



# Haverling

LONDON BOROUGH

## LICENSING SUB-COMMITTEE MOON & STARS PH

### AGENDA

<b>10.30 am</b>	<b>Thursday 13 February 2025</b>	<b>Council Chamber - Town Hall</b>
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Members 3: Quorum 2

**COUNCILLORS:**

Philippa Crowder (Chairman)  
Jane Keane  
Christine Smith

**For information about the meeting please contact:  
Taiwo Adeoye - 01708 433079  
taiwo.adeoye@onesource.co.uk**

**Please would all Members and officers attending ensure they sit in their allocated seats as this will enable correct identification of participants on the meeting webcast.**

***Under the Committee Procedure Rules within the Council's Constitution the Chairman of the meeting may exercise the powers conferred upon the Mayor in relation to the conduct of full Council meetings. As such, should any member of the public interrupt proceedings, the Chairman will warn the person concerned. If they continue to interrupt, the Chairman will order their removal from the meeting room and may adjourn the meeting while this takes place.***

***Excessive noise and talking should also be kept to a minimum whilst the meeting is in progress in order that the scheduled business may proceed as planned.***

### **Protocol for members of the public wishing to report on meetings of the London Borough of Havering**

Members of the public are entitled to report on meetings of Council, Committees and Cabinet, except in circumstances where the public have been excluded as permitted by law.

Reporting means: -

- filming, photographing or making an audio recording of the proceedings of the meeting;
- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing, so that the report or commentary is available as the meeting takes place or later if the person is not present.

Anyone present at a meeting as it takes place is not permitted to carry out an oral commentary or report. This is to prevent the business of the meeting being disrupted.

Anyone attending a meeting is asked to advise Democratic Services staff on 01708 433076 that they wish to report on the meeting and how they wish to do so. This is to enable employees to guide anyone choosing to report on proceedings to an appropriate place from which to be able to report effectively.

Members of the public are asked to remain seated throughout the meeting as standing up and walking around could distract from the business in hand.

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



**AGENDA ITEMS**

**1 APOLOGIES FOR ABSENCE AND ANNOUNCEMENT OF SUBSTITUTE MEMBERS**

(if any) - receive

**2 DISCLOSURE OF INTERESTS**

Members are invited to disclose any interest in any of the items on the agenda at this point of the meeting.

*Members may still disclose any interest in an item at any time prior to the consideration of the matter.*

**3 CHAIRMAN'S ANNOUNCEMENT**

The Chairman will announce details of the arrangements in case of fire or other events that might require the meeting room or building's evacuation.

**4 REPORT OF THE CLERK (Pages 5 - 12)**

Report attached.

**5 APPLICATION TO VARY A LICENSED PREMISES GAMING MACHINE PERMIT - MOON & STARS, 99-103 SOUTH STREET, ROMFORD, RM1 1NX (Pages 13 - 30)**

Report attached

**Zena Smith  
Head of Committee and Election Services**

**LICENSING  
SUB-COMMITTEE**

**REPORT**

13 February 2025

<b>Subject Heading:</b>	<b>Procedure for the Hearing: Gambling Act 2005</b>
<b>Report Author and contact details:</b>	<b>Taiwo Adeoye (01708) 433079 e-mail: taiwo.adeoye@onesource.co.uk</b>

Members are advised that, when considering an application to vary a Gaming Machine Permit. The following options are available by virtue of the section 15 of Schedule 13 of The Gambling Act 2005:

"Where relevant representations are made, the authority must

- (a) hold a hearing to consider them, unless the authority, the applicant and each person who has made such representations agree that a hearing is unnecessary, and
- (b) having regard to the representations, take such steps as it considers necessary for the promotion of the licensing objectives.

The steps are:

- a) modify the conditions of the licence
- b) reject the whole or part of the application

and for this purpose, the conditions of the licence are modified if any of them is altered or omitted or any new condition is added."

The Sub-Committee will also wish to note that, if none of these steps is required, the application must be granted.

Assuming that the Sub-Committee is satisfied that a hearing is required, then the following procedural steps are recommended. The Gambling Act 2005 will govern the arrangements for the hearing of the application under consideration.

