

ADDITIONAL PAPERS - PUBLIC

LICENSING SUB COMMITTEE

Tuesday, 1st November, 2022, 7.00 pm - Microsoft Teams (watch the live meeting [here](#) and watch the recording [here](#))

Members: Councillors Ajda Ovat (Chair), Emily Arkell and Lester Buxton

Quorum: 3

6. APPLICATION FOR A VARIATION OF A BETTING PREMISES LICENCE FOR AN ADULT GAMING CENTRE AT GAME NATION, 450-454 HIGH ROAD, TOTTENHAM, LONDON, N17 (TOTTENHAM HALE) (PAGES 1 - 184)

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

Various documents in the additional papers are exempt under Paragraph 3 of Schedule 12A of the Local Government Act 1972:

iii) Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Nazyer Choudhury, Principal Committee Co-ordinator
Tel – 020 8489 3321
Fax – 020 8881 5218
Email: nazyer.choudhury@haringey.gov.uk

Fiona Alderman
Head of Legal & Governance (Monitoring Officer)
George Meehan House, 294 High Road, Wood Green, N22 8JZ

Wednesday, 26 October 2022

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AGC Premises Licence Variation Application**Game Nation, 450-454 High Road, Tottenham, London, N17 9JN****Applicant Document Bundle**

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STATEMENT OF ADAM HODGES IN SUPPORT OF THE AGC PREMISES LICENCE VARIATION
APPLICATION AT 450- 454 HIGH ROAD, TOTTENHAM, N17 9JN

Introduction

1. The Applicant, City Gaming Limited, was formed in 2018 and has built a group of 58 Adult Gaming Centre (AGC) premises and 2 Family Entertainment Centres.
2. I am the Chief Executive Officer of City Gaming Limited and I have worked in the gaming industry for 36 years. In addition to being an executive of gambling operating companies, I have personally operated several gambling premises including AGCs and betting shops.
3. City Gaming Limited was granted an Adult Gaming Centre ("AGC") premises licence at 450-454 High Road, Tottenham, N17 9JN by Haringey Council in October 2020 and we began operating under the premises licence in June 2021. The premises licence permits us to operate from 09:00 to 24:00 hours Mondays to Saturdays and from 09:00 to 23:00 hours on Sundays, subject to the mandatory licence conditions and an additional 39 licence conditions. Under the Gambling Act 2005 the default hours of operation for Adult Gaming Centre premises is 24 hours.
4. Having now operated the premises for 16 months, we would now like to extend our hours to the default hours under the Gambling Act. Based on our experience, both here and elsewhere, we are certain that we can and will do so without harm to the licensing objectives. We would not proceed on any other basis.

Personal Management Licence

5. I hold a Personal Management Licence granted to me by the Gambling Commission on 25th October 2007. This authorises me to hold a management position within City Gaming Limited. I am responsible for overall strategy and delivery of gambling operations. I sit on the Companies Compliance Committee.
6. The Gambling Commission, as described in their Statement of principles for licensing and regulation, expects those who hold Personal Management Licences, to:
 - a) uphold the licensing objectives and ensure compliance of operators with the Licence Conditions and Codes of Practice (LCCP)
 - b) organise and control their affairs responsibly and effectively
 - c) have adequate systems and controls to keep gambling fair and safe
 - d) conduct their business with integrity
 - e) act with due care, skill and diligence
 - f) maintain adequate financial resources
 - g) have due regard to the interest of consumers and treat them fairly

- h) have due regard to the information needs of consumers and communicate with them in a way that is clear, not misleading, and allows them to make an informed judgment about whether to gamble
- i) manage conflicts of interest fairly
- j) disclose to the Commission anything which the Commission would reasonably expect to know
- k) work with the Commission in an open and cooperative way
- l) comply with both the letter and spirit of their licence, the licence of their operator, and associated Commission regulations.

City Gaming Limited Operating Licence

7. City Gaming Limited is a leading operator of AGC premises in London and the South East and has full authority to provide AGC facilities through the grant of an Operating Licence by the Gambling Commission. A copy of the City Gaming Limited Operating Licence is attached.
8. When considering the suitability of City Gaming Limited to hold an Operating Licence the Commission had regard to the ownership of the Company and the identity of those people relevant to the application, such as myself and the other Directors. The Commission considered the Company's finances and the financial and other circumstances of the Directors both past and present. This included the Company's resources to be available to carry out the licensed activities.
9. The Commission considered the Company's and Directors' integrity, honesty and the trustworthiness of the Directors.
10. They considered our competence, our experience, expertise, qualifications, and history of those in the Company.
11. The Gambling Commission approved the policies and procedures and operational controls and measures which City Gaming Limited put in place to ensure that it trades responsibly in accordance with gambling legislation, the licensing objectives and the Gambling Commission's Licence Conditions and Codes of Practice ("LCCP").
12. The Gambling Commission granted an Operating Licence to City Gaming Limited on 28th November 2018. This Licence authorises the Company to provide facilities for playing bingo; to make gaming machines available for use in an adult gaming centre, and to supply, install, adapt, maintain or repair (but not manufacture) a gaming machine or part of a gaming machine.
13. Holding an Operating Licence places significant scrutiny and regulatory demand on the Company. The Gambling Commission expects operators to:
 - a) conduct their business with integrity

- b) act with due care, skill, and diligence
- c) take care to organise and control their affairs responsibly and effectively and have adequate systems and controls to minimise the risks to the licensing objectives
- d) maintain adequate financial resources
- e) have due regard to the interests of consumers and treat them fairly
- f) have due regard to the information needs of consumers and communicate with them in a way that is clear, not misleading, and allows them to make a properly informed judgment about whether to gamble
- g) manage conflicts of interest fairly
- h) work with the Commission in an open and co-operative way
- i) comply with both the letter and spirit of their licence and associated Commission regulations
- j) disclose to the Commission anything which the Commission would reasonably expect to know.

City Gaming Limited Adult Gaming Centres

14. Of the 58 Adult Gaming Centres we operate, 26 are in London Boroughs. They are:

Site	Address	Local Authority
Barking	9 Station Parade, Barking, IG11 8ED	Barking and Dagenham
Dagenham	250 Heathway, Dagenham, RM10 8QS	Barking and Dagenham
Kilburn 2	89 Kilburn High Road, London, NW6 6JE	Brent
Neasden	322 Neasden Lane, London, NW10 0AD	Brent
Bromley	88 High Street, Bromley, BR1 1EY	Bromley
Kings Cross	1 Euston Road, London, NW1 2SA	Camden
Camden	108-110 Camden High Street, London, NW1 0LJ	Camden
Kilburn	108 Kilburn High Road, London, NW6 4HY	Camden
Croydon	57 North End, Croydon, CR0 1TC	Croydon
Fulham	371 North End Road, London, SW6 1NW	Hammersmith & Fulham
Wood Green	49 High Road, London, N22 6BH	Haringey
Romford	17-19 South Street, Romford, RM1 1NJ	Havering

Islington	37 Chapel Market, London, NI 9EN	Islington
Clapham	74 Clapham High Street, London, SW4 7JL	Lambeth
Deptford	70 Deptford High St, London, SE8 4RT	Lewisham
Lewisham	92 Lewisham High Street, London, SE13 5JH	Lewisham
East Ham	34-36 High Street, North East Ham, E6 2HJ	Newham
Upton Park	353 Green Sy, Upton Park, London, E13 9AR	Newham
Ilford	217 High Road, "ford, IGI ILX	Redbridge
Camberwell	14 Denmark Hill, London, SE5 8RZ	Southwark
Walthamstow	124 High Street, London, E17 7JS	Waltham Forest
Walthamstow 2	159 Hoe St Walthamstow, E17 3AL	Waltham Forest
Tooting	18 Mitcham Road, London, SW17 9NA	Wandsworth
Chinatown	23 Gerrard Street, London W1D 6JJ	Westminster
Soho	89-91 Wardour Street, London W1F 0UB	Westminster
Victoria	195-197 Victoria Street, London SW1E 5NE	Westminster

15. City Gaming Limited has not had a Review of an AGC Premises Licence or of its Operating Licence. It operates in accordance with its legal obligations. No responsible authority has expressed concern with its operation.

City Gaming Limited Management

16. The City Gaming Group has more than eight Personal Management Licence holders throughout their operational structure. A full breakdown of the City Gaming Management Team is provided in the Management Structure Chart attached to this statement.
17. The Board of Directors is formed of experienced operators and management, some of whom I have worked with in the gambling industry for over 10 years.
18. Through their experience and training, the management team from head office to premises level are aware of their roles and responsibilities in regard to the LCCP.
19. The Company received financial backing from Morgan Stanley Fund, who have provided a facility to invest in the Company. Before the Company could secure this investment, Morgan Stanley completed extensive compliance checks on the Company and the Directors as well as extensive due diligence on the industry and gambling sector in the UK.
20. City Gaming Group employs an Industry expert with many years of experience as a Compliance Officer, Graham Glanfield, who reports directly to the Chief Commercial Officer.

His role includes carrying out compliance checks and audits to ensure that the Company's responsibilities and procedures relating to the LCCP are upheld.

21. Our Compliance Officer ensures the Regulatory Returns and Key Event notifications are made to the Gambling Commission in a timely manner.
22. City Gaming Group employs over 450 people in London and the South East. The Company has employed a Head of Health and Safety and Income Protection and a Central Recruitment Manager. These positions will enhance our Health and Safety initiatives for staff and customers in our venues and ensure we have the right people in the right positions to provide a compliant and productive business.
23. We employ experienced local staff to work in the Haringey premises. We have employed staff who have both worked on the High Street in Tottenham. They understand the circumstances of providing arcades in the area, and have knowledge of the local area and local customers.
24. The Company takes its duty to operate safe and compliant gambling premises seriously. To this end, the Company always endeavours to liaise with Responsible Authorities concerning the operation of premises and maintains good relations with the local Police and Licensing Authority teams.

Site and Location

25. As I say above, we opened at 454 High Road, Tottenham in June 2021. In order to do so, we invested approximately £500,000 in the renovation of this unit and created 15 new jobs, all of which are filled by local people.
26. Our AGC Premises Licence authorises us to make category B, C and D gaming machines available. We provide 55 machines in the Tottenham premises at least 80% of which are category C or D machines, similar to the machines available in pubs, with a maximum stake of £1 and maximum prize of £100. Up to 20% of the total number of machines in the venue may be category B3 or B4 machines, with the same stakes and prizes as machines in betting offices and bingo establishments, that is £2 stake and £500 prize.
27. No one under the age of 18 is permitted in an AGC and we operate a THINK 25 policy.
28. Alcohol is not permitted in an AGC.
29. It is hard to get exact figures, but our research suggests there are approximately 80 to 90 pubs and bars in Haringey. Each is automatically entitled to provide two category C machines or apply for more by way of a permit.
30. The Company is aware of the changing nature of Tottenham and has contributed to the investment and regeneration of the area by investing approximately £500,000 in the renovation of this unit and the creation of 15 new jobs in the AGC.
31. In our meetings with the Licensing Authority and the Police during our original premises licence application for Tottenham, we listened to their comments and agreed an extensive

list of conditions, which are attached to the AGC premises licence to ensure the promotion of the licensing objectives. I believe that these conditions, alongside our own management, have proved up to the job, and I am not aware that the contrary is being alleged by anyone.

Operating Hours and Promotion of the Licensing Objectives

32. The Company operates AGC premises in several London boroughs and parts of the South East with similar levels of crime and deprivation as Haringey, including Islington, Brent, Lewisham, Margate and Southampton. We have also operated premises in cities such as Nottingham which have lower levels of deprivation according to the Office of National Statistics' indices of deprivation 2019.
33. The company operates many 24 hour licences, where we consider that there will be customer demand for such a facility. One of these is the Palace Amusements AGC premises in Wood Green, Haringey, where there is no history of issues reported by the Responsible Authorities.
34. We have found the Tottenham venue to be less challenging than other venues we operate. We have no reason to believe that if permitted to open it for 24 hours we will create any issues to local residents or the community.
35. In general, I wish to emphasize, based on long experience, that our premises are not an attractive place for crowds to gather at night or during the day. All of our premises, including Tottenham, are well supervised and where necessary we employ security staff. We have installed prominent "spotter screens" at the entrance and inside the premises to ensure that everyone is under surveillance and all customers are aware of it when entering.
36. The Company's statistics from existing sites indicates that AGC premises generate consistent, low levels of gambling throughout the hours of operation, as opposed to other types of gambling premises, such as betting shops, which often have peaks and troughs with high levels of spending.
37. The staff at all our premises record all incidents on "SmartHubs", which we then review centrally. When we profile incidents we do not find a distinction between day and night. Everything is at an extremely low level and we find there is no more risk attaching to the day or the night.
38. In London specifically we find we are in a 24 hour economy. The people who drop in to our premises at night are no different to those that visit us during the day. These are people using our premises to pop in, have a cup of tea or coffee and play the machines before or after a shift at work.
39. We have found that in our other London venues often the Police comment that we can be a useful presence at night helping to control crime because we are well lit and we have CCTV cameras. We also provide a late night venue for people finishing work to relax in before going home, rather than maybe hanging around on streets. We have broadly found this to

be our experience in Tottenham, where operating to midnight has created no more problems than we can experience in the day.

40. Our night working policy in Tottenham is a minimum of two staff and an SIA registered security guard on duty at all times. We constantly risk assess our management controls to ascertain the levels of security and numbers of staff required. We will not hesitate to install security staff – for example at busier times - where this is necessary since the safety of our staff and customers is paramount. We also operate with Staffguard (a remote surveillance and communication system) at all times, panic buttons, locked customer toilets, and a controlled entrance, so we are able to control who enters the premises whenever such use is necessary.
41. We know that the Admiral AGC premises at 457 High Road operates 24 hours. These premises are directly opposite ours. If we had evidence or any information indicating that the 24 hours operation of Admiral was causing issues then we would review matters. However, we are not receiving that intelligence at all. Nor are we aware that the Admiral premises has been brought in for review because it is failing to promote the licensing objectives at night. It appears inequitable to us that we are being restrained from operating to the same hours as have been operated across the road without conditions for many years.

Conclusion

42. The Company benefits from highly experienced management running all the way through from head office to premises level.
43. The Company do not wish to operate licensed premises which cause regulatory issues or take advantage of vulnerable persons. The Company devotes a great deal of resources to ensuring this.
44. In my experience and as described above, the Company's premises contribute to local economies whilst maintaining what I submit is a high standard for social responsibility and security measures in the industry.
45. The business of City Gaming Limited is the provision of high end, safe and pleasant gaming environments. It is crucial to the business that customers feel safe and welcome in their premises and that the premises form a part of the local community.
46. From our experience operating in Tottenham and operating in similar locations for 24 hours, I do not believe that this application will have any adverse impact on the licensing objectives.

Signature:

Adam Hodges, Chief Executive Officer, City Gaming Limited

Date:

STATEMENT OF STUART J, GREEN IN SUPPORT OF THE AGC PREMISES LICENCE VARIATION
APPLICATION AT 450- 454 HIGH ROAD, TOTTENHAM, N17 9JN

Introduction

1. I am the Chief Commercial Officer of City Gaming Limited and I have worked in the gaming industry for 29 years. In addition to being a Board Member of multiple gambling operating companies, I have personally operated large AGCs, across multiple locations and environments.
2. I hold a Personal Management Licence granted to me by the Gambling Commission on 7th October 2016. This authorises me to hold a management position within City Gaming Limited. I sit on the Company's Compliance Committee.
3. City Gaming Limited is an operator of AGC premises in London and the South East and has authority to provide gaming machines in AGCs through the grant of an Operating Licence by the Gambling Commission. The Operating Licence was granted in November 2018. In granting the application the Gambling Commission approved the measures which City Gaming Limited has put in place to ensure the licensing objectives and compliance with the Licence Conditions and Codes of Practice (LCCP).
4. Since June 2021 City Gaming Limited has operated the AGC premises at 450-454 High Road, Tottenham, N17 9JN between the hours of 09:00 to 24:00 hours Mondays to Saturdays and 09:00 to 23:00 hours on Sundays, in accordance with the premises licence. The Company has applied for permission to operate 24 hours, in line with the default hours under the Gambling Act 2005 for AGC premises and also in line with neighbouring AGC premises.
5. Based on the Company's experience of operating 24 hour venues, and the management policies, procedures and controls that we have in place I believe that operating the Tottenham premises 24 hours will not add to any of the local issues nor have any impact on the Licensing Objectives.

Licence Conditions and Codes of Practice ("LCCP")

6. The LCCP sets out the Gambling Commission's general licence conditions and associated code of practice provisions under the Gambling Act 2005 which are applicable to our Adult Gaming Centres.
7. The LCCP relevant to City Gaming Limited Adult Gaming Centers are attached. The LCCP licence conditions require the Directors and those involved in the Company to hold Personal Management Licences. They require us to provide fair terms and conditions on the gambling to customers; implement policies and procedures concerning the use of cash to minimize the risk of crime; they prohibit giving of credit to customers; they require an anti-money laundering risk assessment of our business; and make specific notifications, or Key Events, to the Gambling Commission when certain defined events occur.
8. The licence conditions require us to make annual Regulatory Returns, describing certain details of our business, such as numbers of gaming machines, to the Gambling Commission.

9. The mandatory Social Responsibility Code Provisions of the LCCP require the Company to consider the Gambling Commission's guidance on anti-money laundering; put into effect policies and procedures intended to promote socially responsible gambling and make an annual contribution to an organization whom deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling. We make a contribution to Gamcare.
10. The Social Responsibility Code Provisions require the Company to put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these. We must make information readily available customers to how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
11. Our staff are required by the Operating Licence to interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a. identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b. interacting with customers who may be at risk of or experiencing harms associated with gambling
 - c. understanding the impact of the interaction on the customer, and the effectiveness of the actions and approach.
12. We must take into account the Commission's guidance on customer interaction.
13. We must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling in our premises.
14. Further Social Responsibility Code Provisions require us to ensure our marketing is responsible and provide a complaint and dispute procedure which includes referring disputes to a third party, alternative dispute resolution entity. We work with the Independent Betting Adjudication Service.
15. We are required to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of our premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, we must take into account relevant matters identified in the licensing authority's statement of licensing policy. Our Local Area Risk Assessment in respect of the AGC in Tottenham has been provided as part of the application.
16. Our premises are subject to regular compliance assessments by local councils and the Gambling Commission, who review the ongoing compliance of our premises with the LCCP. These visits have to date not noted any concerns regarding compliance.
17. We have recently redrafted our operations manual which details how we comply with the Licence Conditions and Codes of Practice and AGC premises licence conditions and how we upholding the licensing objectives of the Gambling Act 2005. A copy of the operations manual is attached. We have also recently redesigned all our premises signage. Again copies are attached.

18. Upon entering all our venues there is an information board covering legal matters and customer information. This includes the No Under 18s, and Challenge 25 policy, the terms and conditions, safer gambling information, the complaint and dispute resolution process, staying in control information, basic legal information and Covid social distancing and related information.
19. We have developed the customer journey to ensure we interact effectively with customers. A copy of the journey is attached.

Application for 24 Hour Operation

20. We operate 24 hours in similar locations to Tottenham, such as, Wood Green, Camberwell and Neasden. We safely operate in these locations 24 hours per day due to the fact we have robust controls in place at these premises which ensure the promotion of the Licensing Objectives as outlined in more detail below. These premises have the same operating practices and CCTV as our Tottenham venue, which is the subject of this variation application.
21. Daliah Barrett, Licensing Team Leader at Haringey Council, informed me on 23rd June 2022 that members of her team had visited the premises and provided a positive report of our compliance with the premises licence conditions and that there had been no incidents. During the visit it was also acknowledged that the additional external lighting installed at the premises was a benefit to anyone using the side passageway.
22. We have not had Police or Local Authority visits as a result of poor operating practices. We have a good working relationship with the Police and regularly provide our external CCTV footage to aid in general surveillance of Tottenham High Road. Most recently we shared our CCTV footage with the police on the 30th September 2022 in relation to their investigation of the Kane Moses murder and the robbery on the Halifax Building Society in June 2022. There is no suggestion that these offences are in any way linked with our premises.
23. In the 17 month period since opening the premises in Tottenham we have only had seven call-outs to the Police. This is only because when people are asked to leave but refuse we will call the police.

CCTV and Lighting

24. In consultation with the police and the Safer by Design team, we have installed a high quality 4K CCTV covering the High Street from left- and right-hand side perspectives, with additional CCTV covering the main entrance. CCTV Spotter screens are installed with live streaming of internal and external images. We have included specific details of the CCTV we provide at the premises.
25. In addition, recommendations were made for additional lighting to be installed along the side passageway along with additional CCTV.
26. All recommendations were implemented and have subsequently been very effective:
 - a. Additional PIR Lighting installed along the side passageway – positioned in accordance with the police Safer by Design team

- b. Three additional 4k Color View CCTV Cameras installed – positioned in accordance with Licensing and Police recommendations
 - c. Three CCTV cameras on the front of venue changed for wider angle coverage.
27. Since opening Game Nation have successfully provided local Police officers four separate CCTV video recordings relating to incidents caught by our CCTV: one in the side passageway, one opposite the venue, one heading towards Bruce Grove and one regarding the Halifax Building Society.
28. The police commented positively on the timely availability of CCTV videos, along with the high quality of the CCTV footage.

StaffGuard

29. We employ StaffGuard at our premises, including Tottenham. StaffGuard is a conflict management system that enables staff to contact a central head office if they are threatened, or have aggressive and/or intoxicated customers or if they feel vulnerable. Fully qualified and vetted operators take control of the situation using conflict management techniques and contact the emergency services for rapid response if required.
30. Each member of our venue staff carries a remote-control key fob or keyring.
31. Should a member of staff feel threatened or vulnerable to attack they can press the remote fob or keyring which immediately alerts the StaffGuard Conflict Management Centre (CMC). Colour coded lights reassure the member of staff that they are connected to the CMC centre.
32. The system also allows a member of staff to connect to the CMC centre which may require emergency services assistance but hasn't escalated to that point. The CMC operator will confirm a "Standby" situation and continue listening should assistance be required.
33. From that point the CMC staff will be able to both see and listen to what is happening on site. The CMC operator will then announce "Security, which service do you require?" - This intervention is normally sufficient to deter further conflict or potential conflict and at that point the person causing concern normally leaves the premises.
34. The system provides 2-way communications which enables the CMC operator to speak to the member of staff and the person causing concern

Training

35. Staff receive training on spotting the signs of those who have had too much to drink or are under the influence of drugs. They are also trained to recognize potential instances of crime and disorder and suspicious transactions, and in the event of any concern about a customer. Examples of our training documentation are attached. This then leads into the training we provide on conflict management.
36. The conflict management training we provide staff is designed to help them recognize Anti-Social behavior and to utilize a range of de-escalation and defusion techniques.

