

ADDITIONAL INFORMATION

SPECIAL LICENSING SUB COMMITTEE

Wednesday, 28th July, 2021, 4.00 pm - MS Teams (watch it [here](#)).

Members: Councillors Sheila Peacock (Vice-Chair, in the Chair), Viv Ross, and Yvonne Say.

Quorum: 3

6. APPLICATION FOR A PREMISES LICENCE FOR AN ADULT GAMING CENTRE AT ADMIRAL, 513 GREEN LANES, LONDON, N4 (PAGES 1 - 42)

To consider an application for a premises licence for an adult gaming centre.

Fiona Rae, Principal Committee Co-ordinator
Tel – 020 8489 3541
Email: fiona.rae@haringey.gov.uk

Fiona Alderman
Head of Legal & Governance (Monitoring Officer)
River Park House, 225 High Road, Wood Green, N22 8HQ

Friday, 23 July 2021

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Additional Information

From: Elizabeth Speed <espeed@novomatic.co.uk>
Sent: 22 July 2021 15:12
To: Barrett Daliah <Daliah.Barrett@haringey.gov.uk>
Cc: Tracey Rose <Tracey.Rose@Luxury-Leisure.co.uk>
Subject: Application for a New Gambling AGC Premises Licence - Admiral, 513 Green Lanes, London N4 1AN
Importance: High

Dahlia

For ease we have updated the LRA submitted with the application. Attached you will find a clean version and a version that highlights the small changes, together with an updated map.

I should be grateful if you would please place these with the papers to be considered at next week's hearing.

Regards
Elizabeth

Elizabeth Speed
Group General Counsel
Novomatic UK
Mobile +44 (0) 7808 571 588
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Local Risk Assessment – Gambling Act 2005 Licensing Objectives

Premises

Premises Name:	Admiral
Premises Address:	513 Green Lanes, Haringey
Premises Post Code:	N4 1AN
Premises Licence Number:	
Category of Premises:	AGC

Company

Operating Company:	Luxury Leisure
Operating Licence Number:	LL – 1876

Assessment Writer

Name of Person Writing this Assessment:	Shaun Hooper
Position within Company or Name of Authorised Agent:	Regional Operations Director
Date of this Assessment	July 2021
Date that Original Assessment was Written	March 2021

Gambling Act 2005 – The Licensing Objectives

The Gambling Act 2005 sets out the three licensing objectives (LO), which 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; and
- (C) Protecting children and other vulnerable people from being harmed or exploited by gambling.

This document seeks to assess the risk to these objectives that our operation may pose and where necessary what measures we have put in place to mitigate that risk.

Independent Accreditation

Luxury Leisure Talarius have attained the prestigious Global Gaming Guidance Group (G4) accreditation. This is only awarded after a rigorous audit of the company's responsible gambling measures. Furthermore, the company have to be reassessed every 2 years in order for it to be maintained.

Local Area and Site Profile

The AGC is located in the town centre on the high street and sits amongst other national high street retailers as well as some local shops. There are high street banks nearby which have ATM facilities. There are a number of other licensed betting offices in the immediate vicinity but spread along the high street and throughout the vicinity, they are not clustered in one part of the town centre. There is another AGC operated by a competitor in the immediate vicinity. There are a number of premises licensed for the sale and consumption of alcohol within the 500 metre radius used in the compilation of this assessment but none in the immediate vicinity of the premises.

Whilst there are no schools for children of secondary school age nearby, there is South Harringay Junior and Infant school nearby and the mapping provided by the local authority in its local area profile shows a number of gambling premises in proximity to the school (8).

There is a bus stop 5 meters from the venue on the same side of the street. Harringay mainline train station is not within the 500 metre radius but is a 15-minute walk from the premises.

There are no addiction support facilities nearby.

The venue has a single entrance/exit at street level to the front, a double single doorway leading directly into the gaming area which is rectangular in shape. The meet and greet station is located prominently towards the front of the store giving a clear line of sight and command of the entrance. The Venue will offer machines of category D, C and B3 with stakes ranging from 10p to a maximum £2. The venue does not offer VIP or loyalty schemes.

The Local Area Profile provided by the local authority identifies the borough as being one of the most deprived in the UK, 13th out of 326 and the 4th most deprived in London. The area in which the venue operates has relatively high levels of crime with 1932 crimes recorded in February 2021, the most prevalent being violence against the person 569, vehicle offences 383 and theft (other than robbery and burglary) 353. The venue is not located in the east of the borough, highlighted in its local area profile as its most problematic area with regards to crime. Neither does the local area profile highlight the venue as being in a high betting shop crime area in the maps it provides.

Our regulatory return data in other comparable north London venues does not reflect any specific problems associated with consumer complaints, the need to call police for assistance or attempts by children and young persons to enter the premises.

