

Trafalgar Leisure

Bingo Premises Licence Application: 33-35 Piccadilly, Manchester, M1 1LQ

Statement of Compliance with the Licensing Objectives

Trafalgar Leisure are committed to ensuring compliance with the licensing objectives and operate a risk based approach to ensure this is achieved.

In developing our policy's and procedures for this site we have had particular regard to:

- The Three Licensing Objectives
- Guidance and Codes of Practice issued by the Gambling Commission
- Gambling Policy Statement 2019-22 issued by Manchester Licensing Authority

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

CCTV – will be installed throughout the site including all entrances and exits.

████████ Intruder Alarm System - monitored 24 hours a day by alarm control centre.

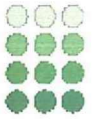
Personal Attack – customer service assistants carry portable PA alarms connected to the alarm monitoring centre who can summon police assistance on activation.

Automated Cashier System – this facility reduces cash handling by staff and reduces the risk of robbery / holdup.

Cash in Transit – banking and change orders are collected and delivered by a third party security company such as G4S reducing the risk of robbery in transit to bank.

Fraud & Theft - staff undertake training to identify suspicious customer behaviour and a set procedure is in place to deal with this and mitigate the risk.

Open / Close Procedure – staff are trained to adopt a specific open and close procedure which is tailored to mitigate the risk of hold up or robbery when opening or closing the premises



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1st Licensing Objective continued:

Admission 21 years – we operate a policy that generally requires customers to be over 21 years of age. Signage is displayed at all entrances stating you must be over 21 to enter these premises. This discourages groups of young persons and mitigates the risk of disorder.

Antisocial Behaviour – all entrances are monitored by staff or security personnel adopting a risk based approach, in addition to this all toilets in the premises are fitted with access codes mitigating the risk of antisocial behaviour.

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

House Rules – are displayed prominently in the venue so that customers can understand our rules and procedure associated with gambling in our venues.

Bingo Games & Machine Rules – are displayed physically and / or electronically to ensure customers can make an informed decision when gambling.

Staff Gambling – staff and their families are prohibited from gambling in our venues.

Tipping Off – staff are prohibited from tipping off customers regarding machine performance.

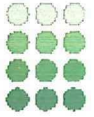
Staff Tips – staff are prohibited from accepting any tips from customers

Customer Complaints - a transparent dispute resolution procedure with access to third party dispute resolution

3rd Licensing Objective - Protecting Children and other vulnerable persons from being harmed or exploited by gambling

- Children are defined as persons under 16 years of age and young persons are classed as persons aged 16 or 17 years of age.

We operate an admission policy of 21 years in most cases and whilst persons under 18 years of age are allowed to enter a bingo premises (subject to restrictions) we have adopted a policy of strictly refusing entry to any persons under 18 years of age whether accompanied by an adult or not.



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3rd Licensing Objective continued:

Entrances will be monitored by staff or security personnel adopting a risk based approach to ensure no persons under 18 years of age enters the premises.

A challenge 25 policy will be adopted for any customer entering the premises with official photo ID required to ascertain proof of age.

All staff are fully trained in the challenge 25 policy and the regulatory requirement to ensure that a child or young person is not permitted to gamble.

The Gambling Act states the following classes of persons are to be considered vulnerable:

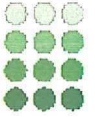
- People who gamble beyond their means

Self Exclusion Policy - this will allow customers to exclude themselves from the premises for an agreed period of time. All customer facing staff are trained to be able to assist customers with any request to self exclude.

Gam Care - Information will be displayed and readily available to customers physically and electronically promoting the Gam Care charity. The information will be situated around the premises including such places as entrance / exits and toilets.

Staff Interaction – staff are trained to be able to interact with customers who request assistance with or appear to have a gambling problem. This will include ensuring the customer is aware of the self exclusion scheme and support services available via Gam Care.

It can also include other methods of intervention such as encouraging customers to take a break from gambling and leaving the premises for a short break as well as more serious interventions such as mandatory exclusion.



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3rd Licensing Objective continued:

- People who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs

Alcohol – entry will be refused to any person who is intoxicated.

Drugs – entry will be refused to any person who appears to be under the influence of drugs.

