at the Broadway drinking alcohol.  |
| 22.40           | Ceased observations and returned to accommodation.   |
|                 | <b>Friday 30<sup>th</sup> October 2020</b>   |
|                 | Continued my observation in Newbury town centre.   |
| 12.00           | Entered Ladbrokes, no maglock, 1 male staff, 5 male, 1 female customer.  |
| 12.15           | Entered Megabet Bridge Street, no maglock, 9 male 1 female customer, 1 female staff.   |
| 12.38           | Entered Coral Market Place, no maglock 1 male staff, 4 male, 1 female customer. Noted second entrance directly into Kennet shopping centre   |

*Every contact leaves an impression*



## EDMUND LOCARD

### Licensing and Security Solutions

|               |  |
|---------------|--|
| 13.00 – 13.20 | 210 pedestrians walked past the site of the proposed venue in Market Place. Also identified Newbury Baptist Church near to railway station and St Nicholas Junior School.  |
| 13.38         | Entered Megabet, Bartholomew Street no maglock, 1 male staff, 2 entrances, 6 male, 2 female customers.   |
| 14.00 – 14.20 | 176 pedestrians walked past the proposed site of the venue in Market Place.  |
| 14.28         | Male walk along Mansion House Street drinking from a can of Perla Lager.   |
| 14.40         | Door to In2win was wedged open, no-one congregating outside.   |
| 15.15         | Male walks past proposed site on Market Place and appears to read the notices for the gaming licence application.  |
| 15.00 – 15.20 | 162 pedestrians walk past the site of the proposed premises  |
| 15.21         | Entered Coral Market Place, no maglock 1 male staff, 5 male and 1 female customer.   |
| 15.32         | Entered Megabet Bartholomew Street no maglock, 1 male and 1 female staff, 4 male customers   |
| 15.47         | Entered Megabet Bridge street no maglock 1 male staff ,2 male customers.   |
| 16.11         | Staff from the Corn Exchange in Market Place construct a queuing barrier system at the front of the premises in Market Place.  |
| 16.15         | Male resident exits 11-13 market Place and smokes in the recessed frontage of the proposed site.   |
| 16.00- 16.20  | 164 pedestrians walk past the proposed site  |
| 16.28         | Entered Ladbrokes, no maglock, 2 male staff, 3 male customers.   |
| 17.15 – 18.15 | Observation outside In2win. Entrance door remained wedged open, 143 pedestrians walked past, 3 male and 1 female seen to enter, on occasions the 3 males come outside to smoke but never more than 1 at any time.                              |
| 18.17         | Entered Ladbrokes, no maglock, 1 male staff, 3 male customers  |
| 18.30 – 18.50 | 125 pedestrians walk past the site of the proposed application.  |
| 19.30- 19.50  | 152 pedestrians walk past the site of the proposed application. The majority of these entered the Corn Exchange building and at one time up to 10 people were queuing to get in.   |
| 20.10         | Still open in Market Place are Coral, One Stop, Kebab Korner, Spare Wheel, Pizza Express, Corn Exchange, Sushi Maki, Hatchett Inn, Bill's, Waggon and Horses, Slug and Lettuce, Document House, Canal Bar, Catherine Wheel and Sundaes Gelato. |
| 20.30         | Coral closes   |
| 20.30- 20.50  | 79 pedestrians walk past the site of the proposed application.   |
| 20.52         | Male walks along Cheap Street drinking a bottle of Stella.   |
| 21.05         | Megabet Bartholomew Street still open, no maglock, 1 female staff, 2 male customers.   |
| 21.16         | 2 males are in the graveyard of St Nicholas Church drinking cans and using one of the raised tombs as a bar top.   |
| 21.17         | Megabet Bridge Street still open, no maglock, 1 male staff, no customers. Ladbrokes closed and advertised as closing at 9pm. In2win remained open.   |
| 21.44         | Male exits In2win.   |

## EDMUND LOCARD

### Licensing and Security Solutions

|               |  |
|---------------|--|
| 21.40         | Male exits In2win.   |
| 21.53         | Male exits In2win.   |
| 21.55         | 2 males In2win and a female member of staff can be seen through the wedged open door hoovering the inside of the venue.  |
| 22.05         | Internal lights on In2win are switched off and a male and female exit leaving the front door wedged open. A group of 10 teenagers (under 18), some of whom are consuming bottles and cans of alcohol walk down Northbrook Street. They pay no intention to the open door of In2win and carry on towards the town centre. |
| 22.11         | A female exits In2win sets the alarm and locks the door.   |
| 22.20         | All venues in Market Place are closed except for Kebab Korner which appeared open for takeaways.   |
| 22.30         | Ceased observations and returned to my accommodation.  |
|               |  |
|               | <b>Saturday 31<sup>st</sup> October 2020</b>   |
|               | My observations continued in Newbury. The area appeared similar to my previous 2 days visits with retail premises being open. A market with a small number of stalls had been erected in Market Place.   |
| 11.00         | In2Win was open although the front door had been closed.   |
| 11.03         | Entered Ladbrokes, no mag lock, 2 male staff, 5 male customers.  |
| 11.15         | Entered Megabet Bridge Street, no maglock, 1 male and 1 female staff, 8 male customers, male staff member reminded me to wear a face mask.   |
| 11.22         | Entered Coral Market place, no maglock, 1 male staff, 7 male customers.  |
| 11.39         | Entered Megabet Bartholomew Street, no maglock, 1 male and 1 female member of staff, 8 male customers.   |
| 12.10         | Police vehicle with blue lights and siren operating travels along Cheap Street but does not stop in the area.  |
| 12.00-12.20   | 149 pedestrians walk past the site of the proposed venue in Market Place   |
| 12.30         | 2 females are smoking outside In2Win before going back inside.   |
| 12.37         | A female enters In2Win   |
| 12.53         | Male enters In2win   |
| 12.57         | Male exits In2Win  |
| 12.30-13.00   | 94 pedestrians walk past the In2Win premises on Northbrook Street.   |
| 13.40         | Noted a beggar in the fire door at the side of the Nationwide Building Society on Northbrook Street  |
| 14.11         | Male pedestrian appears to read the notices in the window of the proposed venue.   |
| 14.00 – 14.20 | 231 pedestrians walk past the site of the proposed venue on Market Place   |
| 14.33         | Entered Coral, no Maglock, 2 male staff but 1 was finishing, 1 male customer.  |
| 14.44         | Entered Megabet Station Road, passed female member of staff who was outside smoking and using her mobile phone. No maglock and 1 male staff member, 2 male customers.  |
| 15.00         | Entered Megabet Bridge Street, no maglock, 1 male staff, 2 male customers.   |
| 15.21         | Entered Ladbrokes, no maglock 2 male staff, 6 male customers.  |
| 15.37         | 1 male seen smoking outside In2Win, front door wedged open. Entered premises, 2  |