The venue trades 7 days per week. **Mon-Sun 09:00-23.00.**

The local authority statement of principles (SOP) in relation to the Gambling Act 2005 has been considered in the completion of this assessment. The statement does not offer specific guidance on the geographic extent to be considered when completing this assessment but does contain a helpful local area profile.

The SOP recognises the significant requirements of the LCCP placed on operators to promote safer gambling and to prevent harm by supporting customers through implementing mandatory measures such as self-exclusion and signposting to sources of help. The local authority explicitly state that it is concerned for the health and well being of its residents and seeks to identify those at risk from gambling related harm. It also sets out its expectations with regards Local Risk Assessments which is detailed and has been considered in the completion of this assessment.

Risk Identification	LO	Level of Risk	Impact	Risk Management	Reviewed
Children entering site unnoticed.	C	Low	Severe to business. Severe to child.	<ul style="list-style-type: none"> - Layout of premises considered in staff numbers and deployment. A minimum of 2 staff are rostered on duty at any one time. Breaks and shift changes are planned to take account of school closing times to ensure there is always supervision of the gaming area. - Staff deployed to specific zones for which they have responsibility. - Machine layout takes into consideration lines of site to the entrance. - The meet and greet station is positioned to give line of sight to the entrance. - CCTV cameras positioned to cover all parts of the premises but specifically the entrance. - A 'live-monitored' hold-up alarm system has been installed to provide additional security and assist staff manage the premises. - The company operate a 'Think 25' policy in which all staff are trained at induction and they receive regular refresh training. - All staff are trained in social responsibility as part of their induction and are provided with regular refresher training. - Posters and displays of acceptable identification on site for staff. 	July 2021
Children enter site with adult.	C	Low	Severe to business. Moderate to child.		July 2021
Children enter site and play before being noticed.	C	Low	Severe to business. Severe to child.		July 2021
Children enter site and play where age is misjudged.	C	Low	Severe to business. Severe to child.		July 2021
Age verification is not sought.	C	Low	Severe to business. Severe to child.		July 2021
Young person wearing face covering is not challenged for verification of age.	C	Low	Severe to business. Severe to child.		July 2021
Children knowingly allowed to play.	C	Low	Severe to business. Severe to child.		July 2021
Those made vulnerable through abuse of drugs and/or alcohol having access to gambling. Those considered to be vulnerable, having access to gambling. (We adopt a	C	Low	Severe to business. Severe to customer.		July 2021

<p>broad definition of 'vulnerable' to include but not limited to those suffering from mental illness, recently bereaved, suffering from long-term or terminal illness, difficulty communicating, learning disability, substance misuse or addiction, breakdown of close personal relationships etc)</p>				<ul style="list-style-type: none"> - Clear 'Over 18' signage is displayed, visible from outside and also in the entrance to the premises. - Luxury Leisure/Talarius use independent test purchasing operations. All venues are tested at least twice in a rolling 12-month period. - Our staff are trained to look for the signs of CSE using a CSE training module on our Admiral Academy training platform. 	
<p>Child sexual exploitation (CSE) - Sexual abuse where a child or young person is forced or manipulated into inappropriate sexual activities, often in exchange for alcohol, drugs, gifts or attention. Although children and young persons are not permitted into AGC premises, it is possible that a customer could target or be targeted by nearby children or young persons as they enter or leave our venue.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business. Severe to child or young person.</p>	<ul style="list-style-type: none"> - The venue is installed with iBeacon technology able to work with the 'Gamblewise' app which is free for our customers to download and use to assist them manage their time spent gambling. - Stringent disciplinary procedures for failures identified through age verification testing. - Social Responsibility returns data reviewed through submissions from Area Managers to National Compliance Manager. - All social responsibility returns data subject to a quarterly compliance review. - Staff log all attempts to enter by young persons on the appropriate log. - Staff have been trained to ask a customer to lower a face covering if necessary, this has the effect of allowing staff to adjudge the apparent age of all customers and if necessary challenge for verification by the presentation of ID. 	<p>July 2021</p>
<p>Failure to provide information to players on responsible gambling.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business Severe to customer</p>		<p>July 2021</p>

