

# Public Document Pack

## Blackpool Council

2 October 2020

To: Councillors Brookes, Hutton and D Scott

The above members are requested to attend the:

### **LICENSING PANEL**

Monday, 12 October 2020 at 2.00 pm  
in Via Zoom Meeting

### **A G E N D A**

#### **1 APPOINTMENT OF CHAIRMAN**

To appoint a Chairman for the meeting.

#### **2 DECLARATION OF INTEREST - LICENSING**

Members are asked to declare any interests in the items under consideration and in doing so state:-

(1) the type of interest concerned

(2) the nature of the interest concerned; and

(3) whether they have or have not sat on a Planning Committee which has previously considered a planning application in respect of a licensed premises which is also subject to consideration for a premises licence as part of the agenda for this meeting.

If any Member requires advice on declarations of interests, they are advised to contact the Head of Democratic Governance in advance of the meeting.

(Members are asked to also pay particular attention to the guidance sheet on interests supplied with the agenda).

#### **3 PROCEDURE FOR THE MEETING**

The Chairman of the Panel will summarise the procedure and announce the equal maximum amount of time for each party to speak for the hearing.

A. Items 1 and 4 (b) will be undertaken in private session by the Panel and not in the Meeting Room.

B. Items 2, 3, 4(a) and 4(c) will be recommended to the Panel to be held in public.

C. The Panel may decide to exclude the public from all or part of a hearing where it considers that the public interest in so doing outweighs the public interest in the hearing, or that part of the hearing, taking place in public. (This includes a party and any person assisting or representing a party)

**4 APPLICATION FOR A NEW BINGO PREMISES LICENCE - MERKUR SLOTS 40 ABINGDON STREET, BLACKPOOL, FY1 1DA** (Pages 1 - 48)

To consider an application for a new bingo premises licence for Merkur Slots, 40 Abingdon Street, Blackpool, FY1 1DA.

**Other information:**

For queries regarding this agenda please contact John Greenbank, Senior Democratic Governance Adviser, Tel: 01253 477229, e-mail [john.greenbank@blackpool.gov.uk](mailto:john.greenbank@blackpool.gov.uk)

Copies of agendas and minutes of Council and committee meetings are available on the Council's website at [www.blackpool.gov.uk](http://www.blackpool.gov.uk).

<b>Report to:</b>	<b>LICENSING PANEL</b>
<b>Relevant Officer:</b>	Sarah Chadwick, Licensing Officer
<b>Date of Meeting :</b>	12 October 2020

## APPLICATION FOR A NEW BINGO PREMISES LICENCE – MERKUR SLOTS

### 1.0 Purpose of the report:

- 1.1 To consider an application for a new Bingo Premises Licence under the Gambling Act 2005 for Merkur Slots, 40 Abingdon Street, Blackpool, FY1 1DA.

### 2.0 Recommendation(s):

- 2.1 The panel is requested to determine the application.

### 3.0 Reasons for recommendation(s):

- 3.1 This application must be determined by a panel.

- 3.2a Is the recommendation contrary to a plan or strategy adopted or approved by the Council? No

- 3.2b Is the recommendation in accordance with the Council's approved budget? Yes

- 3.3 Other alternative options to be considered:

None, once an application is submitted and representations received it must be considered by the Licensing Panel.

### 4.0 Background Information

- 4.1 On 24 July 2020 the Licensing Service received an application from Cashino Gaming Ltd for a new Bingo Premises Licence for Merkur Slots, 40 Abingdon Street, Blackpool.

- 4.2 The application requests the Licence be granted for the default hours for a bingo premises, i.e. 09.00 to midnight, for permitted gaming (bingo). There are no restrictions on the hours in which gaming machines may be made available for use, however the applicant has volunteered a condition proposing that the premises shall

close at 01.00 each day.

4.3 In the application Cashino Gaming Limited are described as operating “a national estate of licensed bingo premises which include the provision of bingo tablets and Bingo Plus and Bingo Express terminals. Substantive facilities for non-remote bingo will be made available in accordance with legislative provisions.”

4.4 Two representations have been received from interested parties who operate businesses in the vicinity of the proposed premises who have expressed concerns about the impact of the proposed premises on vulnerable persons in the town centre.

#### 4.5 **Local policy considerations**

As the representations raise concerns in relation to vulnerable persons, section 4.8 – General standards for all gambling premises - is relevant:

“High standards are expected from operators of gambling premises within the Borough to ensure the promotion of the licensing objectives. The licensing authority will place a high priority on social responsibility. In exercising its statutory powers, the authority will have due regard, where relevant, to the need to:

- Prevent gambling related problems in individuals and groups at risk of gambling addiction;
- Promote informed and balanced attitudes, behaviours and policies towards gambling and gamblers by both individuals and by communities; and
- Protect vulnerable groups from gambling related harm.

The licensing authority will consider, in relation to any particular premises, whether any special considerations apply to the protection of vulnerable persons. Such considerations need to be balanced by the authority’s objective to aim to permit the use of premises for gambling.”

It should be noted that complaints about nuisance cannot be resolved through the Gambling Act 2005.

#### 4.6 **National policy considerations**

5.18 Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority’s policy statement. Any such considerations need to be balanced against the authority’s objective to aim to permit the use of premises for gambling.

5.31 Licensing authorities should not turn down applications for Premises Licences

where relevant objections can be dealt with through the use of conditions. In determining applications for Premises Licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.

#### 4.7 **Observations**

A similar application for this premises from the same operator was submitted to the Licensing Authority on 17 March 2020. Representations to that application were received from Abingdon Barbecue and the Bread Basket (who have also objected to this revised application and operate businesses in the vicinity of the premises.) That application was considered by a panel of the licensing committee on 26 June 2020 and was rejected. Due to the short time that has elapsed since this hearing a copy of the decision notice outlining the reasons for the rejection is attached, for information.

On this revised application the applicant has proposed a number of additional conditions to be attached to the Licence should it be granted. These are detailed in part 5 of the application form which is attached as an appendix to this report.

There are also a number of mandatory and default conditions which attach to a bingo Premises Licence:

##### Mandatory Conditions:

1. A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.
2. No customer shall be able to enter the premises directly from any other premises in respect of which one of the following permissions has effect –
  - (a) a Casino Premises Licence;
  - (b) an Adult Gaming Centre Premises Licence;
  - (c) a Betting Premises Licence other than a Track Premises Licence; and
3. (1) This paragraph shall apply where children or young persons or both are permitted by the Licence Holder to enter the premises, and Category B or C gaming machines are made available for use on the premises.  
(2) Any area of the premises to which category B and C gaming machines are located –
  - a. shall be separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for the purpose;
  - b. shall be supervised at all times to ensure children or young persons or both do not enter the area; and

c. shall be arranged in such a way that ensures all parts of the area can be observed by the persons mentioned in sub-paragraph (3).

