

GAMBLING ACT 2005

APPLICATION 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

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



OFFICES
0121 643 9337
TO LET

AM 2 PM
Recruitment Solutions Ltd
01527 592 411
www.recruitment-solutions.co.uk

RENTALS CATCH

IMPORTANT NOTICE

PROPOSED	
GROSS UNIT AREA	1400 SQFT
GROSS CUSTOMER AREA	50FT
NET CUSTOMER AREA	50FT
NEWSPAPER DISPLAY AREA	LF

i-creative

DO NOT SCALE OFF THIS DRAWING

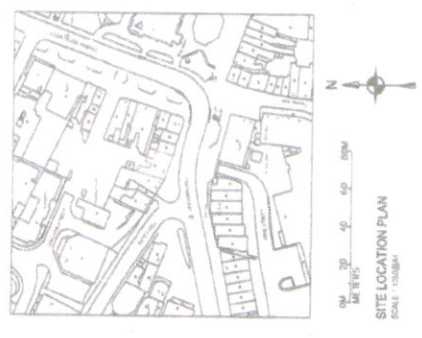
LADBROKES CORAL
GROUP

Site: 815 LINCOLN HILL
REGD UNIT NO: 88740R
ADDRESS: WORCESTER, 88740R

Project: LICENSING PLAN

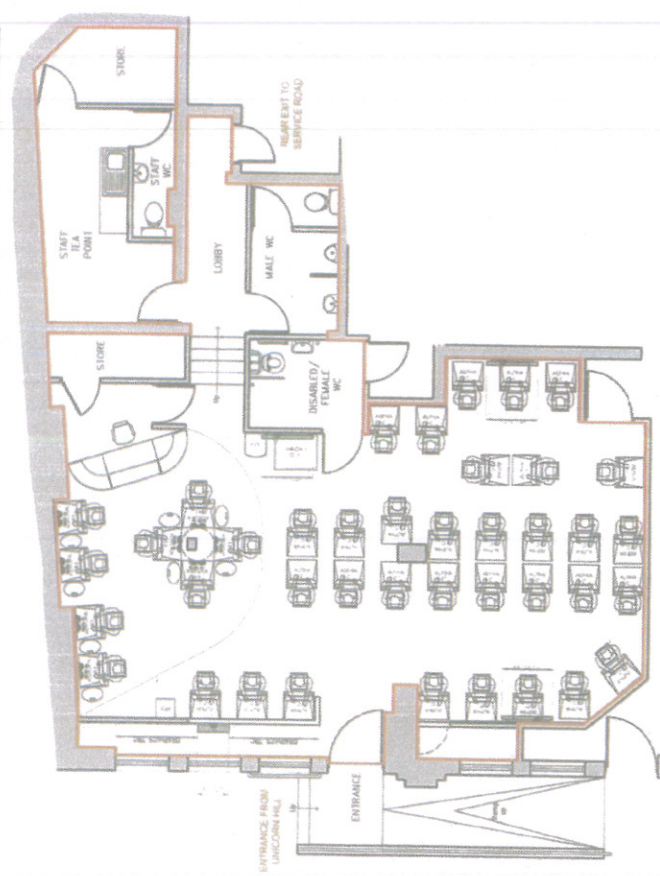
Date: 08/11/2014
Scale: 1/8" = 1'-0"
Drawing: 02A

Project Number: LADDCOR/110817/P101



This building and subject of this plan of this premises which will be used for the purpose of operating a newspaper display area for advertising.

Anything shown as shown on this plan, which is not required by any other regulations, is for illustrative purposes only and does not form part of the license.



Proposed Ground Floor Layout



THINK 21

Lockdown operates in 21 states.
 To find out more, visit www.lockdown.com.au
 or call 1300 666 666.

Pull

18

Lockdown operates in 18 states.
 To find out more, visit www.lockdown.com.au
 or call 1300 666 666.