37. The training we provide is BILD (BILD Association of Certified Training) accredited.
38. Part of our training package includes an eLearning platform which includes induction and introductory Gambling Act 2005 modules, more detailed modules on AGC operation, conflict management, anti-money laundering and safer gambling. The platform backend information on the training activities of each staff member allows us to monitor their performance and areas where they may need to develop.

Crime and Drugs

39. We endeavor to work with local police Safer Neighborhood Teams on issues such as street drinking, homelessness and ASB.
40. We do not tolerate drug use in our premises and anyone found with drugs will be banned. Unlike betting shops we do not let customers stay in our premises if they are not playing on the machines. This makes the premises less attractive to drug dealers who can hang around betting shops to watch the events on which they bet. We do not have live sport as you find in betting shops.
41. We also believe the high quality CCTV we operate, both inside and out, acts as a deterrent to drug dealers.
42. We design our toilet areas to prevent places where customers could use or hide drugs.

SmartHub tablets for managing and recording self-exclusions and interactions

43. We use SmartHub tablets and software to manage our premises. The tablets are used to manage and record self-exclusions, customer interactions and age verification. Full details are attached. The system has extensive back office functions which allow us to monitor venue and staff performance and, for instance, identify where staff may need more training or where we need to reinforce working practices in venues.
44. SmartHub is a tool staff use to manage self-exclusion. The tablet allows staff to quickly take customers through the self-exclusion process. We link with the BACTA national self-exclusion scheme, and customers can register for the scheme at our venues.
45. SmartHub guides staff to ensure we effectively interact with customers and provide them with safer gambling options. We find that staff can be incentivized by the records SmartHub provides. As well as demonstrating where staff may need development it also highlights examples of staff best practice or exemplary performance.

Vulnerability

46. We take the licensing objective of protecting vulnerable people from being harmed or exploited by gambling extremely seriously. Staff are properly trained in their responsibilities, which include customer interaction and self-exclusion. We manage staff to ensure that they not only understand their responsibilities but perform accordingly. Importantly, unlike in, say, betting offices and pubs, our trained staff are not behind a bar or counter but on the trading floor interacting with customers while keeping abreast of their gambling and any untoward patterns or behaviours, prompting an interaction.

47. Socially responsible messaging is displayed on the walls, with signposting to how to obtain help with problem gambling. Machines themselves now display responsible gambling messaging. Our marketing and advertising (inside and out) complies with the Advertising Standards Authority's codes in relation to gambling.
48. We operate premises Play 2 Win at 23 Gerard Street in Soho. Above the premises, sharing the building on the 2nd and 3rd floors, are a Turning Point, Drug and Alcohol Wellbeing Service Clinic. Those suffering with alcohol and drug issues regularly visit the clinic and pass our AGC. We have a good relationship with the Turning Point who report that our premises do not create any problems for their patients. We have not in fact been criticized in any of our premises on this score.

Working with the Community

49. We offered to meet remotely with the Public Health, the Regeneration Team and with the residents and the councilors who made representations to our premises licence application in 2020, to discuss our application and the operation of our arcades. They did not take up our offer. However, of course the offer still stands. We are more than happy to demonstrate that we meet our responsibilities to the community, and more.
50. Prior to opening our Tottenham venue, we liaised directly with a wide-reaching external team of people from several enforcement positions:
- | | |
|--------------------|--------------------------------------|
| a. Leon Wedderburn | ASB Enforcement Officer for Haringey |
| b. Graham Philpot | Town Center Snr Representation |
| c. Philip Cone | Licensing Officer for Haringey |
| d. Lee Warwick | Met Police |
| e. Ian Waylan | Met Police – Safer by Design team |
51. As part of the collective workshop held in the aforementioned Tottenham venue the group openly discussed the real challenges operating in and around Tottenham High Street.
52. We will always proactively work with the Council and SNT to be a proactive member of the Retail community delivering a high street retail business that would sit proudly on any High Street.
53. We were particularly keen to establish our rules from the first day of our trade. Customers who wished to behave in an appropriate manner were welcomed, and are able to visit to enjoy our facilities (and complementary refreshments), while feeling safe and secure. Those who did not comply with our operating standards were banned, both for their own good and that of our staff and customers. This has proved effective, since our behavioural standards are clearly understood, meaning that we have to resort to banning people less and less frequently.
54. Since opening the Tottenham venue, we have become a highly responsible high street retail offer, we believe our LCCP standards are second to none and we have worked hard with the SNT to develop a venue that is a safe low stake environment, free from disorder.

55. I am able to say, without reservation, that I have no reason to believe that permitting us to open for the default hours will prove harmful to the licensing objectives. I would ask the Sub-Committee to grant this variation accordingly.

Signature:

Stuart J Green, Chief Commercial Officer, City Gaming Limited

Date:

STATEMENT OF GRAHAM GLANFIELD IN RESPECT OF THE APPLICATION TO VARY THE ADULT GAMING CENTRE PREMISES LICENCE AT GAME NATION, 450- 454 HIGH ROAD, TOTTENHAM, N17 9JN

Background and Experience

1. I am a self-employed consultant and I have worked in the Gambling Sector for approximately 45 years. My experience includes over 10 years as the Technical Director for Rank Amusements Limited, RAL Limited and Talarius PLC, following which I was Head of Gaming for over 10 years at Moto Hospitality Limited. At various times these companies have been some of the largest adult gaming centre (AGC) operators in the UK.
2. In my previous roles I have been responsible for working closely with the Gambling Commission and succeeded in uniting the Motorway Services sector to engaging regularly with the Gambling Commission. These meetings allowed for frank discussion around any concerns the Commission had relating to a sector that consisted of more than 160 AGCs.
3. I hold a Personal Management Licence issued by the Gambling Commission. I have been a member of British Amusement Catering Trade Association (BACTA) and I am currently a member of the Gambling Business Group.
4. Whilst at Moto Hospitality Ltd, I was personally responsible the compilation and submission of over 40 AGC Premises Licence applications and a similar number of Family Entertainment Centre Permits. All applications were successful.

City Gaming Limited

5. In April 2019 I met with City Gaming Limited's Chief Executive Officer and put forward a proposal based around the integration of several businesses that were being acquired by City Gaming Limited at that time. I was subsequently contracted by City Gaming Limited to work on the integration of these businesses in relation to ensuring that there was a consistent approach across the entire business to overall compliance with the Licence Conditions and Codes of Practice as set out by the Gambling Commission. In addition to the compliance integration, I also commissioned and rolled out a comprehensive machine cash collection and reporting system.
6. City Gaming Limited, through several different trading companies licensed by the Gambling Commission, currently operate 58 AGC premises across Greater London, the Home Counties, East Midlands and South Yorkshire.
7. I continue to work with City Gaming Limited and each of their associated licensed companies to ensure their ongoing gambling compliance. This involves remaining fully informed of any

upcoming legislation and changes to gambling regulation, visiting AGC premises to conduct audits, working with the on-site managers updating local area risk assessments and working with the Chief Commercial Officer, the Operations Directors and the Area Managers on their management oversight process.

8. City Gaming Limited's management oversight process is a robust procedure that ensures the business identifies compliance risks and takes action to mitigate these risks at both higher management and premises level. The process is based on the data produced from every venue across the business by the input of interaction and incident logs by staff into their IHL SmartHub system.
9. Every interaction and incident recorded on the SmartHub is reviewed by myself every week and this information, along with related action points, are communicated to the business via weekly compliance action reports and monthly and quarterly compliance review meetings.
10. The weekly reporting process examines every element of day-to-day compliance and the resulting reports are circulated to the Chief Commercial Officer, the Operations Directors and other key stakeholders within the business. The weekly report details all events that require action or acknowledgement by Senior Operations Management and this feeds down to the staff at each premises. Interactions and incidents will include accident reports, test purchase failures, police-required incidents, incidents and interactions requiring action, self-exclusions where no prior interactions have been recorded or where an exclusion form was not completed, and any suspicious anti-money laundering activity.
11. Between July and September 2022 the Gambling Commission conducted a compliance assessment of City Gaming Limited and their associated trading companies. This included inspections of several AGC premises and an inspection of the companies' social responsibility policies and procedures.
12. In September 2022 I accompanied the Chief Executive Officer and the Chief Operating Officer of City Gaming Limited in a meeting with the Gambling Commission to review the companies' compliance procedures and the results of the Gambling Commission's inspections. The management oversight process outlined above was presented to the Gambling Commission officers, who verbally commended the work that I carry out with City Gaming Limited and confirmed a positive outcome from their compliance inspection.
13. In my time working with City Gaming Limited, neither the Company or any of their associated trading companies have been the subject of any sanctions or regulatory action by the Gambling Commission. Nor have any of the licensed AGC premises been the subject of regulatory action by any local authority in whose jurisdiction they trade.

Game Nation, 450-454 High Road, Tottenham

14. In June 2021, when the AGC premises at 450-454 Tottenham High Road opened, I was tasked with writing to the local centres for the vulnerable on behalf of City Gaming Limited to share information about the measures that we have in place to protect the vulnerable in the area, to provide management contact details and to invite the institutions to meet with us. I emailed the following institutions on 9th July 2021:

- a) Highway House
- b) St Mungo's
- c) CARIS
- d) Home Start
- e) OKF
- f) Ashness Care
- g) HAGA
- h) Grove Drug Treatment Service
- i) Blenheim CDP
- j) Bubic

15. I provided the list of the institutions and a copy of the correspondence to Graham Philpot, Philip Cone and Leon Wedderburn from Haringey Council as well as Lee Warwick and Ian Waylen from the Metropolitan Police. Mr Wedderburn confirmed that these organisations included all those that he was aware of in the area.
16. In addition, following the advice of Haringey Council, I wrote to David Lammy MP on behalf of City Gaming Limited on 20th July 2021 inviting Mr Lammy to meet our Operations Team at the premises to demonstrate first-hand how the business operates and the premises' positive attitude towards working with the community. I received an automated response from Mr Lammy but I did not receive a direct response to the invitation and as far as I am aware the business is yet to have an opportunity to meet with Mr Lammy.
17. Through analysis of the IHL SmartHub data used as part of the management oversight process, I have noted that the premises at 450-454 Tottenham High Road has seen a decline in the number of incidents, interactions, age verification interactions and incidents where police assistance has been required since the premises opened. In my opinion this demonstrates that customers are now aware of the controls and processes in place at the premises, meaning there are fewer problematic interactions that require logging through the IHL SmartHub system.

Signature:

Graham Glanfield

Date:

Game Nation
450-454 High Road, Tottenham, N17 9JN.

Report on application to vary the Premises Licence

By

Adrian Studd, Independent Licensing Consultant.

Introduction and Summary Conclusion.

1. Poppleston Allen Solicitors have instructed me in connection with the application to remove Condition 1 on the current premises licence which states; The opening hours of the premises to be limited to 0900 to 2400 on Monday – Saturday and 0900 to 2300 on Sundays.
2. I have been instructed to consider the impact on the licensing objectives and in particular on crime and disorder and police resources in the area, should the application be granted, and to consider the representations made and any conditions necessary to address these concerns.
3. I worked for 31 years as a police officer in London, including 10 years as an Inspector and Chief Inspector managing the Licensing team in the central unit responsible for licensed premises across London. I have worked as a licensing consultant, mainly employed in London, since my retirement in 2012. I conducted observations and prepared a report in connection with the application for the existing licence in 2020.
4. In connection with this application I conducted observations in the area between 15.00 hours and 03.00 hours on a total of Five (5) occasions: on Thursday the 8th September 2022, Friday 9th September 2022, Saturday 24th September 2022, Monday 10th October 2022 and Friday 14th October 2022. Over these five days I observed Game Nation and Admiral AGC's and the wider area. I visited betting shops, local

shops and take-away's and visited both AGC's on a number of occasions to observe the operation of the premises and any impact that the AGC's have on the area.

5. I visited Game Nation on Five (5) occasions posing as a customer to observe compliance with existing conditions and the inside of premises, how the premises was managed and how staff and customers interacted. I also visited Admiral AGC opposite on Two (2) occasions. Admiral is currently licensed for 24 hours a day 7 days a week and I visited this premises in order to consider the impact an AGC premises open for 24 hours a day has.
6. During my observations and covert visits Game Nation was well run and complied with the objectives of the Gambling Act 2005. The local area risk assessment (LARA) identifies that the risk posed from gambling in the area is higher than many other areas due to higher rates of drug and alcohol abuse, crime, mental health issues and social deprivation. The LARA sets out in detail the measures that will be in place at the premises to mitigate these risks. The premises complies with these measures.
7. I completed an analysis of crime from the www.police.uk website and was unable to find any evidence that the premises generates crime or is associated with crime and disorder or anti-social behaviour in the area. There is no evidence provided by police, or any of the other representations, that the premises is connected to crime in the area or that granting the application will lead to an increase in crime and disorder, drug misuse or anti-social behaviour in the area.
8. From my observations, crime analysis and visits Game Nation has no impact on crime and disorder or drug activity in the area. The Admiral AGC opposite Game Nation is licensed for operation 24 hours a day and I observed and visited this premises during the night-time hours applied for in this application. I observed that the operation was the same during the night-time as during the day and it had no impact on the area. I am satisfied that, if this application is permitted, it will have no impact on the area.

Summary of expertise – Adrian Studd.

9. I retired from the police service on 2nd November 2012 having completed 31 years exemplary service with the Metropolitan Police in London. Between January 2012 and my retirement I was employed as the Chief Inspector in charge of licensing for

the London Olympic Games 2012. In this role, I headed up a team of officers with responsibility for supervision of licensing compliance at all the Olympic venues, including the Olympic Park. In addition, I was responsible for ensuring that any associated events were properly licensed, sufficiently staffed and operated in accordance with the licensing legislation and best practice in order to ensure the safe and effective delivery of the Olympic Games.

10. In addition to leading my team, I visited and worked with both the Olympic-park management and many other venues, reviewing their policies and procedures and ensuring that the Games were delivered safely and securely. The success of this operation not only protected the reputation of the MPS but provided positive benefits for the profile of the MPS and the United Kingdom. I have been awarded an Assistant Commissioners Commendation for this work. Prior to this role, between Jan 2002 and January 2012, I was employed first as an Inspector and then as a Chief Inspector on the MPS Clubs and Vice Unit (Now SCD9 Serious and Organised crime command). My responsibilities over this period focussed on all areas of licensing and included day to day supervision of the licensing team that had a London wide remit to support the Boroughs with licensing activity.
11. Providing both Overt and Covert support for policing problem licensed premises across London, my team worked with premises when licensing issues were identified, in order to address these problems through the use of action plans in order to raise their standards. Where this failed, I would support the Boroughs with evidence for use at review hearings if required. I devised and implemented the MPS strategy 'Safe and Sound' which seeks to improve the safety of customers at licensed premises by reducing violent and other crime, in particular gun crime and the most serious violence. I also developed a Promoters Forum and risk assessment process, and together these initiatives contributed to an overall reduction in violence in London of 5% and of the most serious violence and gun crime at licensed premises by 20% whilst I was there.
12. From 2004 until 2008, my role included representing the MPS and ACPO licensing lead both in London and Nationally. In this role, I developed key partnerships with industry, NGOs and Government departments in order to improve the standards at

licensed premises. I sat on the BII working party and helped develop the national training for Door Supervisors and worked with the SIA to successfully introduce the new regime within London. I sat on a number of Government working parties and worked closely with the alcohol harm reduction team on identifying best practice and ensuring this was used both within London and nationally by police and local authorities.

13. For the last five years of my police service I was responsible for licensing at the Notting Hill Carnival, the largest street carnival in Europe. During this time, I contributed to a reduction in violence overall at the Carnival and delivered increased seizures of illegal alcohol, reduction of unlicensed alcohol sales and a reduction in alcohol related violence. In addition to the above, I have attended a large number of internal MPS training and qualification courses, and I am trained in conducting health and safety risk assessments and hold the National Certificate for Licensing Practitioners, issued by the British Institute of Inn keeping (BII).
14. Following my retirement, I set up a licensing consultancy to provide independent advice for premises requiring a local authority licence. Since then, I have provided evidence gathering services and advice to a broad range of licensed premises on a variety of issues, including crime and disorder, cumulative impact, sexual entertainment, street drinking, rough sleepers, age related products, betting and gaming and planning. This work has involved premises that benefit from licences for activities such as alcohol on and off licences, betting premises licences, SEV licences and late-night refreshment. I have provided expert witness evidence at both local authority and appeal court hearings.

Licensing Objectives under the Gambling Act 2005

15. All licensed gambling premises are required to fulfil the following objectives:
 - 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.

Overview of premises.

16. Game Nation is an adult gaming centre (AGC) located in Tottenham High Road about 250 metres from Tottenham police station. It is currently licensed to open from 09.00 to 24.00 hours Monday to Saturday and 09.00 to 23.00 hours on Sunday having successfully applied for the licence in 2020 and I am not aware of any crime that has taken place at the premises in this time. The police have submitted a general representation against this application but have not produced evidence of any crimes directly connected to the premises.

17. There is another AGC in Tottenham High Road, Admiral Casino at 475 Tottenham High Road which is licensed to open 24 hours a day and also in the area betting shops run by Ladbrokes, William Hill and Paddy Power. The area has a variety of shops including convenience stores, fruit and veg with a diverse range available and many independent restaurants and take away premises as well as national chains such as McDonalds, Kentucky Fried Chicken and Costa Coffee. In common with similar areas there are cycle delivery riders going to and from local restaurants and take-aways picking up and delivering meals to residents. In common with most retail areas there are a number of empty units and some looks run down and neglected and inevitably attract graffiti and damage.

Observations in area.

18. I conducted observations in the area in connection with this application on Five (5) separate occasions, Thursday the 8th September, Friday 9th September, Saturday 24th September, Monday 10th October and Friday 14th October between 15.00 hours and 03.00 hours in order to observe the operation of Game Nation, observe the area as it is in the afternoon and evening when the premises is open and in the area at night-time when the premises is closed.

19. In addition to observing the vicinity of the premises and local shops and take-away premises I went into Game Nation on Five (5) occasions posing as a customer to observe compliance with existing conditions, watch how the premises is run and observe the customers playing the games and interacting with each other and staff. I also went into the Admiral AGC opposite that open 24 hours a day 7 days a week on Two (2) occasions to consider the operation and impact of an AGC premises that is open for 24 hours a day.
20. On Thursday 8th September I arrived in the area at about 15.00 hours. The area was busy with shoppers, school children and families and others using the shops, restaurants and take-aways. The road was busy with through traffic and buses. I observed one beggar close to Bruce Grove station but none in the vicinity of Game Nation. I did not see any evidence of drugs or drug dealing in the street.
21. I entered Game Nation at about 16.20 hours, the premises was clean and bright with a good atmosphere. Staff were visible moving around the premises and chatting to customers. There were about six people playing on the machines. I visited the toilet, a combined male/female/disabled space with access controlled by staff and found it clean and tidy.
22. The toilet is designed to minimise the potential to misuse drugs with flat surfaces designed out, for example the cistern top was covered with a sloped wooden cover. I swabbed the surfaces for traces of cocaine but found none and was unable to find any evidence of drug misuse in the toilet.
23. At 18.50 I observed a door supervisor outside the premises by the front door who then returned inside the premises. I went into the premises again at 19.10 and the door was locked with access controlled by the door supervisor inside activating the security lock. The entrance is covered by extensive CCTV with the monitors clearly visible inside the premises. Again the premises was well run with the door supervisor chatting to those playing on the machines and a generally relaxed atmosphere.
24. The High Road remained busy through the evening with people using the take-aways and restaurants and Deliveroo and other delivery riders coming and going. Some

shops were closed while others remained open and busy. It is clear some locals, particularly some young males, spend time on the street socialising, eating and meeting with friends but the atmosphere was generally unthreatening, and I did not see any evidence of drugs or overt drug dealing. I did not see any beggars or incidents at, or close to, Game Nation or any evidence of gangs inside the premises or in the vicinity. I left the area about 21.00 hours.

25. Friday 9th September followed a similar pattern to the previous day. During the early evening, the road was again busy, there was a male begging further along the road but none near Game Nation. I observed the premises at about 20.45 when two males approached the front door. They appeared to me to be early 20's and rang the bell for admission. I followed them into the premises, and we were stopped by the door supervisor as we entered the premises. He waved me in but asked to see ID documents from the two males and checked this before letting them in.
26. The premises was busier than previously with about 15 to 20 customers playing on the machines. There was a diverse range of ages, sex and ethnicity and the atmosphere was relaxed. Again there was no evidence of gangs or groups loitering inside or of alcohol, drugs or drug dealing. Tea and coffee were available, and some customers were consuming this.
27. Leaving the premises the High Road was busy with people meeting and getting food, using the restaurants and generally active on the street. The weather was still warm. I did not see evidence of drunkenness, drugs or gangs in the premises, or in the vicinity of the premises, and while there were examples of drunkenness, begging and the occasion individual suffering mental health problems in the wider Area, this was no more than would be expected in any similar London Borough.
28. I visited the premises again on the night of Saturday 24th September arriving in the area at about 21.30 hours. The betting shops appeared open but quiet, Admiral AGC opposite was open but appeared quite quiet, I observed three (3) males go to the door and ring a bell, a door supervisor admitted them. Game Nation appeared open, and the door was closed.
29. The area generally was quite busy with pedestrians, cars and other traffic. The take-

away premises were busy as was The Beehive public house. The Elbow Room pub appeared open, but The Ship pub closed. I did not notice any beggars or obvious gang related activity in the area.