(3) The reference to supervision in this paragraph means supervision by –

- a. one or more persons whose responsibilities include ensuring children or young persons or both do not enter the area; or
- b. closed circuit television which is monitored by one or more persons whose responsibilities include ensuring that children or young persons or both do not enter the area.

(4) A notice stating that no person under the age of 18 years is permitted to enter the area shall be displayed in a prominent place at the entrance to any area of the premises in which Category B or C gaming machines are made available for use.

4. (1) In the case of a charge for admission to the premises, a notice of that charge shall be displayed in a prominent place at the principal entrance to the premises.  
(2) In the case of any other charges in respect of gaming, a notice setting out the information in sub-paragraph (3) shall be displayed at the main point where payment for the charge is to be made.  
(3) The notice in sub-paragraph (2) shall include the following information –
  - a. the cost (in money) of each game card (or set of game cards) payable by an individual in respect of a game of bingo;
  - b. in respect of each game card (or set of game cards) referred to in paragraph (a) the amount that will be charged by way of a participation fee for entitlement to participate in that game; and
  - c. a statement to the effect that all or part of the participation fee may be waived at the discretion of the person charging it.  
(4) The notice may be displayed in electronic form.  
(5) A reference in this paragraph to a charge in respect of gaming does not include an amount paid for an opportunity to win one or more prizes in gaming to which section 288 of the 2005 Act (meaning of “prize gaming”) applies.
5. (1) The rules of each type of game that is available to be played the premises other than games played on gaming machines shall be made available to customers within the premises.  
(2) The condition in sub-paragraph (1) may be satisfied by –
  - a. displaying a sign setting out the rules,
  - b. making available leaflets or other written material containing the rules, or
  - c. running an audio-visual guide to the rules prior to any bingo game being commenced.
6. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.

Default Conditions:

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

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

4.8 Does the information submitted include any exempt information? No

4.9 **List of Appendices:**

Appendix 4(a) -Application

Appendix 4(b) - Representation from B Chambers

Appendix 4(c) - Representation from T Hallam

Appendix 4(d) - Decision notice from previous application hearing on 26 June 2020

5.0 **Legal considerations:**

5.1 Please see local and national policy in the background information.

6.0 **Human Resources considerations:**

6.1 None

7.0 **Equalities considerations:**

7.1 None

8.0 **Financial considerations:**

8.1 None

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

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

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

Where the application is—

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

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

**Part 1 – Type of premises licence applied for**

Regional Casino

Large Casino

Small Casino

Bingo

Adult Gaming Centre

Family Entertainment Centre

Betting (Track)

Betting (Other)

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

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

**Part 2 – Applicant Details**

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

**Section A**

**Individual applicant**

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

2. Surname: \_\_\_\_\_ Other name(s): \_\_\_\_\_

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

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

Postcode:

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

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

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

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

## Section B

### Application on behalf of an organisation

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

7. The applicant's registered or principal address:

**Seebeck House**

**1A Seebeck Place**

**Milton Keynes**

Postcode: **MK5 8FR**

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

**000-003266-N-103444**

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

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

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

## Part 3 – Premises Details

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

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

**40 Abingdon Street**

**Blackpool**

Postcode: **FY1 1DA**

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

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

**Ground floor premises, high street location.**

14(a) Are the premises situated in more than one licensing authority area? **No**

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

**N/A**

#### Part 4 – Times of operation

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

*[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]*

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

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

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates: **No**

#### Part 5 – Miscellaneous

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

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? **No**

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a). Do you hold any other premises licences that have been issued by this licensing authority?  
**No**

19(b). If the answer to question 19(a) is yes, please provide full details:

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

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

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

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

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

**Proposed conditions:**

- 1. 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 legislative requirements.**
- 2. A staff member from the premises who is conversant with the operation of the CCTV system shall be in the premises at all times when the premises is open**
- 3. Notices shall be prominently displayed within the premises stating that CCTV is in operation.**
- 4. 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.**
- 5. A think 25 proof of age scheme shall be operated at the premises. Acceptable forms of identification include recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.**
- 6. Signage advertising the aforementioned proof of age scheme shall be prominently displayed**

throughout the premises.

7. 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.
8. Individuals who are deemed to be under the influence of excessive alcohol shall not be allowed to enter the premises.
9. The licensee shall participate in local Betwatch or similar scheme, where available, to promote knowledge sharing within the local industry, with particular regard to local risk but also to promote best practice.
10. The licensee shall take reasonable steps to prevent nuisance directly outside the Premises.
11. The premises shall close at 01:00 each day.

#### Part 6 – Declarations and Checklist (Please tick)

We confirm that, to the best of our knowledge, the information contained in this application is true. We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

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

#### Checklist:

- Payment of the appropriate fee is enclosed
- A plan of the premises is enclosed
- We understand that if the above requirements are not complied with the application may be rejected
- We understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

#### Part 7 – Signatures

21. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:



Print Name: Poppleston Allen

Date: 23 July 2020

Capacity: Solicitors for & on behalf of the applicant

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

Signature:

Print Name:

Date:

Capacity:

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

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

### **Part 8 – Contact Details**

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

**Richard Bradley**

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

**0115 948 7424**

24. Postal address for correspondence associated with this application:

**Richard Bradley**

**Poppleston Allen**

**37 Stoney Street**

**The Lace Market**

**Nottingham**

Postcode: **NG1 1LS**

25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

**r.bradley@popall.co.uk**

## NOTICE OF APPLICATION FOR A PREMISES LICENCE

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

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

of the following address -

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

the number of whose operating licence is: **000-003266-N-103444**

who applied for an operating licence on: **N/A**

has made an application for a **Bingo Premises Licence**

The application relates to the following premises:

**Merkur Slots  
40 Abingdon Street  
Blackpool  
FY1 1DA**

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

**Licensing Service  
Blackpool Council  
Municipal Buildings  
Corporation Street  
Blackpool  
FY1 1NF**

Website: [www.blackpool.gov.uk](http://www.blackpool.gov.uk)

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

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

**Richard Bradley  
0115 948 7424  
Poppleston Allen  
37 Stoney Street  
The Lace Market  
Nottingham  
NG1 1LS**

**Any representations under section 161 of the Gambling Act 2005 must be made no later than the following date: 20<sup>th</sup> August 2020**



