
LICENSING COMMITTEE HEARING – 18 JANUARY 2018

SUPPLEMENTAL EVIDENCE IN SUPPORT OF THE APPLICATION

Paddy Power

1. Paddy Power is Ireland's biggest Bookmaker and operates both a retail business through licensed betting offices and online/telephone business. Paddy Power operates 275 licensed betting offices in Ireland, and 348 betting offices in the United Kingdom.
2. Paddy Power is a leading national operator of betting premises with clear and proactive policies to promote the Gambling Licensing Objectives. We always endeavour to liaise with responsible authorities concerning the operation of our premises and pre-consult with the police prior to making new applications.
3. Paddy Power has full authority to provide betting facilities through the grant of an Operators' Licence by the Gambling Commission, which has approved the measures which Paddy Power has put in place to ensure that it implements effective anti-money laundering procedures and trades responsibly in accordance with gambling legislation, the licensing objectives and the Licence Conditions and Codes of Practice.
4. Paddy Power currently operates from nine sites throughout Barnet.
5. Nationally, Paddy Power has never had a review of a betting premises licence.

Relationship with the Responsible Authorities and Interested Parties

6. Paddy Power takes very seriously its duty to operate safe and Gambling Act compliant premises. To this end it has always sought to maintain good relations with the police and licensing authority.
7. For the purposes of this application, the Police Licensing team were consulted during the application process.
8. The Police made a few suggestions that they felt would enhance the security of the premises operation and that of its surrounds.

These suggestions will be implemented as follows: -

- a. CCTV shall be installed to Home Office Guidance standards and recordings shall be kept for 31 days and shall be made available to the

police and licensing officers if requested. The CCTV system will cover the entry and exit point and the main customer area to include the machine areas and staff area of the premises. External cameras to be installed to cover the front door.

- b. A maglock will be fitted to the front door of the premises and shall be controlled by staff.
- c. An incident record shall be kept and made available to the Police and Responsible Authorities.

In implementing these suggestions, Paddy Power will be operating from premises that are one of the most regulated Paddy Power premises in Barnet.

9. The Police have not made a representation.

10. As detailed at point 4 of Barnet's Statement of Principles for Gambling we also served notice to all the relevant responsible authorities all of whom can make representations about the application and can call for a review of existing licences, these are: -

- the Council as Licensing Authority
- the Gambling Commission
- the London Fire & Emergency Planning Authority
- the Council's Planning Service
- the Metropolitan Police Service
- HM Revenue and Customs
- The Safeguarding Children Board

The London Borough of Barnet has designated the Safeguarding Children Board as the body that is competent to advise it about the protection of children from harm.

None of the above have made representation.

11. We did receive one representation by way of an on-line petition which, replicates the petition submitted against an earlier planning application and has been accepted as admissible by the Licensing Authority. The planning application has been approved and can be found at pages 10-17 of the Paddy Power brochure.

12. A number of signatories have mistakenly assumed that the Paddy Power application will be adding to the number of betting shops in the locality eg numbered 10 on the petition, Donna Labor says "*we have one betting shop already to allow another will encourage others and cause potential problems in the area*".