30. I went to the door of Game Nation at about 22.30 hours. It was locked and I rang the bell and was admitted to the premises. On entry to the premises customers have to walk past the door supervisor to get into the gaming area and I was welcomed in. There was a male who appeared to be the manager who also greeted me and another staff member who was cleaning.
31. There were about half-a-dozen customers who were playing at the machines and the atmosphere was good and relaxed. I played on a few machines for about 10-15 minutes and found the premises was well managed, the atmosphere relaxed and conditions complied with. When leaving the premises I enquired what the closing time was and was told 11.45pm. The staff were friendly and professional and the premises clean and attractive.
32. I continued my observations in the area and noted that the bookmakers had closed and some of the take-away premises were also closed or closing while others remained open and busy with both customers and delivery riders. Bruce Street Station was open but quiet. Overall I would say that the people in the area were diverse by age, sex and ethnicity, including some families, and were on foot as well as using the buses and vehicles. The atmosphere was generally relaxed and there was no evidence of crime and disorder.
33. I conducted observations again on Monday 10th October arriving at about 16.00 hours. The area was very busy with a diverse range of people including school children, families and adults using the full range of shops, cafés and public house facilities available. The Beehive, Ship and Elbow Room pubs were open and quite busy. I visited all the betting shops in the vicinity Ladbrokes (x 2) Paddy Power and William Hill. All were busy with customers watching and betting on the various sports being televised and playing the machines.
34. I saw no incidents in or near any of the betting shops or pubs and the atmosphere was generally relaxed. There was often a couple of individuals at a time standing outside

these premises smoking, but I saw no suspicious activity such as drug dealing or gang issues.

35. I observed occasional beggars and street drinkers in the street and was approached as I stood at the bus stop by a dishevelled female begging. I could see no connection between these individuals and the betting or alcohol licensed premises in the High Road and they appeared to wander up and down the road approaching people randomly.
36. As the afternoon wore on the restaurants and take away premises got busier, in particular McDonalds and KFC and similar take away and restaurant premises. There were many Deliveroo and similar riders picking up food for delivery. Walking past both Game Nation and Admiral I could see both had what appeared to be a small number of customers inside and the occasional customer coming and going but no one loitering in the vicinity or other indications of crime issues. At 20.15 I observed two males go to the door of Game Nation and ring the bell, they were admitted after a few seconds.
37. At about 21.20 I went to the door of Game Nation and rang the bell. After a few seconds I was admitted and walking in I was greeted by the door supervisor who was in the lobby area by the entrance. The premises was clean and tidy with a small number of customers and another member of staff walking the floor. I stayed in the premises for about 10 -15 minutes and the atmosphere was relaxed and the premises well managed.
38. At about 21.50 I went onto Admiral AGC opposite. The entry procedure was similar to Game Nation, and I rang the bell and was admitted. Inside the premises was similar to Game Nation with a door supervisor and staff member, tea, and coffee available. There were about a diverse range of male and female customers playing the machines. The atmosphere was relaxed and the premises well managed. I did not see any evidence of crime, drugs or gang activity. After about 15 minutes I left the premises.
39. The High Road was quieter and by about 22.30 most of the shops had closed although Ozdiller and a few of the other independent supermarkets and convenience stores were open and the restaurant and take-away premises and pubs were still busy. There

were still people on the street, coming and going to the various shops and premises and standing outside some of these smoking. The AGC's were open with a few customers coming and going but other than that they had no impact on the area and were no different from any of the other open premises. There were younger people on the street, some loitering and chatting, but there was no obvious gang activity, crime and disorder or drug dealing. I left the area at about midnight.

40. On Friday the 14th of October I arrived in the area at about 22.30. The High Road was busy with many of people out and about using the takeaways and restaurants, pubs and supermarkets and convenience stores. Bruce Grove station was busy with people coming back from nights out and this activity continued through the evening and into the night. By midnight, the area was still busy and premises such as the Beehive pub were closing, and people were still coming from the station and accessing food and transport.
41. Game Nation was closed but the Admiral AGC was open, and I observed the outside of the premises. Apart from the occasional smoker there was no-one loitering outside and no people entering then leaving a brief time later. I went to the door at about 01.00 hours and rang the bell and was admitted by the door supervisor. Inside the premises was busy with about 20 people using the machines. The Customers were a diverse mix of male and female of various ages. Some were chatting and drinking coffee and others just playing on the machines. There was a door supervisor by the door and another staff member walking the floor and chatting to customers.
42. I played a couple of machines while observing the activity for 20 minutes or so. Customers mainly appeared to be alone or in small groups of two or three with friends. The atmosphere was relaxed. Customers arriving came in and played the machines, those leaving did so in ones and twos and walked away without loitering in the area. Occasionally a customer would go outside to smoke and then return. Inside the toilet was locked and I did not see anyone go into it.
43. There were no groups inside not playing the machines, or huddled in corners, no people coming in briefly and then leaving without gaming. No customers obviously drunk or under the influence of drugs. The premises was orderly and well run and I did not see any evidence of gang related activity, drugs or crime and disorder. The

premises had no impact on the vicinity.

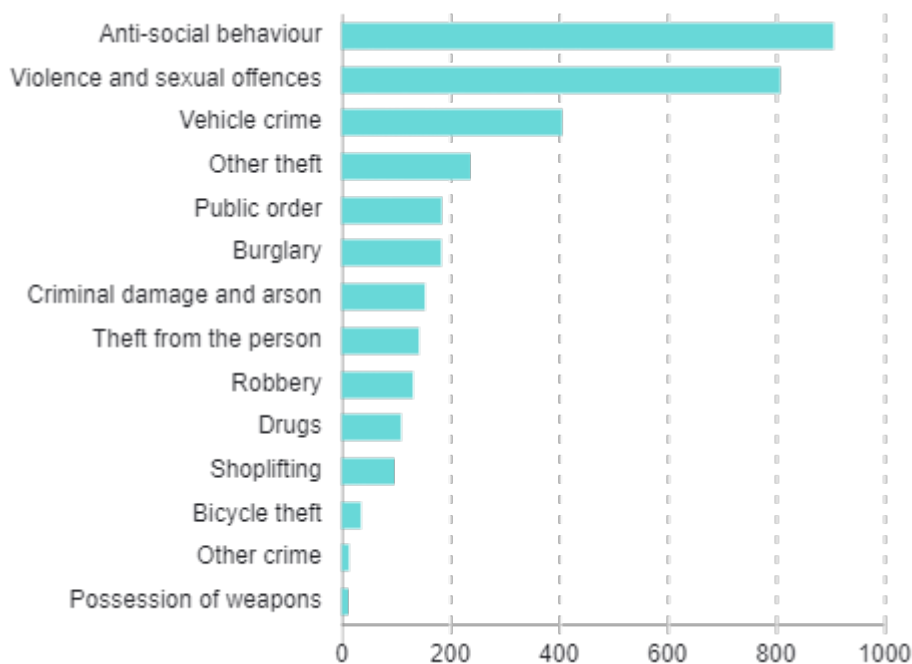
Crime and Disorder.

44. The premise is in Haringey Borough in the Tottenham Hale ward and borders with Bruce Grove ward with the boundary running down the centre of High Road. The nearby Admiral AGC is across the road in Bruce Grove ward.

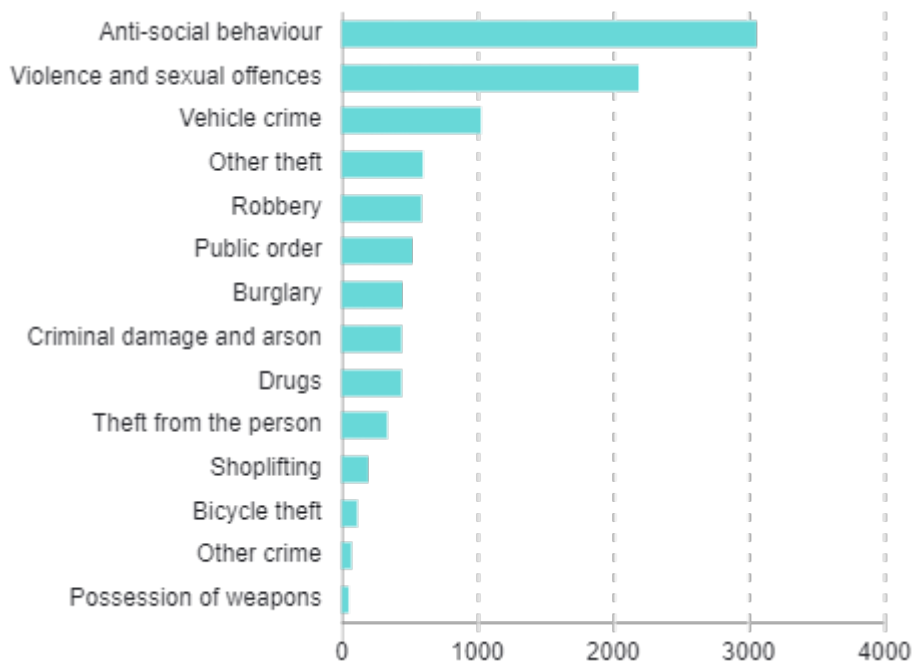
45. I have analysed crime figures available for the area (in Sept 2022) on the [police.uk](https://www.police.uk) website and looked not only at Tottenham Hale ward but also at Bruce Grove ward that borders it on the other side of High Road.

46. Looking at crime trends in both Tottenham Hale and Bruce Grove from August 2019 to June 2022 the most common crimes are Violence and sexual offences, Anti-social behaviour and Vehicle crime. This is the case when the statistics are considered for either the last 12 months or 3 years with Violence and anti-social behaviour being by far the most common offences making up around 50% of all offences and vehicle crime the next most common.

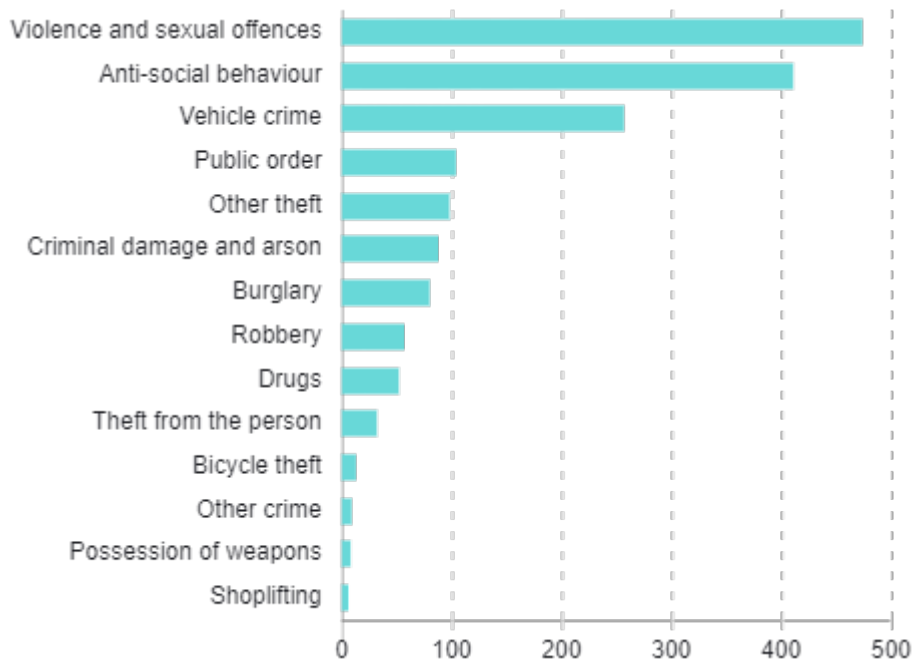
47. Tottenham Hale 12 months to June 2022.



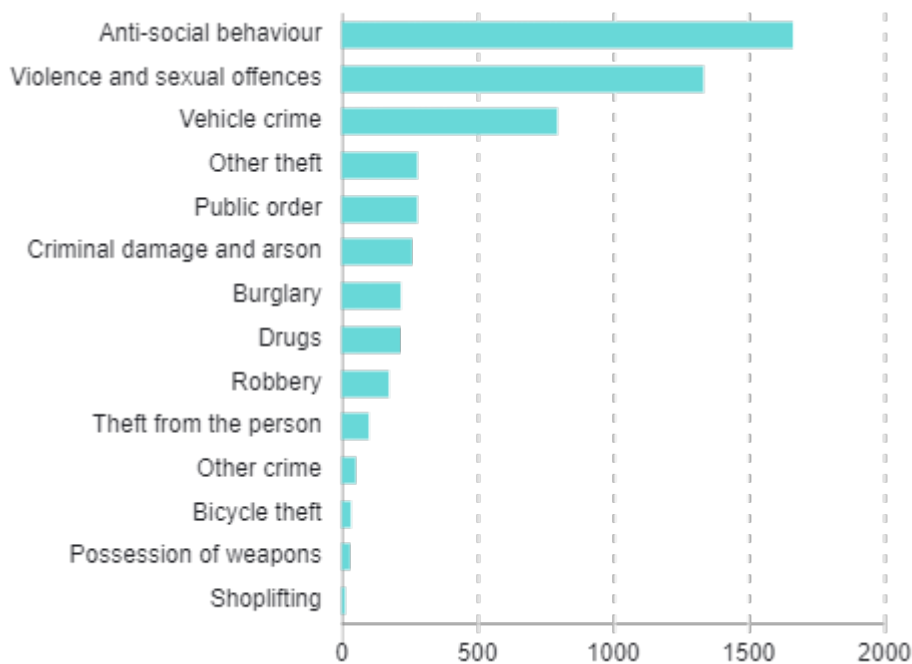
48. Tottenham Hale Last 3 years to June 2022.



49. Bruce Grove last 12 months.



50. Bruce Grove last 3 years.



51. With the exception of vehicle crime these are offences most commonly associated with late-night alcohol licensed premises such as bars and night-clubs and there is no evidence that they are connected to Adult Gaming Centres. There is no evidence that the offences are connected to Game Nation. Vehicle crime is not a crime associated with AGC's.

Crime Hotspots.

52. Analysing crime Hotspot data for both Tottenham Hale and Bruce Grove on the police.uk website:

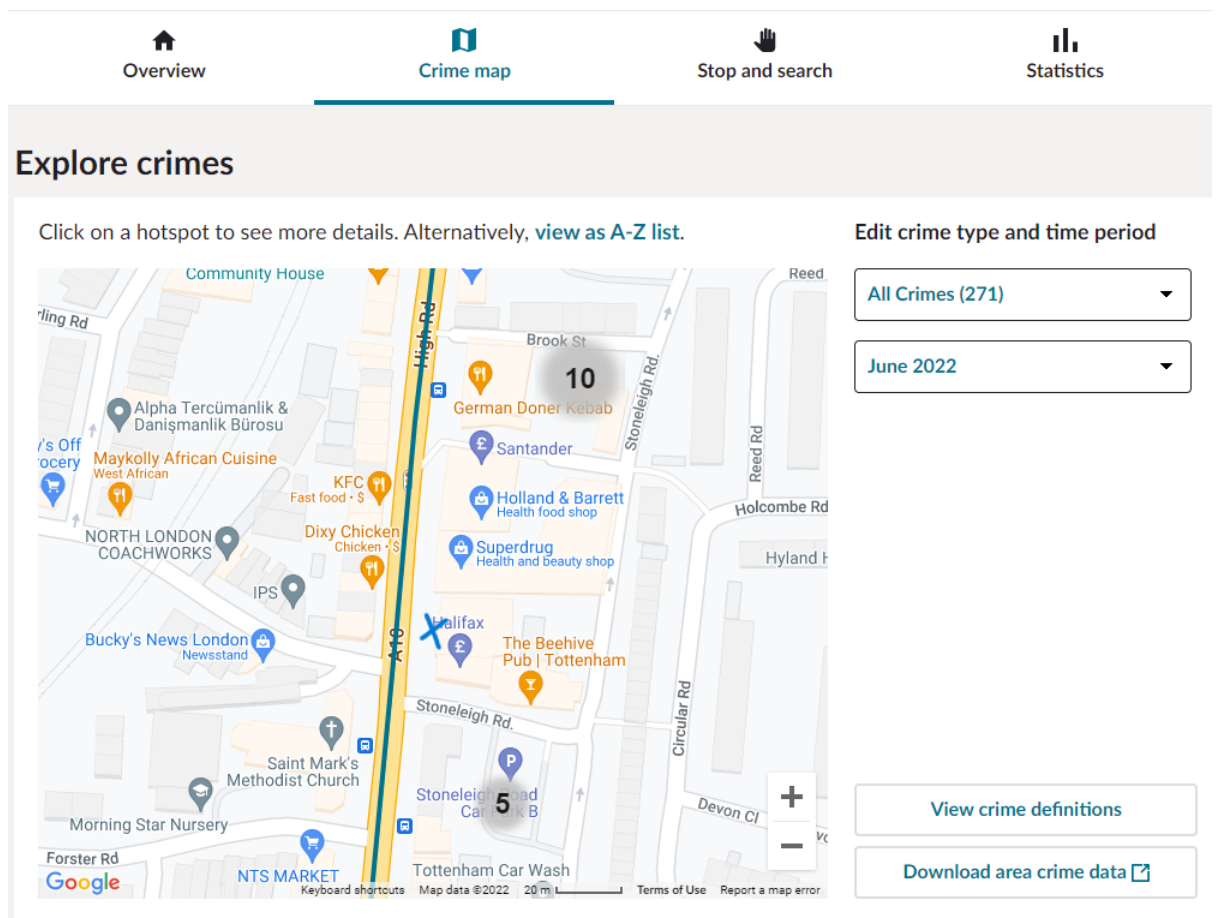
<https://www.police.uk/pu/your-area/metropolitan-police-service/tottenham-hale/?tab=crimemap>

and

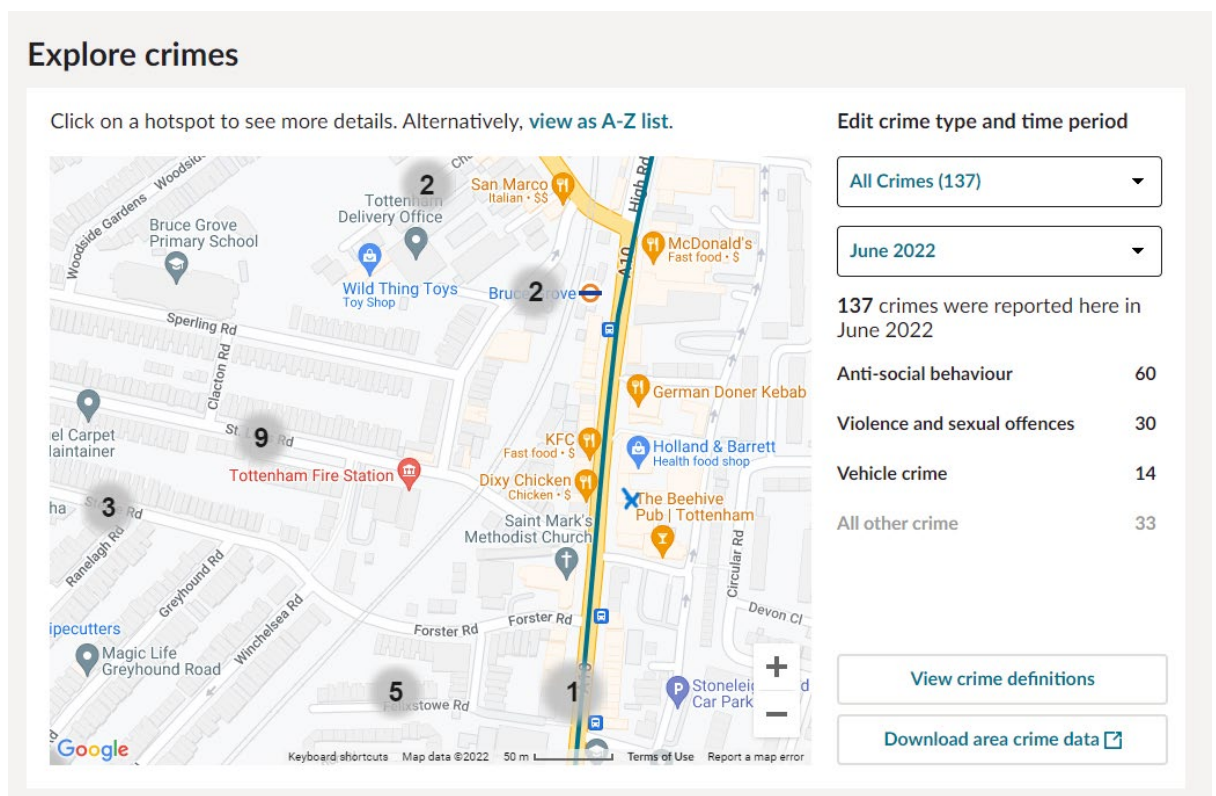
<https://www.police.uk/pu/your-area/metropolitan-police-service/bruce-grove/?tab=crimemap>

Hotspots are shown on a per month basis for all crime or crimes by definition.

53. Tottenham Hale All Crimes June 2022.



54. Bruce Grove All Crimes June 2022.



55. The 'all Crime' analysis for Jan – June 2022 did not show any hotspots of any crime in the vicinity of Game Nation or Admiral. In Tottenham Hale Ward the nearest hotspots were in Stoneleigh Road car park and Brook Street and in Bruce Grove they were in St Loys Road and Felixstowe Road.

56. I also searched on the most prevalent crimes on each ward for the same period for evidence that they were committed at or near Game Nation or the existing 24-hour AGC and no crimes had been recorded in the vicinity of either premise.

Local Area Risk Assessment.

57. I have reviewed the local area risk assessment that has been completed by Game Nation for this premises. The assessment identifies the local risks and appropriate measures that the operator will take to mitigate them. The local area risk assessment identifies that the risk posed from gambling in the area is higher than many other areas due to higher rates of drug and alcohol abuse, crime, mental health issues and social deprivation and sets out in detail the measures that will be in place at the premises to mitigate these risks.

58. These measures include:

- Comprehensive CCTV,
- Door control-use of Mag Lock to control entry,
- Staffing-minimum of two members of staff on duty at any time with an additional, SIA registered security guard, at certain times,
- Bespoke Gangs policy,
- All staff trained on bespoke e-learning programme,
- Staff support 24/7 through the Conflict Management Centre,
- Night security staff on duty on Thursday to Sunday,
- Toilets-Access controlled by staff and UV lighting to deter drug use,
- Toilets-designed to eliminate opportunity for drug use, e.g. no flat surfaces,
- Challenge 25 to prevent access by anyone under 18,

- Staff able to observe and monitor all machines in premises,
- Premises windows and doors that are unattractive to children and prevent children seeing into premises,

59. In my view the local risk assessment has identified the local risks and puts in place appropriate measures to mitigate them. I conducted an inspection of the premises during my observations and found that the premises operated to a high standard and implemented with the above measures.

Representations.

60. Representation have been submitted against this application on behalf of the Metropolitan Police, Public Health, Regeneration Team, Licensing, residents, councillors and the local MP.