Labrokes

WEDDING TIME

OPENING HOURS

MON-FRI	08:30-22:00
SATURDAY	08:00-22:00
SUNDAY	09:30-20:00

14-16 NATIONAL GAMBLING HELPLINE 1800 8020 133

Ladbrokes

STAYING IN CONTROL



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

18+ NATIONAL GAMBLING HELPLINE
0800 8020 133

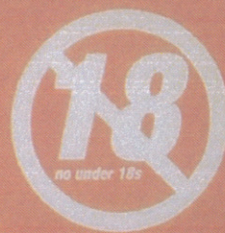
If you think that you, or
anyone you know, might
have a gambling problem,
please pick up a leaflet or call
the In-cas GamCare National
Helpline on:

0800 8020 133

or look on the GamCare website
www.gamcare.org.uk

Ladbrokes

It's the Law



- 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



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



- Alcohol is not permitted on these premises

Your understanding in these matters is appreciated

Bet responsibly www.gamblingaware.co.uk

? 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 insignia
- Photographic Driving Licence
- Passport

If you are under 18 you are prohibited from entering
any premises where gambling is offered

Ladbrokes

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	
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	

? **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

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 Informed. 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
- 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



1567/LCG66/L

Preliminary Premises Risk Assessment for proposed AGC Operation

Region & Area	MD11	Shop Code & Address	8/10 Unicorn Hill, Redditch, B97 4QR	
Local Regulatory Authority	Redditch Borough Council			
Date of Assessment	25.04.2018			
Names and Positions of Persons Contributing to the Risk Assessment	Colleague Name	Job Title	Signature	
	Neil Amos	RSJ		
Work activity being assessed	<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"> - Section 1: Shop and Local Area Profile - 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 - Section 2: Security Assessment - 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 - Section 3: Threat to Licensing Objectives - considers local area risks and hazards / controls posed by the physical design of the shop on meeting our licensing objectives obligations 			
Overall Risk Rating of shop Following completion of risk assessment, record the risk rating by combining the Risk Ratings of Sections 2 & 3 (i.e. Risk Rating = 2b)	2b	Single Scheduling Restrictions 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	
	Additional Control Measures / Actions		By Who	By When
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															
Shop Profile 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.															
Shop Incident History 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.															
Proposed Control Measures Mark all control measures that apply with an <input checked="" type="checkbox"/>	<table border="1"> <thead> <tr> <th>StaffGuard</th> <th>Portable Panic Alarm (shop only)</th> <th>Machine block</th> </tr> </thead> <tbody> <tr> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Safe haven (door opens outwards)</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Money belt</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Smoke cloak</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Mosquito alarm</td> </tr> </tbody> </table>	StaffGuard	Portable Panic Alarm (shop only)	Machine block	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Safe haven (door opens outwards)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Money belt	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Smoke cloak	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Mosquito alarm
StaffGuard	Portable Panic Alarm (shop only)	Machine block														
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Safe haven (door opens outwards)														
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Money belt														
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Smoke cloak														
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Mosquito alarm														
Local Area Profile 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	Other (please specify): <ul style="list-style-type: none"> - Traditional high street location - Located in the centre of town in the main shopping district, opposite Kingfisher Shopping Centre - Train and bus stations - Numerous pubs, bars and restaurants - Competitor AGC and LBOs - High school and college 															

Ladbrokes classification: Internal

Ladbrokes Coral Group – Preliminary Premises Risk Assessment for proposed AGC operation.