# Merkur Slots, 40 Abingdon Street, Blackpool, FY1 1DA

## Local Area Risk Assessment

<b>Trading Name:</b>	Merkur Slots
<b>Premise Address:</b>	40 Abingdon Street, Blackpool, FY1 1DA
<b>Local Authority:</b>	Blackpool Council
<b>Premise Licence No:</b>	New application
<b>Operator Licence No:</b>	000-003266-N-103444-024 (Casino Gaming Ltd)
<b>Company Details:</b>	Praesepe Group, 1a Seebeck House, Seebeck Place, Knowhill, Milton Keynes MK5 8FR Premise Licence Holder: Cashino Gaming Limited
<b>Name and Title of Assessor:</b>	Gill Clulow, Senior Auditor
<b>Date of Assessment:</b>	08/07/2020, 22/7/2020



<b>Review Date:</b>	On opening in conjunction with local staff
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**Local Area Profile Risk Factors**

<b>Local Risk Profile:</b>	Merkur Slots Blackpool is located in the centre of Blackpool on a street connecting Talbot Road with the Winter Gardens. The area has a variety of premises including independent retailers offering daily use provisions such as bread, cooked chicken plus clothing retailers - Sa Fashion and Extacy and an Adult Gaming Centre which is next door. Abingdon Street Indoor Market (est 1928) is at the end of the road open Mon-Sat 08:30-17:00. The premises previously benefitted from a betting premises licence, granted by Blackpool Council.
<b>Establishments of note:</b>	Warwicks Adult Gaming Centre next to the venue and on Talbot Road, William Hill Bookmakers on Talbot Road. Within the Abingdon Street and Talbot Road area are a number of organisations who provide help and support for the homeless and vulnerable Connect Blackpool, The Ashley Foundation, Mankind United. On Abingdon street is TAS, The Alternative School and The Little Rainbows Day Nursery.
<b>Adjoining premises:</b>	Merkur Slots Blackpool is located next to Warwicks Adult Gaming Centre and Extacy Clothing shop.
<b>Crime statistics:</b>	The area of FY1 experiences high levels of crime particularly Anti-Social Behaviour. 41 incidents of Anti-Social Behavior were reported in May 2020, 2 incidents on Abingdon Street in May 2020 – Anti-social behavior (1), Public order (1)
<b>Population:</b>	Abingdon Street is a non-residential urban town centre location, the limited residential properties in the close local area are mainly rented flats with single person occupancy. 71% of residents are male the majority are single in the age bracket 30-60 years who describe themselves as in good health.
<b>Culture:</b>	As a non-residential area the number of residents is limited, of the ones who live there, 90% of the local area are white, 2.4% Indian and 1.9% Pakistani, with 80% describing as Christian or no Religion.
<b>Employment:</b>	Around 18% of the Population are in part-time employment, 4% higher than the average with the majority in the food and accommodation sector. Unemployment rate is 11.2%
<b>Deprivation:</b>	Abingdon street in the Talbot Ward of Blackpool which has high levels of deprivation, there are a large number of people employed in unskilled and manual work or unemployed. Deprivation is highest in the areas of income affecting those over 60, the affordability of housing and the proximity of local services.
<b>Local Police:</b>	Local police have reported No records of any concerns/ issues from the past operation of the premises. They have noted that the premises is located in the centre of Blackpool and suffers from high levels of crime and disorder, albeit not specifically related to gambling premises. There is also a cumulative impact policy in place (of which this premises falls a matter metres outside the zone), this is a result of the area being saturated with alcohol licensed premises and the associated crime and disorder that they collectively bring.

**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 Blackpool local authority Statement of Gambling Principles, reference 3 for Blackpool profile, 4.3 Local Area profile and 4.9 for Bingo Premises.

## 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> Around 18% of the Population are in part-time employment, 4% higher than the average with the majority in the food and accommodation sector. Unemployment rate is 11.2%.</p> <p><b>Deprivation:</b> Abingdon street in the Talbot Ward of Blackpool which has high levels of deprivation, there are a large number of people employed in unskilled and manual work or unemployed. Deprivation is highest in the areas of income affecting those over 60, the affordability of housing and the proximity of local services.</p> <p><b>Schools and Education</b> Saint John's Church of England Primary School, 153 Church St, FY1 3NX TAS Abingdon Street, 85 Abingdon street, FY1 1PP Blackpool Gateway Academy, Seymour Road, FY1 6JH Holy Family Catholic Primary School, Seacrest Avenue, FY1 2SD Westminster Primary Academy, Westminster Road, FY1 2QE Revoe Learning Academy, Grasmere Road, FY1 5HP Saint John Vianney Primary School, 2 Galstonbury Avenue, FY1 6RD Little George's Nursery School, 82A George Street, FY1 3HY The Little Rainbows Day Nursery, The Church, Abingdon Street, FY1 1PP Devonshire Primary School, Deveonshire Road, FY13 8AF Tower Learning Centre, 316A Church street, FY1 3QE</p>	<p><b>Age Verification</b> <i>Ensuring Under 18's do not have access to licensed premises</i> All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Praesepe operates a 'Think 25' policy, with prominent notices placed throughout the premises.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Blackpool frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots Blackpool will ensure that age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p>

