

# additional papers 2



## Licensing Sub-Committee

### Committee

Fri 11 May  
2018  
2.15 pm

Committee Room 3  
Town Hall  
Redditch

**REDDITCH** BOROUGH COUNCIL

*making  
a  
difference*

[www.redditchbc.gov.uk](http://www.redditchbc.gov.uk)

**If you have any queries on this Agenda please contact  
Sarah Sellers**

**Town Hall, Walter Stranz Square, Redditch, B98 8AH  
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**e.mail: [s.sellers@bromsgroveandredditch.gov.uk](mailto:s.sellers@bromsgroveandredditch.gov.uk)**

## **COMMITTEE PROTOCOL – LICENSING SUB-COMMITTEE – GAMBLING ACT APPLICATIONS**

Each application that comes before this Sub-Committee will be treated on its own merits. This licensing authority will make its decision based on the merits of the application and the three licensing objectives, namely:

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

and will also have regard to the Guidance issued by the Gambling Commission and the Redditch Borough Council Statement of Principles published in accordance with section 349 of the Gambling Act 2005.

Members of the Sub-Committee will meet prior to the hearing to note matters to be presented, assisted by the legal and administrative support Officers only. The actual application will not be discussed.

### **LICENSING HEARING PROCEDURE**

#### **The Hearing**

#### **Preliminary Issues**

1. The Sub-Committee may proceed in the absence of a party (or representative) if the party has:
  - Informed the Sub-Committee that he or she does not intend to attend or be represented at a hearing; or
  - Failed to inform the Sub-Committee whether he or she intends to attend; or
  - Left the hearing in circumstances enabling the Sub-Committee to reasonably conclude that he or she does not intend to participate further.
2. If a party, who has indicated that he or she intends to attend, fails to attend or be represented at a hearing the Sub-Committee may:
  - Where it considers it to be necessary in the public interest; adjourn the hearing to a specified date and notify the parties of the date, time and place to which the hearing has been adjourned; or hold the hearing in the party's absence.
3. Where the Sub-Committee holds a hearing in the absence of a party, it will consider at the hearing the application, representations or notice made by that party.
4. The Sub-Committee will not take into account any written comments or documentary evidence from a party which is first produced at the hearing, without the consent of all parties in attendance at the hearing.
5. Cross-examination shall not be permitted unless the Committee considers that it is required to enable it to consider the representations, application or notice as the case may require.

6. At all times it will be a matter for the Chair as to the precise format and order of events.
7. The hearing of the Sub-Committee must take place in public, however a Sub-Committee may direct that all or part of a hearing must be in private if it is satisfied that it is necessary in all the circumstances of the case, having regard to-
  - Any unfairness to a party that is likely to result from a hearing in public; and
  - The need to protect as far as possible, the commercial or other legitimate interests of a party.

### **Procedure**

8. The Chair will open the meeting, outlining the nature of the decision to be taken, and will identify the members of the Sub-Committee and Council Officers present.
9. The Chair will then ask all parties present for that agenda item to introduce themselves.
10. The Chair will give a brief outline of the procedure to be followed at the hearing.
11. The Technical Officer, Licensing, Worcestershire Regulatory Services will present the report, outlining any relevant representations and relevancies to the Redditch Borough Council Statement of Principles and associated Guidance issued by the Gambling Commission and other statutory provisions where relevant.
12. The Technical Officer may be questioned by members of the Sub-Committee and any party on any matter that is relevant to the application or to any representations made on the application where the Sub-Committee considers that in all the circumstances it is appropriate to do so.

(Similar rights of questioning will apply, with the Sub-Committee's permission, in relation to paragraphs 13, 15, 17 and 19 below.)

13. The Applicant and / or his / her representative will speak in support of the application.
14. The Applicant and / or his / her representative may be questioned by members of the Sub-Committee.
15. Any witnesses called by the applicant will then make representations to the Sub-Committee.

(Similar rights will apply in relation to witnesses called by other parties.)

16. The witnesses may be questioned by members of the Sub-Committee.
17. Any officers of the responsible authorities or their representative(s) will be invited to make relevant representations to the Sub-Committee.
18. The responsible authorities and / or their representative(s) may be questioned by members of the Sub-Committee.
19. Any interested parties who have made representations in accordance with the statutory procedure will be invited to outline their relevant representations to the Sub-Committee.



20. The interested parties may be questioned by members of the Sub-Committee.
21. The Technical Officer will be invited to make a closing statement.
22. Each responsible authority who submitted a relevant representation will be invited to sum up.
23. Any Interested parties who have made representations will be invited to sum up.
24. The Applicant and / or his / her representative will be invited to sum up
25. The Chair will ask the Legal Advisor if there is any legal advice to be given.
26. At the conclusion of the hearing members of the Sub-Committee, the Legal Advisor and the Democratic Services Officer will withdraw from the meeting room so that the Sub-Committee can reach its decision in private.
27. The Chair may depart from the above procedure if he / she considers it is in the interests of natural justice to do so, either of his / her own volition or upon application by any party. Before doing so he / she shall invite the views of the parties present and consider any representations that may be made.

### **Decision**

28. The Sub-Committee's decision will not be announced on the day of the hearing but rather, it will be sent to the Applicant and all those parties who made representations within 5 working days.

## **Notes**

1. *Any changes in Sub-Committee membership will be given at the beginning of the meeting.*
2. *Each party will be limited to a maximum time of ten minutes in which to make representations to the Sub-Committee. This period may be extended at the discretion of the Chair. If an extension is agreed, all parties are to be allowed the same time to make representations. Where appropriate, if several parties wish to make the same representation, a spokesperson may, by consent, be appointed, in which case the spokesperson is to be allowed the same period of time as other representatives. If a spokesperson is not appointed, the amount of time must be shared between the persons wishing to make the same representation.*
3. *Any person wishing to make representations and Applicants / Licence Holders can be represented by a legal representative (at their own expense) or by a Councillor.*
4. *The Sub-Committee may require any person attending the hearing, who in its opinion is behaving in a disruptive manner, to leave the hearing and may:*
  - *refuse to permit that person to return; or*
  - *permit that person to return only on such conditions as the Sub-Committee specify,**but such person may, before the end of the hearing, submit in writing any such information which they would have given orally had they not been required to leave.*
5. *Decisions will generally be taken regardless of whether the applicant is present.*
6. *The Sub-Committee will make its decision within 5 working days beginning with the day or the last day on which the hearing was held, and will inform the applicant as soon as is practicable thereafter of its decision.*
7. *Applicants have a right to appeal, details of which can be obtained via the Licensing Officer.*
8. *It is not the general policy of the Council to enter into discussions or correspondence on matters relating to the hearing or any decision made at the hearing.*
9. *Any irregularity resulting from any failure to comply with any provision of the relevant Regulations before the Sub-Committee has made a determination shall not of itself render the proceedings void. In the case of such irregularity, the Sub-Committee shall, if it considers that any person may have been prejudiced as a result of such irregularity, take such steps as it thinks fit to cure the irregularity prior to determination.*
10. *Clerical errors in any document recording a determination of the Sub-Committee or errors arising in such document from accidental slip or omission may be corrected by the Sub-Committee.*
11. *Parties are not normally permitted to cross-examine or question other parties at Licensing Sub-Committee hearings except with the permission of the Sub-Committee. It is important that questions should not be hostile or seek to unfairly undermine the position of any party.*
12. *In the event of any conflict between this procedure and the relevant regulations, namely The Gambling Act 2005 (Proceedings of Licensing Committees and Sub-Committees) (Premised Licences and Provisional Statements) (England & Wales) Regulations 2007, then the Regulations will prevail.*