Every contact leaves an impression

## EDMUND LOCARD

### Licensing and Security Solutions

|               |  |
|---------------|--|
|               | female staff and 7 male customers inside, 1 elderly female customer.   |
| 16.10         | 6 male and 1 elderly female customer remain inside In2Win.   |
| 16.18         | Elderly female customer leaves and is picked up outside by a younger female in a vehicle. Front door remains wedged open, 1 female staff member, 6 male customers remain inside.   |
| 16.32         | I exited In2Win leaving 1 female staff member and 5 males inside. 1 male customer is smoking outside who asked if we had had any luck. He then went on to say that he goes into the venue regularly since recently losing his wife and although he could play on a machine or online at home he preferred to visit the venue in order to socialise with people.  |
| 17.00-17.20   | 154 pedestrians walk past the site of the proposed venue.  |
| 18.00-18.20   | 142 pedestrians walk past the site of the proposed venue.  |
| 18.50         | Observed In2Win  |
| 19.29         | Police vehicle with blue lights operating travelled along Oxford Street/London Road but did come down Northbrook street.   |
| 18.50-19.50   | 63 pedestrians walk past In2Win. No-one is seen to enter or leave. No-one is seen to smoke outside.  |
| 20.23         | A group of 14 teenagers (under 18) walk down Albert Road past Newbury Methodist Church.  |
| 19.50 – 20.50 | 52 pedestrians walk past In2Win. No-one is seen to enter or leave. No-one is seen smoking outside.   |
| 21.22         | A female is seen to park a car on Northbrook Street and enters In2Win.   |
| 21.36         | Male and female exit In2Win.   |
| 21.42         | Lighting above front signage is switched off. Female staff can be seen inside through the wedged open door hoovering.  |
| 20.50-21.50   | 68 pedestrians walk past In2Win.   |
| 22.00         | Male leaves In2Win.  |
| 22.03         | Female who had arrived at 21.22 leaves venue.  |
| 22.05         | Lights to venue are switched off   |
| 22.06         | Female locks up and leaves.  |
| 22.15         | Returned to Market Place. All licensed venues appear to be closed. Kebab Korner remained open with 5 customers outside waiting for takeaways. Approximately 50 people remained in Market Place, along with 1 police officer and 3 street pastors. As I exited Market Place, I passed 5 uniformed Police Officers walking towards Market Place. As I did not observe any crime and disorder taking place, I can only assume that they were on their way to clear the square of remaining members of the public. |
| 22.30         | Ceased observations and left the area.   |
|               |  |
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|               |  |

## NOTICE OF APPLICATION FOR A PREMISES LICENCE UNDER THE GAMBLING ACT 2005

Notice is hereby given that: **Cashino Gaming Limited**

of the following address:

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

is applying for a **Bingo**  
premises licence under section 159 of the Gambling Act 2005.

The application relates to the following premises:

**Merkur Slots  
11-13 Market Place  
Newbury  
RG14 5AA**

The application has been made to: **West Berkshire Council**

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

Any of the following persons may make representations in writing to the licensing authority about the application:

- A person who lives sufficiently close to the premises to be likely to be affected by the authorised activities
- A person who has business interests that might be affected by the authorised activities
- A person who represents someone in any of the above two categories.

Any representations must be made by the following date: **16<sup>th</sup> July 2020**

**It is an offence under section 342 of the Gambling Act 2005 if a person, without reasonable excuse, gives to a licensing authority for a purpose connected with that Act information which is false or misleading.**

## **PROPOSED LICENCE CONDITIONS: 11-13 MARKET PLACE, NEWBURY**

All Merkur Slots premises maintain a high standard of operation and implement the measures listed below as standard.

Should the Licensing-Sub Committee be minded to grant the current application and believe that the additional conditions would be appropriate, Cashino Gaming Limited would be willing to accept the following:

- 1. The premises shall install and maintain a comprehensive CCTV system, which shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days. Viewing of recordings shall be made available upon the request of Police or an authorised officer of the Licensing Authority, subject to data protection legislative requirements.**
- 2. Notices shall be prominently displayed within the premises stating that CCTV is in operation.**
- 3. 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.**
- 4. 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.**
- 5. Signage advertising the aforementioned proof of age scheme shall be prominently displayed throughout the premises.**
- 6. Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises.**
- 7. The appropriate staffing levels will be assessed by way of risk assessment and cognisance will be taken of any police advice**
- 8. The licensee shall participate in a local Betwatch or similar scheme, where available.**
- 9. The licensee shall take reasonable steps to prevent nuisance directly outside the Premises.**
- 10. If trading past midnight the Maglock will always be in use.**
- 11. There shall be no pre-planned single staffing at the premises from 20:00 until closing. Should the premises be single staffed after this time, the magnetic door locking system must be in constant use.**
- 12. If trading past midnight there will always be two members of staff on duty.**
- 13. Notices shall be prominently displayed at all exits requesting patrons to respect the needs of local residents and businesses and leave the area quietly.**

## **Merkur Slots**

### **OPERATIONAL MANAGEMENT PLAN & SECURITY MEASURES**

**October 2020**

Cashino Gaming Ltd is an experienced and responsible premises operator. As with all our premises, we will operate a 'good neighbour' policy and will ensure that all neighbours are respected. We will implement a robust operational management plan and implement robust security measures to ensure that the premises, our customers and our relationship with our neighbours are all well managed.

All staff will be provided with a copy of this Operational Management Plan. All members of the management team will have full training with regards to the management plan. Refresher training will be held with all management members every 6 months.

The Operational Management Plan in the first year will be reviewed on a 6 monthly basis in order to react to any changes in our initial trading pattern and then annually thereafter.

#### **General**

A member of the management team will be on site at all times.

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

A 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.

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

We will place a notice visible from the exterior of the premises stating that drinking of alcohol directly outside the premises is forbidden and that those who do so will be banned from the premises.

We will only play background music in the premises and there will not be any tannoy systems.

The main entrance doors will not be fixed or propped open at any time whilst the premises is trading.

#### **Dispersal Policy**

The premises will not attract large crowds of people and there will not be a mass departure of rowdy people at closing time due to the nature of our premises and our customer base, therefore we do not have formal dispersal policies in place in our premises.

Our premises attract individuals and couples rather than large groups, and our customer base beyond midnight is predominantly the local entertainment workforce and shift workers who like to relax after their busy shifts. It is also unusual for our customers to loiter outside the premises after closing time. However, the following steps will be taken at closing time:

- Staff will alert customers that the premises will be closing 30 minutes before closure.

- Customers will be reminded to respect our neighbours when they leave.
- No waiting outside the premises will be permitted after close. Customers found to be loitering near the building will be politely asked by staff to move on.
- Staff, on request, will provide relevant information to customers who require a taxi or directions to the nearest station or bus stop.

### **Security Measures**

The premises shall install and maintain a comprehensive CCTV system. All recordings shall be stored for a minimum period of 31 days and recordings shall be made available to the Police or an authorised officer of the Licensing Authority subject to data protection requirements.