Acquisition of Bruce Bookmakers & Re-Location

13. Paddy Power have exchanged contacts to purchase Bruce Bookmakers at 229 Woodhouse Road.
14. As is identified in Barnet's Statement of Principles 10.13.1, the trend for modern betting offices is to provide larger premises so that an improved customer experience may be provided.
15. To provide this experience alternative premises have been found at 6 Halliwick Court Parade directly opposite Bruce Bookmakers. The enlarged premises will allow Paddy Power to provide the improved facilities including disabled and bring the existing provision up to modern standards.
16. If the Committee is minded to grant the new application Bruce Bookmakers are contracted to surrender their licence in favour of the replacement at Halliwick Court Parade when the new premises is ready for trading.
17. Paddy Power will be investing a significant sum into the area and be providing spacious and state of the art betting facilities.
 - a. The type and Nature of Betting will be traditional over the counter betting and betting machines.
 - b. Neither the Licensing Authority or Children Safeguarding Board have identified and made us aware of any specific centres for vulnerable adults. Nevertheless we have carried out a Local Area Risk Assessment to take in a half mile radius around the application site and identified all the sensitive premises such as schools and premises selling alcohol etc. this can be found at Appendix 3 of the brochure.
 - c. As per Paddy Powers' operating licence we adhere to strict codes designed not to entice persons under the age of 18 onto our premises. In my experience having worked in a betting shop for many years this issue is rare as there is no cross-over facility provided, as per multiple licence premises.
 - d. Our measures to prevent crime have been looked over in detail by the police.
 - e. Paddy Power adopt a 'think 21' policy to ensure young persons are excluded from our premises.
 - f. Information about organisations that can provide advice and support in relation to gambling and debt are displayed throughout our store as detailed on page 28 of our brochure.

Paddy Power Compliance – Protection of the Vulnerable

18. Set up in 2014, Paddy Power were one of the founding members of the Senet Group. The Senet Group is an independent body set up to promote responsible gambling standards and ensure that the marketing of gambling is socially responsible.
19. Paddy Power have the responsibility of exercising a duty of care to our customers. Where a customer indicates that they have lost control of their gambling, or where we are provided with reliable information of the fact, we here at Paddy Power will offer help and advice. Our training procedures require staff to notice certain recognised behaviours which are sometimes indicative of individuals' being problem gamblers (pages 34-35 of the compliance manual – appendix 1). It should be noted that this duty of care applies to individuals from every background and status entering our betting offices.
20. Our staff are also encouraged to spend as much time as possible with their customers. In addition to the delivery of excellent customer service this allows staff to better recognise customer behaviour so that positive staff led interactions can be made.
21. All Paddy Power's training and compliance policies and procedures have been audited by the Gambling Commission and comply with the Operating Licence conditions.
22. Where possible all new Paddy Power stores ensure line of site to the betting machines. In this instance the staff will have clear site backed up with extensive CCTV coverage.
23. Paddy Power secured Gamcare certification in January 2015 (page 29 of the brochure). Certification is awarded to companies that have successfully implemented player protection policy and practices relevant to their platform and gambling service.
24. Paddy Power regularly engages with external agencies to ensure that its policies and procedures are continually reassessed and improved when needed. For example Paddy Power have worked with St Mungo's, a charity dedicated to helping the homeless to review its Retail Compliance Manual. St Mungo's confirmed that issues around gambling didn't appear on their 'radar' and considered our policies and procedures to be robust.

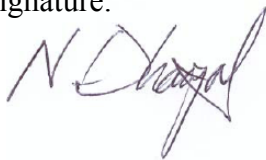
Premises Operation

25. The premises will be managed by an experienced shop manager who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role. Training focuses on the promotion of the licensing objectives and a copy our Compliance Manual has been provided as part of our hearing brochure at appendix 1

Conclusion

26. The business of Paddy Power is the provision of safe, pleasant betting environments in which those who wish to gamble may attend to place bets on a variety of sporting and other events. It is obviously crucial to the business that customers feel safe and welcome in Paddy Power betting offices, so that they will return. This is at the forefront of management thinking, from the head office to shop level.
27. If and when issues of any kind should arise, the resources and commitment are in place to ensure that they are speedily resolved. For obvious reasons, Paddy Power does not wish to run betting offices which cause regulatory issues, and it devotes a great deal of attention to ensuring that there are none.
28. In my experience a good manager and his team will know every one of his regular customers well; new customers will always attract raised awareness.
29. Having worked in the industry, including at shop level, for many years and for another leading national bookmaker, I can say that it is rare for betting offices to be the cause of, or otherwise associated with, crime and disorder in the area. Paddy Power, like other leading bookmakers, would and do take very seriously any issue which their presence creates, both out of respect for the local community and because their licence and commercial reputation depends upon it.

Signature:



Mr Narinder Dhanjal, Development Manager for Power Leisure Bookmakers Limited
Date: 09.01.18