



HILLINGDON
LONDON



NOTICE OF HEARING

VIRTUAL Licensing Sub-Committee

Date: MONDAY, 28 SEPTEMBER
2020

Time: 10.00 AM

Venue: VIRTUAL - LIVE ON THE
COUNCIL'S YOUTUBE
CHANNEL: HILLINGDON
LONDON

If this is a public hearing, the agenda is available online at www.hillingdon.gov.uk or you can use a smart phone camera and scan the code below:



Councillors on the Sub-Committee:

Martin Goddard (Chairman)

Nick Denys

Simon Arnold

IMPORTANT INFORMATION

On receipt of this notice, you **MUST** notify the Committee Clerk (contact details below) by the following date:

WEDNESDAY 23 SEPTEMBER

If you don't notify you may lose your right to speak at the hearing. When notifying you must confirm:

- 1) Whether you intend to attend (virtually) or to be represented by someone at the hearing;
- 2) If you consider a hearing to be unnecessary and;
- 3) Whether to request that another person attends (Virtually) (other than your representative) as a witness

Published: Wednesday, 09 September 2020

Contact: Democratic Services - 01895 250636 or email:

democratic@hillington.gov.uk

Putting our residents first

Lloyd White
Head of Democratic Services
London Borough of Hillingdon,
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Agenda

CHAIRMAN'S ANNOUNCEMENTS

Hearing Protocol

- 1 Apologies for Absence
- 2 Declarations of interest in matters coming before this meeting
- 3 To confirm that the items of business marked Part I will be considered in Public and items marked Part II will be considered in Private
- 4 Matters that have been notified in advance or urgent

Part I - Members, Public and Press

	Title of Report / Address of application	Ward	Time	Page
5	Application for a new bingo premises licence - 58 Station Road, Hayes, UB3 4DF	Botwell	Join Time: 09:40AM Start Time: 10:00AM	3 - 80

Order of proceedings – application under the Licensing Act 2003

The Chairman of the Sub-Committee will open the hearing by introducing the Councillors, explaining the purpose of the proceedings and the general procedure. The Chairman will then check that there are no additions or alterations to the list of those appearing at the hearing.

Introduction by the Regulatory Services/Licensing Officer



The Applicant / Licence Holder



Responsible Authorities (if present)



Other Parties (residents etc...)



DISCUSSION LED BY THE SUB-COMMITTEE

The Chairman will lead the discussion. This will be a chance for all parties to provide comments on any submissions that have been made to the Sub-Committee.



Closing remarks from each party



Sub-Committee deliberates



Chairman announces the decision

The Council's Regulatory Services/Licensing Officer will introduce the report and will outline the matter before the Sub-Committee, giving any relevant background information. The Sub-Committee may ask questions of the officer.

The Applicant, licence holder or the person representing him/her will be invited to address the Sub-Committee. They will be allowed sufficient time to present his/her case. The Sub-Committee may ask questions.

Responsible Authorities will be invited to address the Sub-Committee and will be allowed sufficient time. The Sub-Committee may ask questions of the Responsible Authorities.

Other parties will be invited to address the Sub-Committee. Where there are a number of parties making similar representations the Chairman will expect the parties to nominate a spokesperson to make the representations and all will be allowed sufficient time. The Sub-Committee may ask questions of the Other Parties.

The Chairman will invite the Responsible Authorities and Other Parties to make brief closing remarks on the application. The Applicant / licence holder makes the final closing remarks.

The Sub-Committee will remain in the room to deliberate and make their decision, with only the Legal Advisor and the Clerk to the Sub-Committee remaining. All others present will be asked to leave the room. If the meeting is being broadcast, any filming will be stopped for this part.

Parties may return to the room when invited to do so and the Chairman will announce the decision. The Chairman will remind the Applicant / licence holder that the decision will be sent to them in writing. There can be no further questions or statements.

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TITLE: APPLICATION FOR A NEW BINGO PREMISES LICENCE	ITEM #
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Committee	Licensing Sub Committee
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Officer Contact	Mark McDermott, Licensing Officer 01895 277262
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Papers with report	<ul style="list-style-type: none"> • Annex 1 – Application form & Supporting Information • Annex 2 – Representation – Licensing Authority • Annex 3 – Representation – Cllr Janet Gardner & Cllr John Oswell • Annex 4 – Representation – Cllr Scott Farley • Annex 5 – Representation – Hayes Town Partnership • Annex 6 – Representation – St. Anselm’s Church, Hayes • Annex 7 – Representation – Ms Susan Chick • Annex 8 – Representation – Ms Genevieve Hibbs • Annex 9 – Representation – Mr John McDonnell MP • Annex 10 – Representation – Hayes Town Business Forum • Annex 11 – Representation – YMCA, St Pauls Group • Annex 12 – Representation – Mr Ocen Patric • Annex 13 – Licensing Officer queries, response from Applicant • Annex 14 – Metropolitan Police comment • Annex 15 – Map of the Area
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Ward(s) affected	Botwell
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SUMMARY

To consider representations in respect of a new Bingo Premises Licence for premises at 58 Station Road, Hayes, UB3 4DF. The Application has attracted representations from one responsible authority and ten interested parties.

RECOMMENDATION

The Licensing Sub-Committee grant the licence but show due consideration to adding conditions to uphold the licensing objectives.

1.0 INFORMATION

1.1 An application for a new gambling premises licence, to offer Bingo facilities, was received by the Licensing Service on 3rd June 2020.

The applicant is;

Cashino Gaming Limited
 1A Seebeck House
 Milton Keynes
 MK5 8FR

A copy of the application form and supporting information comprising of plans, local risk assessment and an operational risk document is annexed to this report as **Annex 1**.

1.2 In accordance with the legislation, the applicant sent notice of the application to the responsible authorities being:

- The Gambling Commission
- The Metropolitan Police Service
- H M Revenue & Customs
- London Fire & Emergency Planning Authority
- Child Protection Service, LBH
- Environmental Health Authority, LBH
- Trading Standards Service, LBH
- Planning Authority, LBH

Representations were received from the following Responsible Authorities;

- Licensing Authority – **Annex 2**

1.3 The application was advertised in accordance with the standard procedures required by the Gambling Act 2005 by way of an advertisement in the local paper and the display of a notice in at the premises for the required 28 day consultation period. The application was also posted on the council's website.

Following the advertisement of the application, the following representations were received from Interested Parties;

- Cllr Janet Gardner, Ward Councillor – **Annex 3**
- Cllr John Oswell, Ward Councillor – **Annex 3**
- Cllr Scott Farley, Ward Councillor – **Annex 4**
- Mr David Brough, Hayes Town Partnership – **Annex 5**
- Fr. Matthew Cashmore, St. Anselm's Church, Hayes – **Annex 6**
- Ms Susan Chick – **Annex 7**
- Ms Genevieve Hibbs – **Annex 8**
- Mr John McDonnell MP – **Annex 9**
- Mr Ajaib Singh Puar, Hayes Town Business Forum – **Annex 10**
- Mr Harry McKeown, YMCA St Paul's Group – **Annex 11**
- Mr Ocen Patric – **Annex 12**

1.4 The period for consultation and the making of representations in respect of this application expired on 1st July 2020.

1.5 The applicant has made a standard premises licence application for a bingo licence and has chosen not to exclude the default condition in respect of times of operation.

- No facilities for gambling shall be provided on the premises between the hours of midnight and 9am.
- The condition in paragraph 1 shall not apply to making gaming machines available for use.

1.6 The applicant has an Operating Licence issued by the Gambling Commission to provide bingo facilities.

1.7 A map of the local area is attached as **Annex 15**.

2.0 OFFICER'S OBSERVATIONS

2.1 This is an application for a Bingo Premises Licence under Section 159 of the Gambling Act in respect of Merkur Slots situated at 58 Station Road, Hayes, UB3 4DF. The premises are in Hayes Town Centre and were previously an electrical retail shop. As the name suggests the proposal is not for a traditional bingo hall style premises but to provide bingo facilities via bingo terminals and bingo tablets to provide facilities for bingo.

2.2 I made some enquiries with the applicant's solicitor regarding:

- The types of machines/terminals and category type, the expected ratio and any further information on how the bingo terminals work.
- Will the premises employ door staff and will staff/they receive training with regard to vulnerable/under age/unruly customers?
- The proposed hours of operation in light of the fact that there has been no application to remove the default conditions what are the proposed hours.

Please see response at **Annex 13**

2.3 It should be noted that:

- The available machines will be a combination of B3, C and D products, subject to the legislative limits (only 20% of the total machines made available on site may be category B).
- Generally the applicant does not employ door staff across the estate as they are not required due to the customer demographic and nature of the gaming services provided. They also try to foster relationships with local police and neighbours with a high standard of staff training.
- Subject to planning or any other restrictions the applicant would like to retain the flexibility to have the potential to operate to 1.00/2.00am the following day although due to the electronic nature, machines could be played at any time.

3.0 Representations:

3.1 The applicant company has an operating licence issued by the Gambling Commission so there are no issues regarding the suitability of the applicant

3.2 The number of other gambling premises in the vicinity is not a consideration as Licensing Authority may not have regard to demand.

3.2 The Metropolitan Police did not submit a formal representation in relation to this application, however, they did make observations in an email sent in response to our enquiries, Their comments can be found in **Annex 14**

4.0 Planning permission

4.1 A planning application by Cashino Gaming Ltd (trading as 'Merkur Slots') for the change of use from a retail shop use to an Adult Gaming Centre (Sui Generis) was refused on 22 July 2020. I have been informed by the Applicant's Solicitor that they intend to appeal this decision. Please note that Planning and Licensing matters should be treated as completely separate regimes, as per Section 210 of the Gambling Act 2005:

- i. In making a decision in respect of an application under this Part a licensing authority shall not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with the law relating to planning or building.
- ii. A decision by a licensing authority under this Part shall not constrain any later decision by the authority under the law relating to planning or building.

5.0 Relevant Sections of Guidance Issued by The Gambling Commission

5.1 Objective 1: Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime:

At paragraph 5.3 it states that *“Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator’s own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6.”*

At paragraph 5.8 it states that *“In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act...”*

At paragraph 5.10 it states that *“Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued...”*

5.2 Objective 2: Ensuring that gambling is conducted in a fair and open way

At paragraph 5.11 it states that *“Generally the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness is likely to be a matter for either the way specific gambling products are provided and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence..”*

5.3 Objective 3 : Protecting children and other vulnerable persons from being harmed or exploited by gambling

At paragraph 5.13 it states that *“In exercising their powers under s.153, licensing authorities should consider whether staff will be able to adequately supervise the gambling premises, as adequate staffing levels is a factor to consider regarding the prevention of underage gambling. The Commission would expect the operator and the licensing authority to work together to consider how any impediments to the supervision of premises might be most appropriately remedied...”*

At paragraph 5.14 it states that *“Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight.”*

Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.”

At paragraph 5.15 it states that *“If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.”*

At paragraph 5.17 it states that *“The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define ‘vulnerable persons’ but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.”*

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

5.4 **S.153 principles**

At paragraph 5.20 it states that *“Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this Guidance, any relevant Commission code of practice, its own statement of policy, and the licensing objectives.”*

At paragraph 5.21 it states that *“In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this Guidance, and its own statement of policy or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission’s codes and this Guidance take precedence.”*

At paragraph 5.22 it states that *“In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should not have regard to:*

- - i) *s.153 makes it clear that in deciding whether or not to grant a licence, a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application*
 - ii) *s.210(1) of the Act states that ‘in making a decision in respect of an application...a licensing authority should not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with law relating to planning or building’.*

6.0 **Relevant Sections of the Gambling Policy Issued by The London Borough of Hillingdon**

6.1 **Interested Parties**

At paragraph 1.25 it states that *“Interested parties can make representations about licence applications, or apply for a review of an existing licence. (See annex A with regard to Councillors making representations). For the purposes of the Gambling Act 2005 interested parties will include persons who:*

- i) *Live sufficiently close to premises carrying out gambling activities.*
- ii) *Have business interests that might be affected; and*

iii) *Represent persons listed above.*"

At paragraph 1.27 it states that *"Each case will be decided upon its merits. We will not apply a rigid rule to our decision-making. In the case of doubt, the benefit will be given to the party making the representation until the contrary can be shown."*

At paragraph 1.28 it states that *"Interested parties can include trade associations and unions; and residents' or tenants' associations, providing that they can show they represent someone who would be classed as an interested party in their own right. Within the meaning of the Act, interested parties can also be persons who are democratically elected such as Councillors and MPs"*

At paragraph 1.29 it states that *"Generally, the principles we will apply when deciding whether or not a person is an interested party will include looking at the size of the premises where larger premises may be considered to affect people over a broader geographical area compared to smaller premises offering similar facilities and the nature of the activities being conducted on the premises. As to the different elements of the definition of "Interested Party", the Licensing Authority will take into account the following specific matters of principle:*

At paragraph 5.41 it states *"With regard to segregation of Category B and C machines from Category D machines, there is a requirement that there must be clear segregation between these types of machine so that children do not have access to Category B or C machines and the Licensing Authority will take into account any guidance issued by the Gambling Commission in the light of any regulations made by the Secretary of State."*