Subject to Data Protection guidance and legislation, the management of the premises will ensure that key staff are fully trained in the operation of the CCTV.

The entrance doors will be fitted with a magnetic door locking system. There shall be no pre-planned single staffing at the premises from 20:00 until closing. Should the premises be single staffed after this time, the magnetic door locking system must be in constant use.

If trading past midnight there will always be two members of staff on duty. The entrance doors will have a concealed maximum security deadlock.

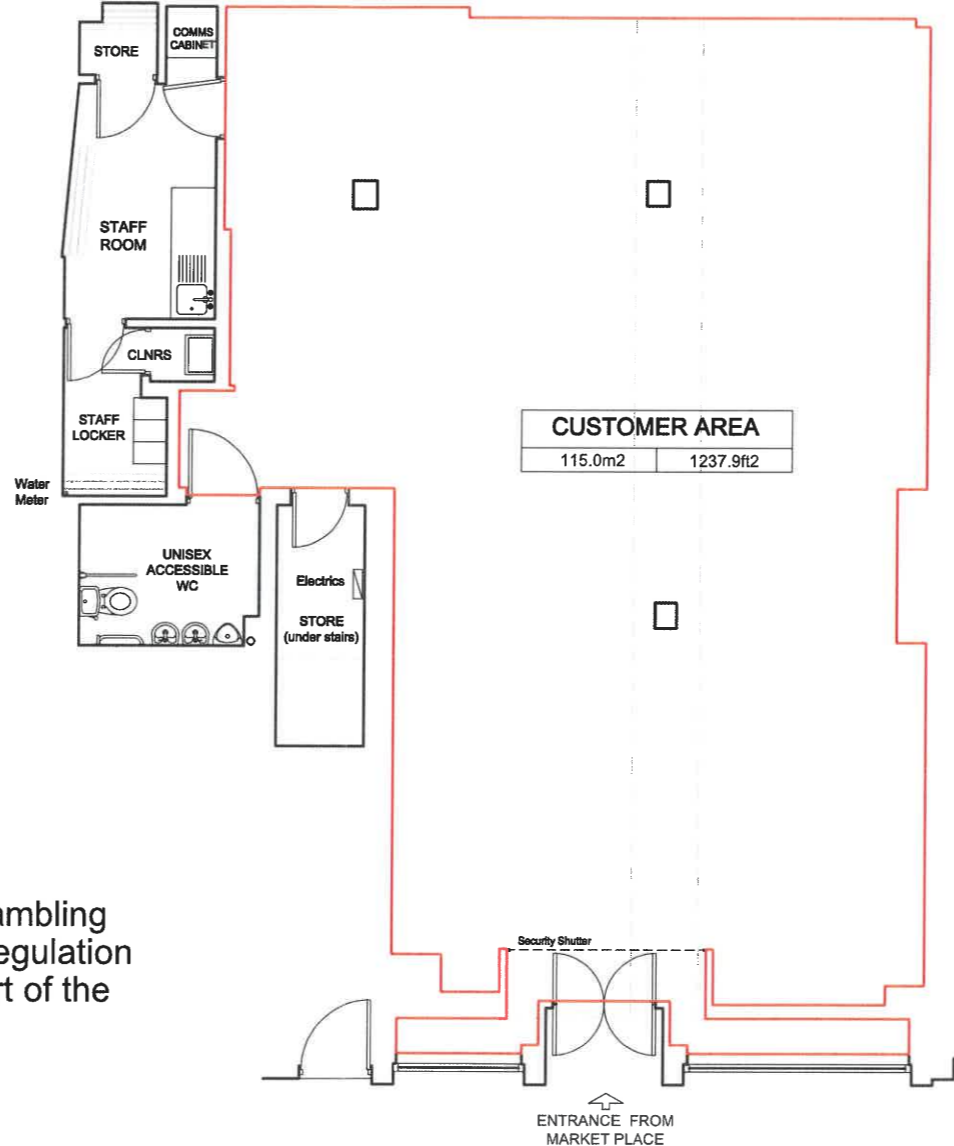
All cash is stored in a cash recycler. There will be no access to cash when the premises is trading and the cash recycler is locked at all other times.





SITE IN APPLICATION  
11-13 MARKET PLACE  
NEWBURY  
RG14 5AA

**Location Plan 1:1250**



**Proposed Ground Floor Plan 1:50**

**GAMBLING ACT 2005 LICENSING PLAN**

Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for information purposes only, and **does not** form part of the premises licence

— Area in which facilities will be provided for gaming.

| Rev | Date       | Description  |
|-----|------------|--|
| A   | 20.05.2020 | Existing Staff Toilet omitted to allow formation of Staff Locker |



Address  
11 - 13 MARKET PLACE  
NEWBURY  
RG14 5AA

Title  
LICENCE PLAN

| Drawn | Date       | Scale     |
|-------|------------|-----------|
| JAM   | 15/05/2020 | 1:50 @ A1 |

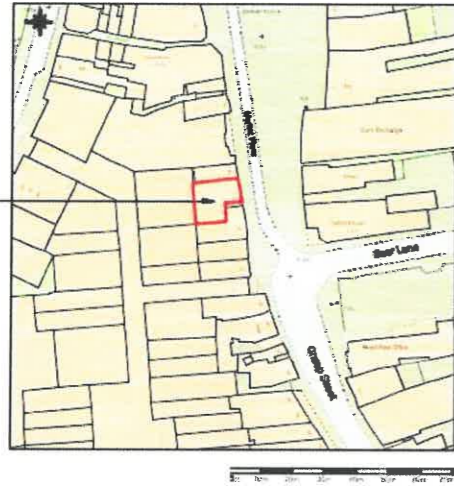
| Customer Area | Revision |
|---------------|----------|
| 115.0m2       | A        |

