



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.

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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