6.2 Persons living "Sufficiently Close"

Paragraph 1.30 *The Licensing Authority recognises "sufficiently close to be likely to be affected" could have a different meaning for, for instance, a private resident, a residential school for children with problems and a residential hostel for vulnerable adults and will therefore deal with each representation on its individual merits.*

Paragraph 1.31 *In determining whether someone lives sufficiently close to a particular premises as to likely to be affected by the authorised activities the Council may take account of the:*

- i) Size of the premises.*
- ii) Nature of the premises.*
- iii) Nature of the authorised activities being proposed.*
- iv) Distance of the premises from the person making the representation.*
- v) Characteristics of the complainant.*
- vi) Potential impact of the premises.*

6.3 Persons with business interests likely to be affected

Paragraph 1.32 *With regard to those persons with business interests that could be affected, the Licensing Authority will (in addition to the factors set out in paragraph 1.38 above) need to be satisfied that the relevant business is indeed likely to be affected and the following factors will therefore be taken into account:*

- i) The 'catchment' area of the premises (i.e. how far people travel to visit);*
- ii) Whether the person making the representation has business interests in that catchment area that might be affected.*
- iii) Whether or not the representation is purely based on 'competition' as the Licensing Authority does not consider this to be a relevant representation.*

6.4 Persons/bodies representing persons named above

Paragraph 1.33 *With regard to persons representing persons living sufficiently close and persons having business interests that may be affected, the Licensing Authority will include trade associations and unions.*

Paragraph 1.34 *Where a Councillor represents an interested party, in order to avoid conflict of interest, the Councillor cannot be part of the Licensing Committee dealing with the licence application. When in doubt, Councillors are asked to contact the Council's Legal Services to gain further advice."*

6.5 Social Responsibility

At paragraph 2.15 it states that *"When considering whether to grant a premises licence or permit the Council will consider whether any measures are necessary to protect children or vulnerable young persons from being harmed or exploited by gambling, such as the supervision of entrances, the segregation of gambling from areas frequented by children and the supervision of gaming machines in non-adult gambling specific premises, such as pubs, clubs, betting tracks etc..."*

At paragraph 5.6 it states *"The Council appreciates that gambling can be an emotive subject but acknowledges and endorses the Gambling Commission Guidance that "moral objections to gambling are not a valid reason to reject applications for premises licences " (except as regards any "no casino resolution") and also that unmet demand is not a criterion for a Licensing Authority."*

At paragraph 5.7 it states *"We recognise that the responsibility for an individual's gambling is his or her own and that the responsibility to exercise a duty of care lies with the site operator. However, the Licensing Authority recommend applicants for Adult Gaming and Family Entertainment Centres to consider adopting BACTA's Code of Social Responsibility and Good Practice and where gaming machines are concerned, applicants are recommended to adopt BACTA's Code of Practice for AWP's in Family Entertainment Centres and Adult Gaming Centres."*

At paragraph 5.8 it states *"Where there are age restrictions on entry to certain premises, the Licensing Authority recommends applicants consider and adopt BACTA's and GamCare's joint training initiative on a Site Age-of-Entry Control Policy."*

At paragraph 5.9 it states *"We also recognise that most customers are able to enjoy and control their gambling, however, where there are those who are unable to control gambling, the Licensing Authority recommends that applicants adopt BACTA's and GamCare's Site Self-Exclusion Policy for those particular clients to request their exclusion for a fixed period."*

6.6 Location

At paragraph 2.25 it states *"When determining the location of proposed gambling facilities, this Licensing Authority in appropriate circumstances, will have regard to any Local Risk Assessment detailed in this policy and will consider very carefully the following factors when considering applications for Premises Licences, permits and other permissions:*

- i) Proximity of premises to local schools.*
- ii) Proximity of premises to centres that pose a high risk to vulnerable and young persons.*
- iii) Proximity of premises to residential areas where there is a high concentration of children and young people.*

At paragraph 5.19 it states *“The Gambling Commission Guidance stipulates that demand issues cannot be considered in relation to the location of premises but that considerations made in terms of the licensing objectives can.”*

At paragraph 5.20 it states *“In accordance with the Gambling Commission’s Guidance for Local Authorities, this Licensing Authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder.”*

6.7 Conditions

At paragraph 5.24 it states *“Any conditions attached to licences will be proportionate and will be:*

- i) Relevant to the need to make the proposed building suitable as a gambling facility.*
- ii) Directly related to the premises and the type of licence applied for;*
- iii) Fairly and reasonably related to the scale and type of premises: and*
- iv) Reasonable in all other respects.”*

At paragraph 5.28 it states *“Decisions upon individual conditions will be made on a case-by-case basis, although there will be a number of control measures this licensing authority will consider utilising should there be a perceived need, such as the use of door supervisors, supervision of adult gaming machines, appropriate signage for adult-only areas etc. There are specific comments made in this regard under each of the licence types below.”*

At paragraph 5.29 it states *“This policy acknowledges that there are conditions that the licensing authority cannot attach to premises licences:*

- i) Any condition on the premises licence which makes it impossible to comply with an operating licence condition.*
- ii) Conditions relating to gaming machine categories, numbers, or method of operation.*
- iii) Conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated).*
- iv) Conditions in relation to stakes, fees, winning or prizes.”*

At paragraph 5.40 it states *“The Council will expect applicants to offer their own measures to meet licensing objectives however appropriate measures / licensing conditions may cover issues such as:*

- Proof of age schemes.*
- CCTV – this should be of sufficient quality that it will use evidence.*
- the provision of entrances/machine areas*
- physical separation areas*
- location of entry*
- notices/signage*
- specific opening hours*
- self exclusion schemes - these are schemes whereby individuals who acknowledge they have a gambling problem ask be barred from certain premises*
- provision of information leaflets/helpline numbers for organisations such as GamCare*

This list is not mandatory, nor exhaustive, and is merely indicative of example measures that the Council can consider implementing.”

6.8 Door Supervisors

At paragraph 5.30 it states *“The Gambling Commission advises in its Guidance for local authorities that Licensing Authorities may consider whether there is a need for door supervisors in terms of the licensing objectives of protection of children and vulnerable persons from being harmed or exploited by gambling, and also in terms of preventing premises becoming a source of crime.”*

At paragraph 5.31 it states *“This policy recognises that door supervisors at bingo or casino premises cannot be licensed by the Security Industry Authority (SIA). This Licensing Authority does not have specific requirements for door supervisors working at bingo or casino premises. Each case will be determined on its individual merits.”*

6.9 Bingo Premises

At paragraph 5.35 it states *“Bingo is a class of equal chance gaming and is permitted in alcohol licensed premises and in clubs provided it remains below a certain threshold, otherwise it will be subject to a bingo operating licence which will have to be obtained from the Gambling Commission.”*

At paragraph 5.36 it states *“The holder of a Bingo Operating Licence will be able to provide any type of bingo game including cash and prize bingo. Where bingo is permitted in alcohol licensed and non-gambling premises, this must not become a predominant commercial activity; otherwise a bingo operating licence will be required.”*

At paragraph 5.37 it states *“Commercial bingo halls will require a bingo premises licence from the Council. Amusement arcades providing prize bingo will require a prize gaming permit from the Council.”*

At paragraph 5.38 it states *“In each of the above cases it is important that where children are allowed to enter premises licensed for bingo, in whatever form, they are not allowed to participate in any bingo game, other than on category D machines. When considering applications of this type the Council will therefore take into account, among other things, the location of the games or machines, access to those areas, general supervision of the premises and the display of appropriate notices.”*

At paragraph 5.39 it states *“The Licensing Authority recognises that there is no ban on children or young people having access to Bingo premises, that it is illegal for Under 18s to play or use Category B and C machines and that they cannot be employed in providing facilities for gambling or bingo premises. In any event, children under 16 cannot be employed in any capacity at a time when facilities for playing bingo are being offered. 16 and 17 year olds may be employed while bingo is taking place provided the activities on which they are employed are not connected with the gaming or gaming machines. Where children aged 16 and 17 are employed in bingo premises, the Licensing Authority would expect to see sufficient controls restricting access to Category B and C machines.”*

At paragraph 5.40 it states *“A limited number of gaming machines may also be made available at Bingo licensed premises. A list of categories of gaming machines is on page 32. Where category C or above machines are available in premises to which children are admitted, the licensing authority will seek to ensure that:*

- i) All such machines are located in an area of the premises separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance.*

- ii) *Only adults are admitted to the area where these machines are located*
- iii) *Access to the area where the machines are located is supervised.*
- iv) *The area where the machines are located is arranged so that it can be observed by staff of the operator or the licence holder and*
- v) *At the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to persons under the age of 18.”*

6.10 NUMBER OF GAMING MACHINES BY PREMISES TYPE:

TYPE	GAMING MACHINES
BINGO PREMISES	<p>MAXIMUM OF 20% OF THE TOTAL NUMBER OF GAMING MACHINES WHICH ARE AVAILABLE FOR USE ON THE PREMISES FOR CATEGORIES B3 AND B4.</p> <p>NO LIMIT ON CATEGORY C AND CATEGORY D MACHINES</p>

7.0 LEGAL IMPLICATIONS

7.1 When considering an application for a grant of a new Premises Licence, the Sub-Committee shall carry out its functions with a view to taking steps it considers appropriate for promoting the licensing objectives. Section 1 of the Gambling Act 2005 creates three licensing objectives:

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1. Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime;
2. Ensuring that gambling is conducted in a fair and open way, and
3. Protecting children and other vulnerable persons from being harmed or exploited by gambling

7.2 An application for a new premises licence may be made pursuant to s.159 of the Act.

7.3 Where relevant representations are made and not withdrawn, the Licensing Authority must hold a hearing to determine the application, unless all are agreed that such a hearing is unnecessary s.162 (2)

7.4 Relevant representations are those that relate to the effect of the granting of the application on the promotion of the licensing objectives made by an interested party or responsible authority that have not been withdrawn and are not, in the opinion of the relevant licensing authority, frivolous or vexatious s.162(3) Gambling Act 2005.

7.5 The Sub-Committee can only consider matters within the application that have been raised through representations from interested parties and responsible authorities. Interested parties will include persons who:

- (i) Live sufficiently close to premises carrying out gambling activities;
- (ii) Have business interests that might be affected; and
- (iii) Represent persons listed above.

All applications will be decided on a case by case basis.

7.6 Following a hearing, the Sub-Committee must consider all relevant representations, and having taken into account the promotion of the licensing objectives, under s.163 Gambling Act 2005, a decision can be taken to either:

- i) Grant the application for the Premises Licence subject to the mandatory conditions and default conditions (pursuant to sections 167 and 168 of the Act) or;
- ii) Grant the application for the Premises Licence subject to the mandatory conditions but excluding specific default conditions AND/OR attach additional conditions. An additional condition may apply to the premises generally or only in relation to a specified part of the premises;
- iii) Reject the application

7.7 The decision determined by the Sub-Committee will be accompanied with clear, cogent reasons for that decision, having had due regard to being reasonably consistent with the Licensing Objectives; the Human Rights Act 1998; any relevant code of practice under Section 24 of the Gambling Act 2005; any relevant guidance issued by the Commission under Section 25 of the Gambling Act 2005; and this Statement of Policy. The decision and the reasons for that decision will be sent to the Applicant and those who have made relevant representations as soon as practicable.

7.8 Section 153(1) of the Act provides that licensing authorities should aim to permit the use of premises for gambling in so far as they think it:

- i) in accordance with any relevant code of practice under section 24;
- ii) in accordance with any relevant guidance issued by the Gambling Commission under section 25;
- iii) reasonably consistent with the licensing objectives; and
- iv) in accordance with the authority's statement of licensing policy.

7.9 **Statutory aim to permit gambling**

The guidance issued by the Commission states at Paragraph 1.19:

"The Act places a legal duty on both the Commission and licensing authorities to aim to permit gambling, insofar as it is considered to be reasonably consistent with the licensing objectives.

The effect of this duty is that both the Commission and licensing authorities must approach their functions in a way that seeks to regulate gambling by using their powers, for example, powers to attach conditions to licences, to moderate its impact on the licensing objectives rather than by starting out to prevent it altogether."

7.10 Section 153(2) of the Act goes on to state that in *"determining whether to grant a premises licence a licensing authority may not have regard to the expected demand for the facilities which it is proposed to provide"*.

7.11 In respect of the imposition of Conditions by the Licensing Authority, Section 169 (4) states that a *"licensing authority may not attach a condition to a premises licence which prevents compliance with a condition of the operating licence which authorises the holder to carry out the activity in respect of which the premises licence is granted"*.

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

- i) Eliminate discrimination harassment, victimisation and any other conduct that is prohibited by or under this Act;
- ii) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- iii) Foster good relations between persons who share relevant protected characteristics and persons who do not.

7.13 Section 149(7) of the Equality Act 2010 defines nine relevant protected characteristics examples are; race, sex, age, disability, gender reassignment and religious beliefs.