Drawing Number  
MP/NEW/02

Licence Plan



SITE IN APPLICATION  
11-13 MARKET PLACE  
NEWBURY  
RG14 5AA

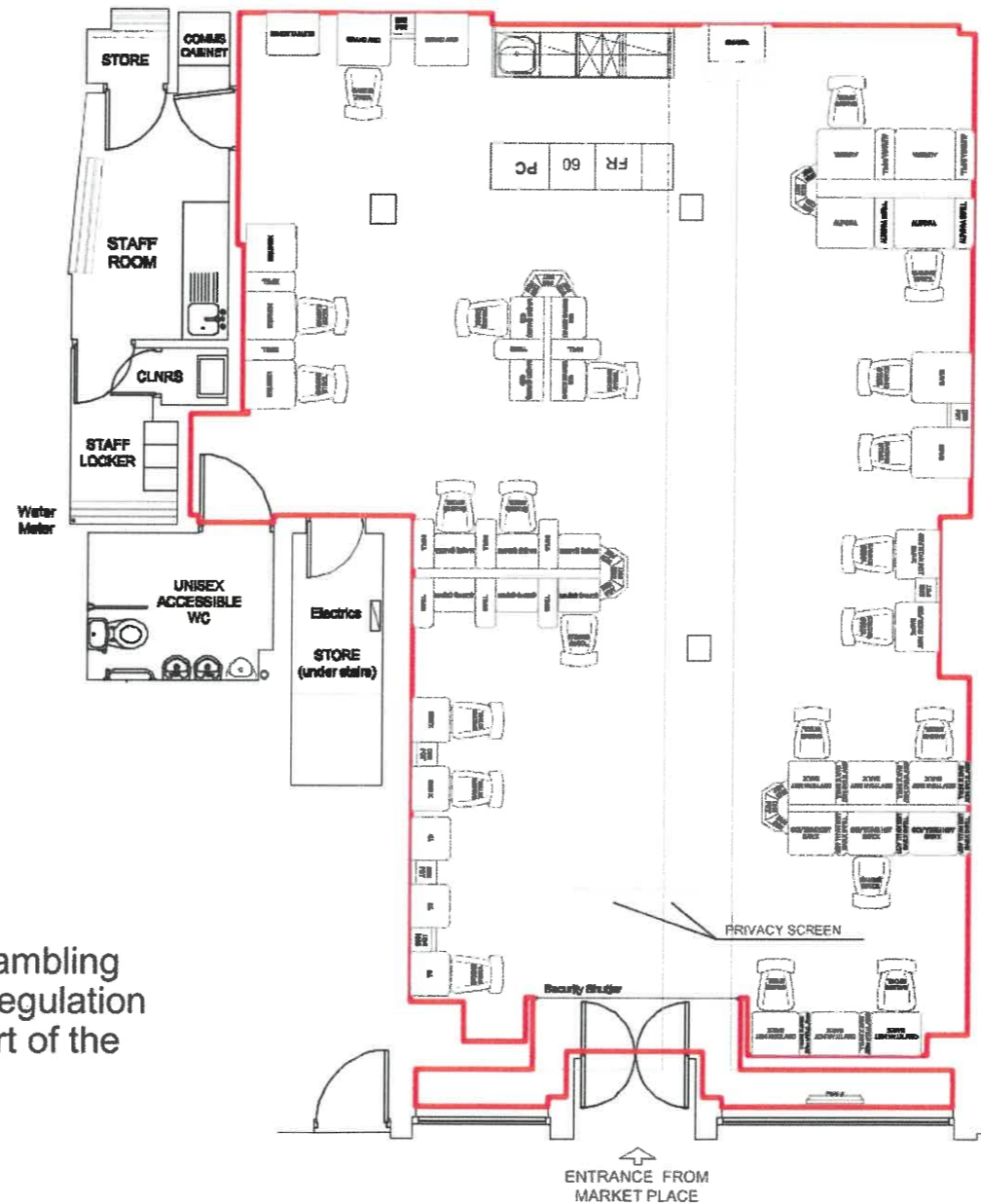


**Location Plan 1:1250**

**GAMBLING ACT 2005 LICENSING PLAN**

Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for information purposes only, and **does not** form part of the premises licence

— Area in which facilities will be provided for gaming.



| CUSTOMER AREA       |                       |
|---------------------|-----------------------|
| 115.0m <sup>2</sup> | 1237.9ft <sup>2</sup> |

FOR ILLUSTRATION  
PURPOSES ONLY

**Proposed Ground Floor Plan 1:50**

| Rev | Date       | Description   |
|-----|------------|---|
| A   | 20-05-2020 | Existing Staff Toilet changed to allow formation of Staff Locker Room |



Address  
11 - 13 MARKET PLACE  
NEWBURY  
RG14 5AA

Title  
LICENCE PLAN

| Drawn | Date       | Scale     |
|-------|------------|-----------|
| JAM   | 04/06/2020 | 1:50 @ A1 |

| Customer Area  | 115.0m <sup>2</sup> |
|----------------|---------------------|
| Drawing Number | MP/NEW/02           |
| Revision       | A                   |

McKeown's  
Planning Consultants  
301 Manchester Road, Birmingham B15 2JY Tel: 0121 420 4545  
Licence Plan

# Merkur Slots, 11-13 Marketplace, Newbury, RG14 5AA

## Local Area Risk Assessment

|                                    |   |
|------------------------------------|---|
| <b>Trading Name:</b>               | Merkur Slots  |
| <b>Premise Address:</b>            | 11-13 Marketplace, Newbury, RG14 5AA  |
| <b>Local Authority:</b>            | West Berkshire Council  |
| <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, Knowlhill, Milton Keynes MK5 8FR<br>Premise Licence Holder: Cashino Gaming Limited |
| <b>Name and Title of Assessor:</b> | Amanda Kiernan -- Head of Compliance and Gill Clulow -- Senior Auditor  |
| <b>Date of Assessment:</b>         | 30/05/20 and 07/08/20   |
| <b>Review Date:</b>                | On opening in conjunction with local staff  |