	<p>St Kentigners Catholic School, Newton Drive, FY3 8BT Henshaw's Guitar School, 72-72 Topping Street, FY1 3DA</p> <p><b>Community Centres and Youth Centres</b> Claremont First Step Community Centre, Dickson Road, FY1 2AP Ibbison Court Community Centre, 70-71 Ibbison Court, FY1 4AT Revoelution Community Hub, A5099, FY1 4AU</p> <p><b>Youth and Child Support Centres</b> Blackpool Young People Services, 2 Market Street, FY1 1ET Connect Young Peoples Centre (Sexual Health, Contraception, Under 25's Only), 26 Talbot Road, FY1 1LF Blackpool Youth Offending Team, Stanley Buildings, 1-3 Caunce Street, FY1 3DN The Boathouse Youth – Bloomfield, 205 lytham Road, FY1 6ET Blackpool Youth Council, 296 Central Drive, FY1 5JW Talbot &amp; Brunswick Children's Centre, Gorton Street, FY1 3JW</p> <p><b>Parks, play grounds and sports/leisure facilities</b> Sandcastle Waterpark, promenade, FY4 1BB Blackpool Zoo, E park, FY3 8PP Stanley Park, W park Drive, FY3 9HU</p> <p><b>Pawnbrokers and Loan Shops</b> I Cash Exchange, 57 Abingdon Street, FY1 1DH North West Pawnbrokers, 100 Church street, FY1 1JA Cash Converters, 127-129 Church street, FY1 1HZ Cash Is King, 123 Church street, FY1 1HZ Money Traders (NS) Ltd, 22-26 Dickson Road, FY1 2AE H&amp;T Pawnbrokers, 97-99 Central Drive, FY1 5EE</p> <p><b>Medical Centres, Care Homes and Mental Health facilities</b> South King Street Medical Centre, 25 S King St, FY1 4NF St Paul's Medical Centre, Dickson Rd, FY1 2HH Adelaide Street Family Practice, 118 Adelaide St, FY1 4LN Whitegate Health Centre, 150 Whitegate Drive, FY3 9ES Bloomfield Medical Centre, 118-120 Bloomfield Road, FY1 6JW Cumberland Medical Services, 1 Cumberland Ave, FY1 5QL</p>	<p>Age verification test purchasing and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the Industry average, all venues receive 3 or 4 random test visits per year.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third party results are shared with the Gambling Commission.</p> <p>To support our Proof of Age scheme, where individuals do not have suitable ID documentation citizencard application forms are available in the venue.</p> <p><b>Vulnerability</b> 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> Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and</p>
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<p><b>Gambling Premises</b></p> <p>Adult Gaming Centres</p> <p>Warwicks Adult Gaming Centre, Abingdon Street, FY1 1DA</p> <p>Warwicks Adult Gaming Centre, 116 Talbot Road, FY1 3AY</p> <p>Warwicks Adult Gaming Centre, 106-108 Church street, FY1 1JA</p> <p>Warwicks Adult Gaming Centre, 118 Central Drive, FY1 5DY</p> <p>Family Entertainment Centres</p> <p>Coral Island, Bonny street, FY1 5DW</p> <p>Central Pier, promenade, FY1 5BB</p> <p>Funland, 61 Promenade, FY1 5AA</p> <p>Silcocks Fun Palace, 125-141 Promenade, FY1 5BE</p> <p>Happy Dayz, Promenade, FY1 5AA</p> <p>Golden Mile, Promenade, FY1 5BD</p> <p>South Pier, Promenade</p> <p>Bookmakers</p> <p>William Hill, 39 Talbot Road, FY1</p> <p>William Hill, 20 Market Street, FY1 1EX</p> <p>William Hill, 10 Central Drive, FY1 5PY</p> <p>Ladbroke, 84 Church Street, FY1 1HP</p> <p>Betfred, 4 Bank Hey Street, FY1 4RU</p> <p>William Hill, 121 Church street, FY1 1HZ</p> <p>Casino's</p> <p>Coral Island Casino, Bonny Street, FY1 5DW</p> <p>Genting Cashino, 64 Queens Promenade, FY2 9QG</p> <p>Grosvenor Casino, promenade, FY4 1BB</p> <p><b>Homeless shelters and food banks</b></p> <p>The Ashley Foundation, 81 Abingdon street, FY1 1PP</p> <p>The Samaritans of Blackpool, Fylde and Wyre Branch, 16 Edward Street, FY1 1BA</p> <p>Mankind United, 41 Abingdon street, FY1 1DH</p> <p>Nacro, 89 Abingdon Street, FY1 1PP</p> <p>Streetlife Nightsheiter, Church street, FY1 1HP</p> <p>The Salvation Army - Blackpool Citadel, Raikes Parade, FY1 4EL</p> <p>Streetlife, 48 Buchanan Street, FY1 3LQ</p>	<p>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> <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></p> <p><i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i></p> <p><i>Failure to provide information to customers on responsible gambling</i></p> <p><i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p> <p>'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are 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 Blackpool if the customer enters at a time they have</p>
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	<p><b>Vulnerable and addiction support services</b>  The Samaritans of Blackpool, Fylde and Wyre Branch, 16 Edward Street, FY1 1BA  Blackpool Young People Services, 2 Market Street, FY1 1ET  Connect Young Peoples Centre (Sexual Health, Contraception, Under 25's Only), 26 Talbot Road, FY1 1LF  Blackpool Youth Offending Team, Stanley Buildings, 1-3 Caunce Street, FY1 3DN  Blackpool Youth Council, 296 Central Drive, FY1 5JW  Blackpool &amp; Fylde Street Angels, 28-30 Cookson Street, FY1 3EF  Lancashire Counselling, 8 Cedar Square, FY1 1BP</p> <p><b>Residential Areas</b>  Abingdon Street is a non-residential urban town centre location, the limited residential properties in the close local area are mainly rented flats with single person occupancy.</p> <p><b>Bus stops and other Transport links</b>  Blackpool North, Train Station, FY1 2AB  North Pier Tram Stop  Abingdon Street Bus Stop</p> <p><b>Locally Identified Premises</b>  Winter Gardens Blackpool, 97 Church street, FY1 1HL</p> <p><b>Public Houses and Alcohol Licensed Premise</b>  The Victoria, 50 Talbot Road, FY1 1LR  Washington, Topping Street, FY1 3AF  The Rose &amp; Crown, 22 Corporation Street, FY1 1EJ  Molloys Blackpool, 23 Talbot Road, FY1 1LB  The Galleon Bar, 68-70 Abingdon street, FY1 1NL  Garlands Blackpool, 69,71 Talbot Road, FY1 1LL  Ma Kelly's (North), 77 Talbot Road, FY1 1LL  Little Black Pug Bar, 13 Talbot Road, FY1 1LB  Temple Bar Blackpool, 19-23 Clifton Street, FY1 1JD  Hogarths, Clifton street, FY1 1JP</p>	<p>chosen not to play which instigates an interaction with the customer. Merkur Slots Blackpool 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. 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> <p><b>Deprivation</b>  Merkur Slots takes a high degree of vigilance regardless of whether the premises are in an area of high or low deprivation. Its systems are designed to protect vulnerable people whatever their economic circumstances. 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>  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 homeless shelters, foodbanks and vulnerable and addiction support services identified in the local risk section to provide social responsibility information.</p>
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<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> The area of FY1 experiences high levels of crime particularly Anti-Social Behaviour. 41 incidents of Anti-Social Behavior were reported in May 2020, 2 incidents on Abingdon Street in May 2020 – Anti-social behavior (1), Public order (1)</p> <p><b>Local Police:</b> Local police have reported No records of any concerns/ issues from the past operation of this premises. They have noted that the premises is located in the centre of Blackpool and suffers from high levels of crime and disorder. There is also a cumulative impact policy in place (of which this premises falls a matter metres outside the zone), this is as a result of the area being saturated with licensed premises and the associated crime and disorder that they collectively bring.</p> <p><b>Public Houses and Alcohol Licensed Premise</b> The Victoria, 50 Talbot Road, FY1 1LR Washington, Topping Street, FY1 3AF The Rose &amp; Crown, 22 Corporation Street, FY1 1EJ Molloys Blackpool, 23 Talbot Road, FY1 1LB The Galleon Bar, 68-70 Abingdon street, FY1 1NL Garlands Blackpool, 69,71 Talbot Road, FY1 1LL Ma Kelly's (North), 77 Talbot Road, FY1 1LL Little Black Pug Bar, 13 Talbot Road, FY1 1LB Temple Bar Blackpool, 19-23 Clifton Street, FY1 1JD Hogarth's, Clifton street, FY1 1JP</p> <p><b>Pawnbrokers and Loan Shops</b> I Cash Exchange, 57 Abingdon Street, FY1 1DH North West Pawnbrokers, 100 Church street, FY1 1JA Cash Converters, 127-129 Church street, FY1 1HZ Cash Is King, 123 Church street, FY1 1HZ Money Traders (NS) Ltd, 22-26 Dickson Road, FY1 2AE H&amp;T Pawnbrokers, 97-99 Central Drive, FY1 5EE</p> <p><b>Gambling premises</b> Adult Gaming Centres</p>	<p><b>Premise Security and violence in the workplace</b> <i>Poor security control measures which may increase vulnerability to crime</i></p> <p><i>Failure to protect employee and customers from harm during the hours of late night opening</i></p> <p>Merkur Slots Blackpool 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 Blackpool will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p><b>General Crime and Disorder</b> <i>To identify aggressive customers to prevent crime and disorder</i></p> <p><i>Awareness of local crime issues in the local area</i> We have reviewed the Police.UK hot-spot mapping for Blackpool 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 Blackpool 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>
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	<p>Warwicks Adult Gaming Centre, Abingdon Street, FY1 1DA  Warwicks Adult Gaming Centre, 116 Talbot Road, FY1 3AY  Warwicks Adult Gaming Centre, 106-108 Church street, FY1 1JA  Warwicks Adult Gaming Centre, 118 Central Drive, FY1 5DY  Family Entertainment Centres  Coral Island, Bonny street, FY1 5DW  Central Pier, promenade, FY1 5BB  Funland, 61 Promenade, FY1 5AA  Silcocks Fun Palace, 125-141 Promenade, FY1 5BE  Happy Dayz, Promenade, FY1 5AA  Golden Mile, Promenade, FY1 5BD  South Pier, Promenade  Bookmakers  William Hill, 39 Talbot Road, FY1  William Hill, 20 Market Street, FY1 1EX  William Hill, 10 Central Drive, FY1 5PY  Ladbroke's, 84 Church Street, FY1 1HP  Betfred, 4 Bank Hey Street, FY1 4RU  William Hill, 121 Church street, FY1 1HZ  Casino's  Coral Island Casino, Bonny Street, FY1 5DW  Genting Cashino, 64 Queens Promenade, FY2 9QG  Grosvenor Casino, promenade, FY4 1BB</p> <p><b>Residential Areas (impacted by Anti Social Behaviour)</b>  Abingdon Street is a non-residential urban town centre location, the limited residential properties in the close local area are mainly rented flats with single person occupancy.</p>	<p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operates an internal security alert system and is 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 Blackpool will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p> <p><b>Anti-social behaviour outside the premise</b>  Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur 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 vigilant to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p> <p>Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.</p> <p><b>Money Laundering</b></p>
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*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.