# Licensing Sub-Committee

Friday, 11th May, 2018

2.15 pm

Committee Room 3 Town Hall

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## Agenda

### Membership:

Cllrs:

Tom Baker-Price  
Anita Clayton

Antonia Pulsford  
Pat Witherspoon

- 5.** Application for an Adult Gaming Centre Premises Licence - 8/10 Unicorn Hill, Redditch, Worcestershire, B97 4QR (Pages 1 - 26)

The Applicant has provided the additional information attached in support of the application:-

Statement of Gavin Dalzell, National Licensing Manager for Ladbrokes Betting and Gaming Limited dated 23 April 2018.

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GAMBLING ACT 2005APPLICATION FOR AN ADULT GAMING CENTRE PREMISES LICENCE

**APPLICANT:** Ladbrokes Betting and Gaming Limited

**PREMISES:** 8/10 Unicorn Hill, Redditch, Worcestershire, B97 4QR

Statement of Gavin Dalzell

1. My name is Gavin Dalzell and I am employed by Ladbrokes Coral Group, whose principal office is One Stratford Place, Montfichet Road, London, E20 1EJ.
2. I am the Company's National Licensing Manager and have responsibility for dealing with all issues relating to the Company's licensed betting office and adult gaming centre estate, including dealing with applications such as the one presently under consideration.
3. I have been in the betting industry for over 40 years, and for the past 33 years have been a Licensing Manager.
4. I am aware of the relevant legislation in broad terms and the guidance from the Gambling Commission. I am well aware of the licensing objectives.
5. In preparation for this application I have visited Redditch and have consulted with our local management team. I have researched websites and I have checked company records.
6. This application is made by Ladbrokes Betting and Gaming Limited. The Company has recently further widened its gambling offer to include the provision of adult arcades (AGCs). Two AGC Premises Licences have already been granted in Nuneaton and Acocks Green, Birmingham.
7. It is my Company's wish to establish a new, modern adult gaming centre in these premises, which formerly traded as a Coral licensed betting office. The premises have been lying vacant since July 2017. Planning permission for use as an AGC was granted on 15 February 2018.
8. I have attached a photo showing our proposed premises and also a shop layout plan of those premises.
  - i. The proposed premises will provide a second adult gaming centre in Redditch, the existing adult gaming centre being operated by Shipleys at 21/22 Church Green East. It should be noted that Ladbrokes intend to spend a little over £70,000 in fitting out the proposed premises to an excellent standard.
  - ii. Ladbrokes take great care in the design and layout of our premises. This includes:..

Both stepped and disabled friendly ramped entrance from Unicorn Hill. Entrance doors will be fitted with staff controlled maglocks.

There will be A4 size u18 and Think 21 signage at the entrance, details of opening/closing times and notification of CCTV coverage within the premises. CCTV cameras will be located throughout the premises ensuring that all areas are covered and can be viewed on a split screen facility from behind the counter area.

A staff counter area will be provided and we will provide separate staff toilets and male and female/disabled customer toilets. We will provide circa 40 machines within the premises of which 8 will be Category B3, with the remainder being Category C or D. All machines will be fitted with a 'blocking' system which enables the staff to stop play on each of the machines. GamCare/BeGambleAware and Problem Gambling leaflets will be available throughout the shop.

Our premises will initially be staffed by a team of 12 with a minimum of two persons on duty.

Staff will be able to lock the entrance, if there are any concerns, by the magnetic door lock controls (Mag Locks) from the counter. This can also be used, eg, to prevent any excluded person from entering. Staff will exclude any person who behaves in a criminal or anti-social manner. Ladbrokes adopt a zero tolerance approach towards drugs and alcohol abuse and the Company's strong Zero Tolerance policy will be implemented through staff with assistance of the Central Control team should the need arise. Persons who appear to be under the influence of drugs or alcohol, will be positively deterred from entering the premises.

The staff will have panic alarm buttons through to the Ladbrokes' 24 hr control room. Police visiting this control room have been very impressed by the systems in place.

The safe will be located in the store room within the staff counter area and the safe insert will be operated by a controlled time delay. Notices in the customer area will confirm that only limited amounts of money are retained in the office.

- iii. Ladbrokes staff have detailed training concerning the importance of ensuring that no under age persons are admitted to our premises.
- iv. Ladbrokes apply a strict Think 21 code of practice. Staff have to complete a log, which is retained on the premises, every time a customer is challenged on age.
- v. Ladbrokes also apply a responsible code of practice of care to our customers, providing a self-exclusion option form, which allows customers to request that they be refused entry into any Ladbroke AGC establishment or other AGC belonging to the Multi- Operator Self-Exclusion Scheme (MOSES) within a customer defined radius of up to 5000 metres (approximately 3 miles) from their home or nominated AGC
- vi. There will be documents located throughout the premises which are available to people who visit our premises and which give guidance with regard to

responsible gambling, complaints and self-exclusion. Ladbrokes are committed to protecting the vulnerable and young persons, as shown in these documents.