61. **The police representation** is a general objection and does not refer to any crimes or allegations at Game Nation or linked to it. The representation refers to offences such as anti-social behaviour, street drinking, use and supply of drugs, public order, theft from shops and a GBH that took place in McDonalds. There is no evidence produced that references these offences in any way to Game Nation or why the premises opening later would lead to an increase in these offences.

62. These offences are consistent with the crime analysis and are not crimes that are related to Adult Gaming Centres generally or Game Nation in particular. They will be unaffected if this application is granted. Game Nation is a safe, well managed space with robust and effective measures in place to prevent drug and alcohol abuse and there is no evidence that its customers are responsible for the street or other crime in the area.

63. **The Public Health and Regeneration Team** representation raises overlapping concerns. Public Health are concerned that the following licensing objectives will not be upheld:

- 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.

64. No evidence is produced that the premises currently fail to uphold these objectives and the police, the experts on crime and disorder, have not provided any evidence to support this assertion. The premises has operated since 2020 and has fully supported these objectives, there is no evidence to indicate this will not continue if the application is permitted.

65. Concern is also raised that anti-social behaviour is high in the ward, however, it is important to consider that anti-social behaviour covers a range of offences including such things as graffiti, litter, abandoned vehicles and noisy neighbours so is not in itself a useful measure for this application.

66. It is important, when considering the wider picture of crime in an area, to consider the context. The High Road is the busy retail area on the ward, containing alcohol on and off-licensed premises, convenience store, take-away food shops and restaurants. These are the places most local people go for shopping, food, drinking entertainment etc. it is to be expected that such an area would have the highest levels of crime. Crime takes place and is reported where people come together and congregate. Despite this there is no evidence that this takes place at or near Game Nation, or that it will if the application is granted.

67. The representations also concern children and vulnerable people and highlights the proximity of schools. The premises currently operates from 08.00 to 24.00 hours which is at the times that school children are likely to be in the vicinity. There is no evidence that it currently has any adverse impact on them. There are robust measures in place contained in the risk assessment, for example challenge 25, and I observed that this was enforced during my observations.

68. Drug dealing and drug use, gangs and street drinking are a particular problem that are raised in these concerns with speculation that gang members flee into betting shops and adult gaming centres as places of sanctuary. No evidence is provided to support this by public health, regeneration or police. In the case of Game Nation the door has

a Maglock controlled by the door supervisor, which I saw was correctly used, so it is not possible for this to occur currently in the evening and will not be possible during the additional hours applied for.

69. **The Licensing Authority representation** raises the same concerns about the premises not supporting the licensing objectives and that street drinking, anti-social behaviour crime and disorder takes place. No evidence is supplied that links this to the existing premises or that granting this application will lead to an increase in this behaviour.
70. Concerns are raised that the premises will be a ‘harbour’ and provide a draw for groups responsible for this behaviour late into the night. The premises is currently open until 24.00 hours and there is no evidence that it currently provides such refuge, or that it will in future if this application is granted. Due to the stringent conditions in place and management of the premises it cannot provide such a refuge, which itself is linked to alcohol on and off-licensed premises and Street Crime rather than the operation of an AGC.
71. There is a suggestion that clients who are refused use of facilities at betting shops and similar generate crime that then leads to requirement for the police to attend. This is not supported by the police representation or crime data available on the police.uk website. No evidence is produced of any crimes reported, or police attendance at, the existing Game Nation premises or at the nearby Admiral AGC that is currently licensed to operate for 24 hours a day.
72. **The resident representations** cover the same issues as the Licensing Team, Regeneration, Police and Public Health shown above. These include the perceived level of alcohol and drug abuse in the area, crime generally in the area, vulnerable adults using gambling premises, the existing anti-social behaviour and protection of children. Others refer to subjective views that anyone gambling after midnight “must have a problem” and that gambling is not conducive to a “nice area.”
73. There are also concerns raised about the moral aspect of gambling, the decline of the High Road generally and perceived attractiveness. These are not relevant considerations for the application. Whilst I am sure the representations are genuinely

heart felt there is no evidence produced of harm caused by the existing Game Nation, or that granting the application will lead to an increase in any of these issues in the area. This premises already operates from 08.00 hours to 24.00 hours without any evidence of crime being generated by it or evidence that it currently fails to promote the Gambling Objectives or will do if this application is granted.

74. **There are objections from Two (2) councillors** Councillor Zena Brabazon and Councillor Gordon Ruth and from Rt. Hon. David Lammy, MP for Tottenham.

75. Councillor Brabazon raises concerns that the area profile identifies Tottenham Hale and Tottenham Central Wards as being most vulnerable to gambling related harm and questions the effectiveness of Game Nations LARA. However, no evidence of Game Nation causing such harm is produced and as described previously, the local risk assessment has identified the local risks and puts in place appropriate measures to mitigate them.

76. Councillor Gordon Ruth's representation refers to complaints apparently received from local residents about the operation of the premises currently and issues they have highlighted. However, there is no evidence of these issues given beyond the anecdotal and I did not find that this view was supported either by my observations or by the evidence of crime on the www.police.uk website.

77. MP David Lammy raises general concerns that granting this application will increase the risk of gambling related crime and that, in his view, there are a high number of vulnerable adults in the area, particularly men, because of local hostels and HMO's. No evidence is produced to support this view or how this specific premises would have a negative impact on them. The LARA acknowledges the issues in the area and, in my view, puts in appropriate measures to deal with them.

Conclusion.

78. This application is to extend the hours of the existing Adult Gaming Centre (AGC) premises located on Tottenham High Road. It currently opens from 9am to midnight Monday to Saturday and 9am until 11pm on Sunday. My observations and crime analysis have failed to find any evidence that the existing conditions have been

breached at the premises or there is currently crime associated with it.

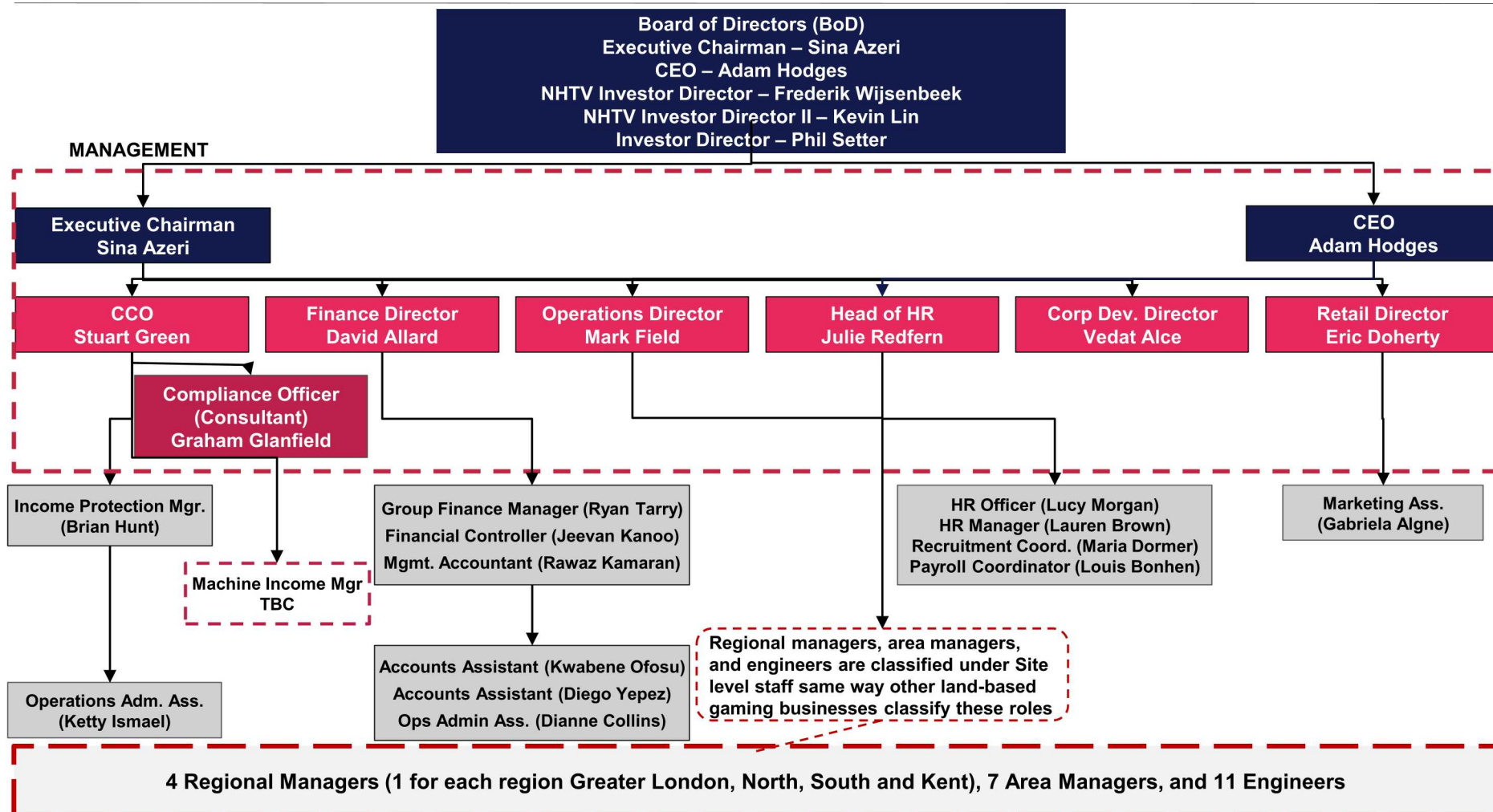
79. There have been a number of representations against the application including those from Residents, Police, Public Health and Regeneration Team, Licensing authority, local MP and Councillors. The representations highlight their writers concerns about what could happen and anecdotes about what does happen, however there is no evidence provided that the premises currently increases crime or attracts vulnerable people.
80. The premises has a comprehensive Local Area Risk Assessment (LARA) that puts in place a raft of substantial measures to ensure that vulnerable groups cannot gain entry to the premises or take part in gaming. My observations and crime analysis indicates that this LARA is working and will continue to do so if this application is permitted.
81. The High Street is a busy environment with a diverse range of shops, pubs, cafés and other retail units. It is where people meet, drink, congregate, and come into contact with each other. This is inevitably where crime takes place and gets reported. There is no evidence that this is connected to the existing AGC premises any more than the other premises on the High Road.
82. From both my observations and crime analysis it is clear that Game Nation currently operates with no negative impact on the area. I am confident that if this application is granted and the premises is permitted to open 24/7 the premises will continue to have no negative impact on the area.

I understand that my duty is to the Sub-Committee and this report has been prepared in compliance with that duty. All matters relevant to the issues on which my expert evidence is given have been included in this report. I believe the facts I state in this report to be honest and true and that the opinions I have expressed are correct to the best of my judgment. The fee for this report is not conditional on the outcome of the case in any way whatsoever.

Adrian Studd,
Independent Licensing Consultant.
17/10/2022.

Management team and Head Office structure

City Gaming Management Team and Head Office Structure



Extract of Licence Conditions and Codes of Practice (LCCP) for Arcades

Version effective from 12 September 2022

1.1.1 - Qualified persons – qualifying position

Applies to:

All operating licences, except ancillary remote licences, issued to small-scale operators

1. In this condition the terms 'small-scale operator', 'qualifying position' and 'qualified person' have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
2. Schedule X¹ lists those individuals notified to the Commission as qualified persons.
3. If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act for amendment of the details of the licence set out in Schedule X¹.
4. An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
5. In this condition 'qualified person' has the same meaning as in the Gambling Act 2005(Definition of Small-scale Operator) Regulations 2006.

¹ The schedules mentioned here will be attached to individual licences.

4.2.1 - Disclosure to customers

Applies to:

All operating licences, except gaming machine technical, gambling software, host, ancillary, remote bingo, and ancillary remote casino licences

1. Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
2. Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
3. In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a. cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
 - b. winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and
 - c. any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

5.1.1 - Cash and cash equivalents

Applies to:

All operating licences except gaming machine technical, gambling software and host licences

1. Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (eg bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
2. Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

6.1.1 - Provision of credit

Applies to:

All gaming machine general operating licences for adult gaming centres and family entertainment centres

1. Licensees must neither:
 - a. provide credit themselves in connection with gambling; nor
 - b. participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

7.1.1 - Fair and transparent terms and practices

Applies to:

All operating licences except gaming machine technical and gambling software licences

1. Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015. Licensees must comply with those terms.
2. The contractual terms on which gambling is offered and any consumer notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
3. Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes to terms before they come into effect.
4. Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008, at any stage of their interactions with consumers.

12.1.1 - Anti-money laundering - Prevention of money laundering and terrorist financing

Applies to:

All operating licences except gaming machine technical and gambling software licences

1. Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
2. Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
3. Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

14.1.1 - Access to premises

Applies to:

All operating licences

1. Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

15.1.1 - Reporting suspicion of offences etc – non-betting licences

Applies to:

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences

1. Licensees must as soon as reasonably practicable, in such a form or manner as the Commission may from time to time specify, provide the Commission with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.¹

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website

15.1.3 - Reporting of systematic or organised money lending

Applies to:

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

1. Licensees must as soon as reasonably practicable, in such form or manner as the Commission may from time to time specify, provide the Commission with any information relating to cases where they encounter systematic, organised or substantial money lending between customers on their premises, in accordance with the ordinary code provisions on money lending between customers.¹

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website

15.2.1 - Reporting key events

Applies to:

All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence¹.

Operator status

1. Any of the following applying to a licensee, any person holding a key position for a licensee, a group company or a shareholder or member (holding 3% or more of the issued share capital of the licensee or its holding company): • presenting of a petition for winding up • making of a winding up order • entering into administration or receivership • bankruptcy (applying to individuals only) • sequestration (applicable in Scotland), or • an individual voluntary arrangement.

Relevant persons and positions

2. In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.
3. The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.
4. The appointment of a person to, or a person ceasing to occupy, a 'key position' (including leaving one position to take up another). A 'key position' in relation to a licensee is:
 - a. in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
 - b. in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c. a position where the holder of which has overall responsibility for the licensee's anti-money laundering and/or terrorist financing compliance, and/or for the reporting of known or suspected money laundering or terrorist financing activity.
 - d. any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)

Financial events

5. Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
6. Any breach of a covenant given to a bank or other lender.
7. Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
8. Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

Legal or regulatory proceedings or reports

9. The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
10. Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities of a person in a 'key position', where such an investigation could result in the imposition of a sanction or penalty which could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
11. Any criminal investigation by a law enforcement agency in any jurisdiction in which the licensee, or a person in a 'key position' related to the licensee, is involved and where the Commission might have cause to question whether the licensee's measures to keep crime out of gambling had failed.
12. The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor, or a professional, statutory or other regulatory or government body (in whatever jurisdiction)) about the provision of facilities for gambling: a summary of the nature of the concerns must be provided.
13. The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
14. The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
15. The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number

issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

Gambling facilities

16. Any security breach to the licensee's environment that adversely affects the confidentiality of customer data; or prevents the licensee's customers, staff, or legitimate users from accessing their accounts for longer than 12 hours.
17. Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
18. In the case of remote gambling, the commencement or cessation of trading on website domains (including mobile sites or mobile device applications) or broadcast media through which the licensee provides gambling facilities (including domains covered by 'white label' arrangements). In this condition: 'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof
 - a. in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
 - b. a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

Read additional guidance on the information requirements contained within this section.

¹Key events are to be reported to us online via the 'eServices' digital service on our website.

15.2.2 - Other reportable events

Applies to:

All operating licences

1. Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable of the occurrence of any of the following events¹:
 - a. any material change in the licensee's arrangements for the protection of customer funds in accordance with licence condition 4 (protection of customer funds) (where applicable)
 - b. any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
 - c. their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised, or their becoming aware of a sustained or meaningful generation of 3% or 10% of group Gross Gambling Yield being exceeded by the group in that jurisdiction.
 - d. any actual or potential breaches by the licensee of the requirements imposed by or under Parts 7 or 8 of the Proceeds of Crime Act 2002, or Part III of the Terrorism Act 2000, or any UK law by which those statutes are amended or superseded.

In this condition:

- a. 'group company' has the same meaning as in condition 15.2.1; and
- b. without prejudice to section 327 of the Gambling Act 2005, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

Read additional guidance on the information requirements contained within this section.

¹ Other reportable events are to be reported to us online via the 'eServices' digital service on our website.

15.3.1 - General and regulatory returns

Applies to:

All operating licences

1. On request, licensees must provide the Commission with such information as the Commission may require, in such a form or manner as the Commission may from time-to-time specify, about the use made of facilities provided in accordance with this licence and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on.
2. In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit an accurate Regulatory Return to the Commission containing such information as the Commission may from time to time specify.¹

Read additional guidance on the information requirements contained within this section.

¹ Regulatory returns are to be submitted to us online via the 'eServices' digital service on our website.

Ordinary code

These do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner.

Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty.

Social responsibility code

Compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution.

1.1.1 - Cooperation with the Commission

Ordinary code

Applies to:

All licences

1. As made plain in its Statement of principles for licensing and regulation, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

1.1.2 - Responsibility for third parties – all licences

Social responsibility code

Applies to:

All licences

1. Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
2. Licensees must ensure that the terms on which they contract with such third parties:
 - a. require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b. oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c. enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

1.1.3 - Responsibility for third parties – remote

Social responsibility code

Applies to:

All remote licences

1. Remote licensees must ensure in particular:
 - a. that third parties who provide user interfaces enabling customers to access their remote gambling facilities:
 - i. include a term that any such user interface complies with the Commission's technical standards for remote gambling systems; and
 - ii. enable them, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of that term.

2.1.2 - Anti-money laundering – other than casino

Ordinary code

Applies to:

All licences except casino licences

1. As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators). *

3.1.1 - Combating problem gambling

Social responsibility code

Applies to:

All licences

1. Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.
2. Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

3.2.3 - AGC SR code

Social responsibility code

Applies to:

All adult gaming centre licences

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
2. This must include procedures for:
 - a. checking the age of apparently underage customers
 - b. removing anyone who appears to be under age and cannot produce an acceptable form of identification
 - c. taking action when there are attempts by under-18s to enter the premises.
3. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
4. Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.
5. In premises restricted to adults, service must be refused in any circumstances where any adult is accompanied by a child or young person.
6. Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and the legal requirements on returning stakes and not paying prizes to underage customers.
7. Licensees must only accept identification which:
 - a. contains a photograph from which the individual can be identified
 - b. states the individual's date of birth
 - c. is valid
 - d. is legible and has no visible signs of tampering or reproduction.
8. Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Read additional guidance on the information requirements contained within this section.

3.2.4 - AGC ordinary code

Ordinary code

Applies to:

All adult gaming centre licences

1. The Commission considers acceptable forms of identification to include any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should put into effect procedures that require their staff to check the age of any customer who appears to them to be under 21.
3. Licensees should consider permanent exclusion from premises for any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission¹ and the police, and making available information on problem gambling.
5. Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
6. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website.

3.2.5 - Bingo and FEC SR code

Social responsibility code

Applies to:

All non-remote bingo and family entertainment centre licences

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
2. This must include procedures for:
 - a. checking the age of apparently underage customers
 - b. refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c. taking action when there are unlawful attempts to enter the adult-only areas.
3. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
4. Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
5. Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a. all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b. the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c. procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
6. Licensees must only accept identification which:
 - a. contains a photograph from which the individual can be identified
 - b. states the individual's date of birth
 - c. is valid
 - d. is legible and has no visible signs of tampering or reproduction.
7. Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test

purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Read additional guidance on the information requirements contained within this section.

3.2.6 - Bingo and FEC ordinary code

Ordinary code

Applies to:

All non-remote bingo and family entertainment centre licences

1. The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
3. Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission¹ and the police, and making available information on problem gambling to the child or young person concerned.
5. Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
6. Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
7. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website.

3.2.11 - Remote SR code

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except lottery licences, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo licences

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these.
2. Such procedures must include:
 - a. Verifying the age of a customer before the customer is able to:
 - i. deposit any funds into their account;
 - ii. access any free-to-play versions of gambling games that the licensee may make available; or
 - iii. gamble with the licensee using either their own money or any free bet or bonus.
 - b. warning potential customers that underage gambling is an offence;
 - c. regularly reviewing their age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves;
 - d. ensuring that relevant staff are properly trained in the use of their age verification procedures; in particular customer services staff must be appropriately trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of legal age; and
 - e. enabling their gambling websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites.

3.2.12 - Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees should, and should request their contracted partners to, draw attention to parental responsibility as part of the purchasing process of facilities such as mobile phones and interactive television.

3.3.1 - Responsible gambling information

Social responsibility code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences

1. Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
2. The information must cover:
 - a. any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
 - b. timers or other forms of reminders or 'reality checks' where available
 - c. self-exclusion options
 - d. information about the availability of further help or advice.
3. The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
4. For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

3.3.2 - Foreign languages

Ordinary code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

1. Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
 - a. the information on how to gamble responsibly and access to help referred to above
 - b. the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
 - c. the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

3.3.4 - Remote time-out facility

Social responsibility code

Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting licences, remote betting (remote platform), gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading room only) licences

- 1 Licensees must offer a 'time out' facility for customers for the following durations:
 - a. 24 hours
 - b. one week
 - c. one month or
 - d. such other period as the customer may reasonably request, up to a maximum of 6 weeks.

3.4.1 - Premises-based customer interaction

Social responsibility code

Applies to:

All non-remote licences (except non-remote lottery, gaming machine technical, gambling software and host licences); only the following remote licences – ancillary remote bingo, ancillary remote casino, ancillary remote betting, remote general betting limited, and remote betting intermediary (trading rooms only).

1. Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a. identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b. interacting with customers who may be at risk of or experiencing harms associated with gambling.
 - c. understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
2. Licensees must take into account the Commission's guidance on customer interaction.

3.5.1 - Self exclusion – Non-remote and trading rooms SR code

Social responsibility code

Applies to:

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences

1. Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b. photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c. staff training to ensure that staff are able to administer effectively the systems; and
 - d. the removal of those persons found in the gambling area or attempting to gamble from the premises.
7. Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.

8. Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

3.5.2 - Self-exclusion – non-remote ordinary code

Ordinary code

Applies to:

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
2. Individuals should be able to self-exclude without having to enter gambling premises.
3. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
4. Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
5. Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
6. Customers should be given the opportunity to discuss self-exclusion in private, where possible.
7. Licensees should take steps to ensure that:
 - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
 - d. at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e. where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.