A number of pawnbrokers and loan shops are in the vicinity and 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 system is 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.

Merkur Slots Blackpool will operate a no pre-planned single staffing policy after 20:00 until close. Any periods of single-staffing are managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.

Merkur Slots Blackpool will operate TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay.

Staff do not carry cash floats and only management can open the machines and change machines.

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



	<p>The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.</p> <p>Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.</p> <p><b>Alcohol and Drugs</b> Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.</p> <p>'No Alcohol Allowed' signage on the door.</p> <p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p> <p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p><b>Money Lending</b> Money lending is not tolerated within our premises.</p> <p>Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>	<p><b>Bingo/Gaming Machine and Supervision</b> The premises 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)</p>

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 premises - 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

Other	<p><b>Places of worship and Religious Buildings</b>  Eckankar, 5 Charles St, FY1 3EG  St John's Blackpool, Church St, FY1 1BP  Blackpool Tabernacle Church, Springfield Rd, FY1 1QL  Sacred Heart Catholic Church, 17 Talbot Rd, FY1 1LB  The Salvation Army - Blackpool Citadel, Raikes Parade, FY1 4EL</p>	<p>promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p> <p><b>Ethnicity and Local Area Demographic</b>  Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p><b>Training &amp; Social Responsibility</b>  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>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People; Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice</p>
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		<p>yearly.</p> <p><b>COVID 19</b> All staff receive training on COVID-19 guidelines.</p> <p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p> <p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p>
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**Merkur Slots Blackpool Premise Layout**

<b>Premise level:</b>	Merkur Slots Blackpool is a ground level premises.
<b>Premise frontage:</b>	Merkur Slots Blackpool will obscure 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 Blackpool will have a floor layout 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 Blackpool 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 Blackpool will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).

	Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling.
<b>Hidden Areas:</b>	Merkur Slots Blackpool will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.

**Additional Comments**

I have worked in the Gaming Industry for 25 years in operations as a venue manager for 4 years and area manager for 20 years before moving to the Audit and Compliance department in 2019, prior to which I was in retail management. During my time in the industry, I have managed venues and areas in many locations from market towns such as Loughborough to large cities like Glasgow and Luton. When I was required to complete a Local Area Risk Assessment for the new Merkur Slots premises in Blackpool, I researched the area and then visited. I had been there on many occasions in the past during holidays and day trips to the area. I then revisited the location following additional research and on this occasion I was accompanied by Graham Siner from the operations department. Graham has a background in retail and has recently joined the company as an Area Manager predominantly for Merkur Slots venues. At the time of our visit lockdown restrictions had been eased and we found the town centre to be unusually quiet and the majority of people in the area were workmen involved in premises on Clifton Street. During my personal visits to Blackpool I have visited the local bars and restaurants especially on Talbot Road and have found the area to have similar atmosphere and vibe to that of other centres late at night such as Manchester and Liverpool and I did not feel uneasy whilst there. On the seaford Blackpool has a concentration of Family Entertainment Centres aimed at children and adults and as you move to the town centre it becomes a more adult environment.