- vii. In summary, our premises will provide clear and accessible information on how to gamble responsibly by highlighting sources of help, training staff to detect signs of potential problem gambling and how to interact with those identified and undertake analysis to identify abnormal activity in premises and specific customers.
9. It is interesting to note that the only other operator in the town, Shipleys, have not made representation to our application. However, it is worth noting in passing that my Company would not be investing a significant sum in this project unless it was felt that there was a substantial level of demand on the part of both local people and visitors to the area for facilities of the quality which we intend to provide.
  10. As previously mentioned, planning permission was granted to Ladbrokes to use these premises as an adult gaming centre on 15 February 2018. In reaching their decision, the planners decided that our proposed use is a main town centre use which is likely to contribute to the vitality and viability of the town centre and add to the diversity of uses on offer in the town. It was also expressed that the proposed site is within a high street location wherein a certain amount of evening activity is to be expected.
  11. Also, in order to prevent any increase in crime and antisocial behaviour in the area and to protect our premises from crime and antisocial behaviour, Ladbrokes will provide full details of internal CCTV provision and relevant security systems (including management and maintenance details of these systems) to responsible authorities on request.
  12. Details of the CCTV provision are as follows:
    - The premises shall install and maintain a comprehensive CCTV system. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system shall have motion sensitive cameras and have the ability to be live streamed at all times.
    - All recordings shall be stored for a period of 31 days with date and time stamping. Recordings shall be made available upon the request of Police or authorised officer throughout the preceding 31 day period.
    - Notices indicating that CCTV is in use at the Premises shall be placed at or near the entrance to the Premises and within the Premises.
    - The counter area will have a CCTV monitor to enable staff to monitor the shop area.
- Staff Guard monitoring system will be fitted in the proposed premises. Staff Guard System has 24hour monitoring with fully qualified operators with SIA registered staff. The system enables the operators to listen, talk and view live CCTV. The operator

has the ability to call the Fire, Police or Ambulance services and raise level 1 status emergency calls. The system also offers Intruder Alarm, Fire Detection, CCTV and Man Down detection.

- The fitting of 'Staff Guard' will enable staff to covertly call for assistance if required and the operator to talk on loud speaker to the staff & customers with action being taken if required.
- Staff will wear a key fob while on the shop floor and have the ability to contact Staff Guard to listen in if required.
- The Counter area will be fitted with two tills, CCTV and a full height security screen to the standard of 'Secure By Design' (SBD) as recommended by the Metropolitan Police Service.
- Entrance door will be fitted with clear glass to assist with security and staff vision as to who is coming in and the street scene outside, to ensure no drinking and loitering is taking place.
- The entrance door will be fitted with a Magnetic Lock (Mag Lock) which is activated from behind the counter. This will enable staff to lock & unlock the front door from behind the counter at opening and closing times. Staff are able to active the Mag Lock at other times during the day should it be required.
- Staff will monitor who has access to the toilets and the length of time any persons remain in the toilet.
- Experienced staff members will be operating the premises.
- Digital Safe with time delay insert will be fitted and will meet the SBD standards.
- Signage will be displayed to show we use time delay cash control
- All windows, counter screens, counter doors, entrance door, locks, safe & shop windows will meet the SBD set by the Metropolitan Police Service

13. When considering a location for new premises and the resulting Premises Licence application, Ladbrokes take serious consideration of the Licensing Objectives as set out in the Gambling Act 2005, which are,

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

14. The Company will also carry out a Preliminary Premises Risk Assessment.



15. I have reviewed the Local Area Risk Assessment which accompanied our application and believe that, in all the circumstances, additional information would assist the Committee. I therefore attach a further version of the Assessment which I invite the Committee to substitute for the earlier version.
16. That Assessment considers the shop and local area, a security assessment and any threats to the licensing objectives and takes into account the requirements of the Licensing Authority in this respect as set out in its Statement Policy. The Assessment attached draws the conclusion that any risks that have been identified will be controlled appropriately to prevent harm to the licensing objectives.
17. Ladbrokes ensure that all staff receive a comprehensive training programme in pursuance of the licensing principles. This training covers the following:
  - The Protection of Vulnerable People
  - Signs of Problem Gambling & Interaction
  - Self –Exclusion & Reinstatement
  - Breach of Self-Exclusion
  - Think 21
  - Complaints & Disputes
  - Anti-social Behaviour, Smoking, Drugs & Alcohol
  - Responsible Gambling (GamCare/BeGambleAware)
  - Money Laundering & Money Lending
  - Shop Licensing conditions
  - Fundraising, Marketing & Promotion Guidelines
  - Training is completed via staff briefings, interactive learning online and regular ongoing refresher training.
  - Premises procedures and ways of working are covered within the training programme. Some of the areas covered include:
    - Cash handling procedures
    - Open and closing a premise
    - Floor walking
    - Drug awareness
    - Robbery and Crime Prevention
18. The only representation lodged to this application is from Power Leisure Bookmakers Limited, who operate a licensed betting office in Redditch.
19. This application is for an AGC premises licence and I confirm that the premises will be properly operated within the legal restrictions for such a licence. It is not an attempt to circumnavigate the gaming machines restrictions as suggested by Power Leisure Bookmakers. It is an entirely separate style of operation and offer to that of a licensed betting office.

20. It is my view that the presence of a Ladbroke adult gaming centre at this site will enhance the already existing vibrancy of the area. We will occupy premises that have been lying vacant for some 10 months and we will be investing some £70,000 in shop fitting the premises to a very high standard. As is the norm, we would liaise closely with the Police, the local authority and other responsible authorities to ensure the smooth operation of our facility.



Gavin Dalzell

23 April 2018

**Statement of Gavin Dalzell****re: 8/10 Unicorn Hill, Redditch****APPENDICES INDEX**

- |          |   |
|----------|---|
| <b>1</b> | <b>Photo of Proposed Premises</b>       |
| <b>2</b> | <b>Premises Plan</b>                    |
| <b>3</b> | <b>Door signage</b>                     |
| <b>4</b> | <b>Customer information</b>             |
| <b>5</b> | <b>Think 21 Poster</b>                  |
| <b>6</b> | <b>Think 21 Register</b>                |
| <b>7</b> | <b>Responsible Gambling information</b> |
| <b>8</b> | <b>Local Area Risk Assessment</b>       |
| <b>9</b> | <b>Machine Categories</b>               |







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PROPOSED	
GROSS UNIT AREA	1400 SQFT
GROSS CUSTOMER AREA	SQFT
NET CUSTOMER AREA	SQFT
NEWSPAPER DISPLAY AREA	
LIFT	
DATE	10/10/2018
BY	10/10/2018
CHK	
APP	