7.14 Officers have provided the Sub-Committee with recommendations related to this application. Subject to the above-mentioned factors having been properly considered, the Sub-Committee may depart from the recommendations if there are good reasons for doing so. The Sub-Committee is advised that such departures could give rise to an appeal or judicial review

7.15 Interested parties, Responsible Authorities and the Applicant have the right to appeal the decision of the Licensing Sub-Committee to the Magistrates' Court within a period of 21 days beginning with the day on which the applicant was notified by the Licensing Authority of the decision to be appealed against.

The Licensing Services
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

SPECIAL DELIVERY

2nd June 2020

RXB/RXB/P55235-519
Doc Ref: 2147361008

r.bradley@popall.co.uk

0115 948 7424

Dear Sirs

Merkur Slots, 58 Station Road, Hayes, UB3 4DF
Bingo Premises Licence

We act for **Cashino Gaming Limited** and have been instructed to submit an application for a Bingo Premises Licence for the above premises.

We therefore enclose:-

1. Application form
2. Notice of Application
3. A copies of the licensing plan of the proposed premises: **SR/HY/02**
4. A copy of plan drawing number **???-PR-05**, for illustrative purposes
5. A copy of local area risk assessment
6. Operational Standards document
7. Cheque in the sum of £3,500
8. Certificate of Service in the name of Nick Arron

Due to the current circumstances, we have we have designated the date for commencement of the consultation period as the **4th April 2020**.

We have arranged for the notice to be displayed on the premises and published within an appropriate local newspaper within 10 working days of **4th June 2020**.

The last date for representations will therefore be the **1st July 2020**.

We confirm we have served notice of the application to the Responsible Authorities as specified in Section 157 of the Gambling Act 2005.

If you have any queries or require anything further, please contact Richard Bradley on the above number so we can discuss the details with you.

We should be grateful if you would acknowledge safe receipt of this letter and the relevant enclosures.

Poppleston Allen

Encs

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

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

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

Where the application is—

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

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

Part 1 – Type of premises licence applied for

Regional Casino Large Casino Small Casino
 Bingo Adult Gaming Centre Family Entertainment Centre
 Betting (Track) Betting (Other)

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

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

Part 2 – Applicant Details

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

Section A

Individual applicant

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

2. Surname: _____ Other name(s): _____

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

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

Postcode:

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

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

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

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

Section B**Application on behalf of an organisation**

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

7. The applicant's registered or principal address:

Seebeck House

1A Seebeck Place

Milton Keynes

Postcode: **MK5 8FR**

8(a) The number of the applicant's operating licence (as given in the operating licence):
000-003266-N-103444

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

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

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

Part 3 – Premises Details

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

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

58 Station Road

Hayes

Postcode: **UB3 4DF**

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

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

Ground floor premises, high street location

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

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

N/A

Part 4 – Times of operation

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

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

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

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

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

Part 5 – Miscellaneous

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

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

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

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

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

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

The Applicant operates a national estate of licensed bingo premises, which include the provision of Bingo Plus and Bingo Express terminals.

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

An extract of Cashino Gaming Limited's Operational Standards has been supplied in support of the application. Full details of the Applicant's policies and procedures can be provided upon request.

Part 6 – Declarations and Checklist (Please tick)

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

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

Checklist:

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

Part 7 – Signatures

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

Signature:

--

Print Name: Poppleston Allen

Date: 2nd June 2020

Capacity: Solicitors for & on behalf of the applicant

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

Signature:

--

Print Name: _____

Date: _____

Capacity: _____

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

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

Part 8 – Contact Details

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

Richard Bradley

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

0115 948 7424

24. Postal address for correspondence associated with this application:

**Richard Bradley
Poppleston Allen
37 Stoney Street
The Lace Market
Nottingham**

Postcode: **NG1 1LS**

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

r.bradley@popall.co.uk

NOTICE OF APPLICATION FOR A PREMISES LICENCE

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

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

of the following address -

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

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

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

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

The application relates to the following premises:

**Merkur Slots
58 Station Road
Hayes
UB3 4DF**

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

**The Licensing Services
London Borough of Hillingdon
High Street
Uxbridge
UB8 1UW**

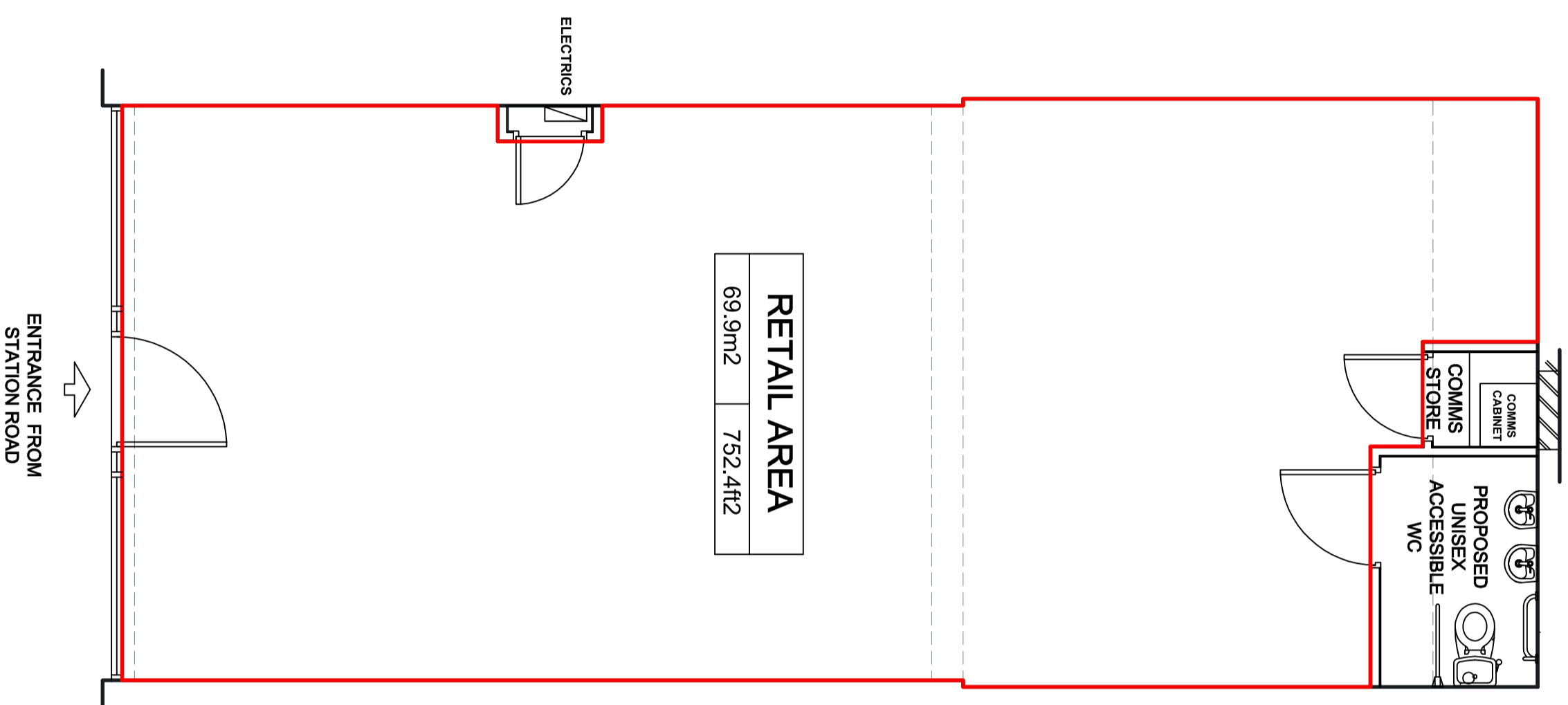
Website: **www.hillingdon.gov.uk**

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

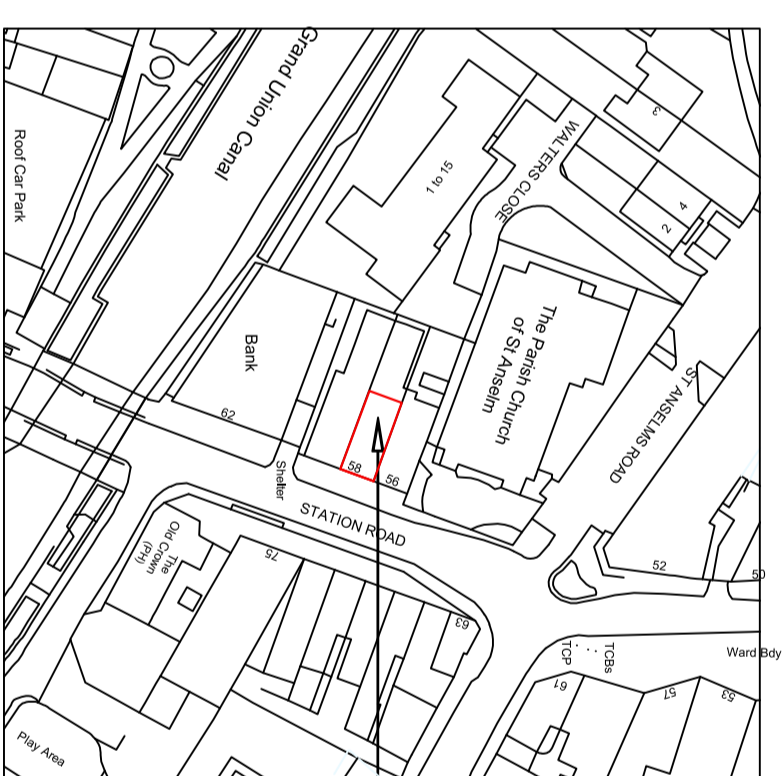
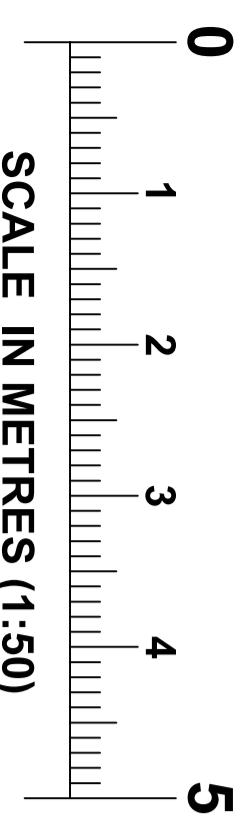
The following person connected with the applicant is able to give further information about the application:

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

Any representations under section 161 of the Gambling Act 2005 must be made no later than the following date: 1st July 2020



Ground Floor Plan 1:50

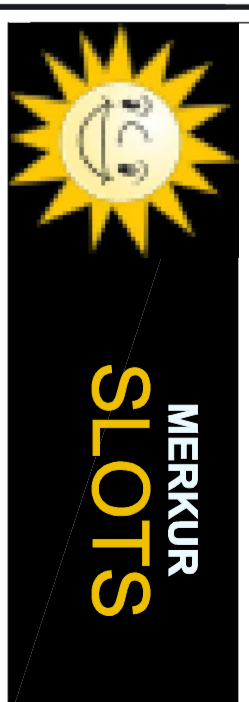


Indicates site in application at:
58 STATION ROAD,
HAYES,
UB3 4DF

Location Plan 1:1250

GAMBLING ACT 2005 LICENSING PLAN

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



Address
58 STATION ROAD
HAYES
UB3 4DF

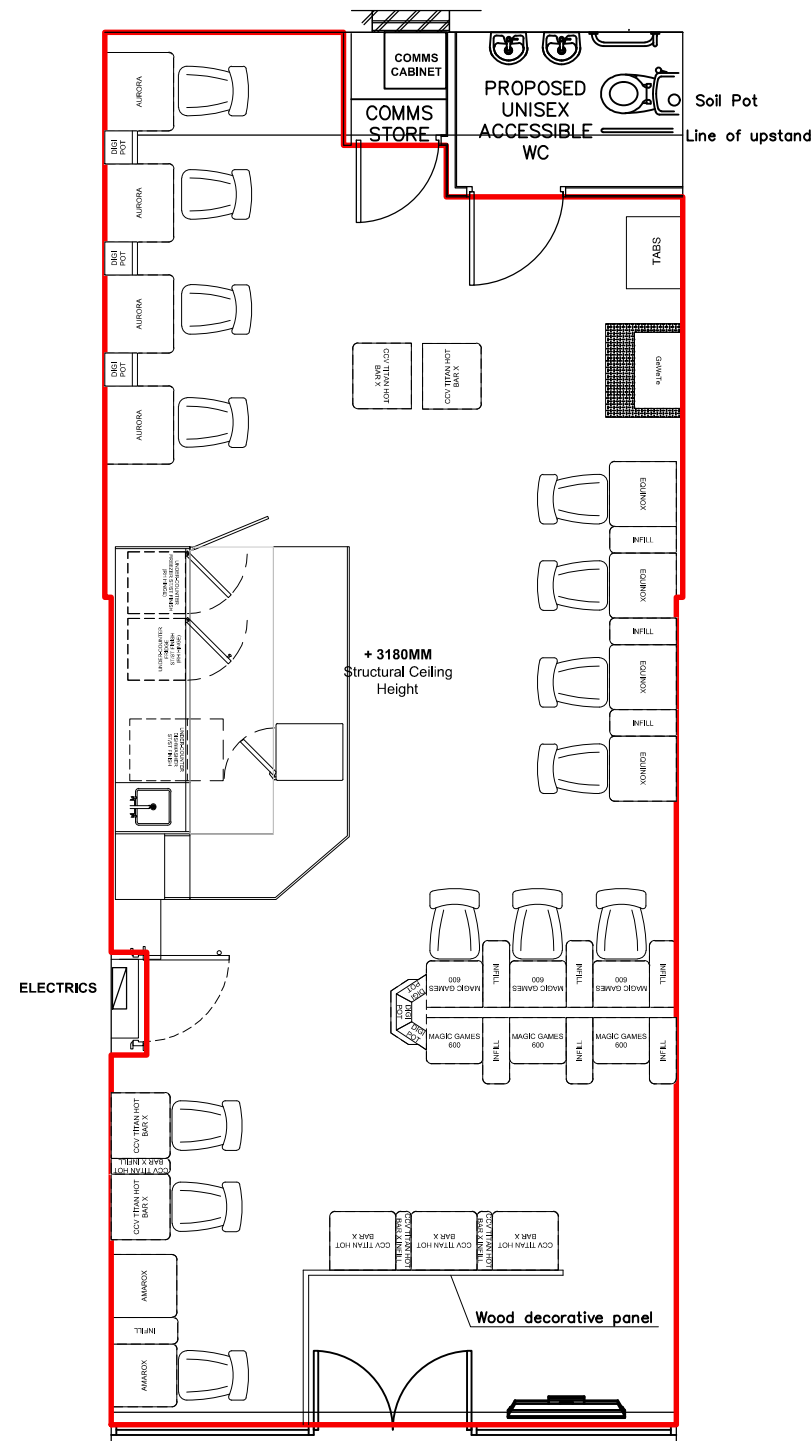
Title
LICENCE PLAN

Drawn	Date	Scale
JAM	13/12/2019	1:50 @ A1
Customer Area	69.9m ²	
Drawing Number	SR/HY/02	Revision