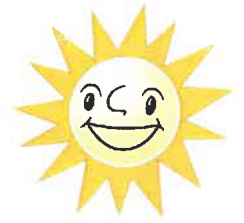
The document provides an assessment of risk at premise level relating to the provision of these facilities for gambling. Praesepe is a national operator and employs a number of standard policies, procedures and control measures across all premises. These issues are clearly articulated in the "Compliance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

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

<b>Assessors Name:</b>	Gill Clulow
<b>Signature:</b>	

Date:

19/07/2020



### 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 do not operate a single-manning policy between 8pm and 6am, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

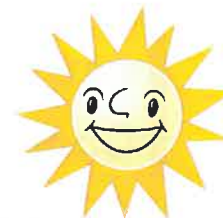
**Objective 2** - Ensuring that gambling is conducted in a fair and open way.

- 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.

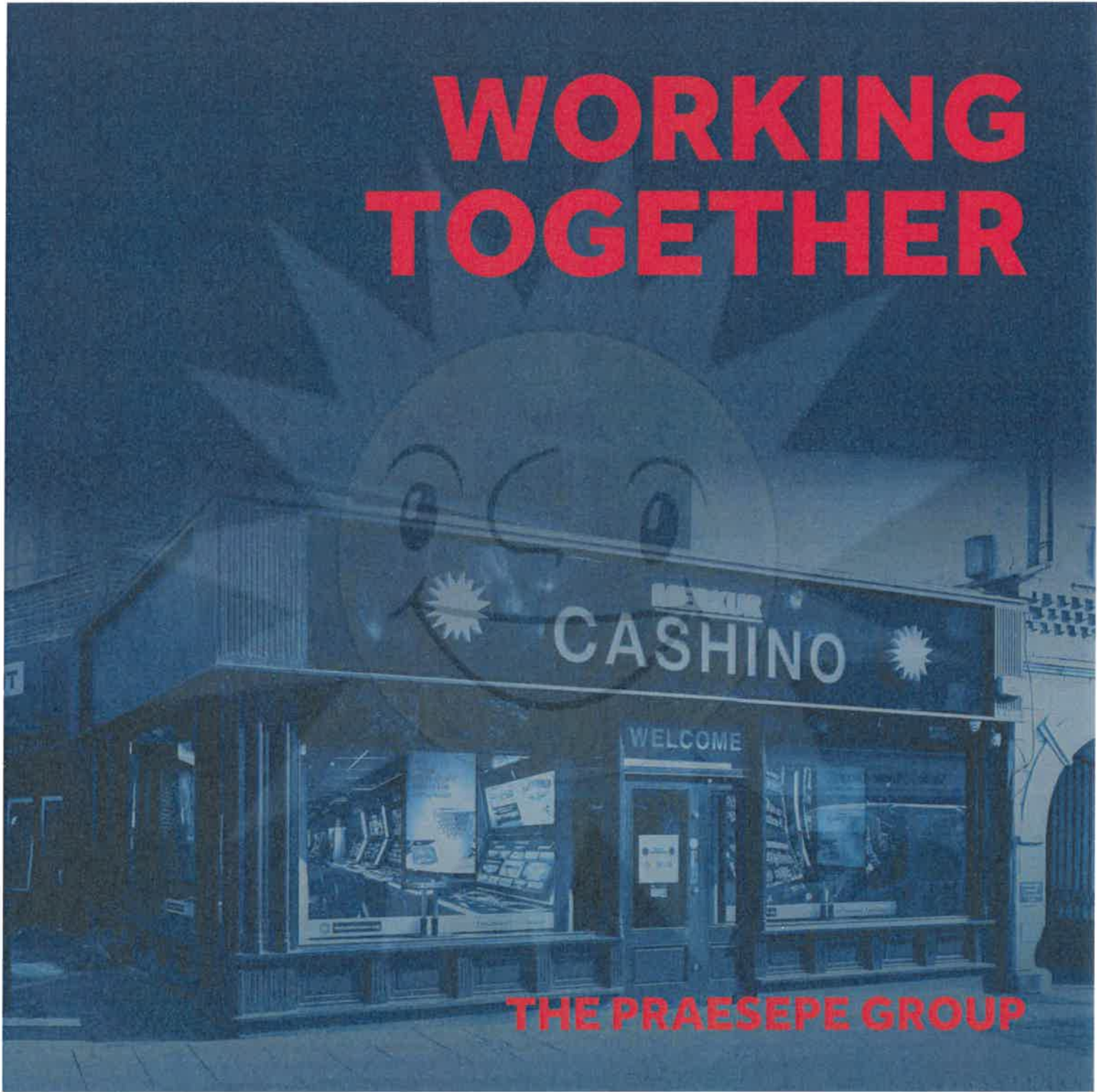
### **Objective 3 - Protecting children and other vulnerable persons from being harmed or exploited by gambling**

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

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



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



Bingo is available for play from 9am until midnight.

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



## Bingo Terminals





# Think 25

## RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

### Think 25 Messaging



### Players in Venue



## We Are Not A Problem

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

### GAMBLING COMMISSION

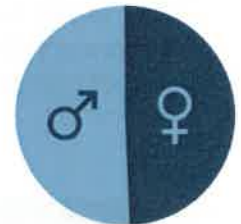
Praesepe is regulated by the  
Gambling Commission and  
Licensing Authorities



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



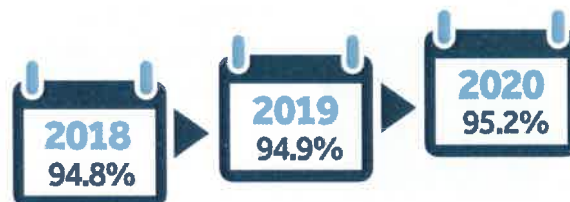
We are immensely proud of the fact that we have never had a licence revoked or even reviewed. Incidents are extremely rare. We simply do not generate noise and anti social behaviour.



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



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



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

# 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**

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

**phone** 01908 351200

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





I, **Richard Bradley** in the firm of Messrs, Poppleston Allen, Solicitors of 37 Stoney Street, The Lace Market, Nottingham, NG1 1LS refer to the following:-

1. Letter to Blackpool Council dated **23<sup>rd</sup> July 2020**
2. Application Form
3. Notice of Application
4. A copy of plan drawing number **AS/BL/02**
5. A copy of layout plan, for illustration purposes only
6. A copy of local area risk assessment
7. Operational Standards document
8. A copy of Cashino Gaming Limited's 'Working Together' document
9. Cheque in the sum of £2,940.