## **1. Membership of the Sub-Committee:**

- 1.1 The Sub-Committee comprises three members of the Licensing Committee, with a quorum of two members. **Unless there are objections, in the absence of three members, the hearing shall proceed with the quorum of two.**
- 1.2 A members of the Licensing Committee will be excluded from hearing an application where he or she:
  - 1.2.1 has considered an application in respect of the premises in the previous 12 months as a Member of the Regulatory Services Committee; or
  - 1.2.2 is a Ward Councillor for the Ward in which the premises, subject to the application, are located; or
  - 1.2.3 is a Ward Councillor for a Ward which is likely to be affected by the application or;
  - 1.2.4 has a personal interest in the application.

## **2. Roles of other participants:**

- 2.1 The Legal Advisor is not a party to the hearing. The role of the Legal Advisor is to provide legal advice relating to the application and submissions.
- 2.2 The Clerk is not a party to the hearing. The role of the Clerk is to record the hearing and the decisions of the Sub-Committee, and ensure efficient administration

## **3. Location and facilities:**

- 3.1 All hearings will be heard at the Havering Town Hall unless otherwise directed.
- 3.2 Interpreters will be provided by the Council on request, provided notice is given at least five working days before the hearing.

#### **4. Notification of attendance:**

- 4.1 The Chairman will enquire of the parties who is in attendance and the parties will indicate their names (and, where relevant, whom they represent). A register will be circulated before the commencement of the hearing on which the applicant, his/her advisers and companions and all interested parties (and/or their representatives) will be asked to record their attendance.

#### **5. Procedural matters:**

- 5.1 Prior to the commencement of the hearing, the Chairman of the Sub-Committee will orally inform the parties whether their applications to have certain people attend the hearing (e.g. witnesses) have been granted or refused. Note this relates to people other than those attending on behalf of a party in the capacity as a representative of the party.
- 5.2 Prior to the commencement of the hearing the Chairman of the Sub-Committee will outline the procedure to be followed at the hearing. This will normally be as follows:

##### **Introduction of the application:**

The Licensing officer will outline:

- details of the application and relevant representations received from the parties;
- relevant legislation;
- relevant Licensing Policy; and
- the time limit in which the Council must reach a determination.

##### **Documentary evidence:**

- Documentary or other information in support of applications, representations or notices should be provided to the Clerk of the Sub-Committee at least 7 clear working days before the hearing. If this information is produced at the hearing it will only be taken into account by the Sub-Committee if the Sub-Committee and all the parties consent to its submission. Permission to have this information included in the hearing should be requested at the beginning of the hearing before any oral submissions have been made.
- Statements made by people in support of a party's representation who are not present at the hearing, must be signed by the maker, dated and witnessed by another person. The statement must also contain the witness's full name and occupation.

## **6. Representations:**

- The Chairman will invite each of the parties at the hearing or their representative sequentially to address the Sub-Committee and call any person/s to whom permission has been granted to appear. Each party will be allowed a maximum period of 10 minutes in which to address the Sub-Committee and call persons on his/her behalf.
- This 10-minute period is where each party has the opportunity to orally address the Sub-Committee and clarify any points in which the Sub-Committee has sought clarification prior to the hearing. This 10-minute period should be uninterrupted unless a member of the Sub-Committee or Legal Advisor considers that the speaker is making submissions that are irrelevant, frivolous or vexatious.
- Members of the Sub-Committee may ask questions of any party, at any time during the proceedings. Time taken in dealing with a Member's question will not be taken into account in determining the length of time available to the party in question to make their representation.

The sequence in which each of the parties will be invited to address the Sub-Committee will normally be in the order of:

- the Gambling Commission
- the Police
- the Fire Service
- the Local Planning Authority
- Environmental Health
- HM Revenue and Customs
- Childrens Social Services
- A licensing authority in whose area the premises is situated (that is, the Council itself and also any adjoining Council where premises straddle the boundaries between the two).

At the discretion of the Sub-Committee the above order may be varied.



### **Cross-Examination:**

Where witnesses have been permitted by the Sub-Committee to speak at the hearing on behalf of a party, permission must be sought from the Sub-Committee before another party can ask the witness questions. This process of questioning is normally referred to as cross-examination. The Sub-Committee will allow cross-examination only where it is necessary to assist it in considering the representations or application.