**l-kreative**

**DO NOT SCALE OFF THIS DRAWING**

**LADBROKES CORAL**  
GROUP

**815 UNICORN HILL**  
**REGENT ROAD**  
**WORCESTER, B97 4QR**

**LICENSING PLAN**

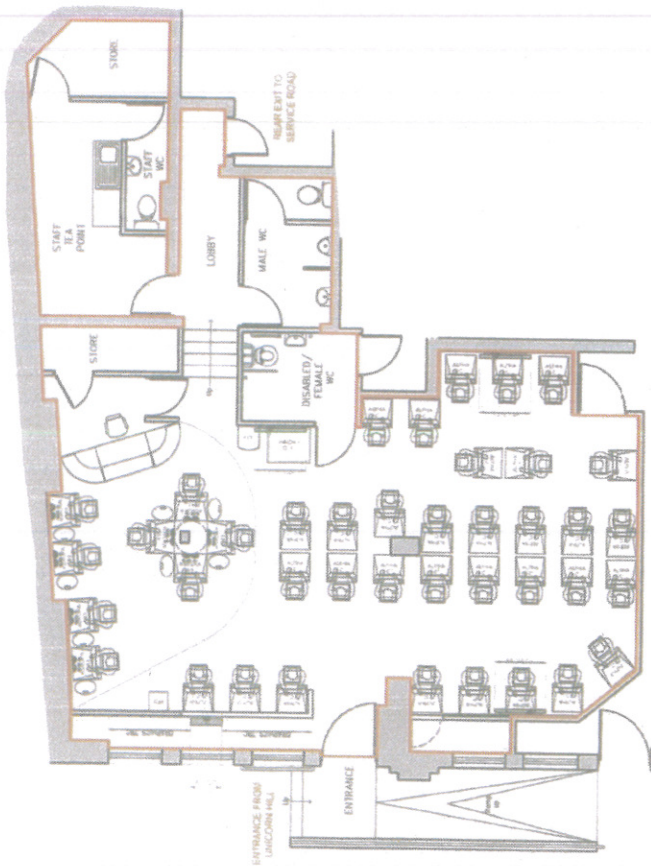
Date: 10/10/2018  
Scale: 1:1000 & 1:5000  
Project: 024  
File: 02

Project Number: LADCB08/110817/P001



This building and contents of this part of the premises which will be used for the purposes of the licence in relation to the licence

Anything which is shown on this plan, which is not required by the plan regulations, is for illustrative purposes only and does not form part of the licence



Proposed Ground Floor Layout







**Ladbrokes**

## STAYING IN CONTROL

**SELF-EXCLUDE**  
FROM MORE THAN  
**ONE**  
**BOOKMAKER**  
IN YOUR AREA

We seek to promote responsible attitudes to betting in our shops.

18+ NATIONAL GAMBLING HELPLINE  
0808 8020 133

If you think that you, or someone you know, might have a gambling problem, please pick up a leaflet or call the In-cash GamCare National Helpline on:

**0800 294 2060**

or look on the GamCare website: [www.gamcare.org.uk](http://www.gamcare.org.uk)

WHEN THE FUN STOPS STOP

**? THINK 21**

**Ladbrokes operates a Think 21 policy in all shops**

**If you LOOK under 21 YOU WILL BE ASKED to prove that you are over 18**

**Please don't be offended if asked and help our staff to do their job**

Forms of acceptable identity:

- Cards bearing the PASS hologram
- Photographic Driving Licence
- Passport

If you are under 18 you are committing an offence by being in a betting premises.

**Ladbrokes**

**Ladbrokes**

## It's the Law

**18**  
no under 18s

- Under 18s are not allowed to enter our premises
- You can help us by
  - Not bringing children into our shops
  - Producing appropriate identification when requested to do so
- We will also not allow anyone to encourage Under 18s to gamble

**No Smoking**

- These are no smoking premises
- It is an offence to smoke or to knowingly permit smoking on these premises

**No Alcohol**

- Alcohol is not permitted on these premises

**Your understanding in these matters is appreciated**

Bet responsibly [www.gamblingaware.co.uk](http://www.gamblingaware.co.uk)