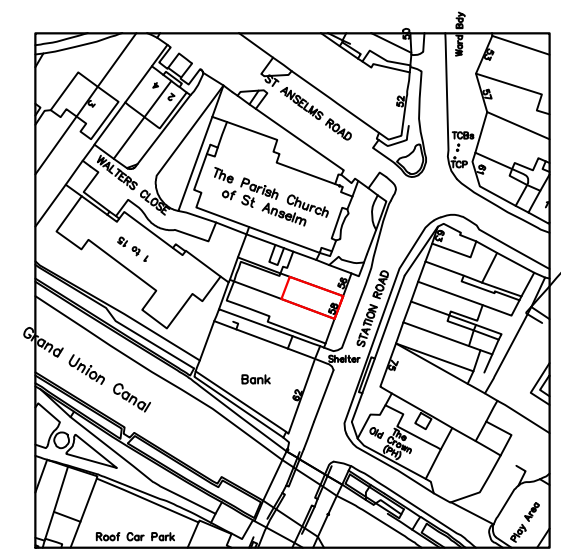
Mickewins Ltd
301 Alvechurch Road, Birmingham, B31 4UB Tel: 0121 433 4745
Licence Plan

FOR ILLUSTRATION PURPOSES ONLY

RETAIL AREA	
69.9m ²	752.4ft ²



Ground Floor Plan 1:50



Location Plan 1:1250

REVISIONS	FIT OUT TYPE FUTURE VENUE	REFERENCE DRAWINGS	
	PROJECT MERKUR SLOTS 58 Station Road Hayes UB3 4DF	SCALE 1:50	DRAWN BY
	DESCRIPTION PROPOSED MACHINE PLAN	DATE 12/05/2020	DRAWING No. ???-PR-05
		REVISION	



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LOCAL GAMBLING RISK ASSESSMENT

Premises Name:	HAYES				
Premises Address:	Merkur Slots, 58 Station Rd, Hayes, UB3 4DF				
Operator Premises Code:	902	Area Manager:		Area:	Area
Category of gambling premises licence:	Bingo	Staff Guard System: Y/N	Yes	24 hours opening:	Yes
Premises Licence Number:	0				
Local Authority details:	London Borough of Hillingdon				
Name of person completing assessment:	Garry Talman	Position within Company:	Compliance Manager		
Date original Assessment completed:	08/01/2020				
Date of Assessment Review:					
Reason for Assessment Review:	New Premise Application				

REQUIREMENT TO COMPLY – social responsibility code provision 10.1.1 - with effect from 6th April 2016

All non-remote casino, adult gaming centres (AGC), family entertainment centres (FEC), bingo, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

This risk assessment must be completed based upon the local risks to the licensing objectives posed **when applying for a new gambling premises licence and when applying for a variation of a premises licence.**

Licensees must review and update their local risk assessment when internal/external changes take place in each of their premises which may affect the mitigation of local risk, taking into account significant changes to local area circumstances, including those identified in a licensing authority's statement of licensing policy. Some authorities have included details of their local area profiles, which you can refer to for further information.

Ordinary code provision 10.1.2

Licensees are required to share their risk assessment with Licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

LOCAL AREA PROFILE

Useful websites:

<https://www.hillingdon.gov.uk>
<http://www.ukcrimestats.com>
<http://www.gov.uk/government/collections/crime-statistics>
<https://www.findmyschool.co.uk>
<https://checkmypostcode.uk>
<https://postcodearea.co.uk>
<https://www.google.com/maps>
<https://www.police.gov>

<p>Premises Design and Gambling Operation</p> <p>Hillingdon councils requirements for Bingo Premises in Part 5.35 to 5.41 of the Statement of Gambling Policy will be fully covered in this venue.</p> <p>The venue will be fitted with a HD CCTV system that is clearly advertised to customers with screens visible by employees when working in the service area. Floor layout will enable supervision of entrances and machines from the central service area. The premise and employees will be protected by an employee Guard security system and intruder alarms will be installed.</p> <p>Premises Logs - Information pertaining to the Licence Conditions and Codes of Practice will be recorded electronically using the IHL SmartTablet with the data evaluated centrally via the back office.</p> <p>The proposed venue will operate under a Bingo License, with a range of category B3, C and D machines and proprietary bingo equipment.</p> <p>Premises frontage will be of a style which obscures the interior with appropriate advertising inline with Licence Conditions and Codes of Practice.</p> <p>External windows will have digital marketing screens which will display safer gambling messages, Think 25, Bingo Played Here, opening times and promotional activity.</p>
<p>Local Risk</p> <p>The venue is situated at the top end of the main shopping street of Station Road and within Hayes Town Centre. Hayes and Harlington stations are nearby.</p> <p>To the left of the premises is a Restaurant and Barclays bank, to the right a hairdressing salon.</p> <p>Further along Station Road are all the mainstream retail outlets and locally owned shops. All of the mainstream bookmakers are in the town centre with William Hill being the closest and there is one other adult gaming centre, Admiral Casino on Station Road.</p> <p>West London YMCA is located approx. 2 minute walk from the venue on the same side of the road. There is a bus stop opposite the venue. H&T Pawnbrokers is approx. 200yds away.</p> <p>There are two public houses in close proximity to the venue; The Old Crown directly opposite the bank and Captain Morgans in Clayton Rd, with one more located in Coldharbour Lane.</p> <p>Local Academies are (Lake Farm) which is 0.9km from the venue with other secondary schools being further away, Botwell House Catholic Primary School is approx. 4 minutes walk. Within a one mile radius the total number of schools are: 2 Secondary School Inc. further education (16 to 18 yr. olds); 7 Primary Schools.</p> <p>The Hayes and Harlington locality population is 106,692 residents of which 25.2% are under the age of 16. Ethnic make up is 40.3% White British, 38.9% Asian/ Asian British and the remaining from other ethnic backgrounds. 70.1% of working age residents are economically active compared to 69.9% for England. 54.2% of residents own their own property. (Hillingdon Ward Profile 2017)</p>
<p>Local Crime Analysis (police.uk)</p> <p>We have reviewed the Police.UK hot-spot mapping for the area and we are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local police over reducing our involvement in any incident.</p> <p>The crime rate in this area is classed as normal compared to similar areas, however, it is lower than the average for the Metropolitan Police force area. Metropolitan Police average 98.65 - Hillingdon average 85.49.</p>
<p>Assessment of premises incident records (Past 12 Months)</p>

The Gambling Act 2005 sets out the three licensing objectives (LO), which are:

CD - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

FO - Ensuring that gambling is conducted in a fair and open way.

CV - Protecting children and other vulnerable people from being harmed or exploited by gambling.

LO	Local Risk Detail	Degree of Risk (Severity vs Likelihood)	Control Measures	Updated
CD	Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.	Moderate	Systems: employees trained on the requirements to comply with the Money Laundering Regulations and the Company AML Policy. Customer Interaction used to identifying potential suspects, behaviour, spend patterns and the use of change machines.	Jan-20
			Designs: Open design with vision across the venue floor.	
			Physical: IHL Smart Tablet to record incidents with emails direct to the AMLO tablet. Shared security alerts and photos of suspects with operators nationally. CCTV systems available for additional monitoring of activity. MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.	
CD	Poor security control measures which may increase vulnerability to crime	Low	Systems: Security Alert system allows the sharing of information on criminal activity across all venues and relevant employees. Key management policy in place. Regular checks on Emergency exits and equipment. Extensive monitoring of employees and customer activity from Audit Department.	Jan-20
			Designs: Open design with vision across the venue floor	
			Physical: Staffguard security system. HD CCTV system installed with remote viewing available. Time lock safe installed. Monitored Intruder alarm system installed. Machine data monitoring in MARS.	
CD	To identify aggressive customers to prevent crime and disorder (will be dependent on customers who frequent premises)	Low	Systems: employee training on how to deal with aggressive customers and situations which may also require police assistance.	Jan-20
			Designs: Open design with vision across the venue floor.	
			Physical: Smart Incident app on the IHL Tablet used to record all incidents Inc. crime reference number, supporting emails and back office report monitoring. Security Group email in operation Inc. BACTA alerts.	
CD	Awareness of local crime issues in the local area	Low	Systems: Annual LARA review, policies and procedures for communication of change in local issues. Reference to http://www.police.uk , http://www.ukcrimestats.com , http://www.gov.uk/government/collections/crime-statistics .	Jan-20
			Designs:	
			Physical: Membership of local Town Radio schemes where available. Security group email alerts.	
CD	Failure to protect employee and customers from harm during the hours of late night opening	Low	Systems: Lone working and night working procedures in place. Use of locked Door policy. Full time Support Night Manager available throughout the night.	Jan-20
			Designs:	
			Physical: Night Time contact number, HD CCTV system, Staffguard Security System.	
FO	Failure to prevent customers complaints and disputes regarding gambling within our premises.	Low	Systems: Management and monitoring of reported faults via MARS. Machines maintained by trained persons. Machine standards audited on regular basis. Gaming rules prominently displayed at entrance to each venue. Employees have full understanding of machine gaming rules. Machine Standards Policy in place.	Jan-20
			Designs: Stakes, prize levels and % pay-outs are clearly displayed on all machines.	
			Physical: Gambling machines comply with technical standards and are acquired from licensed suppliers only.	

FO	Failure to resolve customers complaints and disputes regarding our gambling premises.	Low	Systems: Complaints management policy in place for written and telephoned complaints. Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Employees encouraged to use positive discretion to resolve customer issues in venue.	Jan-20
			Designs:	
			Physical: Code of Practice and Complaints and Disputes policy displayed at venue entrance. Complaints and Disputes policy leaflets available within the venue.	
CV	Ensuring Under 18's do not have access to licensed premises	Low	Systems: Proof of Age scheme in place with application forms available in the venue. 3rd party company - Check Policy employed for underage verification testing. Persons who are unable to provide proof of age are refused entry.	
			Designs: Think 25 policy and posters are displayed at entrance and within the premises, Think 25 badges form part of employee uniform. Entrance door signage and machines display 'No Under 18's'. Marketing and Promotions complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice.	
			Physical: Age verification app on the IHL tablet used to record all Age verification challenges. All entrances and venue floor are monitored by employees.	
CV	To identify signs associated with problem gambling and people who may be at risk of gambling related harm	Moderate	Systems: employees trained on customer interaction and how to identify and interact with players who exhibit signs of developing problem gambling, identifying players whose behaviour changes.	Jan-20
			Designs:	
			Physical: Playright App available in venues to assists players with managing their gambling. IHL tablet used to record all incidents of customer interaction with email alerts to Compliance Manager who has access to back office for additional monitoring.	
CV	Failure to provide information to customers on responsible gambling	Low	Systems: Employees are provided with the training to enable them to provide guidance on safer and responsible gambling.	Jan-20
			Designs: Stay in Control posters and leaflets promoted at venue entrance, within the venue and in washroom areas.	
			Physical: Socially Responsible messaging is implemented on B3 and digital Cat C machines. All machines display Gamble Responsibly stickers with helpline contact details.	
ALL	Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews	Low	Systems: Essentials of Compliance and Safe Guarding Vulnerable People Induction training and 6 monthly refresher training for all employees. This training includes administering the self exclusion process and interacting with players. Central monitoring of all exclusions, breeches, reinstated customers and customer interactions by Compliance Manager.	Jan-20
			Designs: Tablet available for use of all employees.	
			Physical: Self exclusions logged on IHL Tablet Smart App. Information is shared across all operators. Members of Bingo Association Multi-operator Self Exclusion scheme.	
ALL	Training & Social Responsibility		Systems: Essentials of Compliance, Safeguarding and lone working trained on Inductions and refreshed 6 monthly for all employees. Compliance Manager attendance at Manager Meetings for refresher and update training. Review of all logs on IHL back office to identify and promptly target venues where changes are exhibiting.	Jan-20
			Designs: On-line training platform and two regional training centres.	
			Physical: Compliance and Social Responsibility Folder with all policies and procedures available to all employees. Venue Mangers review logs monthly. Area Managers Bi monthly and Compliance Audits twice yearly.	



THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

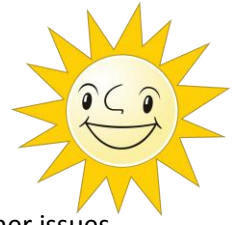
- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

Objective 1 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

- Cashino Gaming Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Cashino Gaming Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Cashino Gaming Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Cashino Gaming Limited premises operate digital CCTV and customer areas are supervised.
- Cashino Gaming operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- The employees in Cashino Gaming premises are required to carry a portable alarm which is provided by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Cashino Gaming Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Cashino Gaming employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Cashino Gaming operate a robust late night working policy, which is fully supported by a full-time Night Manager.
- Cashino Gaming do not operate a single-manning policy between 8pm and 6am, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

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

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.



Cashino Gaming Limited

Operational Standards

- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers attend our National Training Centre for a thorough induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during the course of their employment to ensure that potential issues can be addressed at the earliest opportunity.

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

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and Check Policy are our third-party independent partner for compliance testing.
- All licensed premise employees receive induction and six-monthly refresher training during the course of their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Playright is installed in all licensed premises - this is a self-help App available to customers to enable them to manage spend and play time.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.
- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, education and treatment of problem gambling.

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

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HILLINGDON

LONDON

Mr. Mark McDermott
Licensing Officer
The Licensing Service
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge
UB8 1UW

E-MAIL ONLY

Date: 30th June 2020

Dear Mr. McDermott,

GAMBLING ACT 2005
MERKUR SLOTS, 58 STATION ROAD, HAYES UB3 4DF

I am writing to you as the Officer duly authorised to make representations on behalf of the Licensing Authority. This representation is in relation to the application to for a Bingo Premises Licence submitted by Cashino Gaming Limited on 2nd June 2020.

I have assessed the application and the relevant documents supplied, Guidance from the Gambling Commission and the Council's Gambling Policy.

The Licensing Authority wishes to make a representation against this application based on the following licensing objective:

Protecting children and vulnerable persons from being harmed

Firstly, I have some concerns about the level of facilities for "Bingo" that the applicant is proposing. It appears that the application is one that will simply provide a number of gaming machines similar to other gambling type premises such as those offered by Adult Gaming Centres. It seems that the applicant is offering limited Bingo facilities. Clarification is needed.

For instance, in the applicant's Local Gambling Risk Assessment, under the 'Premises Design and Gambling Operation section it is stated that "the proposed venue will operate under a Bingo Licence, with a range of category B3, C and D machines and propriety bingo equipment".

Although the plans of the application are for illustrative purposes, we can assume there will be about 20 gaming machines at the premises all fitting in a 69.9 squared area. We are told in section 20 of their application form that the applicant "operates a national estate of licensed bingo premises, which include provision of Bingo Plus and Bingo Express terminals". However, it is unclear from this application, apart from the machines, how Bingo will be actually provided. Further information is required about the maximum stakes and maximum prizes of these proposed machines or terminals.

Licensing Service
Residents Services
T.01895 277 753 F.01895 250011
dferrer@hillington.gov.uk
London Borough of Hillingdon,
35/08, Civic Centre, High Street, Uxbridge, UB8 1UW
www.hillingdon.gov.uk

This is important because the Gambling Commission in 18.26 to 18.28 of their Guidance to Local Authorities give advice about this issue. The Guidance states that "unless a bingo premises operator offers substantive facilities for non-remote bingo it should not make gaming machines available for use on the premises in question." (18.26) Furthermore, the Licensing Authority must ensure "that a premises licensed for the purposes of providing facilities for bingo is operating as such and is not merely a vehicle to offer higher stake and prize gaming machines." (18.28)

The Licensing Conditions and Codes of Practice, April 2020, from the Gambling Commission gives further guidance. It points out Social responsibility code provision 9.1.2 - that "gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises."

In relation to the specific licensing objective of Protecting children and vulnerable persons from being harmed, I have concerns about the geographical location of the premises and how vulnerable persons in this local area will be kept safe.

2.16 of The Council's Gambling Policy states in seeking to protect vulnerable people the Council will consider that "vulnerable persons" include (but not limited to):

- (i) People who gamble more than they want to.
- (ii) People who gamble beyond their means, and
- (iii) People who may not be able to make informed or balanced decisions about gambling, perhaps due to a mental impairment, alcohol or drugs.

Hayes Town has experienced issues affecting vulnerable people such as rough sleepers, homelessness and street drinking. With the proposal of this premises offering B3 machines (Maximum stake of £2 with a Maximum prize of £500), there is potential for these type of vulnerable persons to be attracted to this premises.

The applicant's Local Gambling Risk Assessment does not identify or address these risks.

From section 15(a) of their application, the premises will be operating from 09:00 hours to midnight and the applicant has made reference to The Crown at 81 Station Road and Captain Morgan's at 9 Clayton Road in their Local Gambling Risk Assessment. Captain Morgan's is authorised to sell alcohol up to midnight Monday to Thursday and 02:00 Friday and Saturday. The Crown which is in close vicinity of the proposed premises has a terminal hour for alcohol of 01:00 hours every day. Customers who have been drinking at these premises for a substantial amount of time may be tempted by the offerings of higher prized machines at the proposed location.

There are a number of Churches in Hayes Town including the Immaculate Heart of Mary, Hayes Methodist Church and St Anselm's Church Hayes, which will be in close proximity. Vulnerable persons such as the homeless may congregate around the premises and will likely be exposed to the facilities and activities of the proposed premises. Furthermore, it should be noted that the YMCA, St Paul's Group is located at Ventura House, 70 Station Road and they may be affected as a result. They provide support to vulnerable and homeless young people.

If required, I am happy to be present at a formal hearing to verbally deliver my representation and also answer any queries from the Licensing Sub-Committee.

If you have any queries regarding this matter, then please feel free to contact me.

Yours sincerely,

Daniel Ferrer, Licensing Team Manager

On Tue, 9 Jun 2020 at 13:57, Cllr Janet Gardner <jjgardner@hillingdon.gov.uk> wrote:

As one of the cllrs responsible for the ward, like the Coral application which I opposed previously,I am also in opposition to this application

.My prime objection is the licensing objective...

Protecting children and other vulnerable persons from being harmed or exploited

We have college and youth establishments in the area near to the proposed establishment, the YMCA & the Global Academy and if this application is to be approved it will be tempting for the young people and those with problem to tey their luck.s.

We have many in the area who are relying on foodbanks , we have rough sleepers, street drinkers and those with addiction problems. If this is approved it will just be somewhere else for those in financial hardship to gather in the hope that they may strike it lucky..

I have been communicating with residents and these are a couple of responses below that have been sent to the chair of the Hayes Town partnership David Brough which he has shared.

I am sure there will be many more as I know the local Faith groups will have a negative opinion on this application.

Stay safe.

Janet

On Tue, 9 Jun 2020 at 19:13, Cllr John Oswell <joswell@hillingdon.gov.uk> wrote:
Good evening, I also am against this application.

The case against has been made very well by Cllr. Gardner , this is something we don't need,

Regards,

John

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From: **Cllr Scott Farley** <sfarley@hillington.gov.uk>
Date: Mon, 29 Jun 2020 at 17:42
Subject: Re: New Bingo Premises Licence under Gambling Act 2005
To: Mark McDermott <mmcdermott@hillington.gov.uk>
Cc: Cllr Janet Gardner <jgardner@hillington.gov.uk>, Cllr John Oswell <joswell@hillington.gov.uk>, James Rodger <jrodger2@hillington.gov.uk>

Hi Mark

I understand. As a representative of Botwell ward residents I am expressing my concerns for the numbers of gambling establishments and "money lenders" or pawnshops in close vicinity to each other in Hayes Town so it is on the record.

I have expressed, as have my councillor colleagues, about vulnerable people in the area that are in the YMCA in Station Road, on the other side of the canal, people in there with low incomes, some with other personal issues relating to mental health and substance abuse and could be enticed in for the chance to win big and risk putting themselves in worse financial straits. Additionally there is the Global Academy on Blyth Road with young adults in attendance.

There is a food bank operating out of St Anselms church which is only a couple of doors north of the application site. This is also visited by vulnerable people who could be tempted in. These are people in situations whereby they could look upon the "bingo" establishment as a way to raise funds from what limited resources they have.

Also the concern is the application itself which I consider misleading. The plans in the application are a small shop, yet the application is for bingo. The plans suggest these are machines, some standing and some seated. This is not bingo in the traditional sense. Surely the application should be for slot machines under Adult Gaming Centre or Betting (Other). I don't know what a Bingo Plus or Bingo Express terminal is but these are gambling machines and not bingo with a marker pen, paper and bingo balls. Bingo gives a certain impression, and I am not getting this from the application.

Also why have they not completed the times of operation in the application. The "LOCAL GAMBLING RISK ASSESSMENT" file suggests this is 24 hrs of operation! Is this correct? We have a public house across the road just to the south east of the site. This could be an issue and be a draw for the "night time economy". Furthermore, there are homes/flats directly above the premises and on the other side of Station Road which could be disturbed by a 24hr licence.

On the whole, I object to this licence application being granted.

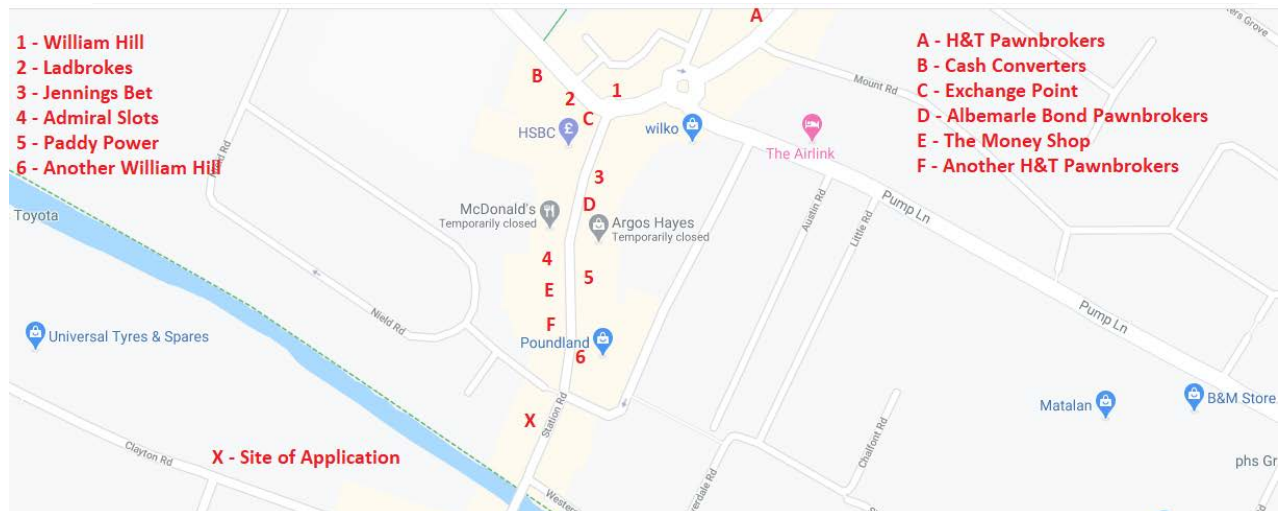
Thanks
Scott

On Sat, 13 Jun 2020 at 01:15, Cllr Scott Farley <sfarley@hillingdon.gov.uk> wrote:

Good evening Mark

In Hayes Town we currently have 6 gambling establishments in the town centre (including two William Hill betting shops). We also have an equal number of pawnbrokers and lending shops, several disturbingly close to the gambling sites and again two of same company, that being H&T Pawnbrokers.

I have illustrated this on the map below to show the proximity of these.



Like my colleagues, I am opposed to this application, particularly in light of the number of gambling establishments we already have in the town centre but also for it's proposed location near accommodation for vulnerable people.

I have also looked at the plans. The application for a bingo licence on the face of it is in my opinion somewhat misleading. As I understand this, it is a for "bingo machines" and not for the traditional bingo halls which clearly could not be the case in a site this small. These are slot machines for all intents of purposes and should be made far more clear as such without having to get to Part 5 - Miscellaneous, question 20. "Please set out any other matters which you consider to be relevant to your application" which if they had not volunteered this information, it would not be clear.