April 2018

<p>Local crime statistics 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 (http://www.ukcrimestats.com)</p> <p>Note: these statistics should be used for indicative purposes, but must be used in conjunction with all other evidence.</p>	<p>0.4 miles from addiction treatment facility.</p>																											
<p>Local Policing Priorities & Local Authority Gambling Policy (if applicable) If available, record the local police priorities for the area. Local Authority gambling policies can be found on google drive</p>	<table border="1"> <thead> <tr> <th data-bbox="384 1081 491 1581">Crime Type</th> <th data-bbox="384 801 491 1081">Rank</th> <th data-bbox="384 73 491 1081">Additional information March 2017 – February 2018 Number of incidents</th> </tr> </thead> <tbody> <tr> <td data-bbox="491 1081 539 1581">Anti-Social Behaviour</td> <td data-bbox="491 801 539 1081">99.576</td> <td data-bbox="491 73 539 1081">1295</td> </tr> <tr> <td data-bbox="539 1081 579 1581">Burglary</td> <td data-bbox="539 801 579 1081">93.159</td> <td data-bbox="539 73 579 1081">148</td> </tr> <tr> <td data-bbox="579 1081 619 1581">Criminal Damage & Arson</td> <td data-bbox="579 801 619 1081">98.631</td> <td data-bbox="579 73 619 1081">228</td> </tr> <tr> <td data-bbox="619 1081 659 1581">Drug Crimes</td> <td data-bbox="619 801 659 1081">98.120</td> <td data-bbox="619 73 659 1081">60</td> </tr> <tr> <td data-bbox="659 1081 699 1581">Possession of Weapons</td> <td data-bbox="659 801 699 1081">99.658</td> <td data-bbox="659 73 699 1081">23</td> </tr> <tr> <td data-bbox="699 1081 738 1581">Robbery</td> <td data-bbox="699 801 738 1081">98.176</td> <td data-bbox="699 73 738 1081">24</td> </tr> <tr> <td data-bbox="738 1081 778 1581">Theft from the person</td> <td data-bbox="738 801 778 1081">99.074</td> <td data-bbox="738 73 778 1081">53</td> </tr> <tr> <td data-bbox="778 1081 853 1581">Violent crime</td> <td data-bbox="778 801 853 1081">99.719</td> <td data-bbox="778 73 853 1081">990</td> </tr> </tbody> </table>	Crime Type	Rank	Additional information March 2017 – February 2018 Number of incidents	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
Crime Type	Rank	Additional information March 2017 – February 2018 Number of incidents																										
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>Local Management Knowledge 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>	<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>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>																											

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"> - No known instances of violence against colleagues from other local businesses. - Homeless people congregate in the town centre. - Late licence pubs, bars and restaurants nearby.
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"> - No recorded instances of violence at former Coral, or existing Ladbrokes LBO (Unit 2 Evesham Street, Redditch, B97 4EH) on central database. - Violent crime incidents 990 March 2017 – February 2018 at post code. Relatively high number of incidents compared to other crimes listed.
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"> - No known instances of robbery at other businesses in the area. - Possession of weapons incidents 23 March 2017 – February 2018 at post code. Incidents are low compared to other crimes listed.
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"> - No recorded instances of violence at former Coral, or existing Ladbrokes LBO (Unit 2 Evesham Street, Redditch, B97 4EH) on central database. - Incidents of anti-social behaviour and violent crime are relatively high compared to other crimes listed.
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"> - No recorded instances of violence at former Coral, or existing Ladbrokes LBO (Unit 2 Evesham Street, Redditch, B97 4EH) on central database. - Incidents of anti-social behaviour and violent crime are relatively high compared to other crimes listed.

Ladbrokes classification: Internal

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"> No recorded instances at former Coral, or existing Ladbrokes LBO (Unit 2 Evesham Street, Redditch, B97 4EH) on central database. Banking facility at Post Office is a short walk from the premises. Banking collection service will be considered.
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"> 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. Proximity to school and college, as well as train and bus stations brings a large volume of under 18's into the area. One recorded incident of a breach of a Self- Exclusion agreement at the former Coral LBO. No aggression or violence during this incident.
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"> 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.
Any further specific threats of violence identified in the shop (make comments as necessary)				
Total Points Accumulated in Section 2: (Add up points in brackets above)		14		
Overall Risk Rating: (Refer to Appendix A: Security Risk Rating)		2		

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

Ladbrokes classification: Internal

	Other identified threats (please specify): None	N/A		
Preventing gambling from being a source of crime or disorder or being used to support crime	Fraudsters	Less Frequent	Ladbrokes Coral Group has a fraudsters database of all known fraudsters. Furthermore colleagues receive training in identifying commonly used fraud techniques. Ladbrokes Coral Group operates a policy to cover the Proceeds of Crime Act 2002 where colleagues receive training on how to recognise and report any incidents of money laundering or betting with the proceeds of crime. Ladbrokes Coral Group employees report all potential instances of money laundering to the Security team at the KMC (Knowledge Management Centre).	
	Stained notes	Less Frequent		
	Anti-money laundering alerts	Less Frequent		
	Actual robberies (within last 3 years)	None at Ladbrokes LBO or Coral's LBO when it operated here		
	Other identified threats (please specify): None	N/A		
				LOW (a) Med (b) High (c)

Ladbrokes classification: Internal

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: 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.			(b) Medium			

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

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					

	A	B1	B2	B3	B4	C	D
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.