I FURTHER CERTIFY that I have served documents 1 - 9 upon the following:-

1. Licensing Service, Blackpool Council, Municipal Buildings, Blackpool, FY1 1NF

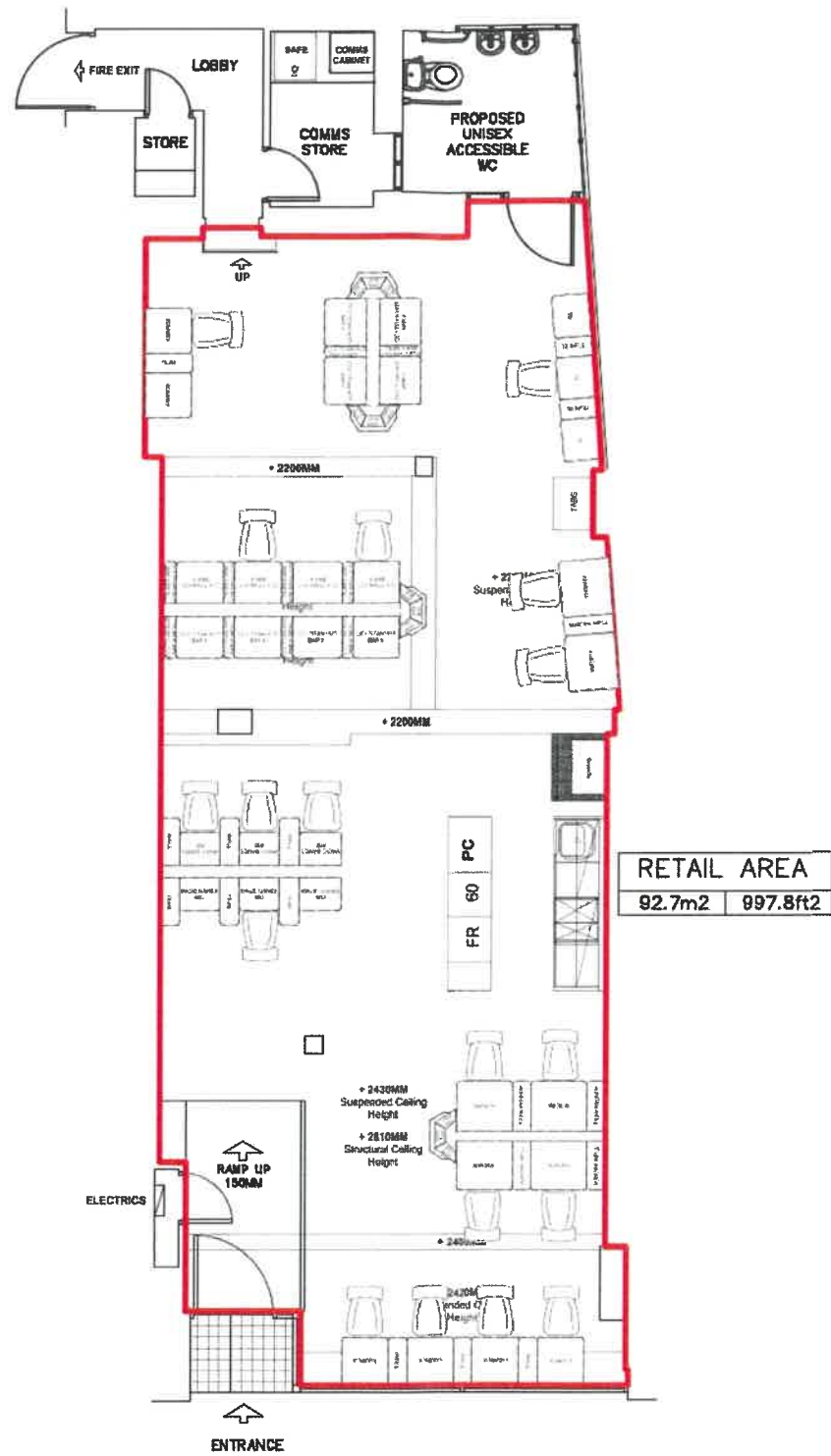
I FURTHER CERTIFY that I have served a true copy of documents 1 & 3 upon the following:-

2. Lancashire Constabulary, Licensing Unit, Bispham Police Station, Blackpool, FY2 0HJ
3. HM Revenue & Customs, Business, Tax and Customs, HM Revenue and Customs, BX9 1GL
4. Lancashire Fire and Rescue Service, Blackpool Fire Station, 62 Forest Gate, Blackpool. FY3 9RA
5. The Gambling Commission, 4th Floor, Victoria Square House, Victoria Square, Birmingham, B2 4BP
6. Child Protection Licensing Officer - Social Services Department, Childrens Services, Blackpool Council, 125 Albert Road, Blackpool, FY1 4BA
7. Planning & Transportation Division, Business and Customer Service Manager, PO Box 17, Blackpool, FY1 1LZ
8. Environmental Protection, c/o Blackpool Council, PO Box 4, Blackpool, FY1 1NA

I effected service by sending the said documents to the licensing department by **Special Delivery** and the other authorities by first class post addressed to them on **23<sup>rd</sup> July 2020**.

SIGNED..........

DATED.....*23/07/20*.....



RETAIL AREA	
92.7m2	997.8ft2

FOR ILLUSTRATION  
PURPOSES ONLY

**Ground Floor Plan 1:50**

REVISIONS

FIT OUT TYPE  
FUTURE VENUE

REFERENCE DRAWINGS

PROJECT  
MERKUR SLOTS  
40 ABINGDON STREET  
BLACKPOOL  
FY1 1DA

SCALE  
1:50

DRAWN BY

DESCRIPTION  
PROPOSED MACHINE PLAN

DATE  
00/00/00

DRAWING No.  
???-PR-05

REVISION



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12 AUG 2020

**ABINGDON BARBECUE**

**44 Abingdon Street, Blackpool FY1 1DA**

31 July 2020

Dear Sir/Madam

**Licence Application Objection – former Corals 40 Abingdon Street Blackpool**

I run the business 2 doors away from the site of these proposed bingo premises. I am surprised that a fresh application should be made so soon after it was squarely refused by our elected representatives on Blackpool Council.

I am concerned that further premises opening late in the street will create a potential gathering place for the many homeless and vulnerable people begging from customers and gathering in the area out of hours resulting in disorder.