I have conducted internet searches for Cashino's so called Bingo establishments. Only two came up. I am dubious.

Best regards

Scott

Gambling Act 2005
Representation Form from Interested Parties
(Please read notes on reverse before completing)

Your details (See notes 2 & 3);

Your Name	David Brough
Your residential address	c/o Botwell Green Library East Avenue Hayes Ub3 2HW
Your email address	hayestownpartnership@gmail.com
Your phone number	
The name of the body or organisation you represent	Hayes Town Partnership

About the premises;

Name of the premises you are making a representation about	Formerly Harrison Electronics
Address of the premises you are making a representation about	58 Station Road Hayes

The Licensing Objectives (See note 4);

Licensing Objective	Reasons for your representation and any supporting evidence
<i>Please tick;</i> <input type="checkbox"/> Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime	
<input type="checkbox"/> Ensuring that gambling is conducted in a fair and open way	
<input checked="" type="checkbox"/> <input type="checkbox"/> Protecting children and other vulnerable persons from being harmed or exploited by gambling	Please see attached

The outcome you are seeking from the Licensing Authority (See note 6);

Refuse the licence application

Signed:

Date: 29 June 2020

Notes:

- 1) All representations must be submitted before the conclusion of the 28 day consultation period. This will be advertised on the public notices and also on the Councils website.
- 2) Persons who may make representation include; persons who reside near to the premises to which the application relates and who are likely to be affected by licensable activities; residents associations who are representing residents who reside near to the application premises; Ward Councillors representing their constituents; any person who lives or works in the area and has concerns about the application premises.
- 3) Please note that representations cannot be anonymous. Copies of all representations will be published in any Committee papers and will be sent to all persons involved with the hearing including the applicant. If you have concerns about the use of your information and would like to discuss this further, please contact one of our Licensing Officers for a discussion, on the contact details below.
- 4) In order to be considered 'relevant', the representation must relate to one or more of the 'Licensing Objectives'. These objectives are;
 - a) Preventing gambling from being a source of crime or disorder, being associated with crime or 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.
- 5) Upon submitting a representation, it is expected that you will attend the Licensing Sub-Committee hearing to deliver your representation verbally and answer any queries that the Committee may have. If you are unable to attend, your written representation will be considered.
- 6) You may wish to suggest an outcome to the Licensing Sub-Committee ie. grant the application with extra conditions; grant the application with fewer hours/activities; reject the application. Please note that the Licensing Sub-Committee will only make reasonable and proportionate decisions based upon the evidence they are presented with, and in line with the laws and regulations governing Licensing Hearings.
- 7) You may continue on separate sheets of paper if necessary and you may also attach any evidence which supports your representation.
- 8) Please submit all completed forms to:
The Licensing Officer
Regulatory Services
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge, UB8 1UW

licensing@hillingdon.gov.uk

Tel - 01895 277433

www.hillingdon.gov.uk/licensing

BINGO LICENCE APPLICATION FOR 58 STATION ROAD HAYES

SUBMISSION FROM HAYES TOWN PARTNERSHIP

Introduction

The Hayes Town Partnership is a multi-agency body set up some years ago by Hillingdon Council in order to support and promote the regeneration of the Town Centre. Besides the Council its members include the Hayes Town Business Forum, Hillingdon Chamber of Trade, Metropolitan Police, Brunel University, Global Academy, Uxbridge College and all major developers and employers in the Town Centre. The views expressed here are those of the Partnership as a whole and do not purport to represent the views of individual members who may submit individual representations.

Grounds of objection – impact on vulnerable people

58 Station Road is in close proximity to St Anselm's Church, Ventura House YMCA Hostel and the YMCA Youth Centre. It is an inappropriate location for a gaming licence of any kind because of the potential impact on vulnerable people as itemised below:

St Anselm's Church Food Bank

This is the main food bank for Hayes and is visited by families in crisis who have been referred there by relevant agencies. 58 Station Road is a few doors away from the foodbank and there is a well-founded fear that people who are strapped for cash could see a gaming centre as a way out of their financial problems.

Ventura House YMCA Hostel

This hostel is a few doors along in the opposite direction. It is home to a large number of young people who have been provided with temporary housing because of their vulnerable situation. It includes those who have left care, those who have suffered family breakdown and others who have had a brush with the law. All the residents are short of money and some have added problems ranging from lack of self-confidence to mental health conditions. The existing of a gambling centre on their doorstep could be a temptation that would be difficult to resist.

YMCA Youth Centre

This is a successful Youth Centre that provides for a wide range of young people in Hayes, some of whom have quite challenging behaviour. Almost all come from poor family backgrounds.

The Centre has a good record in turning lives around by use of various methods of engagement. One of these is the 'Get on Track' training programmes organised together with the Dame Kelly Holmes Trust. The regular football sessions organised by the staff at the Centre have been particularly effective at engaging young males who would otherwise be on the streets. To have a gaming centre right next door to the Centre has the potential for drawing a proportion of the young service users into gambling.

In addition to the comments about this particular location it is important to highlight that mothers in various community groups in Hayes Town have expressed continuing concerns about their children taking up gambling as a way of paying for designer clothes, new telephones and sometimes drugs. They are concerned that more should be done to make young people aware of the temptations of gambling and the dangers of getting drawn into an activity that could do them harm.

For all the reasons set out here the current application should be refused.

David Brough
Chairman
Hayes Town Partnership

29 June 2020

Gambling Act 2005
Representation Form from Interested Parties
(Please read notes on reverse before completing)

Your details (See notes 2 & 3);

Your Name	Fr. Matthew Cashmore
Your residential address	St. Anselm, Station Road, Hayes. UB3 4DF
Your email address	
Your phone number	
The name of the body or organisation you represent	The PCC of St. Anselm's Church, Hayes.

About the premises;

Name of the premises you are making a representation about	58 Station Road, Hayes.
Address of the premises you are making a representation about	

The Licensing Objectives (See note 4);

Licensing Objective	Reasons for your representation and any supporting evidence
<i>Please tick;</i> <input type="checkbox"/> Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime	
<input type="checkbox"/> Ensuring that gambling is conducted in a fair and open way	
<input checked="" type="checkbox"/> Protecting children and other vulnerable persons from being harmed or exploited by gambling	Please see attached letter from the PCC of St. Anselm's, Hayes.

The outcome you are seeking from the Licensing Authority (See note 6);

Rejection of the licence on the grounds of protection of vulnerable persons.
--

Signed:

..... Date: 16th June 2020

Notes:

- 1) All representations must be submitted before the conclusion of the 28 day consultation period. This will be advertised on the public notices and also on the Councils website.
- 2) Persons who may make representation include; persons who reside near to the premises to which the application relates and who are likely to be affected by licensable activities; residents associations who are representing residents who reside near to the application premises; Ward Councillors representing their constituents; any person who lives or works in the area and has concerns about the application premises.
- 3) Please note that representations cannot be anonymous. Copies of all representations will be published in any Committee papers and will be sent to all persons involved with the hearing including the applicant. If you have concerns about the use of your information and would like to discuss this further, please contact one of our Licensing Officers for a discussion, on the contact details below.
- 4) In order to be considered 'relevant', the representation must relate to one or more of the 'Licensing Objectives'. These objectives are;
 - a) Preventing gambling from being a source of crime or disorder, being associated with crime or 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.
- 5) Upon submitting a representation, it is expected that you will attend the Licensing Sub-Committee hearing to deliver your representation verbally and answer any queries that the Committee may have. If you are unable to attend, your written representation will be considered.
- 6) You may wish to suggest an outcome to the Licensing Sub-Committee ie. grant the application with extra conditions; grant the application with fewer hours/activities; reject the application. Please note that the Licensing Sub-Committee will only make reasonable and proportionate decisions based upon the evidence they are presented with, and in line with the laws and regulations governing Licensing Hearings.
- 7) You may continue on separate sheets of paper if necessary and you may also attach any evidence which supports your representation.
- 8) Please submit all completed forms to:
The Licensing Officer
Regulatory Services
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge, UB8 1UW

licensing@hillington.gov.uk

Tel - 01895 277433

www.hillingdon.gov.uk/licensing



THE PARISH CHURCH OF ST ANSELM HAYES

8th June 2020

REF: 60 Station Road, Hayes. Application for a premises licence under the Gambling Act 2005

To Whom It May Concern:

We write to object to the granting of a licence under the Gambling Act 2005 to Cashino Gaming Limited trading as Merkur Slots.

We make our objection, not on any moral grounds, but because we believe this is a bad location for a gambling premises of any kind, but especially gambling that can be carried out alone at a machine.

The location sits between a homeless hostel, a primary care NHS Medical Centre, is directly opposite a pub and next door to a bank. It is on the direct (and very short) path between those in emergency accommodation at the YMCA and the food bank – hosted at our church.

We argue that this location will enable and encourage the most vulnerable in our society to gamble when they do not want to, will gamble well beyond their means, and because of the mental and physical anguish brought on by homelessness, illness or alcohol be unable to make informed or balanced decisions about their gambling. The easy access to both alcohol and cash either side of the proposed location exacerbates these concerns and we believe will have a serious detrimental effect on their ability to get their lives back on track.

We thank you for your consideration of our objection.

In love & with prayer,

The PCC of St. Anselm's Church, Hayes.

St. Anselm PCC | Station Road, Hayes. UB3 4DF | 020 3882 0553

www.stanselm.co.uk

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Representation Form from Interested Parties

(Please read notes on reverse before completing)

Your details (See notes 2 & 3);

Your Name	<u>Susan Chick</u>
Your residential address	<u>51 St Anselms Road, Hayes, Middlesex, UB3 1SD</u>
Your email address	
Your phone number	
The name of the body or organisation you represent	

About the premises;

Name of the premises you are making a representation about	<u>Cashino Gaming Ltd operating as Merkur Slots</u>
Address of the premises you are making a representation about	<u>58 Station Road Hayes, Middlesex UB3</u>

The Licensing Objectives (See note 4);

Licensing Objective	Reasons for your representation and any supporting evidence
<p><i>Please tick;</i></p> <p><input checked="" type="checkbox"/> Prevention of Crime/Disorder</p> <p><input type="checkbox"/> Prevention of Public Nuisance</p> <p><input checked="" type="checkbox"/> Protection of Children From Harm</p> <p><input type="checkbox"/> Public Safety</p>	<p><u>I object to a licence being granted because I feel that the premises are very close to YMCA Ventura House which houses vulnerable people and also runs a youth centre attended by young people who could see this as a way to make money quickly but would probably end up in financial difficulties and possibly become addicted to gambling. The premises are also adjacent to St Anselms Church and people attending the Foodbank held there could be tempted to spend beyond their means. I feel that the premises could also become a meeting point for drug dealing. There are more than enough gaming premises close by and with the amount of deprivation in the area I think these premises could just add to the problems caused by gambling. I feel my appeal meets objectives a and c.</u></p>

The outcome you are seeking from the Licensing Authority (See note 6);

<u>The refusal by the council to grant a licence .</u>
--

Signed:Susan A Chick..... Date:
12/06/2020.....Page 47

Notes:

- 1) All representations must be submitted before the conclusion of the 28 day consultation period. This will be advertised on the public notices and also on the Councils website.
- 2) Persons who may make representation include; persons who reside near to the premises to which the application relates and who are likely to be affected by licensable activities; residents associations who are representing residents who reside near to the application premises; Ward Councillors representing their constituents; any person who lives or works in the area and has concerns about the application premises.
- 3) Please note that representations cannot be anonymous. Copies of all representations will be published in any Committee papers and will be sent to all persons involved with the hearing including the applicant. If you have concerns about the use of your information and would like to discuss this further, please contact one of our Licensing Officers for a discussion, on the contact details below.
- 4) In order to be considered 'relevant', the representation must relate to one or more of the 'Licensing Objectives'. These objectives are;
 - a) Prevention of Crime/Disorder - This relates to any criminal activity, disorder or anti-social behaviour related to the application premises.
 - b) Prevention of Public Nuisance - This relates to noise nuisance and vibration, litter, noxious smells, light pollution.
 - c) Protection of Children from harm - This relates to the protection of children whilst on the application premises.
 - d) Public Safety - This relates to the physical condition of the premises and the safety features provided for members of the public such as; fire safety, health & safety.
- 5) Upon submitting a representation, it is expected that you will attend the Licensing Sub-Committee hearing to deliver your representation verbally and answer any queries that the Committee may have. If you are unable to attend, your written representation will be considered.
- 6) You may wish to suggest an outcome to the Licensing Sub-Committee ie. grant the application with extra conditions; grant the application with fewer hours/activities; reject the application. Please note that the Licensing Sub-Committee will only make reasonable and proportionate decisions based upon the evidence they are presented with, and in line with the laws and regulations governing Licensing Hearings.
- 7) You may continue on separate sheets of paper if necessary and you may also attach any evidence which supports your representation.
- 8) Please submit all completed forms to:

**The Licensing Officer
Regulatory Services
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge, UB8 1UW**

licensing@hillingdon.gov.uk

Gambling Act 2005
Representation Form from Interested Parties
(Please read notes on reverse before completing)

Your details (See notes 2 & 3);

Your Name	Susan Chick
Your residential address	51 St Anselms Road, Hayes, Middlesex UB3 1SD
Your email address	
Your phone number	
The name of the body or organisation you represent	

About the premises;

Name of the premises you are making a representation about	
Address of the premises you are making a representation about	

The Licensing Objectives (See note 4);

Licensing Objective	Reasons for your representation and any supporting evidence
<i>Please tick;</i> <input checked="" type="checkbox"/> Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime	The fact that the premises will be open 24 hours I feel will give a place for drug dealing to take place.
<input type="checkbox"/> Ensuring that gambling is conducted in a fair and open way	
<input type="checkbox"/> Protecting children and other vulnerable persons from being harmed or exploited by gambling	Hayes Town is a place that has a high level of deprivation and people could see this as a way to increase their income but run the risk of becoming addicted to gambling in the process.