## Local Area Profile Risk Factors

|                         |   |
|-------------------------|---|
| Local Risk Profile:     | Merkur Slots, a former William Hill betting shop is located on the Market Place in Newbury Town Centre which is an area of mixed retail and non-retail use. The Market Place contains a high number of pubs with outside seating areas.   |
| Establishments of note: | The entrance to the Kennet Shopping Centre is nearby and has a variety of retailers and Vue Cinema within. The Zinc Nightclub is located at 17 Market Place, this club closes at 3am. Within the Town Centre there are 8 pubs/bars within a 1 minute walking distance: The Elephant at the Market; Walkabout; Then Old Wagon and Horses; The Newbury; Catherine Wheel; Document House and the Globe (closing times range from 11pm to 1am). Within 1 minute walk there are two pawnbrokers, The Gold Buying Centre and CEX exchange. Strawberry Hill Medical Centre is 640 yds. away and the closest hospital is West Berks Community 1.4m. Help and support for the homeless and vulnerable can be found at West Berkshire Homeless, Newbury Soup Kitchen (Salvation Army) and Loose Ends, all around 0.2 miles away. The nearest foodbank is 0.2m. There are 8 churches within 0.5 miles St Nicholas is the closest a 2 minute walk. There are 6 Primary Schools within 1 mile: St Nicholas Coffe E 490yds; Speenhamland 840yds and St Joseph's 0.6m. There are 2 secondary schools within 1 miles - St Bartholomew's and Trinity School. |
| Adjoining premises:     | Merkur Slots is located next door to Kebab Korner, a takeaway with opening hours from late afternoon with closing times ranging from 2am Monday and 5am Friday and Saturday, there is a One Stop convenience store on the other side which is next to Coral Bookmakers.   |
| Crime statistics:       | Market Place, Newbury, RG14 5AA is within the Newbury Town Centre policing neighbourhood, under the Thames Valley Police force area. In June 2020 108 crimes were committed within half a mile of the Centre of Market Place: Violence and sexual offences (33), Anti-social behavior (26), Public order (11), Burglary (10), Criminal damage and arson (8), Vehicle crime (5), Theft (4), Other crime (4), Bicycle theft (2), Drugs (2), Shoplifting (2), Possession of weapons (1). No incidents have been reported on Market Place.<br>There were 2 policing priorities issued in September 2019 both related to drinking and anti-social behavior. The first one was on Newbury Road Island (increased patrols and liaison with the local pub landlord was implemented) and the second one occurred in a shop doorway in the Town Centre (Steering Group formed, building owners traced and community-backed group boarded the doorway).  |
| Population:             | Market Place, Newbury area has a population of 1494 residents The local area around RG14 5AA is predominantly male - 56%, comparing to 49% national average. Dominating age groups are 30-44 (29.4%) and 25-29 (16.9%). 15.4% of local population is at retirement age. In the immediate vicinity of Market Place, Newbury residents are predominantly single 53.3%, which is higher than the national average of 34%. Market Place and surrounding area does not show a significant deviation in education levels from the average figures for the UK. 28% of residents are degree educated or similar (UK average, around 27.1%- Census 2011). 22% of local population has no qualification (average across UK is 22.9%). The majority of the housing stock is purpose built flats rented from private landlords.   |
| Culture:                | Market Place, Newbury isn't more ethnically diverse than UK as a country. As a whole, the UK population claims itself as approximately 86% white, with this area being 87% white. 4.6% of local residents describe themselves as Indian, 3.4% Chinese, 1.7% Mixed Ethnicity, 1.4% are Black African or Other and remaining 0.5% is equally divided between Pakistani, Other Asian and Black Caribbean. 44% of local population is Christian, which is lower than 59.3% UK average. 39% claim to have no religion, 10% did not state their religious views, and 5% identify themselves as Hindu and 1.4% is Muslim.  |
| Unemployment:           | This address within the Newbury Central ward has a larger than average concentration of residents that were in full-time employment - 52% of the resident population. On average, around 38.4% of census respondents fell into this category. 6% of local population is unemployed, which is less than UK average of 7.4% (Census 2011). Dominating employment industries are Information and Communication (19%), Retail (17%) and Accommodation and Food (16.8%).   |
| Deprivation:            | In the latest Index of Multiple Deprivation (IMD) Market Place, Newbury area was ranked 17,784 out of 32,844 in England, where 1 was the most deprived and 32,844 the least. This is amongst the 50% least deprived neighbourhoods in the country. Crime deprivation rate is currently ranked 15,517 out of 32,844 (2019), it was only 4,180 out of 32,844 in 2015.   |
| Local Police:           | Consultation with the Local Police has reported they have no concerns regarding opening the new Merkur Slots on Market Place, Newbury. There is some disorder in the local area due to late night economy but none are gambling related.  |



**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 West Berkshire local authority Statement of Gambling Principles, reference 2.8 Bingo Centres and West Berkshire Borough Profile 2011.

**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 football. 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><br/>This address within the Newbury Central ward had a larger than average concentration of residents that were in full-time employment - 52% of the resident population. On average, around 38.4% of census respondents fell into this category. 6% of local population is unemployed, which is less than UK average of 7.4% (Census 2011). Dominating employment industries are Information and Communication (19%), Retail (17%) and Accommodation and Food (16.8%).</p> <p><b>Deprivation</b><br/>In the latest Index of Multiple Deprivation (IMD) Market Place, Newbury area was ranked 17,784 out of 32,844 in England, where 1 was the most deprived and 32,844 the least. This is amongst the 50% least deprived neighbourhoods in the country. Crime deprivation rate is currently ranked 15,517 out of 32,844 (2019), it was only 4,180 out of 32,844 in 2015.</p> <p><b>Schools and Education</b><br/>St Bartholomew's School, Andover Road, RG14 6JP<br/>St Nicolas C Of E Junior School, Link Rd, RG14 7LU<br/>The Winchcombe School, Maple Crescent, RG14 1LN<br/>Berkshire School of English, St Mary's House, 57 Cheap Street, RG14 5DH<br/>Victoria Park Nursery School &amp; Children's Centre, Victoria Park, RG14 1EH<br/>St Joseph's R C Primary School, Newport Rd, RG14 2AW<br/>OISE Newbury Hall, Enborne Rd, RG14 6AD<br/>The VICI Language Academy, 12 West Mills Yard, Kennet Rd, RG14 5LP</p> | <p><b>Age Verification</b><br/><i>Ensuring Under 18's do not have access to licensed premises</i><br/>All Merkur Slots venues are strictly adult only (over 18's only).<br/><br/>Gambling is an age restricted product and Praesepe operates a 'Think 25' policy.<br/><br/>Age verification is embedded in training platforms and responsible gambling policies.<br/><br/>Over 18's notices are displayed on the entrance.<br/><br/>Think 25 advertising is prominently displayed throughout the premise.<br/><br/>Merkur Slots Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.<br/><br/>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).<br/><br/>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.<br/><br/>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> |