8. The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
9. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
10. Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.
11. Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
12. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

3.5.3 - Self-exclusion – remote SR code

Social responsibility code

Applies to:

All remote licences except: gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, betting intermediary (trading room only) and remote betting (standard) (remote platform) licences. Paragraph 8 does not apply to ancillary remote betting licences, remote general betting (limited), or any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries

1. Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b. a record of the card numbers to be excluded;
 - c. staff training to ensure that staff are able to administer effectively the systems; and
 - d. the removal of access from those persons found to have gambled or who have attempted to gamble on the facilities.
7. Licensees must when administering the self-exclusion signpost the individual to counselling and support services.

8. Customers must be given the opportunity to self-exclude by contacting customer services and in addition by entering an automated process using remote communication. In order to avoid inadvertent self-exclusion it is acceptable for an automated process to include an additional step that requires the customer to confirm that they wish to self-exclude. The licensee must ensure that all staff who are involved in direct customer service are aware of the self-exclusion system in place, and are able to direct that individual to an immediate point of contact with whom/which to complete that process.

3.5.4 - Self-exclusion – Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, remote betting intermediary (trading rooms only) and remote betting (standard) (remote platform) licences

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude:
 - a. over the internet; this can be a box that must be ticked in order to indicate that they understand the system
 - b. by telephone; this can be a direct question asking whether they understand the system.
2. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
3. Licensees should encourage the customer to consider extending their self-exclusion to other remote gambling operators currently used by the customer.
4. Within the licensee's information about self-exclusion policies, the licensee should provide a statement to explain that software is available to prevent an individual computer from accessing gambling internet sites. The licensee should provide a link to a site where further information is available.
5. Licensees should take all reasonable steps to ensure that:
 - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months;
 - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months;
 - c. the self-exclusion arrangements give customers the option of selecting a self-exclusion period of up to at least five years;
 - d. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
 - e. at the end of the period chosen by the customer, self-exclusion remains in place, for a minimum of 7 years, unless the customer takes positive action to gamble again;
 - f. where a customer chooses not to renew, and makes a positive request to begin gambling again, during the 7 year period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed to access gambling facilities. Contact must be made via phone or in person; re-registering online is not sufficient; and
 - g. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed

to accept such material.

6. The licensee should retain the records relating to a self-exclusion agreement for as long as is needed to enable the self-exclusion procedures set out in paragraph 5 above to be implemented.
7. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
8. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

3.5.5 - Remote multi-operator SR code

Social responsibility code

Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting, remote general betting (remote platform), remote betting intermediary (trading room only), remote general betting (limited), gaming machine technical, gambling software, host, ancillary remote bingo, and ancillary remote casino licences

1. Licensees must participate in the national multi-operator self-exclusion scheme.

3.5.6 - Multi-operator non-remote SR code

Social responsibility code

Applies to:

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

1. Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

3.6.5 - AGCs

Ordinary code

Applies to:

All adult gaming centre licences

1. Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
 - a. to employ them to provide facilities for gambling;
 - b. if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
 - c. to employ them to carry out any other function on adult gaming centre licensed premises while any gambling activity is being carried on in reliance on the premises licence.
2. As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
3. Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a. children and young persons are never asked to perform tasks within 1a or 1b, above
 - b. all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
4. Licensees should consider adopting a policy that:
 - a. children and young persons are not employed to work on adult gaming centre licensed premises at any time when the premises are open for business
 - b. gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

3.6.6 - FECs

Ordinary code

Applies to:

All family entertainment centre licences

1. Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
 - a. to employ them to provide facilities for gambling; and
 - b. if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time.
2. As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
3. Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a. children and young persons are never asked to perform tasks within 1a or 1b, above; and
 - b. all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
4. Licensees should consider adopting a policy that:
 - a. children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place; and
 - b. gaming machines sited in adult-only areas are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

3.8.2 - Money-lending – other than casinos

Ordinary code

Applies to:

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

1. Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

3.9.1 - Identification of individual customers - remote

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences) except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees must have and put into effect policies and procedures designed to identify separate accounts which are held by the same individual.
2. Where licensees allow customers to hold more than one account with them, the licensee must have and put into effect procedures which enable them to relate each of a customer's such accounts to each of the others and ensure that:
 - a. if a customer opts to self-exclude they are effectively excluded from all gambling with the licensee unless they make it clear that their request relates only to some forms of gambling or gambling using only some of the accounts they hold with the licensee;
 - b. all of a customer's accounts are monitored and decisions that trigger customer interaction are based on the observed behaviour and transactions across all the accounts;
 - c. where credit is offered or allowed the maximum credit limit is applied on an aggregate basis across all accounts; and
 - d. individual financial limits can be implemented across all of a customer's accounts.
3. Licensees which are companies or other bodies corporate must take all reasonable steps to comply with the above provision as if reference to a customer holding more than one account with them included a reference to a customer holding one or more accounts with them and one or more accounts with a group company.
4. A company is a 'group company' in relation to a licensee if it is the holding company of, subsidiary of, or shares a common holding company with, the licensee. For these purposes 'holding company' and 'subsidiary' have the meanings ascribed to them by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof.

4.1.1 - Fair terms

Social responsibility code

Applies to:

All licences, except gaming machine technical and gambling software licences

1. Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

5.1.1 - Rewards and bonuses – SR code

Social responsibility code

Applies to:

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

1. If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
 - a. the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
 - b. neither the receipt nor the value or amount of the benefit is:
 - i. dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - ii. altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
 - c. if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
 - d. if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.
2. If a licensee makes available incentives or reward schemes for customers, designated by the licensee as 'high value', 'VIP' or equivalent, they must be offered in a manner which is consistent with the licensing objectives.

Licensees must take into account the Commission's guidance on high value customer incentives.

5.1.2 - Proportionate rewards

Ordinary code

Applies to:

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

1. Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

5.1.6 - Compliance with advertising codes

Social responsibility code

Applies to:

All licences, except lottery licences

1. All marketing of gambling products and services must be undertaken in a socially responsible manner.
2. In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
3. The restriction on allowing people who are, or seem to be, under 25 years old (ie: those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

5.1.8 - Compliance with industry advertising codes

Ordinary code

Applies to:

All licences

1. Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

5.1.9 - Other marketing requirements

Social responsibility code

Applies to:

All licences

1. Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
2. Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
3. The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

5.1.10 - Online marketing in proximity to information on responsible gambling

Ordinary code

Applies to:

All licences

1. Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

5.1.11 - Direct electronic marketing consent

Social responsibility code

Applies to:

All licences

1. Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

6.1.1 - Complaints and disputes

Social responsibility code

Applies to:

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences

1. Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
2. Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
3. The services of any such ADR entity must be free of charge to the customer.
4. Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
5. Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
6. Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
7. Licensees should keep records of customer complaints and disputes and make them available to the Commission on request.

In this Code, 'ADR entity' means

- a. a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 and,
- b. whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

7.1.2 - Responsible gambling information for staff

Social responsibility code

Applies to:

All licences, including betting ancillary remote licences, but not other ancillary remote licences

1. Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

8.1.1 - Ordinary code

Ordinary code

Applies to:

All licences

1. As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
2. Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence² :
 - a. any material change in the licensee's structure or the operation of its business
 - b. any material change in managerial responsibilities or governance arrangements
 - c. any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website.

² Events which must be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

10.1.1 - Assessing local risk

Social responsibility code

Applies to:

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.

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 policy¹.
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.

¹This is the statement of licensing policy under the Gambling Act 2005.

10.1.2 - Sharing local risk assessments

Ordinary code

Applies to:

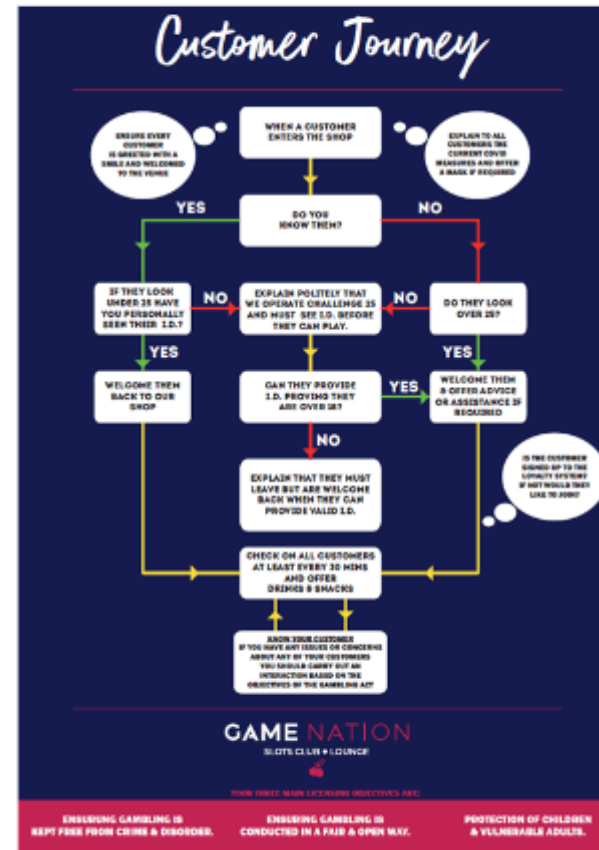
All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

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.

(/?

click_source=logged_element&page_location=header&element_type=logo)

New Customer Journey Procedure



Platform Instructions - PI1

People - Vision & Values - QVV1

LCCP 1 - Access to Gambling by Children & Young Persons - LCCPAGE

LCCP 2 - Access to Premises by the Gambling Commission's Enforcement Officers - LCCPEO

LCCP 3 - Advertising Standards and Marketing - LCCRAS

LCCP 4 - Identifying customers who may be susceptible to gambling harm - LCCPCD

LCCP 5 - Employment of Children and Young Persons - LCCPEOC

LCCP 6 - Fair and Open Practice - Complaint and Dispute Resolution - LCCPFD

LCCP 7 - Information on how to gamble responsibly and help for gamblers with problems - LCCPIGR

LCCP 8 - Money Laundering, Cash Handling and Suspicious Transactions - LCCPML

LCCP 9 - Self Exclusion - LCCPSE

Compliance - POCA - Proceeds of Crime Act 1 - POCA1

Compliance - POCA - Proceeds of Crime Act 2 - POCA2

Compliance - POCA - Proceeds of Crime Act 3 - POCA3

Compliance - Gambling Compliance Training - GCT

Compliance - Identify - Interact - Evaluate - GCA

Compliance - Customer Interaction & Customer Journey - CI1

Compliance - GDPR - GDPR1

Dealing with Drugs - DWD1

Dealing with Gangs - DWGV1

Know Your Customer - Assessing & Mitigating Risk - KYC1

Compliance - Affordability - RG1

Adult Gaming Centres - RAGC

Social Responsibility - SR1

Know Your LARA - LARA1

Anti Money Laundering - AML1

Money Lending - ML1

Service - Conflict Resolution - CR1

Service - Complaints - CH1

Service - Delivering Exceptional Customer Experiences - CSE1

Service - Customer Experience - CE2

Safeguarding & Grooming - SAFEG1

Health & Safety - Covid Safe Working Practices - SWPV1

Health & Safety - Anti-Social Behaviour & Gangs - DWG1

Health & Safety - Staff Guard - RG1

Health & Safety - COSHH - COSHH1

People - Equality & Diversity - ED1

People - Training Skills - TS1

Stay Safe - SS1

Ask for Angela - Wave - AFAM1

Crime Scene Management - CSM1

Anxiety and Anxiety Disorders - ECB_MIND_AXD

Your Wellbeing - ECB_MIND_WB

Smart Hub Background



SmartHUB – The Support Hub for the Gaming Industry

IHL Tech was formed in 2015 and has supplied the High Street gaming sector with self-exclusion and many other functions since April 2016.

SmartHUB allows the operator to effectively remove paper logs from their premises and store information centrally, securely and importantly compliantly with the General Data Protection Regulation 2016/679. A locked down tablet replaces the traditional pen and paper and a back-end reporting portal gives you access to all the information you require.

Smart Hub – Overview

A digital log has numerous advantages of a paper log

- Collating accurate and legible logs
- Standardising understanding and approach
- Central and local visibility
- KPI management to ensure all venues are at a single standard

All the logs allow the operators to comply with the current License Conditions and Code of Practice issued by the UK Gambling Commission.



SmartHUB is used by the majority of large AGC and Bingo licensed premises in the UK and is widely accepted as the most accurate and user-friendly solution. AGC operators including Cashino (160+ venues), Playnation (c80% of UK holiday parks), Roadchef, MOTO & Welcome Break use SmartHUB, along with over 100 SMEs. The Bingo Association provide the Silver package of SmartHUB to their entire membership which includes Buzz Bingo (formerly Gala), Mecca Bingo and Beacon Bingo plus 120 High Street Bingo Licenses and 100+ Licensed Holiday Parks.

Whilst SmartHUB provides digital logs, reports and visibility to operators we also provide, through registered 3rd parties Alternative Dispute Resolution and Test purchasing, one visit per calendar year. Each of which is a requirement of a premise license.

SmartHUB doesn't take away any responsibility of the operator, it simply makes being compliant easier, gives them greater visibility of their venues activity and allows them to report on and review instantly.

Smart Hub – Player Protection Systems

- City Gaming use IHL's SmartHub technology to manage all areas of protection of players from gambling related harm.
- Every venue is equipped with a tablet device which allows easy logging of all player interaction related events. These include the following :

Self Exclusion

- The IHL Smart Exclusion system works in conjunction with the Bacta Multi Operator Self Exclusion System which ensures that details of customers wishing to exclude from operators using either system are automatically recorded on both systems. This is a requirement of the Gambling Commission

Self Exclusion Breaches

- Self Exclusion breaches are closely monitored and customer who persistently attempt to breach their Self Exclusion Agreement are identified and appropriate action taken

Age Verification Challenges

- The numbers of Age Verification challenges made is monitored closely and where inconsistencies are highlighted, the appropriate management action is taken.

Customer Interactions

- Every customer interaction recorded is reviewed on a weekly basis by the Commercial team and interactions/incidents of concern are reported to the senior management team. Where a customer shows clear signs of difficulty with their gambling, this is reported back to the Operations team to follow up as necessary.
- Incidents including those requiring police assistance/intervention
- Every other type of incident recorded is reviewed weekly and where further action is required, this is reported out to the Operations team.

IHL Smart hub – Dash Board

The screenshot displays the IHL Smart Hub Dashboard. The top navigation bar is orange with the IHL Hub logo and links to Dashboard and Profile. The left sidebar contains a list of navigation items: Dashboard, SmartExclusion, Age Verification Log, SmartINCIDENT, SmartALERT, Anti-Money Laundering, SmartINTERACTION, ADR, AvTestPurchase, Compliance, Feature Activation, and IHL Hub. The main content area is titled 'Dashboard' and features three summary cards for 'Total Records': Total Venues (35), Total Exclusions (97), and Total Breaches (146). Below these is a table titled 'Since Last Sign In' showing counts for Total Venues, Total Exclusions, and Total Breaches, all of which are 0.

Total Records	
Total Venues →	35
Total Exclusions →	97
Total Breaches →	146

Since Last Sign In	
Total Venues	0
Total Exclusions	0
Total Breaches	0

IHL Smart Hub is used extensively across our business to manage all Customer Interactions

- 1 Regional Manager's have their own specific log in
- 2 Area Managers review incidents and feedback accordingly
- 3 Remedial action taken if required

IHL Smart hub – Dash Board

IHL Hub Dashboard Profile

Dashboard

Total Records

Total Venues →	35	Total Exclusions →	97	Total Breaches →	146
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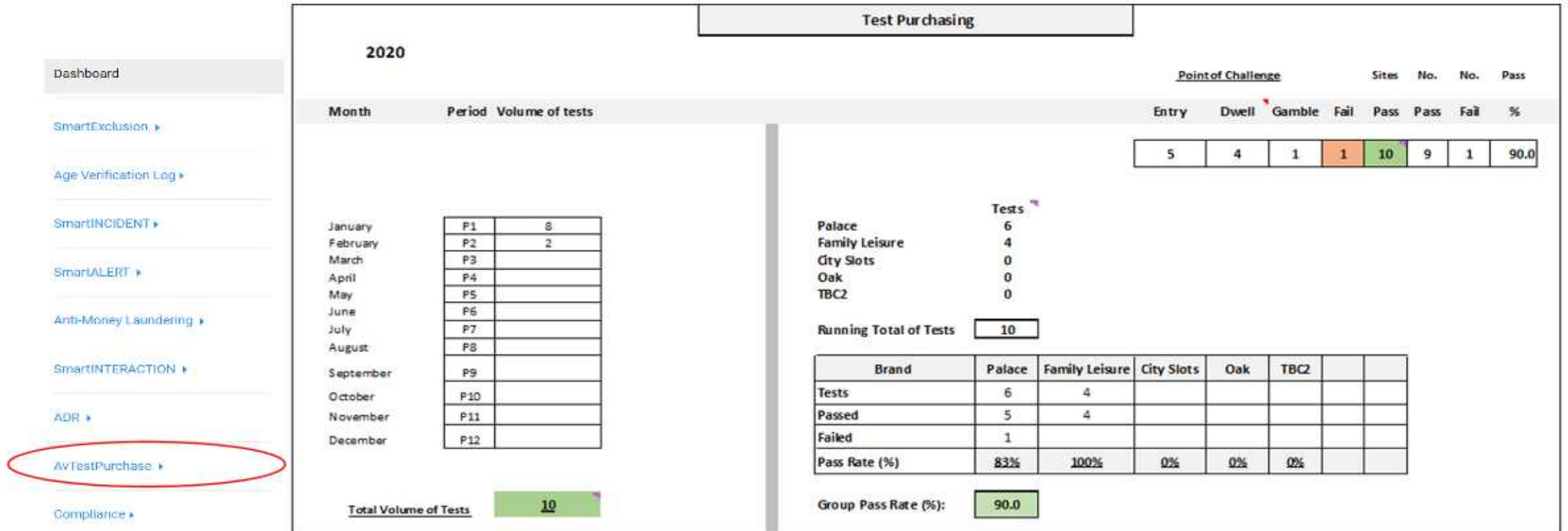
Since Last Sign In

Total Venues	0
Total Exclusions	0
Total Breaches	0

SmartExclusion ▶
Age Verification Log ▶
SmartINCIDENT ▶
SmartALERT ▶
Anti-Money Laundering ▶
SmartINTERACTION ▶
ADR ▶
AvTestPurchase ▶
Compliance ▶
Feature Activation ▶
IHL Hub ▶

The ringed elements on the LHS are key tools in our day to day management


Age Verification



- City Gaming employ a third party test purchase provider to carry out regular Age Verification testing across all venues. This is carried out by CheckPolicy who also carry out AV testing on behalf of Bacta.
- All tests are monitored and reported on a weekly basis. Test failures are investigated within 48 hours of the test report being received and remedial action/disciplinary action taken.
- The following chart shows the 2019 results from the businesses within the City Gaming group.

- We are tested independently every week across our business
- Are results exceed the national average consistently
- Our test results prove we are exceptionally proactive in this Area
 - Any failure occurs, the entire venue undergo retraining

Self Exclusions reporting

 IHL Hub

Dashboard

Profile

Dashboard

SmartExclusion

Exclusions

Reported Breaches

Reports

Age Verification Log

SmartINCIDENT

SmartALERT

Anti Money Laundering

SmartINTERACTION

ADR


AvTestPurchase

Compliance


Feature Activation

Exclusions


Filter exclusions




Name Mr Lee Ford
Added on Mar 17, 2020
Expires on Mar 17, 2021




Name Mr Zaman Qorbani
Added on Mar 16, 2020
Expires on Mar 16, 2021




Name Mr Iosub Iulian
Added on Mar 15, 2020
Expires on Mar 15, 2021




Name Mr Gyan Bukram
Added on Mar 15, 2020
Expires on Mar 15, 2021




Name Miss Cathy Cathy
Added on Mar 14, 2020
Expires on Mar 14, 2021



Name Mr Osman Nedunchezhain
Added on Mar 13, 2020
Expires on Mar 13, 2021




Name Mrs Ramca Gladwin
Added on Mar 5, 2020
Expires on Mar 5, 2021



Name Miss Amy Hawksworth
Added on Mar 5, 2020
Expires on Mar 5, 2021

- Immediately updated to our online portal and available to View Post exclusion

Interaction – Smart Incidents example

 IHL Hub

DashboardProfile ▾

Dashboard

SmartExclusion ▸

Age Verification Log ▸

SmartINCIDENT ▾

Incidents

Reports

SmartALERT ▸


Anti-Money Laundering ▸

SmartINCIDENTS

Filter Incidents ▸

Incident No	Venue Name	Incident Occured at	Incident Type	Is Reviewed
5946	Ramsgate Palace	March 20, 2020 - 08:30PM	Incident relating to barred or previously barred customer	Not Reviewed
5934	Islington Palace	March 19, 2020 - 07:14PM	Incident relating to aggressive behaviour	Not Reviewed
5923	Neasden Palace	March 19, 2020 - 05:21AM	Incident relating to aggressive behaviour	Not Reviewed
5911	City Slots - Walthamstow	March 17, 2020 - 10:27PM	Incident relating to aggressive behaviour	Not Reviewed
5906	Folkstone Palace	March 17, 2020 - 04:29PM	Incident relating to barred or previously barred customer	Reviewed

Incident detail Example

 IHL Hub

DashboardProfile

Dashboard

SmartExclusion

Age Verification Log

SmartINCIDENT

Incidents

Reports

SmartALERT

Anti-Money Laundering

SmartINTERACTION

ADR

AvTestPurchase

Compliance

Incident Details

REVIEW INCIDENT

Incident Details

Venue Name	Ramsgate Palace
Occurred at	March 20, 2020 - 08:30PM
Type of incident	Incident relating to barred or previously barred customer
Incident Description	barred customer Damian entered the premises and started playing while I wasn't looking as was dealing with another customer when I noticed him I kindly asked him to leave the premises
Device name	samsung
Submitted by	David Holmes
People involved	1 (More info)
Known to venue?	Yes
Was incident violent?	No
Is stake returned?	Yes
Returned stake amount	£23,40
Left premises?	Yes

Other Details

Police Assistance Details

Reported to police?	No
Crime reference number	N/A
Police called time	N/A
Police arrived time	N/A
Area manager informed?	Yes
Night manager informed?	Yes
CCTV footage captured?	Yes
Alarm initiated?	No

Incident Injury Details

Is anyone injured?	No
Injury details	N/A
Called ambulance?	No
Any property damage?	No
Damage details	N/A

[Dashboard](#)[SmartExclusion ▸](#)[Age Verification Log ▸](#)[SmartINCIDENT ▾](#)[Incidents](#)[Reports](#)[SmartALERT ▸](#)[Anti-Money Laundering ▸](#)