The outcome you are seeking from the Licensing Authority (See note 6);

There are plenty of gambling outlets in Hayes Town including a 24 hour establishment only a short distance away. I would like to see the Licensing Authority decline this application.

Signed:Susan Chick.....Page 49..... Date:
.....12/06/2020.....

Notes:

- 1) All representations must be submitted before the conclusion of the 28 day consultation period. This will be advertised on the public notices and also on the Councils website.
- 2) Persons who may make representation include; persons who reside near to the premises to which the application relates and who are likely to be affected by licensable activities; residents associations who are representing residents who reside near to the application premises; Ward Councillors representing their constituents; any person who lives or works in the area and has concerns about the application premises.
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 - 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.
- 5) Upon submitting a representation, it is expected that you will attend the Licensing Sub-Committee hearing to deliver your representation verbally and answer any queries that the Committee may have. If you are unable to attend, your written representation will be considered.
- 6) You may wish to suggest an outcome to the Licensing Sub-Committee ie. grant the application with extra conditions; grant the application with fewer hours/activities; reject the application. Please note that the Licensing Sub-Committee will only make reasonable and proportionate decisions based upon the evidence they are presented with, and in line with the laws and regulations governing Licensing Hearings.
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- 8) Please submit all completed forms to:
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Uxbridge, UB8 1UW

licensing@hillingdon.gov.uk

Tel - 01895 277433

www.hillingdon.gov.uk/licensing

Gambling Act 2005
Representation Form from Interested Parties
(Please read notes on reverse before completing)

Your details (See notes 2 & 3);

Your Name	Genevieve Hibbs
Your residential address	122 Cromwell Road HAYES UB3 2PT
Your email address	
Your phone number	
The name of the body or organisation you represent	Myself

About the premises;

Name of the premises you are making a representation about	Merkur Slots
Address of the premises you are making a representation about	58 Station Road HAYES UB3 4DF

The Licensing Objectives (See note 4);

Licensing Objective	Reasons for your representation and any supporting evidence
<i>Please tick;</i> <input checked="" type="checkbox"/> Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime	
<input type="checkbox"/> Ensuring that gambling is conducted in a fair and open way	
<input checked="" type="checkbox"/> Protecting children and other vulnerable persons from being harmed or exploited by gambling	With the YMCA hostel nearby and the friends that the residents attract, there is a very vulnerable group of young people nearby.

The outcome you are seeking from the Licensing Authority (See note 6);

Th refuse this application

Signed:Genevieve M Hibbs.. Date: ..27/6/20..

- 1) All representations must be submitted before the conclusion of the 28 day consultation period. This will be advertised on the public notices and also on the Councils website.
- 2) Persons who may make representation include; persons who reside near to the premises to which the application relates and who are likely to be affected by licensable activities; residents associations who are representing residents who reside near to the application premises; Ward Councillors representing their constituents; any person who lives or works in the area and has concerns about the application premises.
- 3) Please note that representations cannot be anonymous. Copies of all representations will be published in any Committee papers and will be sent to all persons involved with the hearing including the applicant. If you have concerns about the use of your information and would like to discuss this further, please contact one of our Licensing Officers for a discussion, on the contact details below.
- 4) In order to be considered 'relevant', the representation must relate to one or more of the 'Licensing Objectives'. These objectives are;
 - a) Preventing gambling from being a source of crime or disorder, being associated with crime or 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.
- 5) Upon submitting a representation, it is expected that you will attend the Licensing Sub-Committee hearing to deliver your representation verbally and answer any queries that the Committee may have. If you are unable to attend, your written representation will be considered.
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- 7) You may continue on separate sheets of paper if necessary and you may also attach any evidence which supports your representation.
- 8) Please submit all completed forms to:
The Licensing Officer
Regulatory Services
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge, UB8 1UW

licensing@hillingdon.gov.uk

Tel - 01895 277433

www.hillingdon.gov.uk/licensing

Gambling Act 2005
Representation Form from Interested Parties
(Please read notes on reverse before completing)

Your details (See notes 2 & 3);

Your Name	John McDonnell MP
Your residential address	Constituency Office Pump Lane Hayes UB3 3NB
Your email address	mcdonnellj@parliament.uk
Your phone number	0208 569 0010
The name of the body or organisation you represent	Member of Parliament for Hayes and Harlington

About the premises;

Name of the premises you are making a representation about	Merkur Slots (Cashino Gaming Limited)
Address of the premises you are making a representation about	58 Station Road Hayes UB7 8HP

The Licensing Objectives (See note 4);

Licensing Objective	Reasons for your representation and any supporting evidence
<i>Please tick;</i> <input checked="" type="checkbox"/> Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime	There are already a large number of betting shops in the Town Centre area and yet another gambling establishment will further undermine the balance of the retail offer of the Town Centre. The proliferation and concentration of gambling establishments is contributing to community decline. The ongoing spread of betting shops and other gambling establishments has been linked to gambling addiction and crime.
<input checked="" type="checkbox"/> Ensuring that gambling is conducted in a fair and open way	Gambling addiction has increased due to, in part the increase of gambling outlets. If a gambling problem develops, debts can spiral out of control and it can affect relationships, employment and mental health.
<input checked="" type="checkbox"/> Protecting children and other vulnerable persons from being harmed or exploited by gambling	The highest number of participants are young men. When you walk past any of the gambling establishments, you will see several young men congregating outside, waiting for their turn on the slot machines.

The outcome you are seeking from the Licensing Authority (See note 6);

Signed: John McDonnell MP Date: 22nd June 2020

Notes:

- 1) All representations must be submitted before the conclusion of the 28 day consultation period. This will be advertised on the public notices and also on the Councils website.
- 2) Persons who may make representation include; persons who reside near to the premises to which the application relates and who are likely to be affected by licensable activities; residents associations who are representing residents who reside near to the application premises; Ward Councillors representing their constituents; any person who lives or works in the area and has concerns about the application premises.
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www.hillingdon.gov.uk/licensing

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Gambling Act 2005
Representation Form from Interested Parties
(Please read notes on reverse before completing)

Your details (See notes 2 & 3);

Your Name	Ajaib Singh Puar
Your residential address	c/o 3 Coldharbour Lane Hayes UB3 3EA
Your email address	ajaib@puartravel.co.uk
Your phone number	
The name of the body or organisation you represent	Hayes Town Business Forum

About the premises;

Name of the premises you are making a representation about	Previously Harrison Electronics
Address of the premises you are making a representation about	58 Station Road Hayes

The Licensing Objectives (See note 4);

Licensing Objective	Reasons for your representation and any supporting evidence
<i>Please tick;</i> <input type="checkbox"/> Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime	
<input type="checkbox"/> Ensuring that gambling is conducted in a fair and open way	
<input checked="" type="checkbox"/> <input type="checkbox"/> Protecting children and other vulnerable persons from being harmed or exploited by gambling	Please see attached

The outcome you are seeking from the Licensing Authority (See note 6);

Refuse the licence application

Signed:

Date: 30/06/2020.....

Notes:

- 1) All representations must be submitted before the conclusion of the 28 day consultation period. This will be advertised on the public notices and also on the Councils website.
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BINGO LICENCE APPLICATION FOR 58 STATION ROAD HAYES

OBJECTION FROM HAYES TOWN BUSINESS FORUM

Introduction

The Hayes Town Business Forum represents around 50 businesses in Hayes Town, most of which are small independent traders. It is a member of the Hayes Town Partnership and the Hillingdon Chamber of Trade.

Objection on grounds of adverse impact on vulnerable people

As the representative of many of the traders in Hayes Town we are concerned at the way in which increasing numbers of young people are being drawn into anti-social behaviour and petty crime. We already see individuals getting involved in gambling and we fear that this will get worse because of the location of the premises under consideration for a bingo licence.

58 Station Road is very close to the YMCA hostel and the YMCA Youth Centre in Station Road. The Hostel is home to a lot of vulnerable young people, most of whom have few funds and there is a real worry that they will see this proposed new centre as a way of making quick money.

The adjoining Youth Centre has a quite a number of youngsters with challenging backgrounds and there is the same danger that they could get into gambling if the facilities are on the doorstep.

Just along from 58 Station Road is St Anselm's Church which hosts a weekly food bank. This attracts single parent families and other vulnerable people who are struggling to make ends meet. A gambling establishment is the last thing they need but the close proximity could be tempting for people with financial problems.

For these reasons we believe the Council should reject this application.

A S Puar
Chairman
Hayes Town Business Forum

30 June 2020

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Gambling Act 2005
Representation Form from Interested Parties
(Please read notes on reverse before completing)

Annex 11









Your details (See notes 2 & 3);

Your Name	Harry McKeown – Head of Housing and Support
Your residential address	St James' House, 9 St James' Rd, Surbiton KT6 4QH
Your email address	harrymckeown@ymcaspg.org
Your phone number	
The name of the body or organisation you represent	YMCA St Paul's Group

About the premises;

Name of the premises you are making a representation about	Merkur Slots C/O Cashino Gaming Limited Seebeck House 1A Seebeck Place Milton Keynes Postcode: MK5 8FR
Address of the premises you are making a representation about	58 Station Road Hayes Postcode: UB3 4DF

The Licensing Objectives (See note 4);

Licensing Objective	Reasons for your representation and any supporting evidence
<p><i>Please tick;</i></p> <p><input checked="" type="checkbox"/> Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime</p>	<p>Please see attached PDF documents which contain all of the details in relation to our objections on this ground.</p> <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;">  <small>Planning Objection - George Bergin - Ca</small> </div> <div style="text-align: center;">  <small>Planning Objection - Alan Maphosa.pdf</small> </div> <div style="text-align: center;">  <small>Case study.pdf</small> </div> <div style="text-align: center;">  <small>Planning Objection - YMCA SPG - Hayes</small> </div> </div>
<p><input type="checkbox"/> Ensuring that gambling is conducted in a fair and open way</p>	
<p><input checked="" type="checkbox"/> Protecting children and other vulnerable persons from being harmed or exploited by gambling</p>	<p>Please see attached PDF documents which contain all of the details in relation to our objections on this ground (copy of above).</p> <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;">  <small>Planning Objection - George Bergin - Ca</small> </div> <div style="text-align: center;">  <small>Planning Objection - Alan Maphosa.pdf</small> </div> <div style="text-align: center;">  <small>Case study.pdf</small> </div> <div style="text-align: center;">  <small>Planning Objection - YMCA SPG - Hayes</small> </div> </div>

The outcome you are seeking from the Licensing Authority (See note 6);

Reject the application.

Signed:

Date: 30th June 2020

Notes:

- 1) All representations must be submitted before the conclusion of the 28 day consultation period. This will be advertised on the public notices and also on the Councils website.
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Case Study

XX is a young single man aged 28, he had been a resident at YMCA Hayes and Ealing, whilst he was in Hayes he fell foul to all of the many betting shops that were in the Town Centre. Whilst in Ealing it was the same, except in Ealing there was an establishment called Merkur Cashino Ealing (I think this is similar to what is planned in Hayes).

XX was on benefits and he knew that after he had paid his rent etc, he would only be left with enough money to feed himself for 3/4 days; he would have to beg members of the public to be able to feed himself for the rest of the week.

XX eventually got so used to begging that he found himself gambling his money in the hope that he would win and avoid having to beg. XX is Dyslexic and illiterate, so when he was playing these machines, he would just put his money in and randomly press buttons, reducing any chance of winning to practically zero.

Occasionally XX would win and this led to him gambling more and more, having to beg more and more (more often than not XX would have to beg to feed himself for the whole week). This his would lead to him playing the machines more (can always beg more) and eventually he became so addicted to the machines that he would steal from shops to sell goods to fund his gambling habit, this then led to him becoming homeless and begging fulltime.

XX was now more vulnerable as he was on the street 24/7, he was often assaulted and robbed and he started to rob people himself, the more money he was getting, the more he gambled on the machines and in betting shops. XX was hospitalised on one occasion as a result of the lifestyle he had found himself in and eventually after being arrested several times found himself in Prison.

XX was even more vulnerable in Prison and was groomed to sell drugs to survive. When he was released, the same people that took advantage of him in Prison, were waiting for his release to put him to work on the streets selling their drugs. XX has been in and out of Prison three times now.