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| <p><b>Community Centres and Youth Centres</b><br/>Greenham Community Centre, The Nightingales, RG14 7SZ<br/>The Renewal Project, Unit F Hambridge Road Industrial Estate, RG14 5SS<br/>ACE Space, St Nicholas Rd, RG14 5PR<br/>City Arts Newbury, 10 Hampton Rd, RG14 6DB<br/>14 Platoon Newbury Army Cadet Force, 3-23 St David's Rd, RG14 5PS</p> <p><b>Parks, play grounds and sports/leisure facilities</b><br/>City Recreation Ground, Andover Rd, RG14 6LR<br/>Stroud Green, Newbury RG14 7JH<br/>Kids Playground, Newbury RG14 1DF<br/>St George's Play Park, St George's Ave, RG14 5NY<br/>Kids Playground, Newbury RG14 2ER</p> <p><b>Vulnerable and addiction support services</b><br/>Newbury Samaritans, 58 West St, RG14 1BD</p> <p><b>Charity Shops</b><br/>Save the Children Charity Shop, Newbury, RG14 5DB<br/>Cancer research, 27 Market Pl, Newbury RG14 5AA<br/>Sue Ryder, Unit 22, The Mall, Newbury RG14 5EN<br/>British Heart Foundation, 5 Mansion House St, Newbury RG14 5ES</p> <p><b>Homeless shelters and food banks</b><br/>West Berkshire Homeless, 8 Northcroft Ln, RG14 1BU<br/>Loose Ends, Newbury Baptist Church, Morton Hall, Cheap St, RG14 5DD</p> <p><b>Pawnbrokers and Loan Shops</b><br/>Gold Buying Shop, 2 The Arcade, RG14 5AD<br/>CEX Exchange, Unit 34, The Kennet Centre, Newbury RG14 5EN</p> <p><b>Medical Centres, Care Homes and Mental Health facilities</b><br/>Strawberry Hill Medical Centre, Old Bath Rd, RG14 1JU<br/>Dr Angus Whitfield, St Mary's Road Surgery, St Mary's Rd, RG14 1EQ<br/>Eastfield House Surgery, 6 St John's Rd, RG14 7LW<br/>The Fairbourne Clinic, 17 Wendan Rd, RG14 7AG<br/>West Berkshire Psychotherapy, Wendy Bramham Therapy, 47 Cheap St, RG14 5BX<br/>Argyles Care Home – Bupa, Pound St, RG14 6AE<br/>Winchcombe Place – Care UK, Maple Cres, RG14 1LN</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><br/>Training and guidance is given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p><b>Customer Interaction</b><br/>Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying 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><b>Gambling premises</b><br/>Coral, 5-7 Market Pl, Newbury RG14 5AA<br/>Megabet, 153 Bartholomew St, RG14 5HB<br/>Ladbroke, 60 Northbrook St, RG14 1AH<br/>Casino slots, 45 Northbrook St, RG14 1DT</p> <p><b>Residential Areas</b><br/>The area containing Market Place, Newbury consists predominantly of flats, which is common in inner cities, student neighbourhoods and poorer suburban settings. In local vicinity, there is higher than average level of social housing - 38% of household spaces. This contrasts with the national average of just over 18%. 44% are rented from private landlords. Housing occupancy is mainly single person (61%).</p> <p><b>Bus stops and other Transport links</b><br/>Bus stop, Cheap Street, RG14 5DB<br/>Newbury Railway Station, Station Approach, RG14 5DS</p> <p><b>Locally Identified Premises</b><br/>Corn Exchange, Market Pl, RG14 5BD<br/>Whitewall Galleries Newbury, 43 Park Way, RG14 1AY<br/>City Arts Newbury, 10 Hampton Rd, RG14 6DB<br/>West Berkshire Museum, The Wharf, RG14 5AS</p> <p><b>Public Houses and Alcohol Licensed Premise</b><br/>Walkabout, 42 Cheap St, RG14 5BX<br/>The Catherine Wheel, 35 Cheap St, RG14 5DB<br/>The Lock Stock &amp; Barrel, 104 Northbrook St, RG14 1AA<br/>Slug &amp; Lettuce, 1-3 Wharf St, RG14 5AN<br/>The Elephant at the Market, 8 Market Pl, RG14 5BD<br/>The Dolphin, 113 Bartholomew St, RG14 5DT<br/>The Globe, 148 Bartholomew St, RG14 5HB<br/>Document House, 7-9 Wharf St, RG14 5AN<br/>Plough on the Green, The Folly RG14 7HY<br/>The Coopers Arms, Bartholomew St, RG14 5LL<br/>Cross Keys, London Rd, RG14 1JX<br/>The Monument, 57 Northbrook St, RG14 1AN<br/>The Lion, 39 West St, RG14 1BD<br/>The Red House, 12 Hampton Rd, RG14 6DB<br/>The Castle, Oxford Rd, Donnington, RG14 3AA<br/>The Newbury, 137 Bartholomew St, RG14 5HB<br/>The Hatchet Inn, 12 Market Pl, RG14 5BD<br/>Starting Gate, 75 Brummell Rd, RG14 1SG</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><br/><i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i><br/><i>Failure to provide information to customers on responsible gambling</i><br/><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 Slots Newbury if the customer enters at a time they have chosen not to play which instigates an interaction with the customer.<br/>Merkur Slots 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 including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> |
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|   | <p>Cobrizo Lounge, 12 Northbrook St, RG14 1DJ<br/>Toby Carvery, 110 London Rd, RG14 2AJ</p>   | <p><b>Deprivation</b><br/>Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm<br/>Merkur Slots 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><br/>Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>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.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high risk premises, homeless shelters and foodbanks to provide social responsibility information.</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><br/>Market Place, Newbury, RG14 5AA is within the Newbury Town Centre policing neighbourhood, under the Thames Valley Police force area.<br/>In June 2020 108 crimes were committed within half a mile of the Centre of Market Place: Violence and sexual offences (33), Anti-social behavior (26), Public order (11), Burglary (10), Criminal damage and arson (8), Vehicle crime (5), Theft (4), Other crime (4), Bicycle theft (2), Drugs (2), Shoplifting (2), Possession of weapons (1). No incidents have been reported on Market Place.<br/>There were 2 policing priorities issued in September 2019 both related to drinking and anti-social behavior. First one was on Newbury Road Island (Increased patrols and liaison with the local pub landlord was implemented) and second one in shop doorway in Town Centre (Steering Group formed, building owners traced and community-backed group boarded the doorway).<br/>Crime Statistics in Market Place, Newbury has significantly improved since 2015.</p> | <p><b>Premise Security and violence in the workplace</b><br/><i>Poor security control measures which may increase vulnerability to crime</i><br/><i>Failure to protect employee and customers from harm during the hours of late night opening</i></p> <p>Merkur Slots Newbury is subject to a separate security risk assessment, local factors are considered and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots Newbury 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> |

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| <p><b>Local Police:</b><br/>Thames Valley Police, 12 Mill Lane, RG14 5QU<br/>Local Police have no concerns regarding opening new Merkur Slots on Market Place, Newbury. There is some disorder in the local area due to late night economy but not gambling related.</p> <p><b>Public Houses and Alcohol Licensed Premise</b><br/>Walkabout, 42 Cheap St, RG14 5BX<br/>The Catherine Wheel, 35 Cheap St, RG14 5DB<br/>The Lock Stock &amp; Barrel, 104 Northbrook St, RG14 1AA<br/>Slug &amp; Lettuce, 1-3 Wharf St, RG14 5AN<br/>The Elephant at the Market, 8 Market Pl, RG14 5BD<br/>The Dolphin, 113 Bartholomew St, RG14 5DT<br/>The Globe, 148 Bartholomew St, RG14 5HB<br/>Document House, 7-9 Wharf St, RG14 5AN<br/>Plough on the Green, The Folly RG14 7HY<br/>The Coopers Arms, Bartholomew St, RG14 5LL<br/>Cross Keys, London Rd, RG14 1JX<br/>The Monument, 57 Northbrook St, RG14 1AN<br/>The Lion, 39 West St, RG14 1BD<br/>The Red House, 12 Hampton Rd, RG14 6DB<br/>The Castle, Oxford Rd, Donnington, RG14 3AA<br/>The Newbury, 137 Bartholomew St, RG14 5HB<br/>The Hatchet Inn, 12 Market Pl, RG14 5BD<br/>Starting Gate, 75 Brummell Rd, RG14 1SG<br/>Cobrizo Lounge, 12 Northbrook St, RG14 1DJ<br/>Toby Carvery, 110 London Rd, RG14 2AJ</p> <p><b>Pawnbrokers and Loan Shops</b><br/>Gold Buying Shop, 2 The Arcade, RG14 5AD<br/>CEX Exchange, Unit 34, The Kennet Centre, Newbury RG14 5EN</p> <p><b>Gambling premises</b><br/>Coral, 5-7 Market Pl, Newbury RG14 5AA<br/>Megabet, 153 Bartholomew St, RG14 5HB<br/>Ladbrokes, 60 Northbrook St, RG14 1AH<br/>Casino Slots, 45 Northbrook St, RG14 1DT</p> | <p><b>General Crime and Disorder</b><br/><i>To identify aggressive customers to prevent crime and disorder Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police UK hot-spot mapping for Newbury Town Centre 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 Thames Valley Police over reducing our involvement in any incident.</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 Slots Newbury 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><br/>Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.</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> |
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**Residential Areas (Impacted by Anti-Social Behaviour)**