Mental Impairment – any customer who appears to have a mental impairment will prompt a staff intervention, this may result in advice consistent with the principles of the staff intervention policy described above or alerting the police to assist in ensuring the person is taken to a place of safety.

In addition to this and in the locality of the proposed premises the following people are also considered to be vulnerable:

- Those with an inclination to gamble more than they want or beyond their means

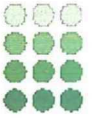
Policy and procedures applicable to – People who gamble beyond their means - The policy of encouraging customers to take a break from gambling is particularly relevant to this group of persons and they should also be encouraged to set time and spend limits.

- Those who are dependent for a source of income on somebody who gambles more than they want to or beyond their means.

Policy and procedures applicable to – People who gamble beyond their means - The policy of staff interaction is crucial in mitigating this risk. The bingo environment can allow staff to “Know Your Customer” and this can be invaluable in spotting a person who has dependents that may become vulnerable because of the customers gambling.

- Those who are employed by gambling operators and have regular contact with gambling.

We recognise this and all staff are prohibited from gambling within our premises and are made aware support services such as Gam Care in case they are adversely effected by the environment they work in.



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3rd Licensing Objective continued:

- Those aged 16-24

Policy and procedures applicable to – Children and young persons – The policy of discouraging 18-21 year olds and prohibiting any person under 18 assists in mitigating the risk of harm to this group of persons.

Policy and procedures applicable to – People who gamble beyond their means – Increased vigilance and consideration of staff interaction.

- Habitual Players of gaming machines

Policy and procedures applicable to – People who gamble beyond their means - The policy of encouraging customers to take a break from gambling is particularly relevant to this group of persons and they should also be encouraged to set time and spend limits.

General – in support of all three of the licensing objectives

Data gathering and sharing – our policy and procedures include a regulatory incident log and self exclusion log to record:

- Staff interventions with customers concerning potential problem gambling
- A self excluded person entering or attempting to enter the premises
- A self excluded person gambling or attempting to gamble
- Requests for police assistance
- Persons underage attempting to enter or entering the premises
- Persons underage gambling or attempting to gamble
- An adult attempting to enter or entering with an underage person
- Suspicious financial behaviour

The log will record the time and date as well as containing a description which will allow further analysis and grouping of the data. This allows the operator to fulfil its annual regulatory reporting obligations as well as be able to share data on a local basis with the relevant licensing authority.

Date: 25th January 2021

LOCAL RISK ASSESSMENT

Date : 22nd January 2021

Premises Type: Bingo

Premises Location: 33-35 Piccadilly, Manchester, M1 1LQ

The purpose of this risk assessment is to assess the local risks to the licensing objectives associated with the location of the premises.

In this assessment we will assess the local risks and identify existing policies, procedures and control measures in place to mitigate these risks. We will adopt a risk based approach in deciding if further measures are required and these measures will be identified in the assessment where applicable.

The assessment will use a table to identify

1. Local risk
2. Specific licensing objective associated with the risk (this can be more than one)
3. Existing measures in place to mitigate the risk
4. Further measures required to mitigate the risk

The Licensing objectives will be referred to as A, B and C in the table as follows:

- 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*

Identified Local Risk	Licensing Objective	Existing Measures	Further Measures
Piccadilly Gardens is known to be frequented by homeless person and rough sleepers	C	Entrances monitored by staff adopting a risk based approach Staff Interaction / Intervention	This is a vulnerable group and staff will be trained to be extra vigilant to spot persons trying to enter. Entry will be refused and staff will offer a pack of advice literature advising of local support services.
Piccadilly Gardens is known to be frequented by drug users	A - C	Entrances monitored by staff adopting a risk based approach CCTV Toilets require access code from staff	This is a vulnerable group and staff will be trained to be extra vigilant to spot persons trying to enter. Entry will be refused and staff will offer a pack of advice literature advising of local support services. Adopting a risk based approach consideration will be given to installation of UV lighting in the customer toilets.