XX is now living in his own flat, but is still addicted to playing the machines, I find myself wondering how things might have turned out different if he had not had access to the establishment known as Merkur Cashino, Ealing. We do not want the same to be the same for any of our residents at Ventura House, Hayes.

George Bergin, Youth Programmes and Volunteering Officer – Hayes.

My concerns.

From one young person's perspective who I've supported at Ventura House; gambling is a pastime that slowly became and scheduled habit. After a few months it was part of their budget from universal credit. The addiction even made him look for job so that he could satisfy the urge to play regularly, bearing in mind he lost more than he won. This young person struggled for ages with this addiction, they have gotten to a stage where they are not highly addicted, but they still have the habit to gamble a fruit machine occasionally.

Many young people we work with start from hanging out with their friends in the betting shops, then eventually either get encouraged to try or it becomes a pastime while at the shops with friends. There are so many betting/gambling shops as it is within one high street, and would play a part in increasing loitering, petty crime, and hot spots for unorganized criminal activity. I genuinely feel it is not beneficial for any residents in the area and will only benefit the gambling shop itself and no one in the community.

Alan Maphosa, Youth Worker – Hayes

Case study

XX is a young man referred to the YMCA in 2016. He presented with Alcohol challenges and has a history of rough sleeping prior to being referred to the YMCA.

XX has found living in shared accommodation difficult; he has struggled to manage his tenancy for the following reasons;

- Alcohol Addiction challenges (referred to ARCH)
- Loss of employment due to Alcohol dependency
- Involved in Criminal Activity, stealing from local shops.
- Risk of becoming Homeless again due to Rent arrears
- Physically assaulted whilst intoxicated.

XX's Alcohol issues became apparent on moving into Ventura House, he was referred to ARCH (Hillingdon Substance Misuse support) and completed a program with Arch to be able to manage his addiction safely.

He continues to be supported by ARCH and continues to have occasional relapses.

XX has been proactive in finding employment and was able to secure 4 jobs in a short period of time. He was not able to maintain employment due to his addiction.

XX was caught shop lifting from a local business and subsequently banned from the store. He was referred to a Debt Advisor for support to help him manage and budget his money as at this point he was at risk of losing his tenancy.

Large amounts of money were being spent and unaccounted for. XX said he had been encouraged to go into the Gambling shops in the high street by friends. He was habitually using the gambling establishments in Hayes Town and losing his money. He also felt that there was an element of gangs, substance users and sellers all congregating in the Betting Office.

XX becomes very vulnerable when intoxicated and has been the victim of assault in Hayes Town on several occasions. He was targeted by a group of men in the betting office because he was vulnerable and often intoxicated.

Staff continue to work with XX to support him to reduce his rent arrears, continue his support with ARCH and referred him to Gamblers Anonymous for support with his addiction.

XX does not support the opening of another gambling establishment in the local area.



Planning Objection

Background on the YMCA in Hayes

Ventura House is based on the high street, Station Road, Hayes.

We house young people and families who require support and guidance to gain independent life skills to enable them to live in the local community. Many of our residents arrive with underlying issues and addictions. YMCA SPG began to manage Ventura House in 2003.

History of Ventura House and the relationship with the local community

Over the years Ventura House have forged good relationships with the local community, Churches, local businesses, Councillors and the Police. Our residents are encouraged to volunteer their time to the local community with various events, activities and programs.

Objections

We have consulted with our vulnerable residents and they feel that if another gambling establishment is opened in the local area it would be detrimental to their community and vulnerable people who are already living unsettled lives.

The gambling establishments in Hayes Town already encourage crime, exploitation, assault, substance misuse, financial abuse and places vulnerable and young people at risk of mismanaging their money, which can lead to homelessness.

Our residents are a key group of vulnerable people who need protecting, and through them their wider circle of friends and contacts. The addition of another gambling outlet could worsen the ongoing (anti-social behaviour) linked to existing gambling outlets, causing more crime and increasing the fear of crime in the area.

The YMCA SPG work hard to support vulnerable and young people to make key transitional changes in their lives. Our residents feel that to add another gambling establishment is unnecessary and does nothing to add cultural or meaningful economic value to the town.

We thoroughly object to the request for planning permission to be granted, and attached to this objection are the signatures of 61 of our young, vulnerable residents.

We hope that the Local Authority support us in ensuring that the safety and prosperity of our town is maintained and that planning permission for this establishment is denied.

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Representation Form from Interested Parties

(Please read notes on reverse before completing)

Your details (See notes 2 & 3);

Your Name	<u>OCEN PATRICT</u>
Your residential address	<u>UNIT 3, 45 COLDHARBOUR LANE, HAYES, UB3 3EE</u>
Your email address	
Your phone number	
The name of the body or organisation you represent	<u>INDIVIDUAL MEMBER OF THE PUBLIC</u>

About the premises;

Name of the premises you are making a representation about	<u>Merkur Slots (Cashino Gaming Limited)</u>
Address of the premises you are making a representation about	<u>58 Station Road, Hayes, UB3 4DF</u>

The Licensing Objectives (See note 4);

Licensing Objective	Reasons for your representation and any supporting evidence
<p><i>Please tick;</i></p> <p><input type="checkbox"/> Prevention of Crime/Disorder</p> <p><input type="checkbox"/> Prevention of Public Nuisance</p> <p><input type="checkbox"/> Protection of Children From Harm</p> <p><input type="checkbox"/> Public Safety</p>	<p><u>THE APPLICANTS ARE IRRESPONSBLE IN ALL THEIR PREVIOUS APPLICATIONS IN OTHER TOWNS IN PREVENTING CRIME AND CONTROL OF THE PROLIFERATIONS OF DRUGS AND PROMOTIONS DRUGS.</u></p> <p><u>HAYES ALREADY HAVE OVER 10 SUCH SLOTS AND HILLINGDON IN GENERAL HAS OVER 20 SUCH RECREATIONAL FACILITIES AS SUCH, THE OPERATION OF THIS BUSINESS WILL ENCOURAGE CRIME AND DISORDERLINESS AND AS SUCH IT DESTROY THE BUSINESS ENVIROMENT AND CONTROL OF DRUGS, FRAUD AND CRIME, ALREADY THE GAMININGS WITHIN HAYES HAS CAUSED ENORMOUS PRBLEMS DRUGS, ALCOHOLISM AND HOMELESSNESS, DEATH, ROBBERY AND ALL OTHER NUISSANCE.</u></p> <p><u>NO ENVIROMENTAL IMPACT ASSESSMENT HAVE BEEN UNDER TAKEN BY THE APPLICANTS AND THE LOCAL AUTHORITY, NO CHILD IMPACT ASSESSMENTS HAVE BEEN UNDERTAKEN OR GUARANTEES THAT IT WILL, THE APPLICANT IS A CORPORATE ORGANISATION THAT DOES NOT HAVE A POLICY ON CORPORATE SOCIAL RESPONSIBILITY AND DOES NOT CARE ABOUT THE PLIGHT</u></p>

	<p><u>OF PEOPLE ADDICTED TO GAMING.</u></p> <p><u>THEY MUST NOT BE GRANTED THE LICENCE TO OPERATE IN HAYES TO PROTECT THE ENVIROMENT AND THE YOUNG PEOPLE FROM ADDICTIONS AND OTHER ASSOCIATED SOCIAL EVILS.</u></p>
--	--

The outcome you are seeking from the Licensing Authority (See note 6);

Signed:O.PATRICK..... **Date:**
08/06/2020.....

Notes:

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 - a) Prevention of Crime/Disorder - This relates to any criminal activity, disorder or anti-social behaviour related to the application premises.
 - b) Prevention of Public Nuisance - This relates to noise nuisance and vibration, litter, noxious smells, light pollution.

- c) Protection of Children from harm - This relates to the protection of children whilst on the application premises.
 - d) Public Safety - This relates to the physical condition of the premises and the safety features provided for members of the public such as; fire safety, health & safety.
- 5) Upon submitting a representation, it is expected that you will attend the Licensing Sub-Committee hearing to deliver your representation verbally and answer any queries that the Committee may have. If you are unable to attend, your written representation will be considered.
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Mark McDermott <mmcdermott@hillington.gov.uk>

23 Jun
2020,
14:58

to r.bradley

Good afternoon,

I attach a copy of the plan 'machine layout' you have submitted for ease of reference. Can you let me know what types of machines/terminals with various names are for please including the category type and expected ratio. Also if you have any further information on how the bingo terminals work and for instance are they linked nationally to other premises in the group?

Do the premises employ door staff and do you have any material on staff training with regard to vulnerable/under age/unruly customers?

I note you have applied not to exclude the default condition in respect of times of operation:

1. no facilities for gambling shall be provided on the premises between the hours of midnight and 9am.
2. The condition in paragraph 1 shall not apply to making gaming machines available for use.

Do you have set hours for when the premises will open please?

There is a betwatch scheme in Hayes would your clients be open to joining this?

Kind regards

Mark

Regulatory Services

Hi Mark,

Machines

I know that a combination of B3, C and D products will be available, subject to the legislative limits (only 20% of the total machines made available on site may be category B). I am also aware that the average stake placed at Cashino Gaming Limited's High Street bingo premises is between 30p and 40p.

If you need a further breakdown I can ask our client if they can provide the details?

A combination of bingo terminals and bingo tablets will be made available during permitted hours and due to the electronic nature can be played at any time. Our client also has a linked remote operating licence, which allows players to participate

in linked games, which is dependent upon other players participating at other venues.

Premises management and training

Our client does not retain door staff as standard across its estate as for the majority of cases this is not deemed necessary due to the general minimal level of incidents at its premises. Venue management are trained to manage and supervise all customers, which includes those in the immediate vicinity of the premises. For the majority of Cashino Gaming Limited's venues there is minimal congregation outside of premises, unlike betting premises for example, due to the customer demographic and nature of the gaming services provided.

Venue managers and staff are also encouraged to develop a strong relationship with local police teams and other local businesses to ensure that any local risks, whether or not they are not specifically related to gambling, can be addressed.

With regard to the Betwatch scheme, our client is always willing to participate in any such schemes to ensure local knowledge is shared and that all local risks are identified and mitigated.

The attached 'standards' document provides a general overview of the detailed security measures and training provided across the Cashino Gaming Limited estate and it is worth highlighting that all licensed premise employees receive induction and six-monthly refresher training during the course of their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.

I have also attached a copy of our client's compliance folder, which contains details of Cashino Gaming Limited' policies and procedures including protection of vulnerable individuals. Please can this document **not** be shared with third parties. If the application proceeds to a hearing extracts may be provided for the Committee members.

Our client has two national training centres. Our client also has a compliance/audit team which runs independently of the Operations Team and completes regular premises and staff audits to ensure that the Company's high standards are maintained and that any additional training or other matters are swiftly addressed.

I can also provide you with a copy of our client's Operations Manual, which may contain some irrelevant operational details but this also concludes operational aspect such as CCTV and other security systems?

Hours of operation

As you correctly identify, bingo can be operated from 9am until midnight. Whilst I appreciate that planning is not a consideration from a licensing perspective, any permission granted by the bingo licence would be subject to any other restriction, such as planning.

Whilst it is unlikely that the premises would want to operate well into the early hours, our client would like the potential to operate until 1am/2am the following day, if possible and subject to daily demand and viability.

Our client operates a no pre-planned single staffing policy after 8pm and also operates a maglock security system for later hours operation.

If you do require any further details, please let me know.

Kind regards,

Richard

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Mark McDermott <mmcdermott@hillington.gov.uk>

New Bingo Premises Licence under Gambling Act 2005

David.A.Butler@met.police.uk <David.A.Butler@met.police.uk>
To: mmcdermott@hillington.gov.uk, licensing@hillington.gov.uk
Cc: Amy.Kalinowski@met.police.uk, GRAHAM.R.Edwards@met.police.uk

26 June 2020 at 14:39

Good Afternoon Mark,

Having studied the application I made enquiries into the overall crime statistics from April 2019 to April 2020.

Hayes Town Centre has suffered no greater than any other Town Centre within the Borough of Hillingdon and although I am aware of its Social and welfare issues I cannot attribute and specific crime or Anti-Social Behaviour problem directly to any Gambling Premises within the Hayes Town Foot Print.

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I have read and noted the concerns of the other interested parties and fully understand the needs and weaknesses of this community however, crime is down over this period and I know a lot of that is due to Covid-19 Lockdown.

There is a Bet Watch Scheme in Hayes Town Centre which has worked well for a number of years. The Local Policing Team are also actively involved with proactive policing in The Town Centre and we make contact frequently.

I feel with the current crisis and struggling businesses in our Town Centres, some critically damaged we need to encourage new ventures.

I do understand that this venue would not be classed as an essential service and strict operating procedures would have to be implemented, which I believe they are with this company.

I am happy to arrange a multi-agency meeting with the Applicants, as we would with any other premises where concerns were raised.

At this time The Police Licensing Team have insufficient evidence to undermine this application and unless any other damning evidence comes to light then I cannot raise an objection under The Prevention of Crime and Disorder at this time.

Yours Faithfully.

David Butler, Police Licensing Officer, Hillingdon.

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Dave Butler PC 2845WA

Police Licensing Officer

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