				<ul style="list-style-type: none"> - A responsible Gambling message is displayed at all positions where gaming is possible through posters, leaflets and stickers on machines. - Poster/Leaflet designs to incorporate QR codes for GAMCARE, Playnice.org and Gambleaware contact information. - Responsible Gambling information stickers on all machines. - Compliance Audit function performed by Area Manager and also through regional field auditors and security managers. - Luxury Leisure Talarius have attained the Global Gaming Guidance Group (G4) accreditation for our responsible gambling measures. 	
Failure to provide information in a suitable format.	C	Low	Severe to business. Severe to customer.		July 2021
Failure to recognise signs of problem gambling.	C	Low	Severe to business Severe to customer	<ul style="list-style-type: none"> - Additional aspects to training incorporating guidance on identifying problem gambling, procedure for interaction and sources of help. - Clear policy to detail the procedure for interaction and level of staff that can 'intervene'. 	July 2021
Failure to interact with customer displaying signs of problem gambling.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - New 'Stay in control leaflets' with QR codes to Playnice.org and GAMCARE and Gambleaware. 	July 2021
Screens erected as part of measures to be 'COVID Secure' preventing staff from being able to effectively monitor players in relation to Age Verification, customer interaction and self-exclusion.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - All recorded SR data subject to a quarterly compliance review by senior management. - Staff have been trained to ask a customer to lower a face covering if necessary This has the effect of allowing staff to adjudge the apparent age of all customers and if necessary challenge 	July 2021

<p>Failure to sign-post customer to help and support.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business. Severe to customer.</p>	<p>for verification by the presentation of ID and also to identify if a customer attempting to enter is self-excluded.</p> <ul style="list-style-type: none"> - Screens are available to create a barrier when 2M social distancing is not practicable upon customer request to create a covid safe barrier between machines but are not floor to ceiling and are not deep enough so as to enclose a machine position, they simply divide it from the adjacent machines. Staff can continue to monitor their customers. - The screens are portable, on their own foot, and therefore can be moved by staff so as not to create enclosed machine positions in a venue. 	<p>July 2021</p>
<p>Failure to properly administer self-exclusion.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business. Severe to customer.</p>	<ul style="list-style-type: none"> - Staff training incorporates policy and procedure for self-exclusion. - Since April 2016 Luxury Leisure/Talarius have operated one or both of the AGC national multi-operator self-exclusion schemes (MOSES), offered through BACTA and IHL. - Digital cameras or suitable tablet devices are provided at all sites to take an image of customers wishing to self-exclude so that the exclusion can be effectively enforced. - The location of the site in relation to the customer's home address and any regular routes to work for example will be considered if the customer requests a wider exclusion. 	<p>July 2021</p>
<p>Failure to impose exclusion in locality and in same types of establishments.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business. Severe to customer.</p>		<p>July 2021</p>
<p>Customer breaches of self-exclusion.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business. Severe to customer.</p>		<p>July 2021</p>
<p>Customer breaches self-exclusion by using another to gamble on their behalf.</p>	<p>C</p>	<p>Unknown</p>	<p>Moderate to business. Severe to customer.</p>		<p>July 2021</p>

				<ul style="list-style-type: none"> - All SR returns data subject to a quarterly compliance review. - All staff trained to regularly check the MOSES gallery relating to their venue to ensure information shared from other local operators relating to self-excluded customers is monitored. 	
Money Laundering (Dye stained notes and Criminal spend).	A	Low	Low – Severe	<ul style="list-style-type: none"> - The company have a Money Laundering Reporting Officer (MLRO). - Staff training at induction and refresh training. - Luxury Leisure/Talarius have a corporate AML Risk Assessment and policies and procedures relating to AML. - £1000 limit on automated transactions using TITO. Any greater amounts require the intervention of a staff member. - Technical parameters on note acceptors designed to reject poor quality notes. (Often notes obtained by way of robbery are perished). - Manufacturer activity alerts from machines on independent networks (primarily SG and Inspired). - TITO tickets not transferable between sites. - Change machines set up so that notes cannot be changed 'up'. - Comprehensive CCTV coverage in all sites. - Partnerships with local police where appropriate to identify and discourage criminal spend. 	July 2021
Commission of criminal offences to fund problem gambling	A	Low	Low – Severe	<ul style="list-style-type: none"> - Stringent policy and procedures in place to identify and intervene with customers who may 	July 2021

				be vulnerable to harm through problem gambling. See above under Information to players, Customer Interaction and Self-Exclusion.	
Anti-social behaviour associated with late night operation	A	Low	Low – Severe	<ul style="list-style-type: none"> - Access control measures either through door supervision or physical controls, utilised at night where appropriate. - Policy of non-players refused entry or asked to leave. - Refreshments offered only to players and known customers. 	July 2021
Poor security increasing vulnerability to robbery or theft.	A	Low	Low – Severe	<ul style="list-style-type: none"> - A 'live-monitored' hold-up alarm system is used so that monitoring station staff can communicate with and support shop staff through CCTV and two way audio using mics and speakers mounted in the ceiling. - All staff have personal attack 'hold-up' alarms and there are some strategically placed static alarms also. - The premises are fitted with an intruder alarm which can also be live monitored from the monitoring station, meaning alarm activations are verified, using sight and sound, by the monitoring station thus reducing the number of false alarms to police. - Extensive CCTV coverage with recording of approx. 30 days of footage. - Strict key storage procedure. - Time lock and/or time delay safes utilised. - Drop safe used for banking. - Staff personal floats limited to £200. 	July 2021