The area containing Market Place, Newbury consists predominantly of flats, with higher than average level of social housing. 44% of properties in local vicinity are privately rented and households are mainly occupied by a single person. There was no crimes reported on Market Place, Newbury in June 2020 but 26 Anti-social behavior incidents were reported within half a mile from RG14 5AA postcode.

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

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

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

**Money Laundering**

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

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

There 1 pawnbroker and loan shop 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 period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.

Merkur Slots Newbury will operate T1to 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.

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

**Alcohol and Drugs**

Anti-social 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.

'No Alcohol Allowed' signage on the door.

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.

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 IHL SMART Tablet Incident App and depending on severity will be reported to the police.

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.

Maglock systems will be deployed during times of public houses closing.

**Money Lending**

Money lending is not tolerated within our premises.

Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.



Ensuring that gambling is conducted in a fair and open way

**Bingo/Gaming Machine and Supervision**

The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p). Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling.

**Customer Complaints**

*Failure to prevent customers complaints and disputes regarding gambling within our premises*

*Failure to resolve customer's complaints and disputes regarding our gambling premises.*

Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website.

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.

Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.

Complaints portal used to collate and manage responses.  
4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints.

Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.

**Marketing**

Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns.

Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

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.

All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.




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| <p>Other</p> | <p><b>Places of worship and Religious Buildings</b><br/> St Nicolas Church, W Mills, RG14 5HG<br/> Newbury Baptist Church, Cheap St, RG14 5DD<br/> Newbury URC Church, 2 Cromwell Place, RG14 1AF<br/> Newbury Methodist Church, 56 Northbrook St, RG14 1AN<br/> St John's Church, St John's Rd, RG14 7PY<br/> Kennet Christian Centre, 12 Erborne Rd, RG14 6AH<br/> St Joseph's Catholic Church, 105 London Rd, RG14 1JP<br/> Newbury Central Mosque, 33 Pound St, RG14 6AE</p> | <p><b>Ethnicity and Local Area Demographic</b><br/> Merkur Slots does not discriminate on the ground of ethnic or social demographic, takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots 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><br/> Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by 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 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><br/> 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. Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p> |
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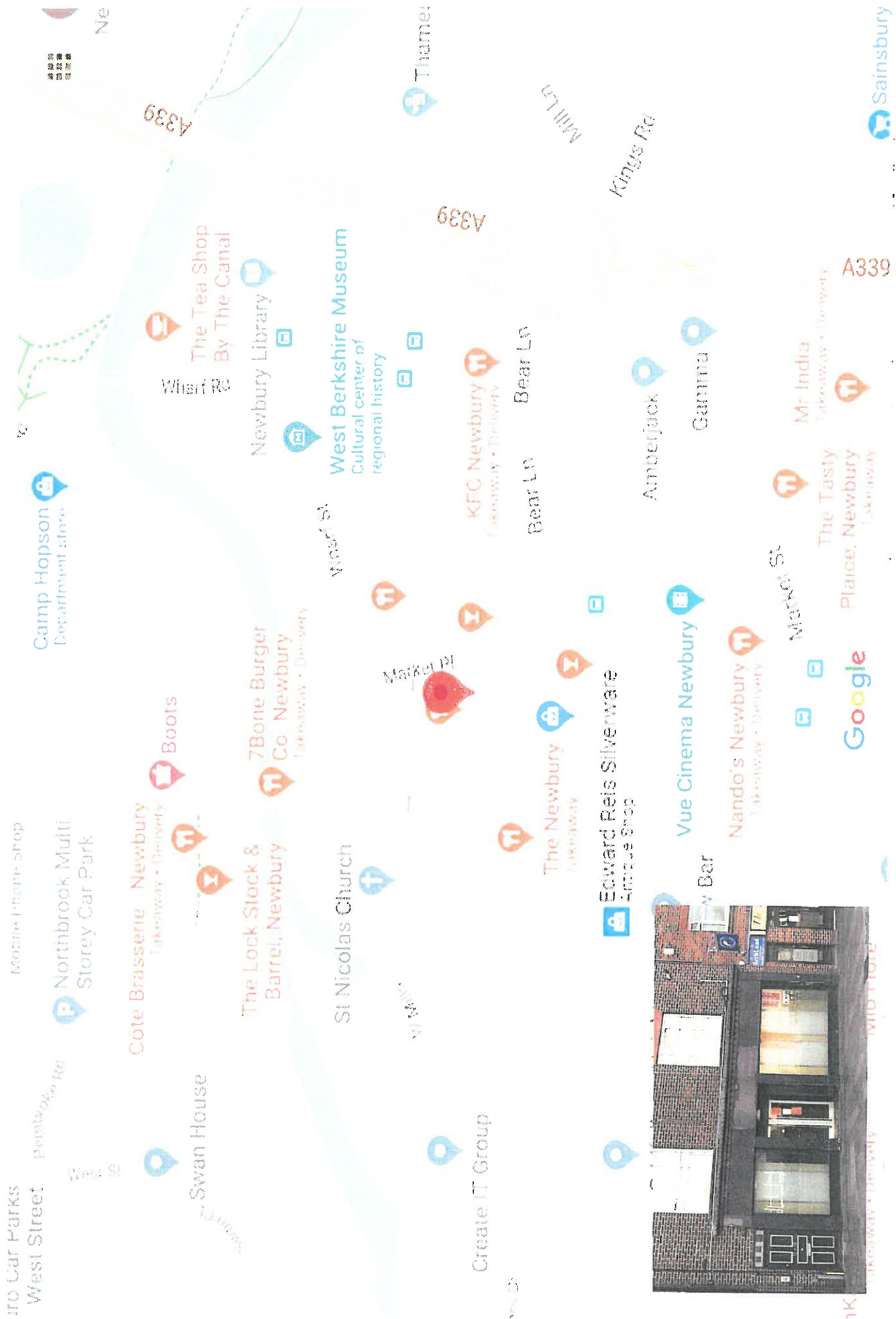
**Merkur Slots Premise Layout**

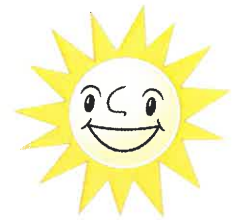
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| <b>Premise level:</b>     | Ground floor premise on the Market Place, Newbury.  |
| <b>Premise frontage:</b>  | Merkur Slots Newbury will be of a style which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions will comply with LCCP and standards set by the Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP).  |
| <b>Counter Position:</b>  | Merkur Slots Newbury 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 Slots Newbury 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 Slots Newbury 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).<br><br>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling.   |
| <b>Hidden Areas:</b>      | Merkur Slots Newbury 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.  |

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.