### **Relevance:**

Information submitted at the hearing must be relevant to the applications, representations, or notice and the promotion of the licensing objectives. The Chairman of the Sub-Committee is entitled to exclude any information it considers to be irrelevant whether presented in written or oral form. The licensing objectives are:

- **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**

### **7. Failure of parties to attend the hearing:**

- 7.1 If a party, who has not given prior notice of his/her intention not to attend the hearing, is absent from the hearing the Sub-Committee may either adjourn the hearing or hold the hearing in the party's absence. Where the hearing is held in the absence of a party, the Sub-Committee will still consider the application, representation or notice submitted by that party.

### **8. Adjournments and extension of time:**

- 8.1 The Sub-Committee may adjourn a hearing to a specified date or extend a notice period except where it must make a determination within certain time limits in the following specific applications:
- Applications for conversion of existing licences where the Sub-Committee must make a determination within 2 months of the application first being received. In default of a decision being made the application will be treated as being granted;

- Applications for variation of existing licences where the Sub-Committee must make a determination within 2 months of the application first being received. In default of a decision being made the application will be treated as being rejected;
- Applications for conversion of existing club certificates where the Sub-Committee must make a determination within 2 months of the application being first received. In default of a decision being made the application will be treated as being granted;
- Applications for variation of existing club certificates where the Sub-Committee must make a determination within 2 months of the application being first received. In default of a decision being made the application will be treated as being rejected;
- Applications made by holders of justices' licences for personal licences must be determined within 3 months of the application first being received. In default of a decision not being made within this period the application will be treated as being granted;
- Review of premises licences following closure orders where the Sub-committee must make a determination within 28 days of receiving notice of the closure order.

## **9. Sub-Committee's determination of the hearing:**

- 9.1 At the conclusion of the hearing the Sub-Committee will deliberate in private accompanied by the Clerk and the Legal Advisor who will be available to assist the Sub-Committee with any legal problems but will not participate in any decision making of the Sub-Committee.
- 9.2 The Sub-Committee will normally make its determination and announce its decision at the end of the hearing.
- 9.3 Where all parties have notified the Sub-Committee that a hearing is not required the Sub-Committee must make its determination within 10 working days of being given notice that the hearing is not required.

## **10. Power to exclude people from hearing:**

- 10.1 The public are entitled to attend the hearing as spectators. However, the Sub-Committee may exclude any person from the hearing including any person assisting or representing a party where:
  - it considers that the public interest would be best served by excluding the public or the individual person from the hearing; or

- that person is behaving in a disruptive manner. This may include a party who is seeking to be heard at the hearing. In the case where a party is to be excluded, the party may submit to the Sub-Committee in writing any information which they would have been entitled to give orally had they not been required to leave the hearing.

**11. Recording of proceedings:**

- 11.1 A written record of the hearing will be produced and kept for 6 years from the date of the determination of the hearing.

**12. Power to vary procedure:**

- 12.1 The Sub-committee may depart from following any of the procedures set out in this document if it considers the departure to be necessary in order to consider an application, notice or representation.

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Licensing Officer's Report

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# LICENSING SUB-COMMITTEE

# REPORT

13 February 2025

**Subject heading:**

**Moon & Stars  
99-103 South Street Romford RM1 1NX  
Gaming machine permit variation  
Paul Jones, Public Protection Officer  
licensing@havering.gov.uk  
01708 432777**

**Report author and contact details:**

This application to vary a licensed premises gaming machine permit is made by JD Wetherspoon PLC further to the provisions of schedule 13 of the Gambling Act 2005. The application was received by Havering's Licensing Authority on 10<sup>th</sup> January 2025.

## **Geographical description of the area and description of the building**

The Moon & Stars is located in South Street in Romford's town centre.



## Details of the application

This application is to vary the extant licensed premises gaming machine permit, to increase the number of category C machines available for use from six to seven.

## Comments and observations on the application

The application was made in accordance with the provisions of schedule 13 of the Gambling Act 2005 and in accordance with Havering's gambling policy. Paragraph 11.6 of Havering's gambling policy states:

If a premises wishes to have more than two machines then it needs to apply for a permit and the Licensing Authority must consider that application based upon the licensing objectives, any guidance issued by the Gambling Commission issued under Section 25 of the Act, and "such matters as they think relevant." The Licensing Authority considers that "such matters" will be decided on a case-by-case basis but generally, there will be regard to the need to protect children and vulnerable persons from harm or being exploited by gambling or at risk of child sexual exploitation.