<p>Advertising Standards and Marketing</p>	<p>A</p>	<p>Low</p>	<p>Low – Moderate</p>	<ul style="list-style-type: none"> - All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). We ensure that our marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008), including ‘free bet’ offers, do not amount to or involve misleading actions or misleading omissions within the meaning of those regulations. We adopt the general principles that our advertising is: <ul style="list-style-type: none"> - legal, decent, honest and truthful - Prepared with a sense of responsibility to consumers and to society - Respectful to the principles of fair competition generally accepted in business - Not intended to bring advertising into disrepute. Specifically we ensure that: <ul style="list-style-type: none"> - Advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise - Advertisements and promotions are socially responsible and do not encourage excessive gambling - Care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable - Advertising is not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear. No medium is used to advertise 	<p>July 2021</p>
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				<p>gambling if more than 20% of its audience is under 18 years old</p> <ul style="list-style-type: none"> - Persons shown gambling are not, nor do they appear to be, under 25 years of age - There is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer - Advertising and promotional material carries a reference for the need to keep gambling under control - It is never suggested or implied that gambling is a means of getting out of financial difficulty. - Advertising and marketing material should not appear on any primary web page/screen or micro-site that provides advice or information on responsible gambling. - Marketing decisions are controlled by the central marketing department and a system is in place for local managers to apply for marketing initiatives that are approved by the Head of Marketing to ensure they are legal, honest and compliant with the Gambling Act/License Conditions & Codes of Practice. 	
Failure to display Terms and Conditions	B	Low	Low – Moderate	<ul style="list-style-type: none"> - Terms and Conditions displayed prominently within the premises. 	July 2021
Failure to deal with customers making complaints about the outcome of gambling	B	Low	Low – Moderate	<ul style="list-style-type: none"> - Machines only acquired from licensed suppliers. - Additional machine compliance checks completed by a technician when installing new machines. - Machine maintenance carried out by qualified technician. 	July 2021

				<ul style="list-style-type: none"> - Clear service complaint protocol to deal with machine or game performance related customer complaints. - Customer complaints policy and procedure. - Complaints policy and procedure displayed prominently in each site. - Complaint forms available at each site. - Luxury Leisure head office complaints telephone line. - Novomatic UK group complaints channel. - Registered with an ADR entity – BACTA. 	

Requirement to Comply

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

Effective as at 6 April 2016

Social responsibility code provision 10.1.1

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at **each of their premises**, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.

2. Licensees must review (and update as necessary) their local risk assessments.
 - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. when applying for a variation of a premises licence; and
 - d. in any case, undertake a local risk assessment when applying for a new premises licence.

Ordinary code provision 10.1.2

1. Licensees should 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 Risk Assessment – Gambling Act 2005 Licensing Objectives

Premises

Premises Name:	Admiral
Premises Address:	513 Green Lanes, Haringey
Premises Post Code:	N4 1AN
Premises Licence Number:	TBC On Application
Category of Premises:	AGC

Company

Operating Company:	Luxury Leisure
Operating Licence Number:	LL – 1876

Assessment Writer

Name of Person Writing this Assessment:	Shaun Hooper
Position within Company or Name of Authorised Agent:	Regional Operations Director
Date of this Assessment	July 2021
Date that Original Assessment was Written	March 2021

Gambling Act 2005 – The Licensing Objectives

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

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Whilst there are no schools for children of secondary school age nearby, there is South Harringay Junior and Infant school nearby and the mapping provided by the local authority in its local area profile shows a number of gambling premises in proximity to the school (8).

There is a bus stop 5 meters from the venue on the same side of the street. Harringay mainline train station is not within the 500 metre radius but is a 15-minute walk from the premises.

There are no addiction support facilities nearby.

The venue has a single entrance/exit at street level to the front, a single doorway leading directly into the gaming area which is rectangular in shape. The meet and greet station is located prominently towards the front of the store giving a clear line of sight and command of the entrance. The Venue will offer machines of category D, C and B3 with stakes ranging from 10p to a maximum £2. The venue does not offer VIP or loyalty schemes.