Under 21 Log

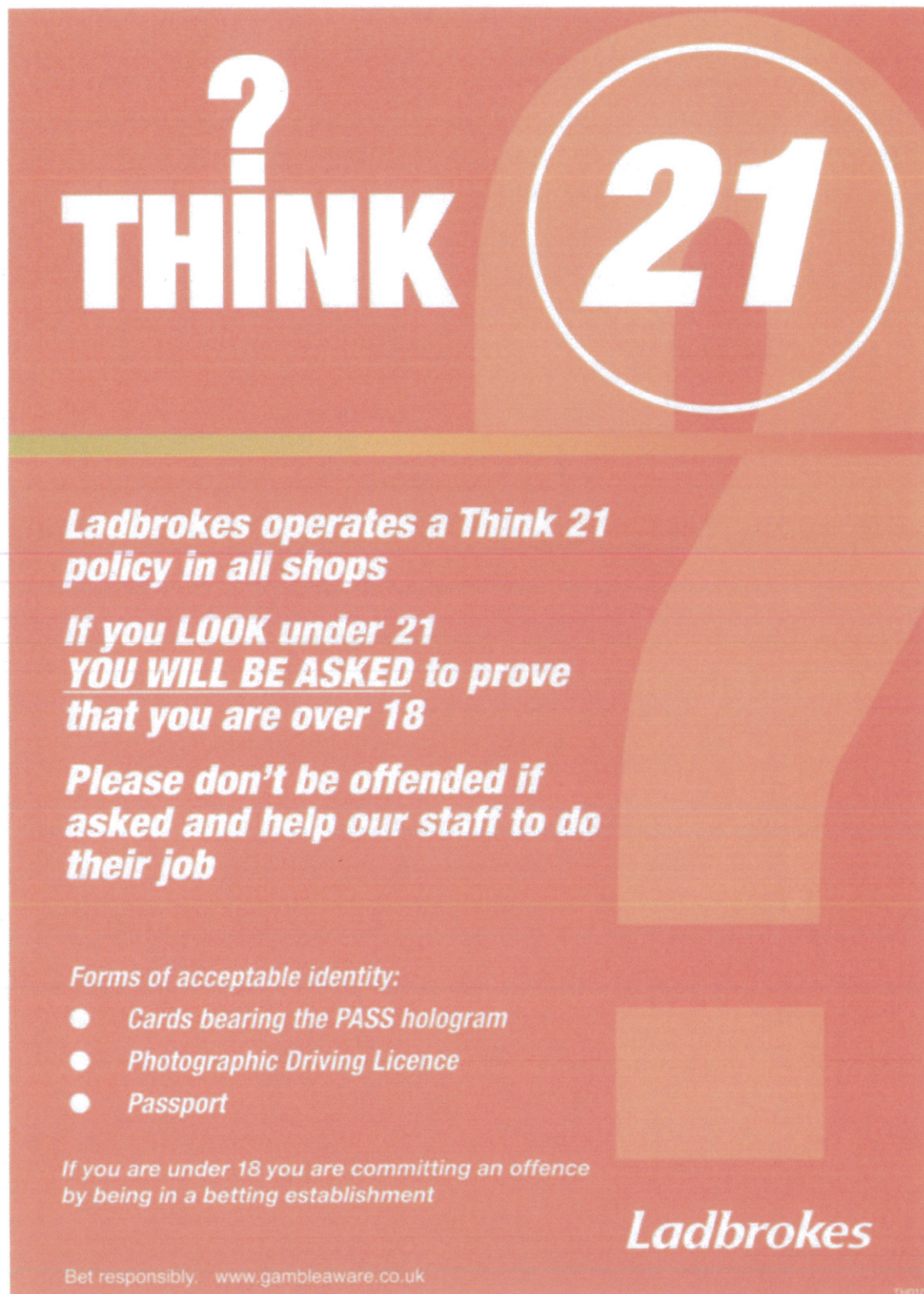
Ladbrokes serious about compliance

August

Date	Time	Employee Name	Challenged no valid ID		Challenged valid ID provided			
			Not Yet Gambled	Gambled	Passport	Driving Licence	Valid other (pass hologram)	
02/08/09	11.15am	John Smith	0	0		0		
02/08/09	1.55pm	Mary White	✓		✓			
03/08/09	6.35pm	Mary White	✓					
05/08/09	3.30pm	Steve Jones		✓				
09/08/09	7.35pm	John Smith				✓		
10/08/09	11.07pm	John Smith	✓					
10/08/09	2.08pm	Brenda Wilson				✓		
10/08/09	7.45pm	Steve Jones				✓		
12/08/09	8.37pm	John Smith		✓				
14/08/09	5.12pm	Mary White			✓			
15/08/09	3.50pm	Mary White	✓					
15/08/09	7.08pm	Steve Jones	✓					
18/08/09	6.35pm	Steve Jones	✓					
19/08/09	4.27pm	Brenda Wilson					✓	
Regulatory Return - monthly total/sub-total (delete as appropriate)			6	2		6		

64/2083



A poster with a red background. At the top, the word "THINK" is in large white capital letters, with a large white question mark above it. To the right, the number "21" is in large white italicized font, enclosed in a white circle. Below this, the text "Ladbrokes operates a Think 21 policy in all shops" is written in white. Then, "If you LOOK under 21 YOU WILL BE ASKED to prove that you are over 18" is written in white, with "LOOK" and "YOU WILL BE ASKED" in all caps. Next, "Please don't be offended if asked and help our staff to do their job" is written in white. Below that, "Forms of acceptable identity:" is written in white, followed by a bulleted list: "Cards bearing the PASS hologram", "Photographic Driving Licence", and "Passport". Then, "If you are under 18 you are committing an offence by being in a betting establishment" is written in white. The "Ladbrokes" logo is in white at the bottom right. At the bottom left, "Bet responsibly. www.gambleaware.co.uk" is written in small white text. A small "T14010" code is at the bottom right.

**THINK** **21**

***Ladbrokes operates a Think 21 policy in all shops***

***If you LOOK under 21  
YOU WILL BE ASKED to prove  
that you are over 18***

***Please don't be offended if  
asked and help our staff to do  
their job***

***Forms of acceptable identity:***

- *Cards bearing the PASS hologram*
- *Photographic Driving Licence*
- *Passport*

***If you are under 18 you are committing an offence  
by being in a betting establishment***

***Ladbrokes***

Bet responsibly. [www.gambleaware.co.uk](http://www.gambleaware.co.uk)

T14010



# EMPLOYEE GUIDE TO RESPONSIBLE GAMBLING

## ARE YOU STAYING IN CONTROL?

PLEASE SEE OVERLEAF IF YOU  
NEED FURTHER HELP OR ADVICE

**NATIONAL GAMBLING  
HELPLINE**  
**0808 8020 133**

INFORMATION AND SUPPORT ALSO AVAILABLE IN  
MANY OTHER LANGUAGES VIA THE WEBSITE BELOW



**Ladbrokes**

WHEN THE **FUN** STOPS **STOP**

Be Gamble Aware 18+

Ladbrokes supports responsible gambling at all times and offers all employees who choose to gamble the following guidance:

- Working in the industry does not give you an 'inside edge' or any special advantage
- Your chances of winning or losing are no different to that of the customer
- Know how much you can afford to lose and stop gambling when that point is reached
- Remember to set a time and spend limit when using a gaming machine to assist in managing your play
- If gambling stops being fun and you feel a problem is developing consider seeking advice and support in confidence from your HR advisor or the **NATIONAL GAMBLING HELPLINE** (operated by GamCare), or visit [www.gambleaware.co.uk](http://www.gambleaware.co.uk)
- Ensure you only gamble in accordance with the relevant employee gambling policy

Please remember the warning signs!

- **Don't** chase losses by continuing to gamble when on a losing streak
- **Don't** see gambling as anything other than a form of entertainment
- **Don't** use gambling as a way to escape from other problems
- **Don't** try to hide the extent of your gambling from family and friends
- **Do** seek support from your HR advisor and/or the **NATIONAL GAMBLING HELPLINE** (GamCare) if you feel your gambling is getting out of control