The council is doing its best to keep the streets clear for the people of the town but these people are a problem and will deter shoppers from the area.

I maintain my objection and urge you to refuse the licence applied for.

Yours faithfully

B T Chambers



Licensing

Blackpool Council

Municipal Buildings

Corporation Street

Blackpool FY1 1NA

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Blackpool Council  
Licencing Department  
Municipal Buildings  
Corporation Street  
Blackpool  
FY1 1NA  
July 31<sup>st</sup> 2020

Dear Sirs

**New Bingo Licence Application 40 Abingdon Street, Blackpool**

I understand that a further application has been made despite the recent refusal of a similar licence by the council.

I believe the council should refuse again to protect vulnerable people (of which there seem to be many more in Blackpool town centre than elsewhere) and restrict more gambling premises with one armed bandits from grouping together in this part of the town centre. There is no doubt that the proposal will lead to public order problems in this part of the town centre both during the day and in the evening when this is a fairly peaceful area at the moment.

There are problems with these groups which are only found in Blackpool and which don't occur in other centres like Preston or other seaside towns such as St Annes or Fleetwood.

Further, it will bring the problems experienced in other parts of the town centre to this part of the town centre.

Please refuse the application because of this.

Yours



Tony Hallam  
The Bread Basket  
33 Abingdon Street  
Blackpool  
FY1 1DG

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## NOTICE OF REJECTION OF AN APPLICATION FOR A PREMISES LICENCE

This notice is issued in accordance with regulations made under section 165(2) of the Gambling Act 2005.

Notice issued by **Blackpool Borough Council**  
**PO Box 11**  
**Town Hall**  
**Blackpool**  
**FY1 1NB**

An application for a premises licence of the following type **Bingo**

Made by **Cashino Gaming Limited**

Of the following address  
 Seebeck House  
 1A Seebeck Place  
 Milton Keynes  
 MK5 8FR

The number of whose operating licence is **000-003266-N-103444**

**Is rejected**

The premises to which this notice applies are

Merkur Slots  
 40 Abingdon Street  
 Blackpool Council  
 FY1 1DA

### **This application has been rejected for the following reasons:**

This application was considered by a panel of the licensing committee at a hearing on 26 June 2020. The applicant was represented by Mr Bradley and the Objectors were represented by Mr Whur. Both parties submitted extensive written representations in advance of the hearing all of which were taken into consideration when determining this application, for the sake of brevity they will not be repeated here.

In oral submissions, Mr Bradley explained to the panel that the premises had previously been licenced as a betting office. The applicant was a recognised responsible operator who had 73 similar small high street premises. None of their licences had ever been the subject of review. The proposal was to operate a mixed use premises where bingo would be offered by way of Bingo express and via

a tablet and gaming machines would also be available for use. There would be 20 hand held tablets for bingo, 13 B3 machines, 21 Category C machines and 4 tri-max terminals. The panel were told that bingo was a 'softer' type of gambling than betting because there was a different customer profile and spend. Mr Bradley added that the local authority were in the best position to know the local area. A local area risk assessment had been prepared by the applicant but they conceded that no operation was without risk but any risk could be mitigated by having the correct policies and procedures in place. All venues were proactively managed and any emerging risks would be dealt with when they came to light. The premises would be adult only and Challenge 25 would be operated as standard. The premises was fully fitted with CCTV and there would be a maglock system on the door. Dealing with the question of hours, there was no application to vary the default hours applied to bingo licences. They would however like to operate the gaming machines to a later hour should there be customer demand for this. It was stressed that there was no intention to operate the premises 24 hours a day. A condition permitting the use of gaming machines until 1 a.m. or 2 a.m. was suggested. As far as the single staffing of the premises was concerned there would be no pre-planned single staffing after 8 p.m. which could be attached to the licence as a condition.

Mr Whur, on behalf of the objectors referred to what he considered to be deficiencies in the local area risk assessment. He told the panel that this appeared to be a tick box exercise containing standard documentation and nothing about local risks even though it did identify that the locality in which the premises is situated is an area of high deprivation with sexual health and homeless services in the vicinity. The panel were asked to compare what they had been told by the applicant with the job adverts which gave an indication that the business intended to operate seven nights a week and that applicants had to be prepared to work on their own. Mr Whur also referred to the planning application made by the applicant being for an AGC not a bingo premises. He told the panel that the application was just not good enough because it was not clear when the premises would be opened and when it would be single manned. Continuing with the issue of single manning, Mr Whur also expressed concerns about the layout of the premises there being no apparent staff facilities with staff needing to share one single unisex toilet with the customers. The panel were also asked to consider primary activity. The premises would have 13 B3 machines with a £500 pay out. Looking at the number of gaming machines compared to the number of bingo machines this operation would be very much machine led rather than bingo led.

When determining this application the panel reminded themselves of the provisions of section 153 Gambling Act 2005 that they should aim to permit the use of premises for gambling in so far as the authority think it:

- In accordance with any relevant code of practice under section 24;
- In accordance with any relevant guidance issued by the Gambling Commission under section 25;
- Reasonably consistent with the licensing objectives; and
- In accordance with the Council's statement of policy

Mr Whur, in his address made great play of the fact that the applicant had asked the authority to grant the application without a hearing under section 162(3) of the Act, describing it as an attempt to take away the discretion and decision making role of the local authority. The panel did not believe that the applicant could be criticised for seeking to have the application disposed of in this manner, officers considered the content of the request and quite properly determined that the hearing should proceed. The fact that the applicant had made this request was, in the panel's opinion, irrelevant and played no part in their decision.

Whilst the panel did agree with the applicant that it was useful to have some form of standard template for a local area risk assessment, they did feel that it was not sufficient to address the



identified risks of being one of most deprived areas in the Country with nearby services for the vulnerable. The panel were of the opinion that the risk assessment they had been provided with was generic and had not sufficiently taken account of the local conditions, for example there was no indication of measures that would be put in place to protect customers and staff when the crime level in the area is 54% above average. The panel did not believe that the location was suitable for this type of late night operation. Although conditions have been offered, albeit at the last minute, the panel are not satisfied that the granting of this application would be reasonably consistent with the licensing objectives.

An appeal may be brought against the rejection of this application by the applicant. An appeal must be instituted:

- In the Magistrates' Court for a local justice area in which the premises are wholly or partly situated;
- By notice of appeal given to the designated officer;
- Within 21 days beginning with the date of receipt of this notice of rejection.

*Sharon Davies*

29.06.20.

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