The Authority will also expect the applicant to satisfy it that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machines. Measures, which will satisfy the Authority that there will be no access, may include the adult machines being in sight of the bar, or in the sight of staff who will monitor that the machines are not being used by those under 18. Notices and signage may also be helpful. As regards the protection of vulnerable persons, applicants may wish to consider the provision of information leaflets/helpline numbers for customers who may have a gambling addiction, from organisations such as GamCare and GambleAware.

Pubs that choose to make machines available to the public must only do so during the hours that the premises licence allows the sale of alcohol. They should also adhere to the code of practice for gaming machines in clubs and premises with an alcohol licence.

It should be noted that the Licensing Authority can decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for. The Licensing Authority cannot attach conditions to the applicant's permit.

Paragraph 11.7 states:

It should also be noted that the holder of a permit must comply with any code of practice issued by the Gambling Commission about the location and operation of the machines. Notifications and applications for three machines will generally be dealt with by Licensing Authority officers. Those for four or five machines will be determined by licensing officers in consultation with the Chair of the licensing committee, and **applications for six or more machines will be referred to a licensing sub-committee.**

## Summary

The application was referred to the Police for comment. No response was made.





## Licensed Premises Gaming Machine Permit granted under the Gambling Act 2005

<b>No.: 8059</b>
This notice confirms that: <b>J D Wetherspoon PLC</b>
has given notification pursuant to section 283 of the Gambling Act 2005 of their intention to make available:  <b>Number of category C gaming machines authorised by this permit - 6</b> <b>Number of category D gaming machines authorised by this permit - 0</b>  for use at the following premises:  <b>Moon &amp; Stars 99-103 South Street Romford RM1 1NX</b>
Licensing Act 2003 premises licence number: <b>1484</b>
Date on which this notice takes effect: <b>22<sup>nd</sup> August 2013</b>
This notice is issued by:  <b>Licensing Authority London Borough of Havering Mercury House Mercury Gardens Romford RM1 3SL</b>
..... Arthur Hunt Licensing Officer  29 <sup>th</sup> August 2013  <i>All alcohol licensed premises which provide gaming machines for use on the premises must comply with any relevant Code of Practice issued by the Gambling Commission under Section 24 Gambling Act 2005. (available at <a href="http://www.gamblingcommission.gov.uk">http://www.gamblingcommission.gov.uk</a>)</i>  <b><i>This permit becomes invalid if the information ceases to be accurate.</i></b>

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**Havering**  
LONDON BOROUGH

Copy of Application

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**APPLICATION FOR THE NOTIFICATION / GRANT / VARIATION /  
TRANSFER OF A LICENSED PREMISES GAMING MACHINE PERMIT  
(FOR USE BY PREMISES LICENSED TO SUPPLY ALCOHOL FOR CONSUMPTION  
ON THE PREMISES)**

*Please refer to guidance notes at the back of this form before completing*

To:  
Licensing Section  
Housing & Public Protection  
London Borough of Havering  
Mercury House  
Mercury Gardens  
Romford RM1 3SL

**Section A – Applicant Details**

1. Name of Applicant

**JD Wetherspoon Plc**

2. Date of Birth or Company registration No. as applicable

**1709784**

3. Address / registered office of applicant

**Wetherspoon House, Reeds Crescent, Watford, Hertfordshire WD24 4QL**

4. Telephone number (daytime) of applicant

**01923477902**

5. E-mail address of applicant

**jodell@jdwetherspoon.co.uk**

6. Name, address, telephone and e-mail of agent (e.g. solicitor) if submitted on behalf of the applicant

.....

**SECTION B – Premises Details**

1. Name of premises

Moon & Stars...

.....

2. Address of premises

99-103 South Street, Romford, RM1 1NX

.....

3. Telephone number of premises

.....

4. E-mail address of premises (where available)?

[jodell@jdwetherspoon.co.uk](mailto:jodell@jdwetherspoon.co.uk)

.....

5. Licensing Act 2003 Premises Licence Number

001484.....

**SECTION C – What do you want to do?**

Please indicate what you would like to do:

a) Notify licensing authority that you intend to provide up to a maximum total of 2 gaming machines of category C and / or D. *If you choose this option then please complete section F.*

b) Apply to the licensing authority for more than 2 gaming machines. *If you choose this option then please complete sections D and F.*

c) Apply to vary an existing permit. *If you choose this option then please complete sections D and F.*

d) Request that the licensing authority transfers an existing permit to yourself. *If you choose this option then please complete sections E and F.*

**SECTION D – Grant and variation requests**

1. How many gaming machines are you currently authorised to provide and how many do you wish to provide? Please complete the boxes in the table.