**0808 8020 133**  
[www.gamcare.org.uk](http://www.gamcare.org.uk)



1567/LCG66/L



# Preliminary Premises Risk Assessment for proposed AGC Operation

LADBROKES CORAL GROUP

<b>Region &amp; Area</b>	MD11	Shop Code & Address	8/10 Unicorn Hill, Redditch, B97 4QR	
<b>Local Regulatory Authority</b>	Redditch Borough Council			
<b>Date of Assessment</b>	25.04.2018			
<b>Names and Positions of Persons Contributing to the Risk Assessment</b>	<b>Colleague Name</b>	<b>Job Title</b>	<b>Signature</b>	
	Neil Amos	RSJ		
<b>Work activity being assessed</b>	<p>This risk assessment is comprised of three sections which address safety of our colleagues in the workplace, as well as ensuring we fulfil our obligations under our licensing objectives;</p> <ul style="list-style-type: none"> <li>- <b>Section 1: Shop and Local Area Profile</b> - reviews general profile of the shop, including any incident history as well as the local community and crime statistics to assess whether the shop is at greater risk of incidents</li> <li>- <b>Section 2: Security Assessment</b> - reviews general work activities in an AGC at different times throughout the working day to assess the risk of work related violence, aggression and conflict to colleagues and customers</li> <li>- <b>Section 3: Threat to Licensing Objectives</b> - considers local area risks and hazards / controls posed by the physical design of the shop on meeting our licensing objectives obligations</li> </ul>			
<b>Overall Risk Rating of shop</b> Following completion of risk assessment, record the risk rating by combining the Risk Ratings of Sections 2 & 3 (i.e. Risk Rating = 2b)	<b>2b</b>	<b>Single Scheduling Restrictions</b> Following the completion of the risk assessment, record details of any single scheduling restrictions imposed on the shop as per Appendix B	No single scheduling permitted from 7pm onwards	
<b>Additional Control Measures / Actions</b>		<b>By Who</b>	<b>By When</b>	
Following the risk assessment, record summary of any additional control measures / actions which must be implemented				

## Section 1: Shop and Local Area Profile

This section of the assessment should be completed by the assessor taking into account relevant local crime statistics (anti-social behaviour, criminal damage, drugs, robbery, theft from person, violence and sexual offences), local community, shop incident history and local management knowledge of the area. This information should be used throughout sections 2 and 3 of this risk assessment when determining a risk rating for the shop.

Category	Information																								
<b>Shop Profile</b> Record details of the current shop layout, including position of counter, CCTV coverage, blind spots, etc which may impact on the risk profile of the shop	The shop is a large unit housed in a run of terraced commercial properties in the town centre of Redditch, opposite the entrance to the Kingfisher Shopping Centre. There is an existing customer entrance on the front of the building, facing Unicorn Hill, and an emergency exit at the rear of the premises.																								
<b>Shop Incident History</b> Record details of relevant significant incidents reported over the last three year for the shop. Highlight any significant concerns which have not been adequately addressed through control measures	The shop has not traded as an AGC, but was previously operated as a Coral shop. I have had regard to the records for that operation over the last 3 years of its trading and only two incidents were recorded during that time worth mention. The two incidents recorded were one of drug paraphernalia being identified by colleagues in the customer toilets, and one of a breach of a Self-Exclusion agreement by a customer.																								
<b>Proposed Control Measures</b> Mark all control measures that apply with an <input checked="" type="checkbox"/>  All colleagues must read the shop operating procedures (SOP's), which provide instruction on how to work safe and secure in the shop.	<table border="1"> <thead> <tr> <th>StaffGuard</th><th></th><th>Portable Panic Alarm (shop only)</th><th>Machine block</th></tr> </thead> <tbody> <tr> <td><input checked="" type="checkbox"/> CCTV</td><td><input checked="" type="checkbox"/></td><td><input checked="" type="checkbox"/> Portable Panic Alarm (individual)</td><td><input checked="" type="checkbox"/> Safe haven (door opens outwards)</td></tr> <tr> <td><input type="checkbox"/> Duress code (alarm panel)</td><td><input checked="" type="checkbox"/></td><td><input checked="" type="checkbox"/> Magnetic lock (front door)</td><td><input checked="" type="checkbox"/> Money belt</td></tr> <tr> <td><input checked="" type="checkbox"/> Counter screen</td><td><input checked="" type="checkbox"/></td><td><input checked="" type="checkbox"/> Magnetic lock (toilet)</td><td><input type="checkbox"/> Smoke cloak</td></tr> <tr> <td><input checked="" type="checkbox"/> Single scheduling restrictions</td><td></td><td><input type="checkbox"/> Personal distress alarm</td><td><input type="checkbox"/> Mosquito alarm</td></tr> <tr> <td colspan="4">Other (please specify):</td></tr> </tbody> </table>	StaffGuard		Portable Panic Alarm (shop only)	Machine block	<input checked="" type="checkbox"/> CCTV	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Portable Panic Alarm (individual)	<input checked="" type="checkbox"/> Safe haven (door opens outwards)	<input type="checkbox"/> Duress code (alarm panel)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Magnetic lock (front door)	<input checked="" type="checkbox"/> Money belt	<input checked="" type="checkbox"/> Counter screen	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Magnetic lock (toilet)	<input type="checkbox"/> Smoke cloak	<input checked="" type="checkbox"/> Single scheduling restrictions		<input type="checkbox"/> Personal distress alarm	<input type="checkbox"/> Mosquito alarm	Other (please specify):			
StaffGuard		Portable Panic Alarm (shop only)	Machine block																						
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<input checked="" type="checkbox"/> Single scheduling restrictions		<input type="checkbox"/> Personal distress alarm	<input type="checkbox"/> Mosquito alarm																						
Other (please specify):																									
<b>Local Area Profile</b> Record detail of other businesses and services within the local community which may impact on the risk profile of the shop i.e. schools, pubs, drug clinics, etc	<ul style="list-style-type: none"> <li>- Traditional high street location</li> <li>- Located in the centre of town in the main shopping district, opposite Kingfisher Shopping Centre</li> <li>- Train and bus stations</li> <li>- Numerous pubs, bars and restaurants</li> <li>- Competitor AGC and LBOs</li> <li>- High school and college</li> </ul>																								