SmartINCIDENTS

Filter Incidents



Incident No	Venue Name	Incident Occured at	Incident Type	Is Reviewed
5946	Ramsgate Palace	March 20, 2020 - 08:30PM	Incident relating to barred or previously barred customer	Not Reviewed
5934	Islington Palace	March 19, 2020 - 07:14PM	Incident relating to aggressive behaviour	Not Reviewed
5923	Neasden Palace	March 19, 2020 - 05:21AM	Incident relating to aggressive behaviour	Not Reviewed
5911	City Slots - Walthamstow	March 17, 2020 - 10:27PM	Incident relating to aggressive behaviour	Not Reviewed
5906	Folkstone Palace	March 17, 2020 - 04:29PM	Incident relating to barred or previously barred customer	Reviewed

Incident Detail -

 IHL Hub

Dashboard

Profile ▾

Dashboard

SmartExclusion ▸

Age Verification Log ▸

SmartINCIDENT ▾

Incidents

Reports

SmartALERT ▸

Anti-Money Laundering ▸

SmartINTERACTION ▸

ADR ▸

AvTestPurchase ▸

Incident Details

REVIEW INCIDENT

Incident Details

Venue Name	Islington Palace
Occurred at	March 19, 2020 - 07:14PM
Type of incident	Incident relating to aggressive behaviour
Incident Description	a male walked into the shop looks at me and started shouting I asked for ID started shouting and calling me names, at this time I told him he's got to LEAVE THE SHOP, he asked why, i then told him I do not accept that behaviour shouting and swearing
Device name	samsung
Submitted by	Lincoln
People involved	1 (more info)
Known to venue?	No
Was incident violent?	No
Is stake returned?	No
Returned stake amount	N/A
Left premises?	Yes

Other Details


Police Assistance Details

Reported to police?	No
Crime reference number	N/A
Police called time	N/A
Police arrived time	N/A
Area manager informed?	Yes
Night manager informed?	Yes
CCTV footage captured?	Yes
Alarm initiated?	No

Incident Injury Details

Is anyone injured?	No
Injury details	N/A
Called ambulance?	No
Any property damage?	No
Damage details	N/A

Area Managers Review Process

 IHL Hub

DashboardProfile ▾

Dashboard

SmartExclusion ▸

Age Verification Log ▸

SmartINCIDENT ▾

Incidents

Reports

SmartALERT ▸

Anti-Money Laundering ▸

SmartINTERACTION ▸

ADR ▸

AvTestPurchase ▸

Incident Details

Incident Details

Venue Name	Islington Palace
Occurred at	March 19, 2020 - 07:14PM
Type of incident	Incident relating to aggressive behaviour
Incident Description	a male walked into the shop looks at me and started shouting i asked for ID started shouting and calling me names, at this time i told him he's got to LEAVE THE SHOP , he asked why, i then told him i do not accept that behaviour shouting and swearing
Device name	samsung
Submitted by	Lincoln
People involved	1 (More info)
Known to venue?	No
Was incident violent?	No
Is stake returned?	No
Returned stake amount	N/A
Left premises?	Yes

Other Details

Police Assistance Details

Reported to police?	No
Crime reference number	N/A
Police called time	N/A
Police arrived time	N/A
Area manager informed?	Yes
Night manager informed?	Yes
CCTV footage captured?	Yes
Alarm initiated?	No

Incident Injury Details

Is anyone injured?	No
Injury details	N/A
Called ambulance?	No
Any property damage?	No
Damage details	N/A

REVIEW INCIDENT

Area Managers Review Process

The screenshot shows the 'Review Incident' modal in the IHL Hub application. The modal is centered over the 'Incident Details' page. The background page shows incident information such as Venue Name, Device name (samsung), Submitted by (Lincoln), and People involved (1). The modal contains four questions with radio button options for 'Yes' and 'No'. The 'No' option is selected for all four questions. At the bottom of the modal are 'REVIEWED' and 'CANCEL' buttons.

Review Incident

Was the incident reported timely and effectively?
☒ Yes ☐ No

Is the venue CCTV coverage accurate?
☒ Yes ☐ No

Is any further training required?
☐ Yes ☒ No

Do we need to update the venue risk assessment?
☐ Yes ☒ No

REVIEWED **CANCEL**

Incident Details

Venue Name: [redacted]
Occurred: [redacted]
Type of incident: [redacted]
Incident Description: [redacted]

Device name: samsung
Submitted by: Lincoln

People involved: 1 ([More info](#))
Known to venue? No
Was incident violent? No
Is stake returned? No
Returned stake amount: N/A
Left premises? Yes

Incident Updated Log

Incident Type	From Venue	Staff Name	Known to venue	Log created at
171				

Area Manager to review regular with subsequent actions taken accordingly

Conditions	Game Nation, 450-454 Tottenham High Road	Admiral 475 Tottenham High Road	Paddy Power, 486 Tottenham High Road	Ladbrokes, 480 Tottenham High Road	William Hill, 440 Tottenham High Road	Ladbrokes, 529-531 Tottenham High Road
Minimum of 2 members of staff on duty when the premises are open	✓	✗	✗	✗	✗	✗
SIA registered Security Guard on duty between 1700 and closing	✓	✗	✗	✗	✗	✗
Staff training on recognizing drug use, conflict management, and restricting service to persons under 18 years of age	✓	✗	✗	✗	✗	✗
Staff training on specific issues related to the local area	✓	✗	✗	✗	✗	✗
Induction and refresher training every six months for new and seasonal staff	✓	✗	✗	✗	✗	✗
Training records maintained and made available for inspection	✓	✗	✗	✗	✗	✗
Comprehensive 4K HD CCTV System maintained throughout the building covering all key locations	✓	✗	✗	✗	✗	✗
3 x 4K cameras will be specifically focused on the High Street	✓	✗	✗	✗	✗	✗
Large "spotter screen" inside the entrance showing live CCTV images viewable by customers as they						

enter the premises	✓	✗	✗	✗	✗	✗
Ensure that sufficient lighting is installed outside the premises	✓	✗	✗	✗	✗	✗
CCTV images recorded on a Hard Drive and retained for 30 days	✓	✗	✗	✗	✗	✗
CCTV images to be made available for Police and Licensing Authority inspection in reasonable time	✓	✗	✗	✗	✗	✗
Staff member conversant with the procedure for obtaining CCTV images on the premises at all times when the premises are open to the public	✓	✗	✗	✗	✗	✗
Premises shall display notices near the entrance to the venue stating that CCTV is in operation	✓	✗	✗	✗	✗	✗
Premises to be connected to external conflict management facility staffed by SIA licensed conflict Management Operators (City Gaming Limited Conflict Management Centre (CMC))	✓	✗	✗	✗	✗	✗
CMC to operate 24 hours a day	✓	✗	✗	✗	✗	✗
Staff in the venue provided with remote-control key fob or keyring, which on activation alerts the CMC	✓	✗	✗	✗	✗	✗
The CMC system will provide 2-way communications enabling the CMC operator to speak to the member of staff and customer causing concern	✓	✗	✗	✗	✗	✗

Licensee shall implement a policy of banning customers who engage in crime or disorder within or outside the premises	✓	✗	✗	✗	✗	✗
Licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs	✓	✗	✗	✗	✗	✗
A Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable by staff	✓	✗	✗	✗	✗	✗
The front door will be locked between 1900 and closing time each day	✓	✗	✗	✗	✗	✗
Access between 1900 and closing time available at the discretion of the staff	✓	✗	✗	✗	✗	✗
Front Door Entry Security system to include video images on internal screen	✓	✗	✗	✗	✗	✗
Toilets will be always locked, and access controlled by staff	✓	✗	✗	✗	✗	✗
Toilet design will ensure no storage space can be gained to conceal drugs	✓	✗	✗	✗	✗	✗
Licensee will engage with the local centres for the vulnerable and provide them with Safer Gambling information and contact details of the premises	✓	✗	✗	✗	✗	✗
Gang Management Policy will be implemented, in conjunction with the Police	✓	✗	✗	✗	✗	✗

All staff shall receive training on the Gang Management Policy	✓	✗	✗	✗	✗	✗
An incident log shall be kept and made available on request to an authorised officer of the Licensing Authority or the Police	✓	✗	✗	✗	✗	✗
Licensee shall install and maintain an intruder alarm on the premises	✓	✗	✗	✗	✗	✗
Challenge 25 proof of age scheme shall be operated at the premises	✓	✗	✗	✗	✗	✗
Posters prominently displayed advising that no antisocial behaviour will be tolerated, that a Challenge 25 policy is in place and that Drinking Alcohol is not permitted on the premises	✓	✗	✗	✗	✗	✗
Third party testing on age restricted sales systems shall take at least twice a year and results provided to the Licensing Authority upon request	✓	✗	✗	✗	✗	✗
Licensee will ensure customer toilets are checked every hour for evidence of drug taking. Toilet checks to be documented stating the time and member of staff	✓	✗	✗	✗	✗	✗
Prominent GamCare documentation will be displayed at the premises	✓	✗	✗	✗	✗	✗
Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban those who do so	✓	✗	✗	✗	✗	✗
Licensee shall place a notice visible from the						

exterior stating that customers drinking alcohol outside the premises are not permitted and those who do so will be banned	✓	✗	✗	✗	✗	✗
No cash point or ATM facilities on the premises	✓	✗	✗	✗	✗	✗
Default Hours limited by condition	0900 - 0000 Mon to Fri; 0900 – 2300 Sun	24 hrs Not Limited	Not limited	Not limited	Not limited	Not limited

Premises

Premises Name:	Game Nation		
Premises Address:	Unit 1, 450-454 High Road, Tottenham, London		
Premises Post Code:	N17 9JD		
Premises Licence/Permit Number:	TBC		
Category of Premises:	<div> <div>Adult Gaming Centre</div> <div><input checked="" type="checkbox"/></div> </div> <div> <div>Unlicensed Family Entertainment Centre</div> <div><input type="checkbox"/></div> </div> <p>(please identify with ✓)</p>		

Company

Operating Company: (the "Company")	City Gaming Limited
Operating Licence Reference Number:	
Registered Office Address:	City Gaming Limited, 4 Cavendish Square, London, W1G 0PG

Assessment Completion

Original Assessment completed by (Signature):		Updated Assessment completed by (Signature):	
Original Assessment completed by (Print):	Darren Russell	Updated Assessment completed by (Print):	G Glanfield
Position within the Company:	Regional Director	Position within the Company:	Consultant
Date of completion of Original Assessment:		Date of completion of Updated Assessment:	19 th October 2022

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

- a. 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.

COMPANY OVERVIEW

1. Senior Management of City Gaming Limited have worked in the gaming industry for approximately 30 years. In addition to being a Board Members of multiple gambling operating companies, they have also operated large scale Holiday Park FEC's, including AGCs.
2. City Gaming Limited is a leading operator of AGC premises in London, the South East and Midlands and has full authority to provide AGC facilities through the grant of an Operating Licence by the Gambling Commission. The Gambling Commission has approved the measures which City Gaming Limited has put in place to ensure that it implements effective anti-money laundering procedures, security procedures and trades responsibly in accordance with gambling legislation, the licensing objectives and the licence conditions and codes of practice.
3. The City Gaming Group has thirteen Personal Management Licence holders throughout their operational structure. All in key, high profile positions.
4. The Executive Board of Directors is formed of highly experienced operators and management. The Executive Chairman, Sina Azeri, was also a Partner in a private equity firm and has extensive experience in the gambling industry.
5. The entire management team from head office to premises level are fully aware of their roles and responsibilities in regards to the Licence Conditions and Codes of Practice (LCCP).
6. City Gaming Group employs a highly recognised individual within industry as Compliance Officer, reporting directly to the CCO to carry out compliance checks and audits to ensure that the Company's responsibilities and procedures relating to the LCCP are upheld.
7. City Gaming Group employs over 400 people in London, the South East and the Midlands.
8. City Gaming utilises an E-Learning platform to under pin the emphasis we apply to our learning culture.
9. City Gaming engages with a reputable 3rd Party Security Business. We have worked extensively with Incognito (our security advisor and agent) the following policies have been established in order to ensure provision of the very best advice and practical solutions, for the benefit to deliver high quality engagement and effective problem resolution.

EXPLANATORY NOTE

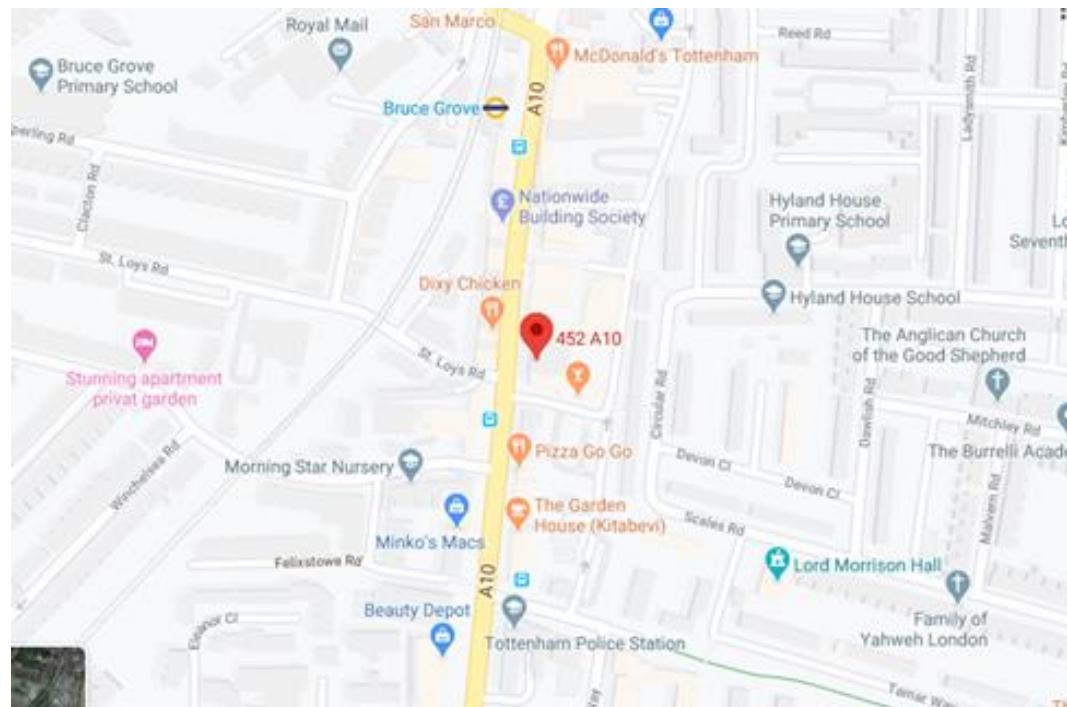
- a/ **This Risk Assessment is designed to ensure that Game Nation staff fully understand the level of risk in the Local Area. Game Nation procedures require Risk Assessments to be reviewed on a regular basis and by including significant detail, staff will become very much more aware of the areas of risk as they review each section of the assessment.**

Local Area Profile

Image of Premises



Location Plan



Description of Local Area

The Adult Gaming Centre is located on Tottenham High Road within a primary shopping area. To one side of the unit is a closed Peacocks clothing store and Patisserie and immediately adjacent to the unit on the other side is an empty retail unit and a branch of the Halifax Building Society.

The venue is rectangular in shape internally. No auxiliary activities will be offered other than Cat B3's, Cat C's and Cat D machines.

There are a considerable range of premises in the surrounding area that we are aware of that may heighten the risk to some vulnerable groups of people.

A recognised definition of vulnerability in relation to gambling is as follows – People vulnerable from gambling related harm are people, who gamble more than they want to, gamble beyond their means and may not be able to make informed or balanced decisions about their gambling due to a mental impairment, alcohol, or drugs. Other factors such as bereavement, divorce and other changes in personal circumstances may also affect a person's ability to make balanced decisions in relation to their gambling.

It is noted, in particular, that the following establishments are nearby:

Betting Shops – Ladbrokes * 2, William Hill, Betfred and Paddy Power

Adult Gaming Centres – Admiral

Pawn Shops – H&T Pawnbrokers * 2, Pickwicks

Public Houses – There are numerous public houses in the surrounding area but closest are the Beehive, Ship and Elbow Room, all of which are within a short walk of the unit.

Markets – Holcombe Road market is also within a short walk of the unit. The OK Foundation Soup Kitchen is also situated in Holcombe Road.

Post Office – Bruce Grove Post Office is very close by

Banks and ATM cashpoints – There are at least 3 ATMs within close proximity plus a Nationwide Building Society, Santander, Halifax and TSB also nearby.

These establishments can all have links to people who are vulnerable from gambling related harm such as establishments which provide gambling services such as AGCs and betting shops to sources of funds to gamble such as ATMs, Post Office or Pawnbrokers. Public houses do risk that customers may become inebriated and not be in a position to control their gambling.

City Gaming's E Learning training program and procedures ensure that customers displaying and signs of problem related gambling are identified quickly and the appropriate action taken.

SELF EXCLUSION

Customers are able to Self-Exclude from gambling as a result of a direct request to any member of staff who will be able to arrange for self-exclusion to take place provided the customer has the necessary ID documents and a member of staff authorised to carry out a self-exclusion is present at the time. Should the customer not have the necessary ID documents, an appointment will be made to process the exclusion, and the customer discouraged from gambling in the meantime.

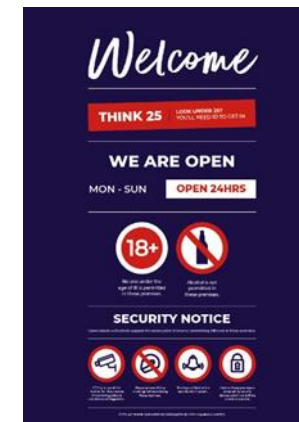
Self-exclusions may also occur through the interaction process whereby a member of staff sees a change in a customer's behaviour that causes concern, and the staff member interacts accordingly. During these interactions, Self-exclusion would be discussed along with spending limits, time-outs, referral to BeGambleAware etc and on some occasions the customer will decide to self-exclude as a result of the interaction or a series of interactions.

All interactions, including self-exclusion, are recorded via a SmartHub database, and these are reviewed weekly by senior management.

SIGNAGE

It's All Under Control posters will be displayed around the venue with leaflets readily available in both prominent and discrete locations for customer to take.

Over 18s Only messaging will also be prominently displayed.



Promotional signage is not designed to be attractive to children or young people and is mainly positioned inside the venue.

Schools

Primary schools – Welbourne Primary School, Holy Trinity C of E Primary School, Bruce Grove Primary School, The Mulberry Primary School, Hyland House Primary and Assunnah Primary School all within a relatively short distance of the unit. It is noted that School SuperZones are in the pilot phase of Haringey's School Superzone project at Holy Trinity Primary School and Welbourne primary and Childrens' schools.

Also in the vicinity are Devon Close Pre-School and Morning Star nursery.

Junior Schools

The nearest Junior school is the Belmont Junior School just over 1 mile distance.

Secondary Schools and Colleges

North London College is within a short distance of the venue with a further 4 being in the vicinity, these being Ambitious College, The College of Haringey, Enfield and N E London, National college of Digital Skills and the London College of Law

Harris Academy and Park View are both Secondary Schools within a relatively short distance of the unit.

It is noted that High Road Tottenham is a major thoroughfare for children travelling to and from school. This risk is mitigated by the processes as noted on Page 11 of this Risk Assessment. It should also be noted that there will be no visibility of gambling by children through entrance and window design. This design will also prevent visibility of gambling by children even from the upper deck of a passing bus or other vehicles.

Other areas of interest to children and young persons

Roller Nation in Bruce Grove is a roller skating venue featuring restaurant, bar etc

The **Marcus Garvey Library** in Philip Lane is located some 0.4 miles from the proposed AGC

Centres for vulnerable people

BUBIC drug and alcohol dependency unit – Bruce Grove

Blenheim CDP drug and alcohol dependency unit – Bruce Grove

Haringey drug & alcohol service – Bruce Grove

Barnet, Enfield & Haringey Mental Health Trust – St Ann's Road

HAGA, Action on Alcohol – Park Lane

Ashness Care – Philip Lane

Citizen's Advice Haringey – Waltheof Gardens

OK Foundations Soup Kitchen – Holcombe Road

Home Start Children's Home – Tower Gardens Road

CARIS Haringey Homeless Shelter – Philip Lane

St Mungo's Homeless Shelter – Tottenham High Road

St Mungo's Homeless Shelter – High Cross Road

Highway House Homeless Shelter – Fountayne Road

Bruce Grove Primary Health Care

Residents Associations and other groups

City Gaming are aware of and would be happy to work with local groups such as the Ladder Community Safety Partnership and Tottenham Conservation Advisory Committee.

Risk from gambling related harm

Haringey Council's Local Area Profile produced in January 2019 highlights the area as being of high risk from gambling related harm


City Gaming propose the following specific procedures and physical approaches to identify those people at risk and prevent access to gaming.


The risk posed from gambling related harm in this area is higher than normal because of the higher than normal rates of alcohol and drug abuse, crime, mental illness and social deprivation. However, this increased risk will be mitigated by the company's superior levels of staff training through bespoke E Learning courses, door controls and systems such as StaffGuard and SmartHub. These combined with weekly reviews will equip staff to the highest level to recognise and manage those customers displaying any signs of gambling related problems.

CCTV systems – Typical CCTV system specification is detailed in Appendix 1. Signage will be in place to make customer aware.

Our CCTV policy/coverage will be regularly reviewed, and additional cameras/equipment will be installed as and when required. A plan of camera positioning will be made available. The CCTV system will be supplied by Link Integrated who also supply the StaffGuard system as described in Appendix 1. In accordance with generally accepted standards, CCTV recordings will be kept for a minimum of 31 days.





City Gaming Group operates high quality CCTV equipment including the latest HiColour HIKVision 4k Cameras which provide a superior image quality for monitoring and evidence purposes. Including **CCTV systems**

GAME NATION




4K ColorVu PoC Fixed Mini Bullet Camera


- High quality imaging with 8 MP, 3840 × 2160 resolution
- 24/7 color imaging
- Clear imaging against strong back light due to 130 dB true WDR technology
- 3D DNR technology delivers clean and sharp images
- 2.8 mm, 3.6 mm fixed focal lens
- Up to 20 m white light distance for bright night imaging
- Water and dust resistant (IP67)

4K, also called *4K resolution*, refers to a horizontal display resolution of approximately 4,000 pixels. With up to four times higher resolution than standard HDTV 1080p resolution, 4K has not only been adopted by the television industry as a standard but is also becoming the new norm for video-based security systems, promising better image quality and richer detail.