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Those made vulnerable through abuse of drugs and/or alcohol having access to gambling. Those considered to be vulnerable, having access to gambling. (We adopt a	C	Low	Severe to business. Severe to customer.		July 2021

<p>broad definition of 'vulnerable' to include but not limited to those suffering from mental illness, recently bereaved, suffering from long-term or terminal illness, difficulty communicating, learning disability, substance misuse or addiction, breakdown of close personal relationships etc)</p>				<ul style="list-style-type: none"> - Clear 'Over 18' signage is displayed, visible from outside and also in the entrance to the premises. - Luxury Leisure/Talarius use independent test purchasing operations. All venues are tested at least twice in a rolling 12-month period. - Our staff are trained to look for the signs of CSE using a CSE training module on our Admiral Academy training platform. 	
<p>Child sexual exploitation (CSE) - Sexual abuse where a child or young person is forced or manipulated into inappropriate sexual activities, often in exchange for alcohol, drugs, gifts or attention. Although children and young persons are not permitted into AGC premises, it is possible that a customer could target or be targeted by nearby children or young persons as they enter or leave our venue.</p>	<p>C</p>	<p>Low</p>	<p>Severe to business. Severe to child or young person.</p>	<ul style="list-style-type: none"> - The venue is installed with iBeacon technology able to work with the 'Gamblewise' app which is free for our customers to download and use to assist them manage their time spent gambling. - Stringent disciplinary procedures for failures identified through age verification testing. - Social Responsibility returns data reviewed through submissions from Area Managers to National Compliance Manager. - All social responsibility returns data subject to a quarterly compliance review. - Staff log all attempts to enter by young persons on the appropriate log. - Staff have been trained to ask a customer to lower a face covering if necessary, this has the effect of allowing staff to adjudge the apparent age of all customers and if necessary challenge for verification by the presentation of ID and hand sanitiser available. 	<p>July 2021</p>

Failure to provide information to players on responsible gambling.	C	Low	Severe to business Severe to customer	<ul style="list-style-type: none"> - A responsible Gambling message is displayed at all positions where gaming is possible through posters, leaflets and stickers on machines. - Poster/Leaflet designs to incorporate QR codes for GAMCARE, Playnice.org and Gambleaware contact information. - Responsible Gambling information stickers on all machines. - Compliance Audit function performed by Area Manager and also through regional field auditors and security managers. - Luxury Leisure Talarius have attained the Global Gaming Guidance Group (G4) accreditation for our responsible gambling measures. 	July 2021
Failure to provide information in a suitable format.	C	Low	Severe to business. Severe to customer.		July 2021
Failure to recognise signs of problem gambling.	C	Low	Severe to business Severe to customer	<ul style="list-style-type: none"> - Additional aspects to training incorporating guidance on identifying problem gambling, procedure for interaction and sources of help. - Clear policy to detail the procedure for interaction and level of staff that can 'intervene'. - New 'Stay in control leaflets' with QR codes to Playnice.org and GAMCARE and Gambleaware. - All recorded SR data subject to a quarterly compliance review by senior management. - Staff have been trained to ask a customer to lower a face covering if necessary This has the effect of allowing staff to adjudge the apparent age of all customers and if necessary challenge for verification by the presentation of ID and also 	July 2021
Failure to interact with customer displaying signs of problem gambling.	C	Low	Severe to business. Severe to customer.		July 2021
Screens erected as part of measures to be 'COVID Secure' preventing staff from being able to effectively monitor players in relation to Age Verification, customer interaction and self-exclusion.	C	Low	Severe to business. Severe to customer.		July 2021

Failure to sign-post customer to help and support.				<p>to identify if a customer attempting to enter is self-excluded.</p> <ul style="list-style-type: none"> - Screens are available upon customer request to create a covid safe barrier between machines but are not floor to ceiling and are not deep enough so as to enclose a machine position, they simply divide it from the adjacent machines. Staff can continue to monitor their customers. - The screens are portable, on their own foot, and therefore can be moved by staff so as not to create enclosed machine positions in a venue. 	
Failure to properly administer self-exclusion.	C	Low	Severe to business. Severe to customer.	<ul style="list-style-type: none"> - Staff training incorporates policy and procedure for self-exclusion. - Since April 2016 Luxury Leisure/Talarius have operated one or both of the AGC national multi-operator self-exclusion schemes (MOSES), offered through BACTA and IHL. - Digital cameras or suitable tablet devices are provided at all sites to take an image of customers wishing to self-exclude so that the exclusion can be effectively enforced. - The location of the site in relation to the customer's home address and any regular routes to work for example will be considered if the customer requests a wider exclusion. - All SR returns data subject to a quarterly compliance review. 	July 2021
Failure to impose exclusion in locality and in same types of establishments.	C	Low	Severe to business. Severe to customer.		July 2021
Customer breaches of self-exclusion.	C	Low	Severe to business. Severe to customer.		July 2021
Customer breaches self-exclusion by using another to gamble on their behalf.	C	Unknown	Moderate to business. Severe to customer.		July 2021