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- 0.4 miles from addiction treatment facility.				
<p><b>Local crime statistics</b> Record the crime rank, indicating the highest likely crimes in the area. Where 0 equals lowest and 100 equals highest ranked crime rate.</p> <p>These statistics are taken from the UK Crime Stats website (<a href="http://www.ukcrimestats.com">http://www.ukcrimestats.com</a>)</p> <p>Note: these statistics should be used for indicative purposes, but must be used in conjunction with all other evidence.</p>	<b>Crime Type</b>	<b>Rank</b>	<b>Additional information March 2017 – February 2018 Number of incidents</b>	
	Anti-Social Behaviour	99.576	1295	
	Burglary	93.159	148	
	Criminal Damage & Arson	98.631	228	
	Drug Crimes	98.120	60	
	Possession of Weapons	99.658	23	
	Robbery	98.176	24	
	Theft from the person	99.074	53	
	Violent crime	99.719	990	
	<p>No local policing priorities listed on West Mercia Police website.</p> <p>The Licensing Authority recognises that properly regulated gambling contributes to the growth of the City's local economy. The Council will also liaise with the Gambling Commission. A further objective under the Act is to protect children and other vulnerable people from being harmed or exploited by gambling, and all applications have to be determined with the due consideration of the objectives under the Act.</p>			
<p><b>Local Policing Priorities &amp; Local Authority Gambling Policy (if applicable)</b> If available, record the local police priorities for the area. Local Authority gambling policies can be found on google drive</p>	<p>Analysing reported incidents on the central database demonstrates that the Coral LBO previously housed in the existing site, as well as the Ladbrokes LBO are subject to very few incidents, none of which have been significant. 'Pathways To Recovery' (opened 09.12.2011) is an addiction treatment facility located 0.4 mile on the opposite side of the Kingfisher Shopping Centre. Moving from the facility to Unicorn Hill would be via the Kingfisher Shopping Centre, first passing the Ladbrokes, on exiting the shopping centre. One recorded incident of a customer breaching their Self- Exclusion agreement at the Coral LBO, however it is unknown if the customer concerned was an attendee at the treatment facility. There is a homeless population in the town centre, who engage in begging on the street close to the Kingfisher Shopping Centre. No recorded instances of incidents involving this population at the Ladbrokes LBO, and the colleagues report no issues.</p>			
<p><b>Local Management Knowledge</b> Record details of management knowledge of the local area and any incidents or potential threats which may affect the risk profile of the shop</p>				

## Section 2: Security Assessment

The purpose of this section of the assessment is to determine the overall risk rating of the premises in terms of workplace violence and aggression. After completing the questions below, add up the total risk score, then refer to the Security Risk Matrix to calculate the overall shop risk rating and minimum control measures which should be in place to protect the welfare of colleagues and customers;

Potential threats A threat is any activity / working condition that may cause provide exposure to violence and aggression	Likelihood Based on the history and local profile of the shop, what is the likelihood that this threat will occur			Evidence to support decision Record details which support the decision you have made regarding the likelihood of this occurring, including any relevant shop incidents, local area profile or local crime information
Actual or threat of violence against colleagues and/or customers whilst opening or closing of the shop	Low (1)	Med (2)	High (3)	<ul style="list-style-type: none"> <li>- No known instances of violence against colleagues from other local businesses.</li> <li>- Homeless people congregate in the town centre.</li> <li>- Late licence pubs, bars and restaurants nearby.</li> </ul>
Actual or threat of violence against colleagues and/or customers during general shop operations	Low (1)	Med (2)	High (3)	<ul style="list-style-type: none"> <li>- No recorded instances of violence at former Coral, or existing Ladbrokes LBO (Unit 2) Evesham Street, Redditch, B97 4EH) on central database.</li> <li>- Violent crime incidents 990 March 2017 – February 2018 at post code. Relatively high number of incidents compared to other crimes listed.</li> </ul>
Actual or threat of violence against colleagues and/or customers during a robbery or security incident	Low (1)	Med (3)	High (5)	<ul style="list-style-type: none"> <li>- No known instances of robbery at other businesses in the area.</li> <li>- Possession of weapons incidents 23 March 2017 – February 2018 at post code. Incidents are low compared to other crimes listed.</li> </ul>
Actual or threat of violence against colleagues and/or customers during movement of all cash in shop (i.e. general cash handling or paying out a customer)	Low (1)	Med (2)	High (3)	<ul style="list-style-type: none"> <li>- No recorded instances of violence at former Coral, or existing Ladbrokes LBO (Unit 2) Evesham Street, Redditch, B97 4EH) on central database.</li> <li>- Incidents of anti-social behaviour and violent crime are relatively high compared to other crimes listed.</li> </ul>
Actual or threat of violence against colleagues and/or customers while emptying gaming machines.	Low (1)	Med (2)	High (3)	<ul style="list-style-type: none"> <li>- No recorded instances of violence at former Coral, or existing Ladbrokes LBO (Unit 2) Evesham Street, Redditch, B97 4EH) on central database.</li> <li>- Incidents of anti-social behaviour and violent crime are relatively high compared to other crimes listed.</li> </ul>

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Actual or threat of violence against colleagues in relation to performing duties requiring cash in transit (i.e. banking or shop transfer)	Low (1)	Med (3)	High (5)	<ul style="list-style-type: none"> <li>No recorded instances at former Coral, or existing Ladbrokes LBO (Unit 2 Evesham Street, Redditch, B97 4EH) on central database.</li> <li>Banking facility at Post Office is a short walk from the premises. Banking collection service will be considered.</li> </ul>
Actual or threat of violence against colleagues in relation to age verification requests as part of the Think 21 initiative and customer interaction as part of our Responsible Gambling obligations	Low (1)	Med (2)	High (3)	<ul style="list-style-type: none"> <li>No recorded instances of violence at former Coral, or existing Ladbrokes LBO (Unit 2 Evesham Street, Redditch, B97 4EH) on central database whilst completing age verification request.</li> <li>Proximity to school and college, as well as train and bus stations brings a large volume of under 18's into the area.</li> <li>One recorded incident of a breach of a Self-Exclusion agreement at the former Coral LBO. No aggression or violence during this incident.</li> </ul>
Actual or threat of violence against colleagues during floor walking activities and interactions	Low (1)	Med (2)	High (3)	<ul style="list-style-type: none"> <li>No recorded instances of violence at former Coral, or existing Ladbrokes LBO (Unit 2 Evesham Street, Redditch, B97 4EH) on central database whilst colleagues complete floor walking activities and interactions.</li> </ul>
Any further specific threats of violence identified in the shop (make comments as necessary)				
<b>Total Points Accumulated in Section 2:</b> (Add up points in brackets above)	14			
<b>Overall Risk Rating:</b> (Refer to Appendix A: Security Risk Rating)	2			

Any additional actions required that is not listed risk matrix			By Who	By When

## Section 3: Threats to Licensing Objectives

This section of the assessment evaluates any specific risks to each of the three licensing objectives. It considers not just local area risks but also the potential threats and controls posed by the physical design of the shop. After completing each of the questions related to the specific licensing objective, determine the likelihood of the threat to the licensing objective. The overall risk rating to the licensing objectives is the equivalent of the highest risk rating identified in the assessment (i.e. if shop scored 'high' on a single question in section 3, it scored 'high' in its overall risk rating for this section and gets a 'c' rating)