Camera	
Image Sensor	1/2.5" Progressive Scan CMOS
Min. Illumination	Color: 0.028 Lux @ (F2.0, AGC ON), 0 Lux with IR
Shutter Speed	1/3 s to 1/100,000 s
Slow Shutter	Yes
Wide Dynamic Range	120dB
Day & Night	IR Cut Filter
Angle Adjustment	Pan: 0° to 355°; tilt: 0° to 75°; rotate: 0° to 355°

Lens	
Focus	Fixed
Lens Type	Fixed lens, 2.8/4/6 mm
FOV	2.8 mm, horizontal FOV: 102°, vertical FOV: 53°, diagonal FOV: 124°; 4 mm, horizontal FOV: 79°, vertical FOV: 42°, diagonal FOV: 95°; 6 mm, horizontal FOV:



4K WDR Fixed Dome Network Camera with Build-in Mic New

- High quality imaging with 8 MP resolution
- Efficient H.265+ compression technology
- Clear imaging against strong back light due to 120 dB true WDR technology
- Built-in microphone for real-time audio security
- Water and dust resistant (IP66) and vandal proof (IK10)
- Robust structure design with full metal materials

CCTV Information

Door Control

City Gaming Ltd have extensive experience of operating AGCs in areas such as London that experience high levels of drug dealing and general crime. This experience allows considered decisions to be made in relation to the levels of staff and night security required as detailed below.

- External CCTV coverage
- Door and frontage design will ensure that children will not be able to see gambling taking place whether on the footpath or travelling by bus or other vehicle type.
- SIA door staff will be utilised. Where SIA staff are employed directly, they will be fully trained through their in-house eLearning program supplied by UpSkills (Appendix 3) who are a recognised provider of eLearning to the UK Gaming industry.
- Where SIA door staff need to be sourced from external suppliers, they will be expected to complete and acknowledge completion of the Bacta Toolkit that relates to “Access to Gambling by Children and Young People” – A copy of these training records will be retained on site for inspection. Example below

Company: _____ Site Address: _____ Site Ref: _____ Serial No. _____ / _____

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

SUMMARY OF STAFF TRAINING

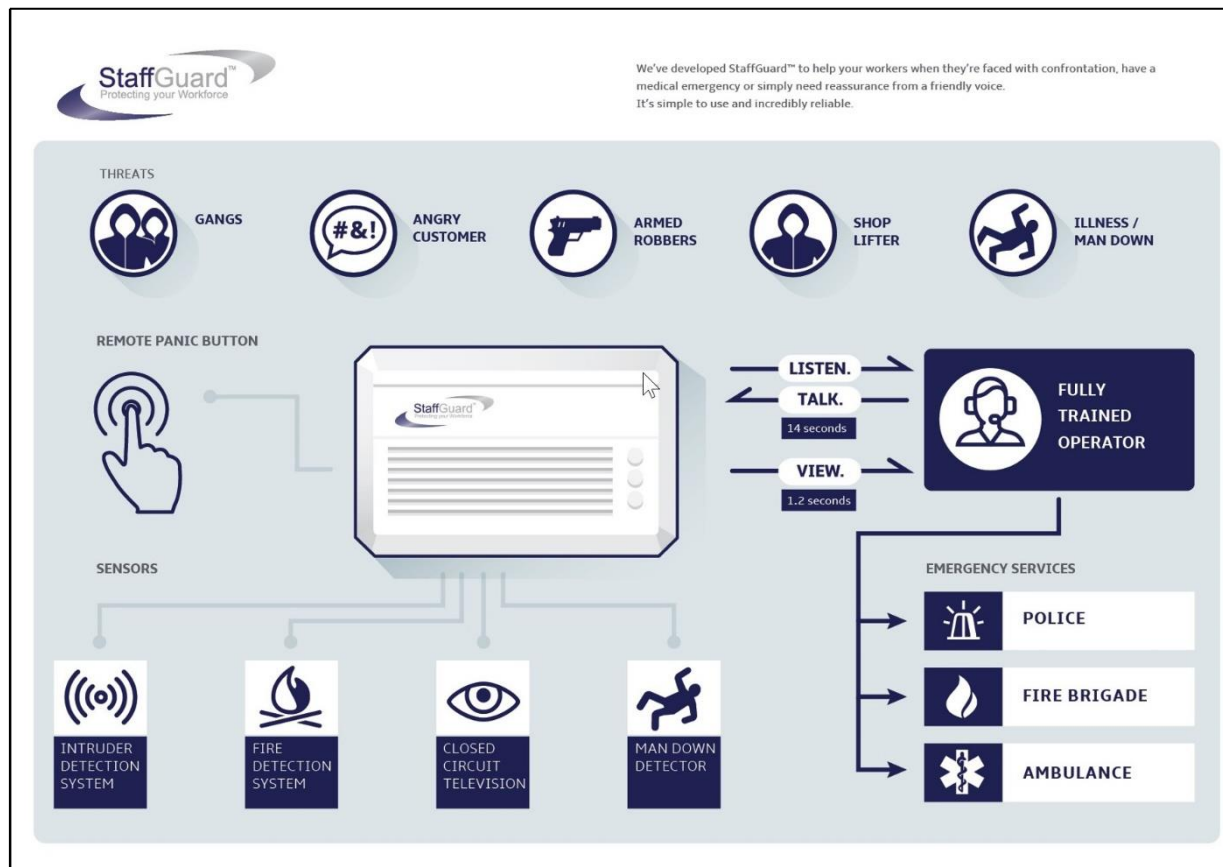
Management and Staff, as appropriate, declare that they have read and understood the following documents, are fully aware of Company policy and procedures and their own respective requirements in relation to them:

<ol style="list-style-type: none"> 1. Access to Gambling by Children and Young Persons 2. Access to Premises by the Gambling Commission's Enforcement Officers 3. Advertising Standards and Marketing 4. Customer Interaction 5. Employment of Children and Young Persons 	<ol style="list-style-type: none"> 6. Fair and Open Practice and Dispute Resolution 7. Information on how to Gamble Responsibly and Help for Gamblers with problems 8. Money laundering, Cash handling & Suspicious Transactions 9. Self-exclusion
--	--

Name	Position	Interval not to exceed 7 days		Signature	Leave Date	Tick against relevant Policies										
		Joining Date	Training Date			1	2	3	4	5	6	7	8	9		

In addition to CCTV

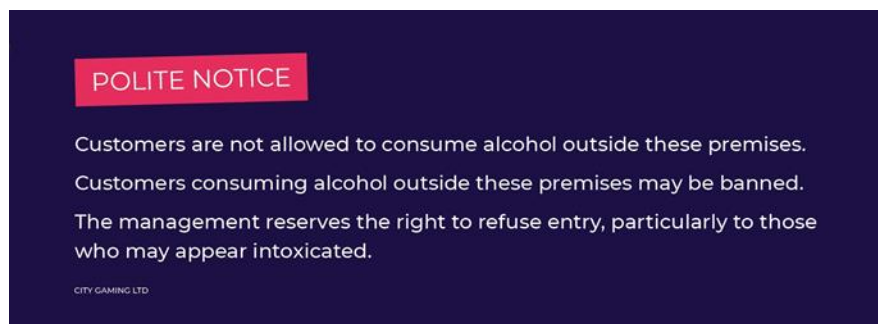
We've developed StaffGuard™ to help create a safe environment for our Customers and Staff when they're faced with an incident, have a medical emergency or simply need reassurance from a friendly voice. It's simple to use and incredibly reliable. Staff Guard is a supplementary remote managed service from a command centre that provides 3rd party assessment and support. All three of the emergency Service become an extension of the tools our teams can deploy.



Toilet Facilities are designed to deter individuals from attempting to inject drugs on the premises – Controls are as follows :

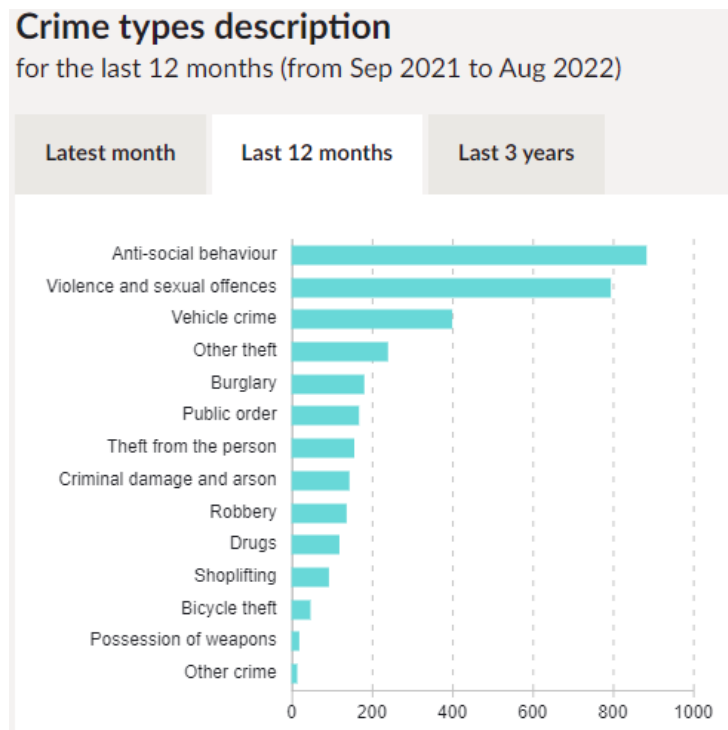
- Access controlled by staff
- Toilets inspected after every use to identify those individuals involved in drug or alcohol abuse
- Zero tolerance to drug or alcohol abuse with appropriate signage
- Toilet facilities designed so that no areas are accessible to hide drugs, syringes or alcohol.
- Also disabled facility

Zero tolerance to alcohol abuse with appropriate signage



Local Factors

Crime statistics – (Source Police.uk)



Between Sept 2021 and Aug 2022 an average of 285 crimes were reported each month in the Tottenham High Road area. This remains very much in line with the statistics reported in Oct 2022.

We are also aware that drug dealing, gangs and street drinking are a particular problem in the area as well as drug use and gang members fleeing into betting shops and AGCs as places of sanctuary – **City Gaming propose to minimise the risk by the implementation of systems as described in the previous sections.**

Mental Health – Data source (Haringey Local Area Profile January 2019)

Haringey has high levels of severe and enduring mental illness with higher than average suicide rates. Noted that Haringey has some 4000 residents with severe mental illness. This is 3 times more than would be expected for a population the size of Haringey's.

32% of offenders on probation report having mental health issues whilst this is further compounded by drug and alcohol misuse in 20%

Deprivation – Data source (Gov.uk / English Indices of Deprivation 2019)

LSOA code (2011)	LSOA name (2011)	Local Authority District code (2019)	Local Authority District name (2019)	Index of Multiple Deprivation (IMD) Rank	Index of Multiple Deprivation (IMD) Decile
E01002081	Haringey 012D	E09000014	Haringey	2,971	1

The IMD of 2,971 out of 32,844 indicates that this is an area of extremely high levels of deprivation which brings with it the associated high levels of alcohol and drug abuse, crime and mental illness.

Ethnic and Religious Demographics

Religious demographics from the 2011 census show that 52.9% of the Haringey population were born in England with the rest being comprised of small percentages of people from other nations across the world. The census also showed that 70.3% of people in Haringey spoke English with next most spoken languages being Turkish and Polish

In terms of religious demographics, the same census showed that 45% of the Haringey population are of Christian religion followed by some 25% who claimed to have no religion and then 14.2 who are Muslim.

With such a diverse population within Haringey, City Gaming will endeavour to ensure through the recruitment process that local staff are employed who have a good understanding of the religious and ethnic population and their attitudes toward gambling.

Economic makeup of the community – Data source (Haringey Economic Strategy & Business Relationships – Overview & Scrutiny Committee)

Haringey is 24th out of 33 London boroughs for the number of businesses and has a very small proportion of large companies – Only 4 other London boroughs have a smaller proportion of large firms.

Only 1% of all London employment is in Haringey. At 72,600, this is less than half the London average. However, the number of jobs have grown by 17% in recent years. The employment rate for the period Oct 2018 to Sept 2019 is 73.7%, slightly less than London at 74.4% and the rest of the country at 75.7%.

Health and retail are the joint two largest sectors by employment in Haringey followed by education. There have been declines in Public administration and business support jobs but significant increases in arts, entertainment, recreation and other services.

In work poverty – 17% of residents claim that their household income is less than £15,000 per year including benefit payments whilst 1 in 5 residents report that at least one member of their household earns less than the London Living wage.

Appendix 3 to this Risk Assessment is the Game Nation Safeguarding Adults Policy Statement

Gambling Act 2005 – The Licensing Objectives

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

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
2. Ensuring that gambling is conducted in a fair and open way; and
3. Protecting children and other vulnerable people from being harmed or exploited by gambling.
4. Safeguarding – (Company Objective)

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Children entering site unnoticed/unchallenged	1	Low	Severe to Business Sever to Child	Interior Design	<ul style="list-style-type: none"> ✓ Constant and effective monitoring of the main entrances by Managers/Staff/Security at all times. ✓ Staff have uninterrupted visibility of all gaming machines at all times 	Oct 2022
				Exterior Design	<ul style="list-style-type: none"> ✓ Front of the Venue is designed not to be attractive to children and challenge 25 posters clearly visible from street. ✓ Frontage and doors designed so that children cannot see gambling taking place from the footpath or passing vehicles 	Oct 2022
				Physical	<ul style="list-style-type: none"> ✓ Think 25 Policies in place and implemented ✓ Regular independent (Check Policy) age verification testing ✓ Regular staff training in-house and through e learning with 6 monthly refresher courses ✓ The BACTA Toolkit is available and supplements the E Learning program ✓ Clear & Prominent premises signage and machine labelling ✓ Thank 25 material displayed ✓ Regulatory Return data collected through IHL tablet process and reviewed weekly with weekly reporting up to CCO level by Commercial team ✓ Policy of preventing the wearing of hoods ✓ Health and Safety Policies & procedures in place 	Oct 2022

Failure to deal with Consumers making complaints about the outcome of Gambling	2	Moderate	Moderate to Business Severe to vulnerable customer	Physical	<ul style="list-style-type: none"> ✓ Machine maintenance carried out by qualified engineer ✓ Machine turned off immediately should fault be identified ✓ Machine only acquired from licensed suppliers. 	Oct 2022
				Systems	<ul style="list-style-type: none"> ✓ Complaints Procedure & Forms available on premises ✓ Staff training through E Learning with 6 monthly refresher courses ✓ Registered with ADR Entity – CEDR. Centre for Effective Dispute Resolution ✓ Compliant with Company Procedures 	Oct 2022
Failure to provide information to players on responsible gambling.	3	Low	Severe to Business Sever to Customers	Physical	<ul style="list-style-type: none"> ✓ Sufficient quantity of posters and leaflets. "Playing the machines" posters displayed prominently. ✓ All machines labelled displaying National Gambling Helpline number and website address. 	Oct 2022
				Systems	<ul style="list-style-type: none"> ✓ Stock control system in place for leaflets and is monitored daily. ✓ Adhere to Company Procedures and Policies ✓ Regular audit to ensure system is in place 	Oct 2022
Failure to recognise signs associated with problem gambling or substantial changes in gambling style.	3	Moderate	Severe to Business Sever to Customers	Interior design	<ul style="list-style-type: none"> ✓ Players behaviour and positions are closely and effectively monitored. Clear lines of sight to all machines and effective CCTV systems 	Oct 2022
				Systems	<ul style="list-style-type: none"> ✓ Staffed trained in customer interaction via E Learning with 6 monthly refresher training ✓ Clear policy to record the procedure for interaction and logging of interactions through IHL SmartHub tablet system. All interactions reviewed weekly by the Commercial team and a weekly report produced and distributed to all senior management. 	Oct 2022
Staff lacking awareness and unsure how to recognise or respond to a vulnerable person who may be at risk	4	Moderate	Severe to Business Sever to Customers	Training	<ul style="list-style-type: none"> ✓ Safeguarding Adults Policy and Training 	Oct 2022
Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements.	3	Low	Severe to Business Sever to Customers	Physical	<ul style="list-style-type: none"> ✓ CCTV effectively positioned at entrance to benefit identification of knowns excluders. ✓ 	Oct 2022

				Interior Design	<ul style="list-style-type: none"> ✓ Consideration given to internal layout so as to ensure effective monitoring of customers entering the premises and those that might enter in order to gamble on behalf of self-excluder. 	Oct 2022
				System	<ul style="list-style-type: none"> ✓ IHL Multi Operator Self Exclusion System in place ✓ All exclusion and breach data subject to weekly review by Commercial team and reported to senior management. ✓ IHL tablet always available to ensure that customers wishing to exclude can do so ✓ Details of Self Excluded customers distributed to other sites and operators via IHL/Bacta MOSES systems 	Oct 2022
Failure to identify attempts to launder money on the premises (e.g. dye stained notes) and to follow correct reporting procedure.	1	Low	Sever to business Low to customers	Interior Design	<ul style="list-style-type: none"> ✓ Effective monitoring of customers' behaviour by good lines of sight from floor staff and Managers, and well positioned CCTV cameras. 	Oct 2022
				Physical	<ul style="list-style-type: none"> ✓ Where machines operate TITO, tickets cannot be transferred or used in any other premises. Suspicious tickets are automatically flagged and staff interaction is then required ✓ The majority of larger wins are paid by hand which forces interaction with staff 	Oct 2022
				Training	<ul style="list-style-type: none"> ✓ Red Flag indicators trained. ✓ For example – Increased spend inconsistent with the customer's normal profile, unknown customers staking large amounts, customers with no known means of income staking large amounts etc 	Oct 2022
				System	<ul style="list-style-type: none"> ✓ The Company has an appointed Money Laundering Officer and has Policies and Procedures in place which are reviewed regularly, are implemented and monitored in respect of Money Laundering and Suspicious Transactions including a Disclosure Procedure for use by staff and reporting to the National Crime Agency using SARs. 	Oct 2022
Poor security increasing vulnerability to crime	1	Low	Sever to business Sever to customers	Physical	<ul style="list-style-type: none"> ✓ StaffGuard system incorporating Panic Alarms that connect to an independent Conflict Management Centre ✓ Intruder alarm installed and regularly serviced 	Oct 2022

					✓ Effective CCTV coverage with data stored for a minimum of 30 days	
				Exterior Design	✓ Toughed glass windows and door to limit criminal damage ✓ Outdoor CCTV with full coverage of all entrances	Oct 2022
				Systems	✓ Limited cash desk and personal floats ✓ Regular liaison with local law enforcement agencies ✓ Log maintained should Police be called to assist. All incidents reviewed weekly by Commercial Team and reported to senior management ✓ Keep abreast of local crime trends	Oct 2022
Awareness of heightened local crime in the local area.	1			Systems	Higher than average crime statistics although an increase in the level is not higher than similar areas or the Metropolitan Police Area in total https://www.police.uk	Oct 2022
Awareness of students learning facilities (schools & colleges) in the local area	3			Systems	✓ Local research identified schools as listed earlier in the assessment ✓ Challenge 25 process and systems ✓ No gaming visible to children or young persons from outside of the venue	Oct 2022
Awareness of residential facilities for the vulnerable in the local area	3			Systems	✓ Care homes as listed earlier in the assessment ✓ Door controls, CCTV and training in place	Oct 2022
Awareness of gambling care agencies in the local area	3			Systems	No physical facilities for problem gambling in the vicinity http://www.gamecare.org.uk http://www.gordenmoody.org.uk	Oct 2022

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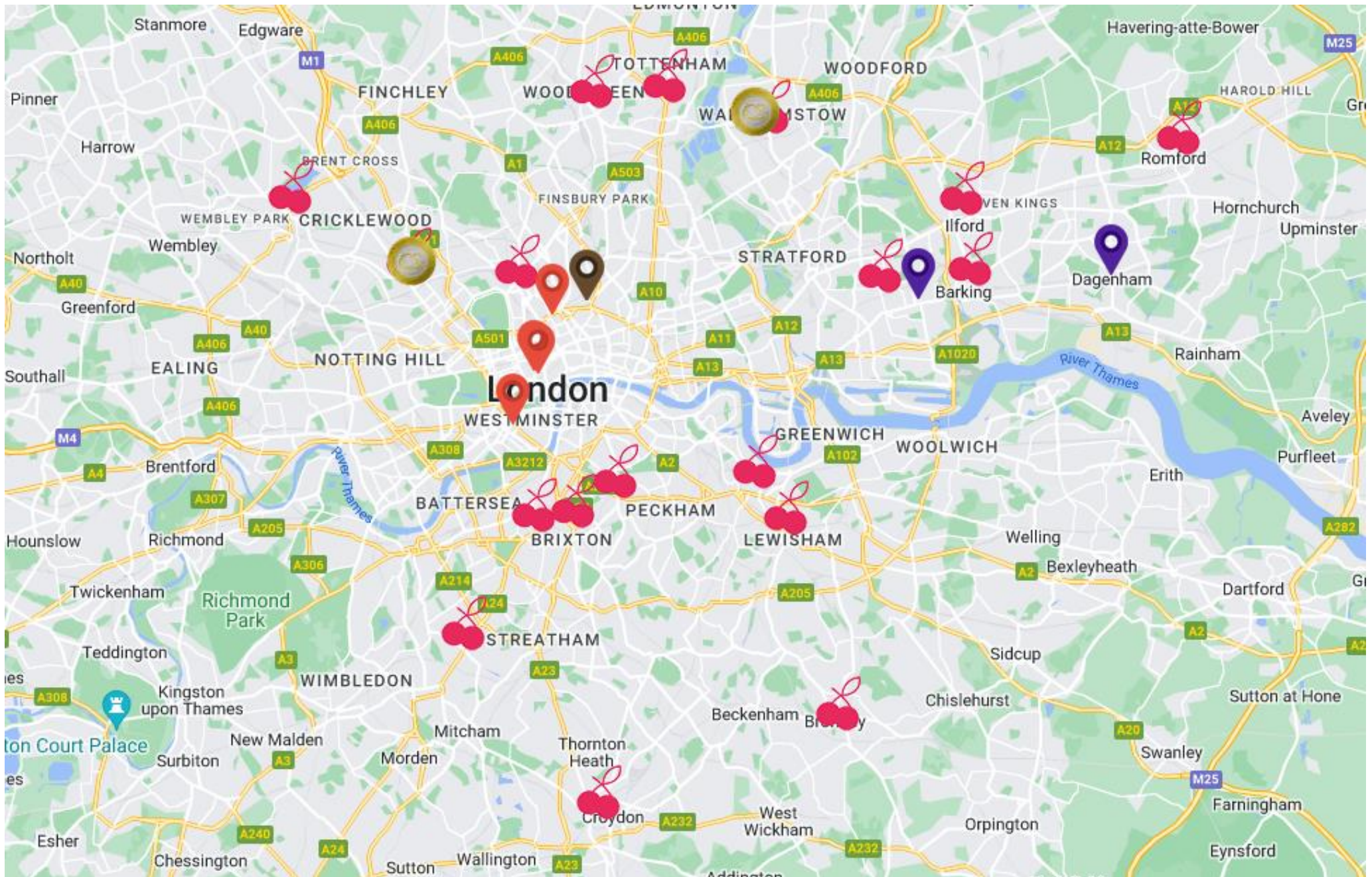






City Gaming premises located in the Index of Multiple Deprivation Top Decile

Venue Name	Address	LSOA code (2011)	LSOA name (2011)	Local Authority District code (2019)	Local Authority District name (2019)	Index of Multiple Deprivation (IMD) Rank	Index of Multiple Deprivation (IMD) Decile	Licensed Hours	Operational Hours	Additional Licence Conditions
Margate	90 High Street, Margate, CT9 1JW	E01024676	Thanet 003A	E07000114	Thanet	67	1	24 Hours	24 Hours Mon-Sun	No
Firth Park	9-11 Sicey Avenue, Sheffield, S5 6NF	E01008062	Sheffield 013E	E08000019	Sheffield	1138	1	24 Hours	9am-8pm Mon-Sun	No
Ipswich	37 Upper Brook Street, Ipswich, IP4 1ED	E01033129	Ipswich 007H	E07000202	Ipswich	1620	1	24 Hours	24 Hours Mon-Sun	No
Shirley	71 High Street, Shirley, Southampton, SO15 3NP	E01017250	Southampton 010B	E06000045	Southampton	1669	1	24 Hours	24 Hours Mon-Sun	No
Dover 1	60 Biggin Street, Dover, CT16 1DD	E01024215	Dover 013B	E07000108	Dover	2105	1	24 Hours	10am-6pm Mon-Sun	No
Dover 2	9 Biggin Street, Dover, CT16 1BD	E01024215	Dover 013B	E07000108	Dover	2105	1	24 Hours	24 Hours Mon-Sun	No
Tottenham	448-454 High Road, London, N17 9JN	E01002081	Haringey 012D	E09000014	Haringey	2971	1	9am-midnight Mon-Sat 9am-11pm Sun	9am-midnight Mon-Sat 9am-11pm Sun	Yes
Portsmouth 1	101 Commercial Road, Portsmouth, PO1 1BQ	E01017032	Portsmouth 016B	E06000044	Portsmouth	3086	1	24 Hours	24 Hours Mon-Sun	No
Portsmouth 3	3 Edinburgh Road, Portsmouth, PO1 1DE	E01017032	Portsmouth 016B	E06000044	Portsmouth	3086	1	24 Hours	9am-10pm Mon-Sun	No



COMBINED OPERATING LICENCE

Number: 000-052732-N-329729-007

This licence issued under Part 5 of the Gambling Act on 27 November 2018 is amended under section 104 of the Act .