				<ul style="list-style-type: none"> - All staff trained to regularly check the MOSES gallery relating to their venue to ensure information shared from other local operators relating to self-excluded customers is monitored. 	
Money Laundering (Dye stained notes and Criminal spend).	A	Low	Low – Severe	<ul style="list-style-type: none"> - The company have a Money Laundering Reporting Officer (MLRO). - Staff training at induction and refresh training. - Luxury Leisure/Talarius have a corporate AML Risk Assessment and policies and procedures relating to AML. - £1000 limit on automated transactions using TITO. Any greater amounts require the intervention of a staff member. - Technical parameters on note acceptors designed to reject poor quality notes. (Often notes obtained by way of robbery are perished). - Manufacturer activity alerts from machines on independent networks (primarily SG and Inspired). - TITO tickets not transferable between sites. - Change machines set up so that notes cannot be changed 'up'. - Comprehensive CCTV coverage in all sites. - Partnerships with local police where appropriate to identify and discourage criminal spend. 	July 2021
Commission of criminal offences to fund problem gambling	A	Low	Low – Severe	<ul style="list-style-type: none"> - Stringent policy and procedures in place to identify and intervene with customers who may be vulnerable to harm through problem gambling. See above under Information to 	July 2021

				players, Customer Interaction and Self-Exclusion.	
Anti-social behaviour associated with late night operation	A	Low	Low – Severe	<ul style="list-style-type: none"> - Access control measures either through door supervision or physical controls, utilised at night where appropriate. - Policy of non-players refused entry or asked to leave. - Refreshments offered only to players and known customers. 	July 2021
Poor security increasing vulnerability to robbery or theft.	A	Low	Low – Severe	<ul style="list-style-type: none"> - A 'live-monitored' hold-up alarm system is used so that monitoring station staff can communicate with and support shop staff through CCTV and two way audio using mics and speakers mounted in the ceiling. - All staff have personal attack 'hold-up' alarms and there are some strategically placed static alarms also. - The premises are fitted with an intruder alarm which can also be live monitored from the monitoring station, meaning alarm activations are verified, using sight and sound, by the monitoring station thus reducing the number of false alarms to police. - Extensive CCTV coverage with recording of approx. 30 days of footage. - Strict key storage procedure. - Time lock and/or time delay safes utilised. - Drop safe used for banking. - Staff personal floats limited to £200. 	July 2021

<p>Advertising Standards and Marketing</p>	<p>A</p>	<p>Low</p>	<p>Low – Moderate</p>	<ul style="list-style-type: none"> - All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). We ensure that our marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008), including ‘free bet’ offers, do not amount to or involve misleading actions or misleading omissions within the meaning of those regulations. We adopt the general principles that our advertising is: <ul style="list-style-type: none"> - legal, decent, honest and truthful - Prepared with a sense of responsibility to consumers and to society - Respectful to the principles of fair competition generally accepted in business - Not intended to bring advertising into disrepute. Specifically we ensure that: <ul style="list-style-type: none"> - Advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise - Advertisements and promotions are socially responsible and do not encourage excessive gambling - Care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable - Advertising is not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear. No medium is used to advertise gambling if more than 20% of its audience is under 18 years old 	<p>July 2021</p>
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				<ul style="list-style-type: none"> - Persons shown gambling are not, nor do they appear to be, under 25 years of age - There is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer - Advertising and promotional material carries a reference for the need to keep gambling under control - It is never suggested or implied that gambling is a means of getting out of financial difficulty. - Advertising and marketing material should not appear on any primary web page/screen or micro-site that provides advice or information on responsible gambling. - Marketing decisions are controlled by the central marketing department and a system is in place for local managers to apply for marketing initiatives that are approved by the Head of Marketing to ensure they are legal, honest and compliant with the Gambling Act/License Conditions & Codes of Practice. 	
Failure to display Terms and Conditions	B	Low	Low – Moderate	<ul style="list-style-type: none"> - Terms and Conditions displayed prominently within the premises. 	July 2021
Failure to deal with customers making complaints about the outcome of gambling	B	Low	Low – Moderate	<ul style="list-style-type: none"> - Machines only acquired from licensed suppliers. - Additional machine compliance checks completed by a technician when installing new machines. - Machine maintenance carried out by qualified technician. - Clear service complaint protocol to deal with machine or game performance related customer complaints. 	July 2021

				<ul style="list-style-type: none"> - Customer complaints policy and procedure. - Complaints policy and procedure displayed prominently in each site. - Complaint forms available at each site. - Luxury Leisure head office complaints telephone line. - Novomatic UK group complaints channel. - Registered with an ADR entity – BACTA. 	