Licensing Objective	Potential Threat We have listed the most common threats plus space for you to capture any further shop specific threats identified	Frequency (Daily, Weekly, Monthly or less frequent)	Proposed Control Measures Proposed control measures in place to minimise risk	Likelihood Based on the identified threats, rate the likelihood the shop will be exposed against this licensing objectives
Protecting children and other vulnerable persons from being harmed or exploited by gambling	Underage gambling (refusal of service)	Weekly	<p>To ensure the "under-18" law is complied with at all times Ladbrokes Coral Group operates a Think 21 Policy which requires that all customers who appear to be under the age of 21 are approached and their age verified by the production of the appropriate valid ID document, before they have the chance to gamble.</p> <p>Ladbrokes Coral Group has an Interaction policy where colleagues are required to recognise behavioural/physical triggers which may lead them to believe that a customer is showing signs of developing a gambling problem. Colleagues should facilitate an interaction at the earliest opportunity in accordance with the interaction policy.</p>	Low (a)
	Intoxicated customers (either drugs or alcohol), leading to a refusal of service	Weekly		Med (b)
	Problem Gamblers (self-exclusions, RG alerts, etc)	Weekly		High (c)

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Ensuring that gambling is conducted in a fair and open way	Customer complaints	Less Frequent	To ensure that gambling is conducted in a fair and open way, Ladbrokes Coral Group has a detailed set of rules and conditions that is on display in every shop.  Ladbrokes Coral Group also has a complaints process as set out in the complaints and disputes policy, which is split into two stages. The complaint will be dealt at shop level first before it is escalated to the customer services team.	Low (a)	Med (b)	High (c)
	Other identified threats (please specify): None	N/A				
Overall Highest Threat Level Identified:				(b) Medium		
Take the highest rating from the three licencing objectives above and note in the box provided. For example if highest rating is 'low' then overall rating is 'low' and gets an 'a' rating.						

Based on the threats identified to each of the licensing objectives, please any specific shop actions required to minimise threat to the shop's licence, as required.

Action Required		By Who	By When

## Appendix A: Security Risk Matrix

After completing Section 2 of the risk assessment, use the below risk matrix to determine the overall security risk rating of the shop. The table also details the minimum control measures that should be put in place based on this rating.

Risk Rating	Total Score	Minimum control measures in place
4	25 - 28	<ul style="list-style-type: none"> <li>- As lower, medium &amp; higher risk, plus the following:</li> <li>- Counter screen</li> <li>- Banking collection service</li> <li>- Safe haven should be considered</li> <li>- Shop to be reviewed by HSSE steer co</li> </ul>
3	19 - 24	<ul style="list-style-type: none"> <li>- As lower and medium risk, plus the following:</li> <li>- Counter screen</li> <li>- Lockable counter door</li> <li>- Banking collection service should be considered</li> </ul>
2	14 - 18	<ul style="list-style-type: none"> <li>- As lower risk, plus the following:</li> <li>- Magnetic or key lockable customer toilets</li> <li>- Mag lock (front door)</li> </ul>
1	8 - 13	<ul style="list-style-type: none"> <li>- StaffGuard</li> <li>- CCTV</li> <li>- Time lock safes w/ time delay insert</li> <li>- Money belts</li> </ul>



## Appendix B: Single Scheduling Restrictions Matrix

After completing sections 2 and 3, use the below table to determine any additional single scheduling restriction for the premises.

Overall Risk Profile	Overall Risk Category	Single scheduling restrictions
Heightened	4c, 4b, 3c	- No single scheduling permitted at any time of day
Higher	4a, 3b, 2c	- No single scheduling permitted from 2:30pm onwards
Medium	3a, 2b, 1c	- No single scheduling permitted from 7pm onwards
Lower	1a, 1b, 2a	- No single schedule restrictions required

### Categories of Gaming Machines

Category of Machine	Maximum Stake	Maximum Prize
A	Unlimited	Unlimited
B1	£5	£10,000*
* or where the prize value available through its use is wholly or partly determined by reference to use made of one or more other sub-category B1 machines, no more than £20,000		
B2	£100 (in multiples of £10)	£500
B3	£2	£500
B3A	£2	£500
B4	£2	£400
C	£1	£100
D non-money prize (other than crane grab machine)	30p	£8
D non-money prize (crane grab machine)	£1	£50
D money prize	10p	£5
D combined money and non-money prize (other than coin pusher or penny falls machines)	10p	£8 (of which no more than £5 may be a money prize)
D combined money and non-money prize (coin pusher or penny falls machine)	20p	£20 (of which no more than £10 may be a money prize)

Premises Type	Machine Category						
	A	B1	B2	B3	B4	C	D
Large casino (machine/table ratio of 5-1 up to maximum)		Maximum of 150 machines Any combination of machines on categories B to D, within the total of 150 (subject to table ratio)					
Small casino (machine/table ratio of 2-1 up to maximum)		Maximum of 80 machines Any combination of machines in categories B to D, within the total limit of 80 (subject to table ratio)					
Pre-2005 Act casinos (no machine/table ratio)		Maximum of 20 machines categories B to D or C or D machines instead					

Betting premises and tracks occupied by Pool Betting			Maximum of 4 machines categories B2 to D				
Bingo Premises				Maximum of 20% of the total number of gaming machines which are available for use (see notes below)		No limit C or D machines	
Adult gaming centres				Maximum of 20% of the total number of gaming machines which are available for use (see notes below)		No limit C or D machines	
Family entertainment centre (with premises licence)						No limit on category C or D machines	
Family entertainment centre (with permit)							No limit on category D machines
Clubs or miners' welfare institutes with permits					Maximum of 3 machines in categories B3A or B4 to D		
Qualifying alcohol licensed premises						1 or 2 machines of category C or D automatic upon notification	
Qualifying alcohol licensed premises with gaming machine permit						Number as specified on permit	
Travelling fair							No limit on category D machines
	A	B1	B2	B3	B4	C	D

**Notes** Adult gaming centres (AGC) and bingo premises are entitled to make available a number of category B3/B4 gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises. Licensed AGCs and bingo premises in existence before 13 July 2011 are entitled to make available four (AGC) or eight (bingo) category B3/B4 gaming machines, or 20% of the total number of gaming machines, whichever is the greater.

AGC and bingo premises licences granted on or after 13 July 2011, but before 1 April 2014, are entitled to a maximum of four (AGC) or eight (bingo) category B3/B4 gaming machines or 20% of the total number of gaming machines, whichever is the greater; from 1 April 2014 these premises will be entitled to 20% of the total number of gaming machines only.