Identified Local Risk	Licensing Objective	Existing Measures / Risk	Further Measures
Street Drinkers – Piccadilly Gardens	A - C	Staff trained to refuse entry to any person that is intoxicated	Adopting a risk based approach consideration will be given to dedicated security if adopting late night opening
Street Robberies – Piccadilly Gardens Current data shows the demographic of persons who are the victim of this type of crime to be young persons involving robberies of mobile phones etc The demographic of customer at the premises will be much older and it is considered that the risk to customers becoming victim to such crimes is low. GMP - not aware of any data suggesting customers of nearby AGC have become victims of such crimes.	A	CCTV	External CCTV Internal ATM to mitigate any risk of customers becoming a victim of crime when using such facilities outside Freephone taxi service within the premises

Identified Local Risk	Licensing Objective	Existing Measures	Further Measures
Christmas Market – Increase in the number of children and young persons in the vicinity of the premises	C	21 Years admission policy Challenge 25 Entrances monitored by staff adopting a risk based approach	Increased staff vigilance and training refresher course on the importance of challenge 25 and appropriate ID to be carried out.
Counselling & Services dealing with addiction in the vicinity of the premises. None in the immediate vicinity. The closest locations are: 42 nd Street Great Ancoats Street, M4 5AG Adult & Young People's Drug & Alcohol Service 43a Carnavon Street, M3 1EZ Start Addiction Recovery 243 Chapel Street, M3 5EP	C	Entrances monitored by staff adopting a risk based approach Staff trained to refuse entry to any person that is intoxicated Staff Interaction / Intervention Self Exclusion Policy Gam Care Literature displayed and available at the premises	Entry will be refused to any person who appears to be intoxicated or under the influence of drugs and staff will offer a pack of advice literature advising of local support services.

Identified Local Risk	Licensing Objective	Existing Measures	Further Measures
<p>Pawnbrokers / Payday Loan services within the immediate vicinity of the premises.</p> <p>Immediate Vicinity:</p> <p>Albermarle & Bond 3 Central Buildings, Oldham Street, M1 1JQ</p> <p>Mays Pawnbrokers 3 Royal Exchange Arcade, M2 7EA</p> <p>Further services within 1 mile of the premises:</p> <p>The Money Shop 1 King Street, M2 6AW</p> <p>The Gold Emporium 1A Stockport Road, Longsight, M12 4NE</p>	C	<p>Staff Interaction / Intervention</p> <p>Self Exclusion Policy</p> <p>Gam Care Literature displayed and available at the premises</p>	<p>Staff vigilance adopting a KYC approach to decide on intervention and advice.</p>

Identified Local Risk	Licensing Objective	Existing Measures	Further Measures
<p>Schools, Collages & Universities within the immediate vicinity of the premises:</p> <p>None in the immediate vicinity.</p> <p>It is recognised that a number of colleges and universities exist in the wider city and young persons from these establishments will generally frequent the city centre.</p>	C	<p>21 Years admission policy</p> <p>Challenge 25</p> <p>Entrances monitored by staff adopting a risk based approach</p> <p>This demographic is not the target market of the premises</p>	<p>Whilst the premises is legally allowed to permit entry to persons under 18 years of age (so long as those persons are in a dedicated machine category area) it has adopted a strict policy of no entry to any person under 18 years of age whether accompanied by an adult or not</p> <p>The premises has adopted a policy of encouraging over 21 years of age entry.</p>

LOCAL RISK ASSESMENT

Date : 22nd January 2021

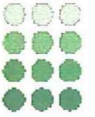
Premises Type: Bingo

Premises Location: 33-35 Piccadilly, Manchester, M1 1LQ

Completed By: Mr S. Hamadi

Reviews to this assessment will be carried on the following basis:

1. To take account of significant changes in local circumstances
2. To take account of significant changes at the licensed premises
3. On each date the licensing authority publishes a revised gambling policy statement



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Statement of Engagement - Police and Local Crime Prevention Partnership Schemes

1. We have submitted a secure by design application to GMP Design for Security and are committed to achieving a Secure by Design accreditation for the premises.
2. We have held a remote meeting with the GMP local crime prevention officer to discuss the proposal and seek his views on the impact of the premises on any existing crime & disorder issues in the vicinity.

The meeting was productive and no concerns were raised that the premises would be likely to add to any crime and disorder in the vicinity of the premises.

We are committed to staying in regular contact with the officers that have responsibility for the local area in order that any future risks or concerns can be addressed proactively in partnership with the relevant authority.

3. We are fully committed to participation in the local business partnership schemes that would support the licensing objectives. This was discussed with the local crime prevention officer, who will be forwarding details of the schemes relevant to the premises.

Date: 25th January 2021

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