Requirement to Comply

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

Effective as at 6 April 2016

Social responsibility code provision 10.1.1

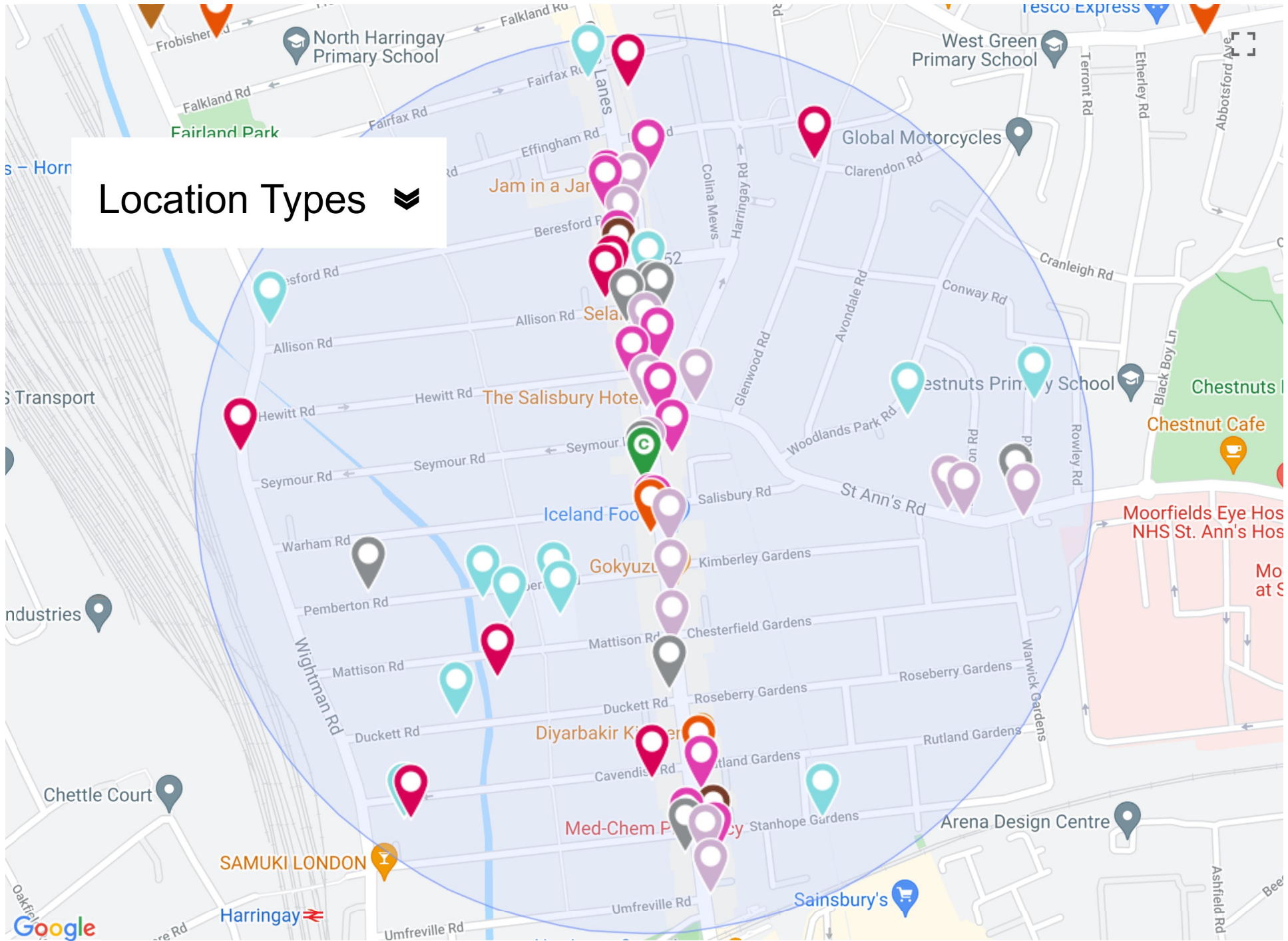
1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at **each of their premises**, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.

2. Licensees must review (and update as necessary) their local risk assessments.
 - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;

- c. when applying for a variation of a premises licence; and
- d. in any case, undertake a local risk assessment when applying for a new premises licence.

Ordinary code provision 10.1.2

- 1. Licensees should 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.



Selected Location Types

Banks

Name: Barclays Bank

Address: 67 Grand Parade, Green Lanes, London

Name: Turkish Bank (UK) Ltd

Address: 577-579 Green Lanes, London

Betting shops

Name: Ladbrokes

Address: 1 Rutland Gardens, London

Name: Paddy Power

Address: 507 Green Lanes, London

Name: William Hill

Address: Mary Rose Mall, 14 Frobisher Rd, London

Name: William Hill

Address: 472, 480 W Green Rd, London

Name: William Hill

Address: 297-301 W Green Rd, London

Casino/AGC

Name: Admiral (custom)