Category machine	Number currently authorised to provide	Number wish to provide
C	...6...	...7...
D	.....	.....
Total	.....	...7...

2. If you are authorised to provide more than 2 machines, please provide your existing permit, or provide reasons stating why it cannot be provided.

Existing permit provided

Reasons why existing permit cannot be provided

.....  
 .....

**Section E – Transfer request**

1. Name of person requesting the transfer

JD Wetherspoon plc

.....

2. Please confirm that an application to transfer the relevant Premises Licence under the Licensing Act 2003 has been:

Requested

Granted

3. Please provide your existing permit, or provide reasons stating why it cannot be provided.

Reasons why existing permit cannot be provided

.....  
.....  
.....

**Section F – Fee and Signature(s)**

**1. I enclose**

**In all cases**

- *the relevant fee* ✓

**2. I confirm that**

- *the premises where the machines are proposed to be located are licensed to supply alcohol for consumption on the premises and that there is a bar for serving alcohol to customers on the premises (without the requirement that alcohol is served only with food).* ✓

- *I am aware of and will abide by the Gaming Machine Code of Practice for Alcohol Licensed Premise Permits and Permissions issued by the Gambling Commission.* ✓

- *All staff will be trained as to the limits of any stakes and prizes and the requirements of the Act, Guidance and any appropriate codes of practice or conduct* ✓

**Please note: It is an offence under section 342 of the Gambling Act 2005 if a person, without reasonable excuse, gives to a licensing authority for a purpose connected with that Act information which is false or misleading.**

Dated 10<sup>th</sup> January 2025

.....

Signed by or on behalf of the applicant .....*J. Odell*

.....

Name (please print).....Jennie Odell on behalf of JD Wetherspoon.co.uk

.....

\* If you wish to have a maximum of 2 gaming machines then the fee payable is £50. If you wish to have more than 2 gaming machines then the fee payable is £100 by an existing operator or £150 in all other cases.

To Vary the Permit £100  
To Transfer the Permit £25

**GUIDANCE NOTES: APPLICATION FOR THE NOTIFICATION / GRANT / VARIATION /  
TRANSFER OF A LICENSED PREMISES GAMING MACHINE PERMIT  
(FOR USE BY PREMISES LICENSED TO SUPPLY ALCOHOL FOR CONSUMPTION ON THE PREMISES)**

1. This form is to be used for the NOTIFICATION of up to 2 gaming machines of categories C and / or D under Section 282 of the Gambling Act 2005, or the GRANT / VARIATION / TRANSFER of a gaming machine permit under Section 283 and Schedule 13 of the Gambling Act 2005.
2. All references to 'Premises Licence' refer to a Premises Licence under the Licensing Act 2003 authorising the sale of alcohol for consumption on the premises.
3. The premises must be licensed under the Licensing Act 2003 to sell alcohol for consumption on the premises.
4. A 'Premises Licence holder' is a person holding a Premises Licence under the Licensing Act 2003.
5. The gaming machines must be located on these licensed premises and there must be a bar for serving alcohol to customers on the premises, without the requirement that alcohol is served only with food.
6. The permit's duration is indefinite as it is linked to the Premises Licence. There is a first annual fee payable 30 days after the grant of the permit and an annual fee payable after that before each anniversary of the date of issue of the permit. Failure to pay the annual fee may result in the cancellation of the permit. The annual fee is £50.
7. Two types of gaming machines can be located in alcohol licensed premises. These are:
  - Category C: Maximum stake = 50p / Maximum prize = £25
  - Category D: Maximum stake = 10p or 30p non-monetary / Maximum prize = £5 cash or £8 non-monetary
8. The holder of a licensed premises gaming machine permit must comply with any relevant Code of Practice issued by the Gambling Commission under Section 24 of the Gambling Act 2005. The Gaming Machine Code of Practice for Alcohol licensed premises permits and permissions is available via the Gambling Commission's website at: <http://www.gamblingcommission.gov.uk/> Should you be unclear as to the provisions of such a code of practice please contact your local licensing officer at the council address provided.
9. This licensing authority must notify the applicant of its grant / refusal of the application for a permit as soon as is reasonable practicable after that decision to grant / refuse has been made.