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| <b>Assessors Name:</b> | Amanda Kiernan  |
| <b>Signature:</b>      |  |
| <b>Date:</b>           | 8 <sup>th</sup> August 2020   |





### 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.

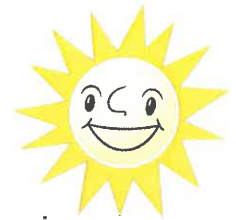
- Cashino Gaming Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Cashino Gaming Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Cashino Gaming Limited has completed its own 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.

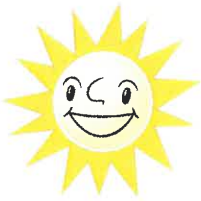
All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.



# WORKING TOGETHER



**THE PRAESEPE GROUP**



## 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:



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



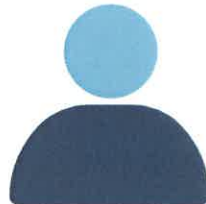
## What is it?

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.



Bingo is available for play from 9am until midnight.

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



## Bingo Terminals



# Think 25

## 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

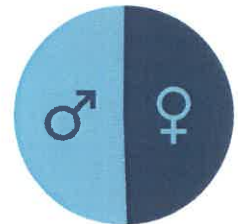
Praesepe is regulated by the Gambling Commission and Licensing Authorities



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.



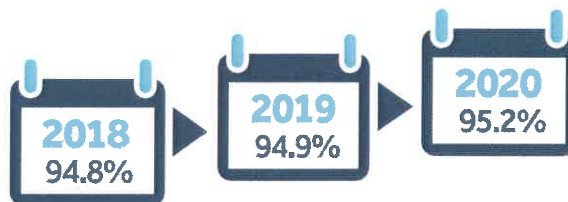
We are immensely proud of the fact that we have never had a licence revoked or even reviewed. Incidents are extremely rare. We simply do not generate noise and anti social behaviour.



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.

## Compliance



## Training Centre



## PlayRight App



## Online Training







# SOCIAL RESPONSIBILITY MEASURES IN PLACE

## Machine Messaging



## Customer Interaction Training



## All Levels

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



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



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

Praesepe also engages with the [Bingo Association](#) and [Bacta](#) trade groups:



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



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

# BENEFITS TO THE HIGH STREET



## Benefits for your High Street Include:



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



Increased footfall to the high Street.



Linked trips with other shops helping to support other businesses.



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



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

# COMMUNITY & CHARITY



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

**Please contact us.**

**Praesepe PLC**

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**praesepe**



# G-TAB Bingo



**Bringing Traditional Bingo  
to the High Street**

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

## Standalone Tablet Terminal

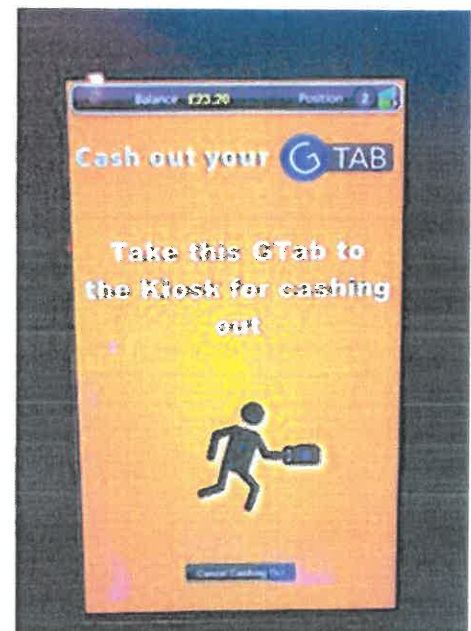
Bingo numbers announced and shown live on the top display



Charges to play clearly displayed



Requires customer interaction to credit the device and cash out

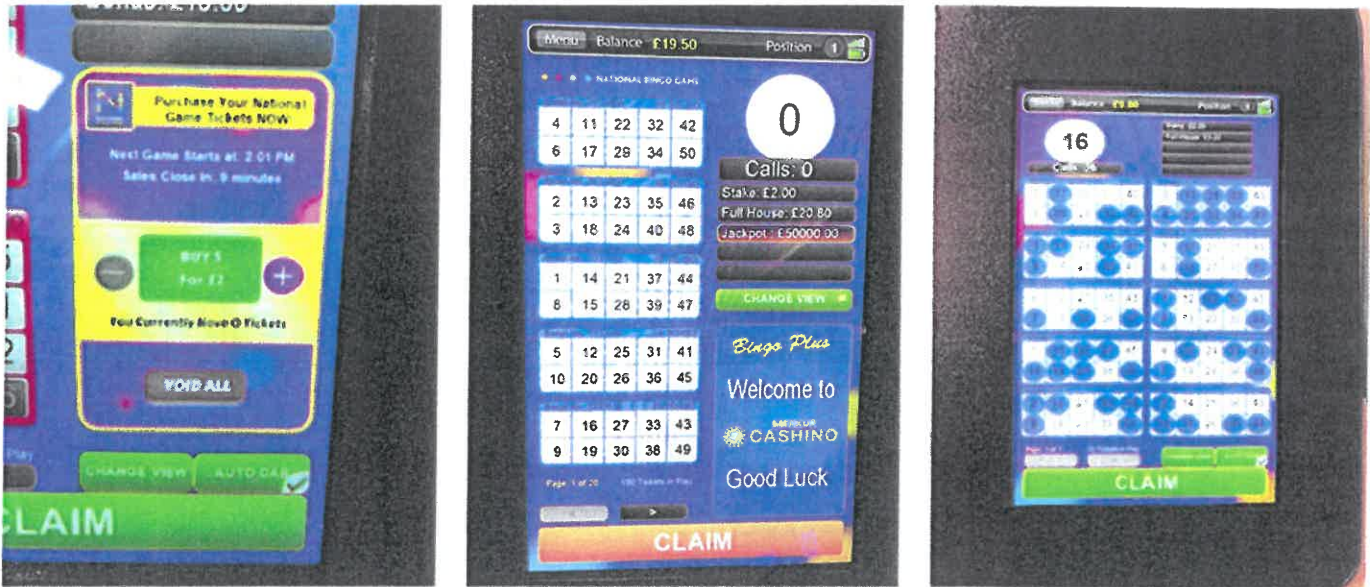


Customers cannot stake-up once game has commenced

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



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



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





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

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



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



### Low stake games:

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