Address: 513 Green Lanes, undefined, undefined, N4 1AN

Doctors Surgery

Name: House of Smiles

Address: 517 Green Lanes, London

Name: The Old Surgery

Address: 572 Green Lanes, London

Name: The Jennifer Home

Address: 17 Pemberton Road, London

Name: MEDI-PARK CLINIC

Address: 573 Green Lanes, London

Name: Just Health HGV PCV D4 MEDICALS HARRINGAY

Address: 573 Green Lanes, London

Name: Patel Dr V N D

Address: 572 Green Lanes, London

Name: Dr. Teoman Sirri

Address: Not located at this address, 336 Saint Ann's Road, London

Name: Sos Footcare

Address: 401 Green Lanes, London

Drug and Alcohol Treatment facilities

Hostels

Pawn Shops

Nurseries

Name: Little Jewels Pre-school

Address: St Pauls Church Centre, Cavendish Rd, London

Name: Woodlands Park Nursery School & Children Centre

Address: 74-76 Woodlands Park Rd, London

Name: Brown Bears Nursery - Green Lanes

Address: 582 Green Lanes, London

Name: Busy Bunnies

Address: Wightman Rd, London

Payday Loan Shops

Place of worship

Name: Glenwood Road Kingdom Hall of Jehovah's Witnesses

Address: 5a Glenwood Road, London

Name: Mustard Seed Chapel International, NSG Branch

Address: 628 Green Lanes, London

Name: The Parish Church of St. Paul Haringay

Address: Wightman Road, London

Name: Haringay United Church

Address: Green Lanes, London

Name: Eagle Nursery Ltd Within Haringey United Church

Address: Junction of Alison Road & Green Lanes, Corner of, London

Name: Saint Augustine's of Canterbury Church (Roman Catholic)

Address: 51 Mattison Road, London

Name: Lighthouse Seventh-day Adventist Church

Address: 88B Cavendish Road, London

Name: Holy Spirit Conference - Freedom - MCL Church

Address: Wightman Road, London

Pubs and Bars

Name: The Salisbury Hotel

Address: 1 Grand Parade, Green Lanes, London

Name: Brouhaha

Address: 501 Green Lanes, London

Name: Bun & Bar

Address: 553 Green Lanes, London

Name: Beans & Barley

Address: Etcetera Workshop, Green Lanes, London

Name: Diyarbakir Restaurant

Address: 69 Grand Parade, Green Lanes, London

Name: Jam in a Jar

Address: 599A Green Lanes, London

Name: The Old Ale Emporium
Address: 405 Green Lanes, London

Name: LimitedLDN
Address: 5 Grand Parade, Green Lanes, London

Name: Brou's Cellar London
Address: 499 Green Lanes, London

Name: Green Lanes Cafe & Bar
Address: 7, Salisbury Promenade, Green Lanes, London

Name: Ora Lounge
Address: 581 Green Lanes, London

Name: The Langham Club
Address: 600 Green Lanes, London

Name: Abraço
Address: 60 Grand Parade, Green Lanes, London

School

Name: Woodlands Park Nursery School & Children Centre

Address: 74-76 Woodlands Park Road, London

Name: South Haringay Infant School & The Ladder Children's Centre

Address: Pemberton Road, London

Name: South Haringey Infant School

Address: Pemberton Road, London

Name: music teacher

Address: 37 Duckett Road, London

Name: Nat Yelverton Music Tuition

Address: 186B Wightman Road, London

Name: Quest For Education

Address: 639 Green Lanes, London

Name: South Haringay Junior School

Address: Mattison Road, London

Name: South Haringay Infant & Nursery School

Address: 110 Pemberton Road, London

Name: Brown Bears Nursery - Green Lanes

Address: 582 Green Lanes, London

Name: Demirdöğmez Turkish Clarinet School

Address: 582-584 Green Lanes, London

Name: Firat Altay - Piano Music Tuition

Address: 33 Stanhope Gardens, London

Name: Guitar Lessons Haringey

Address: 34B Ritches Road, London

Name: Little Jewels Pre-school

Address: Saint Pauls Church Centre, Cavendish Road, London

Transport nodes

Name: St Ann's Road

Address: United Kingdom

Name: Mattison Road

Address: United Kingdom

Name: St Ann's Road (Stop HH)

Address: United Kingdom

Name: Mattison Road (Stop HN)

Address: United Kingdom

Name: Haringay Road (Stop HL)

Address: United Kingdom

Name: St Ann's Road (Stop HK)

Address: United Kingdom

Name: Mattison Road (Stop HG)

Address: United Kingdom

Name: Beresford Road

Address: United Kingdom

Name: Beresford Road (Stop HJ)

Address: United Kingdom

Name: Beresford Road (Stop HZ)

Address: United Kingdom

Name: Warwick Gardens (Stop HP)

Address: United Kingdom

Name: Warwick Gardens

Address: United Kingdom

Name: Warwick Gardens (Stop HX)

Address: Saint Ann's Road, London

Name: Haringay Green Lanes Station (Stop HM)

Address: United Kingdom

Name: Haringay Green Lanes Station

Address: United Kingdom

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