**Official Use Only**

**Date of receipt:** .....

**Signature and name of staff who received:** .....

**Date of receipt of fee:** .....

**Signature and name of staff who received fee:** .....

**Application accepted / returned (please delete as appropriate)**

**Date of premises licence (Licensing Act 2003) transfer (if applicable):** .....





**Havering**  
LONDON BOROUGH

## Plan

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## **JD Wetherspoon PLC**

### **Licensed Premises Gaming Machines**

#### **Policy and Procedure Overview**

We understand when considering this application that the Licensing Authority will consider the 3 objectives of the Gambling Act 2005 and therefore have set out below the policies and procedures JD Wetherspoon undertakes in its pubs to promote these objectives. In addition, the Gambling Commission's "Gaming Machine Permits Code of Practice" is complied with.

#### **1. Protecting children and other vulnerable people from being harmed or exploited by gambling.**

To ensure that no persons under the age of 18 are permitted to play on our gaming machines, we abide by a Challenge 21/25 policy in all of our premises. Under this policy, all of our employees are trained to ask any customer who appears to be under the age of 21/25 years to provide valid proof of age that they are over the age of 18. When in use, Door Supervisors are also fully briefed on our policy and what is expected of them in the implementation of the same.

JD Wetherspoon has adopted the industry standards and the recommendations of the Gambling Commission and recognises only the following forms of identification as valid forms of proof of age:

- Valid National passport (any nationality)
- Valid Photographic Drivers' Licence
- United Kingdom 'PASS' accredited age identification card with photograph.
- UK Military ID
- Valid photographic European ID
- Ireland Age Card (Republic of Ireland only)
- NI Electoral Identity Card (Northern Ireland only)

We apply this policy to all age restricted activities on our premises.

All employees receive induction training on our Challenge 21/25 policy when they commence employment with the Company and then receive regular refresher training. All employees complete video training, quizzes and sign a letter to confirm that they have had this training and understand their responsibilities. Records of all training is retained centrally at head office via our online training platform. Staff training records are regularly reviewed by the pub management team and members of our Retail Audit department to ensure that the training system is being satisfactorily completed.

Staff compliance with our Challenge 21/25 policy is tested by a number of means:

1. Management review of a 'refusals log' which records when and how often bar staff are recording when a sale has been refused.
2. Independent mystery visitors who are aged 18 and 19 years are sent into our pubs to test compliance with our Challenge 21/25 policy.

Our Challenge 21/25 policy is also actively promoted within the premises using self-adhesive signs at every entrance and on/around gaming machines.

All front of house staff are aware of their responsibility for preventing underage gambling.

All machines are situated in a place where their use can be supervised and in front of the bar where possible to increase visibility.

Information shall be made available to customers on how to gamble responsibly and how to access information about and find help in respect of problem gambling. The Gamcare Charity's details are made available by way of a sticker on each of the gaming machines.

JD Wetherspoon ensures that there is always a duty manager working on every shift. This means that there is always a senior member of the team on duty to assist with the monitoring and supervision of persons using the machines should customer interaction be required.

## **2. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime.**

The power to all gaming machines is turned off after the pub has closed to ensure potential thieves are not attracted by the lights in the pub.

JD Wetherspoon pubs also have two types of alarm systems, the panic alarm and intruder alarm, which cover the majority of the pub including the customer area where gaming machines are located.

The monitored intruder alarm covers the main entry points when the pub is closed. It is mainly activated by a forced entry into the pub triggering the door contacts or motion detectors. This pub is internally described as having a 'level 1 response' to its alarm system, meaning police response. This is an automated system which feeds through to Secom central station, our alarm consultants, who notify the police and the registered key holders of the pub.

JD Wetherspoon prides itself on provide safe, well run premises for all people to enjoy themselves in. Over our estate of over 800 pubs we spend considerable time and resources ensuring they are all well equipped with adequate and appropriate CCTV coverage.

## **3. Ensuring that gambling is conducted in a fair and open way.**

All of our AWP machines are located in well supervised areas and are regularly monitored by staff and door staff.

**JD Wetherspoon PLC**  
**Updated: January 2022**