The effective date of the amendment is ¹ 18 January 2022

Part 1

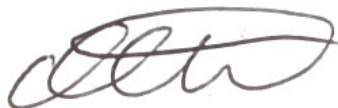
This operating licence² is issued to:

City Gaming Limited
trading as City Slots; Game Nation; Golden Touch; Palace
Amusements
of
4 Cavendish Square
London
W1G 0PG

This Licence authorises the Licensee to carry out the following activities:

to provide facilities for playing bingo; to make gaming machines available for use in an adult gaming centre; to supply, install, adapt, maintain or repair (but not manufacture) a gaming machine or part of a gaming machine

Signed on behalf of the Gambling Commission



Programme Director

¹ Note: Licences may be surrendered, lapse, be forfeit or be revoked in accordance with sections 113, 114, 115, 118 or 119 of the Act. Under section 111 of the Act the Commission may determine that licences, or licences of a specified class, shall cease to have effect at the end of a specified period

² which is not a remote licence

This Licence is subject to the following conditions:

- The specific conditions attached to this licence by the Commission by virtue of section 77 of the Act, which are set out below
- the statutory conditions attached by virtue of the Act: these are set out in the enclosed documents
- the general conditions imposed by the Commission by virtue of section 75 of the Act, which are set out in the enclosed documents
- the general conditions imposed by the Secretary of State by virtue of section 78 of the Act which are set out in the enclosed documents

Part 2 Commission Specific Conditions

1. Until the time that the licensee becomes operational, the licensee must provide a written quarterly management summary report to the Commission within 28 days of the end of each quarter. The first report is due no later than 31 March 2019 and must include:

- a) Up to date bank statement from the UK business bank account; once opened
- b) Details of where and how any funds have been used.
- c) Details of what actions have been taken by the licensee to become operational, this should include details of any third parties that are taking steps on the Licensee's behalf.

2. Before commencement of trading the Licensee will provide the Commission will evidence of a UK business bank account and evidence of the transfer of the funding for the licence activity in to the bank account in the name of City Gaming Limited

3. The licensee must notify the Commission no later than 28 days prior to the commencement of trading of their intention to trade and the premises that they will trade from.

4. The licensee must provide the Commission no later than 28 days before they intend to commence trading from any premises with the following:

- a) copies of revised policies and procedures
- b) risk assessment for the premises
- c) business continuity plan
- d) details of all third parties to be used

5. Machine Maintenance-This licence is subject to the condition that the authorised activities may only be provided by the licensee itself or, as principle, through the agency of City Gaming Leasing Limited

6. This Licence is subject to the condition that the authorised gambling facilities may only be provided by the licensee itself or, as principal, through the agency of the company specified against the relevant activity below:

Providing facilities for bingo:

Family Leisure Holdings Limited
Family Leisure Victoria Limited
Family Leisure Euston Limited
Family leisure Gerrard Limited
Atlantic Amusements Limited
Errolbrook Limited

Conditions specific to providing facilities for playing bingo

This licence is subject to the condition that the annual gross gambling yield is less than £200,000.

Conditions specific to making gaming machines available for use in an adult gaming centre

This licence is subject to the condition that the annual gross gambling yield is less than £30,000,000

Conditions specific to supplying, installing, adapting, maintaining or repairing (but not manufacturing) a gaming machine or a part of a gaming machine

This licence is subject to the condition that the value of the licensee' s annual gross sales is less than £550,000.

City Gaming Limited (52732), Family Leisure Holdings Limited (1875), Mulbrook Limited (37250) and Whittaker Arcades Limited (49054)

Trading as City Slots, Game Nation, Palace Amusements, Play 2 Win, Reel Time, Vegas Gold, Las Vegas, Oak Amusements, Gaming Fun, Golden Touch

Money Laundering / Terrorist Financing / Proceeds of Crime Act (ML / TF / PoCA) Arcade Business Risk Assessment

Version: 1.10

Dated: **September 2022**

Updated By: **Graham Glanfield – Consultant**

ML/TF/PoCA risk overview	
Business Head Office Address	4 Cavendish Square London W1G 0PG
Overall ML/PoCA Risk	Our business model and gaming machines are not ideally suited for exploitation and use for money laundering purposes and the overall risk of Money Laundering, Terrorist Financing and receipt of Proceeds of Crime is still considered to be low as only 3 sites operate full TITO compared to two when this Risk Assessment was first written.
Summary of business	Arcade (AGC) operator, offering a variety of gaming machines, category B3, C and some D. Arcades provide our customers an opportunity to gamble, meet and socialise in a safe controlled environment. We currently have 59 trading locations Employing over 400 People The business is geographically managed via four Regions – London North / London South / London Greenfield / North We have 13 PML Holders

ML, TF & POCA Business Risk Assessment
City Slots/Family Leisure
Version 1.10 Dated 27th September 2022

Local Area Risk Assessments	Local Area Risk Assessments have been completed for all AGC premises and retained on site.
There are two recognised forms of Money Laundering in relation to gambling.	<p>a/ Exchanging money, assets, goods and property that were acquired criminally for money or assets that appear to be legitimate or clean. This is frequently achieved by transferring or passing funds through some form of legitimate business transaction or structure. This “Classic” Money Laundering normally consists of a number of stages – Placement, Layering and Integration.</p> <p>b/ The use of criminal proceeds to fund gambling as a leisure activity. So called criminal or lifestyle spend.</p>
Methodology	<p>A risk based approach is utilised whereby the potential threats from known and emerging risks to the business and customers are assessed and appropriate policies, procedures and controls established to manage and mitigate these risks, establish ongoing monitoring and improvement of these controls and record what has been done and why. (Licence condition 12.1.1)</p> <p>From Identification, analysis and evaluation, the known risks are:</p> <ul style="list-style-type: none"> • Senior Management failing to comply with money laundering and terrorist financing legislation and guidance. • Businesses being acquired by organised crime to launder proceeds of crime. • Lack of competence of key personnel and licence holders which can then be exploited by criminals seeking to launder the proceeds of crime. • Anonymous customers laundering proceeds of crime through gaming machines. • Server Based Gaming machines using Automatic Ticket Redemption machines, ATRs or Kiosks, to launder criminally derived funds. • TITO facilities used in conjunction with ATR or Kiosk machines to launder criminally derived funds Note - Only one additional TITO site on City Gaming operation since the Risk Assessment was first written.. • Privacy booths which can limit the amount of supervision and interaction from venue staff. (Not applicable to City Gaming Limited venues) • Dyed or stained notes being laundered through gaming machines. • Emerging risks such as Cashless Apps and Bring Your Own Device which increase the risk of reduced KYC interactions, transactions not monitored in real time, customers could gamble without interaction with venue staff and “Smurfing” whereby customers could make numerous low level transactions to avoid suspicion. <p>The risks and measures employed are detailed through the following pages of this assessment.</p> <p>The following guidance documents have been reviewed and taken into account in conjunction with the review of this Risk Assessment :</p> <ul style="list-style-type: none"> • Gambling Commission Money Laundering and Terrorist Financing Risk Assessment 2019 • Gambling Commission Money laundering and terrorist financing risk within the British gambling industry • Gambling Commission Duties and responsibilities under the Proceeds of Crime Act 2002 – November 2020 • Gambling Commission Raising Standards for consumers. Compliance and enforcement report 2020 to 2021 .

Summary Risks to Business	<p>The level of stakes and prizes which apply to gaming machines in our arcade venues and the measures in place in SBG machines and handpay mechanism make for a continued low overall risk. The amount of time and level of investment which would be required to cycle a significant amount of illicit cash through these machines would render this an impractical means of laundering money.</p> <p>Our business is highly regulated, through the oversight of the Gambling Commission, and Licensing Authorities and through a strong industry commitment to self-regulation. We hold operating licences granted by the Gambling Commission as well as AGC premises licence(s) granted by Licensing Authorities. All management receive induction and refresher training on Company Policy and Procedure, including Money Laundering and training records are maintained.</p> <p>The principle risks in respect of ML and TF is from customers potentially spending money obtained from a criminal source, or criminal spend or forged/faked notes. Customers could also recycle cash through games in an attempt to conceal its source. Customers could also attempt to use the Ticket In Ticket Out (TITO) systems to attempt to recycle notes. However, our assessment is that the only activities which would hold out the prospect of a sufficiently large payout ratio to make for effective money laundering through recycling is through the use of Category B3 gaming machines. The impracticality of using gaming machines as a laundering mechanism reinforces the continued low risk it presents.</p> <p>In the event of any ML or TF incident being reported to the designated Money Laundering Officer (MLO), David Allard, it will be the MLO's decision as to whether the incident should be reported to the National Crime Agency (NCA), usually via the preferred reporting process of a Suspicious Activity Report (SAR's) .</p>		
Historical incidents of ML/PoCA problems	None		
Names and Positions of Persons Completing the Risk Assessment	Graham Glanfield Darren Russell Paul McGhee Edmir Dashja Mark Field David Allard	3rd Party Consultant Director of Operations - North Regional Director Business Development Manager Operations Director Finance Director (MLO)	
Identify the risks of ML/TF/POCA and controls to manage those risks	Description of Risk	Level of Risk	Controls
Details of customer base, customer behaviour and	Dyed notes/Smurfing	Low	We predominantly operate venues within the local community; however, we do have 4 locations that cater for more transient Customers

ML, TF & POCA Business Risk Assessment
 City Slots/Family Leisure
 Version 1.10 Dated 27th September 2022

<p>description of any risk they present</p>	<p>The majority of customers are known to the staff and management. Staff are actively encouraged to interact with customers in order to build relationships.</p> <p>Low risk of new customers carrying out one off transactions. Customers who are not regulars to the venue should be easily identified by staff.</p> <p>Customers who may attempt to use stained or fake notes are likely to be identified quickly by circulating staff.</p> <p>Money laundering through TITO and SBG Machines</p>	<p>Two close to main transport hubs. Kings Cross and Victoria train stations, along with 2 in tourist locations in Soho.</p> <p>The demographics of our community venues suggests circa 80% are local, within 3 miles of each venue. Venue Managers are encouraged to know their Customers</p> <p>Premises permanently staffed. Staffing levels approved by senior management following completion of risk assessments</p> <p>Use the CCTV throughout licensed premises All staff are vetted and ID verified upon employment. Results are recorded onto our central Data Base (IHL Smart Hub) Staff receive induction and refresher training on Company policy and procedures including 'Know Your Customer', due diligence, customer monitoring and interaction requirements. Interactions are recorded on our central Data Base (IHL Smart Hub) Regular customers known to staff members, which facilitates profiling and knowledge of customer activity.</p> <p>All Premises operate Challenge/ 25 age verification.</p> <p>SBG Data plays an important part of our income data set. EG Turnover / Hold / Ave Stake below / Margin.</p> <p>Combination of CAT B3 & C</p>
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Headlines		
This Week	Week 6	% Change
Reporting Units:	33	2
Cash In Per Reporting Unit:	£2,185.68	-0.24%
Turnover Per Reporting Unit	£5,849.29	-19.32%
Plays Per Reporting Unit:	5,163	-11.61%
Value Retained Per Reporting Unit:	£584.60	-2.90%
Average Stake:	£1.13	-8.72%
Margin:	9.99%	1.69%
Outlets:	15	7.14%

- Inspired SBG machines have an AML trigger built into the software that means a customer has to play off 15% of their stake before being able to "cash out"
- In the event of a customer attempting to cash out without playing, the machine will allocate a TITO ticket but render it void until further investigation from the management team for authorisation
- Machine float levels have been reduced to a base level of circa £50. Therefore any wins over £50 are paid by hand through a member of staff who will log details of all such interactions.
These interactions were recorded as a written events log but more recently are digitally recorded using our ASK kiosks.
- All Handpay details are now captured via a CSA interaction via a smart card
- The CSA taps the kiosk with their smart card. This identifies the staff member. The machine is identified by a unique serial number, the amount to be hand paid is selected and the kiosk then dispenses that amount.
- All data is subsequently available via the Integrated Collection System showing CSA, machine and cash value.
- This data now forms part of our security profiling.

ML, TF & POCA Business Risk Assessment
City Slots/Family Leisure
Version 1.10 Dated 27th September 2022

	<p>Are any customers involved in business that handle large amounts of cash?</p> <p>Are any customers known to have criminal backgrounds or associate with criminals</p> <p>Are customers known to seek to obtain or provide loans to other customers?</p> <p>Does systematic money lending take place between one or more customers?</p>		<p>No</p> <p>No</p> <p>This is reported through IHL on very rare occasions and action is always taken to prevent further occurrences.</p> <p>No</p> <p>Active monitoring of CCTV and the installations of CCTV Spotter screens reduces the risk of transient customers who are not local to the premises. Early engagement on entrance is paramount. E-learning platform will deliver specific training around know your Customer & Positive interaction and de-escalation.</p> <p>Staff Guard is a remote monitoring system that helps provide additional security, this comprises of remote monitoring and personal panic alarms. This is combined with Mag Lock door controls. This system is widely deployed across our estate.</p> <p>Customers who refuse to provide identification are always asked to leave.</p>
Details of Venues and Locations	<p>Identify local risk: Areas of high crime compared to national averages. Nearby schools, religious buildings, support services for vulnerable individuals. Other nearby gambling premises.</p>	Low	<p>Local Risk Assessment completed for all premises, subject to annual review.</p> <p>All premises permanently manned by trained staff members.</p> <p>Use of CCTV throughout premises</p> <p>Relationship maintained with local police licensing team and local authority.</p>

			Company marketing policy applied in accordance with LCCP and ASA and industry guidance. Challenge/Think 25 age verification. Staff trained to monitor customer behaviour and complete customer interaction, where appropriate to do so.
Product / Service			
Gaming machines Category B3, C, D, (B4)	<p>Gaming machines operated by inserting cash, tokens, smart cards, or tickets (but not credit cards or debit cards)</p> <p>Category B3 Max. stake £2 Max. prize £500 Category B4 Max. stake £2 Max. prize £400 Category C Max. stake £1 Max. prize £100 Category D Max. stake 10p Max. prize £5</p> <p>In the case of Category B3 gaming machines, it would be theoretically possible for a money launderer to recycle cash through machines, accepting a loss in the region of 10%. However, the practical constraints of feeding the machine place a relatively low upper limit on the amount which could be recycled in this way. This combined with a HandPay threshold of just £50 on B3 machines makes it a very unattractive way to launder money.</p> <p>In order to achieve a return up to the level of the 2,000 Euro threshold proposed a player on a B3 machine would need to stake (assuming a 90% return to the player) some €2,222 (£1,977), requiring over 900 plays of the machine.</p>	Low	<p>Supervision of gaming machine area provided by staff at all times Staff trained to look out for unusual/dyed notes. Staff trained to report any concerns to Duty Manager. CCTV coverage over all machines Senior staff perform all note collections Full machine audit on all machines on a weekly basis – ad hoc spot check in case of any suspicion Staff & management to be alert to customers attempting to exchange large volumes of paper notes for alternative denominations. Staff trained to watch suspicious behaviour, signs of stress, red flag indicators. E.g. Spend inconsistent with apparent income or unusual patterns of play. Potential AML incidents are recorded on the IHL Smart Tablet. Gaming machines are only supplied and maintained by businesses licensed by the Gambling Commission and machine audit trail retained. Analysis of cash staked and ticket transactions Instances of nil or low play of cash staked before redemption are cross checked to CCTV to identify individual(s). Instances of high stake values are cross checked to CCTV to identify individuals(s). Profiling of member(s) found to redeem stake with little or no play and who have high stakes, ascertaining further detail of spend levels and where appropriate additional personal information including source of funds. A HandPay process is used on Category B3 machines whereby a customer selecting to cash out any funds over the value of £50 will be paid through interaction with a member of staff rather than automatically being dispensed by the gaming machine. This acts as a further deterrent to criminal or money laundering activity.</p>

Treasury/Cash Office/change machines/ATMs	Banking activities Machine collections	Very Low	All Treasury staff trained on ML/TF/PoCA Staff trained to look out for unusual/dyed notes Staff trained to report any concerns to Manager / Capturing all events on the IHL SMART HUB for Snr Manager Review. CCTV coverage in cash office areas Treasury staff are permanent All cash banking completed by senior staff members Staff & management to be alert to customers exchanging large volumes of paper notes for alternative denominations Any ML/TF/PoCA concerns/suspicious reported to Senior Management Gaming Machines' emptied by approved staff members.	
Assessment Review				
Frequency of Review	Every 12 months or after any incidents or changes	Date Review Due :	September 2023	
Signature of Lead Assessor				
Signature of City Gaming Ltd Director		Position	Date	

GAME NATION – CUSTOMER AND STAFF NOTICES

It's important to provide our customers with all the information they need to have fun and feel safe and valued in our venues. It's also very important that our venue staff are well training and comfortable with their obligations. Reminders though visual notices is one way we use to drive home those important messages.

Eye catching and easy to read notes are posted in venue and back of house as a constant daily reminder.



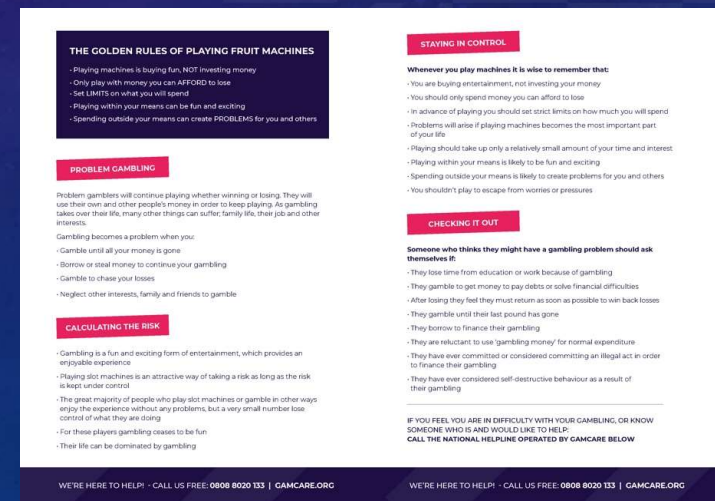
FRONT OF HOUSE OF NOTICES

- Each venue has the House Rules notice poster local to the entrance, suited to that venue.
 - Pictograms highlighting CCTV, no alcohol or smoking etc.
 - Highlighting the complaints process, we also have a dedicated poster and leaflets for this
 - Responsible Gambling
- Complaints and Disputes Policy notices, several size versions and take away leaflets
- Think 25 notices would be posted local to entrance and through out the venue.
- Our “IT’S ALL UNDER CONTROL’ poster available in several sizes, located throughout the venue. Highlighting GamCare details.



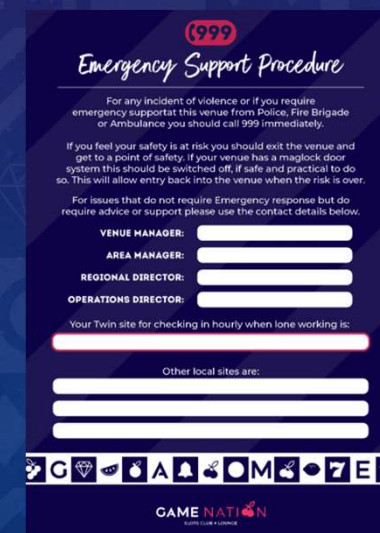
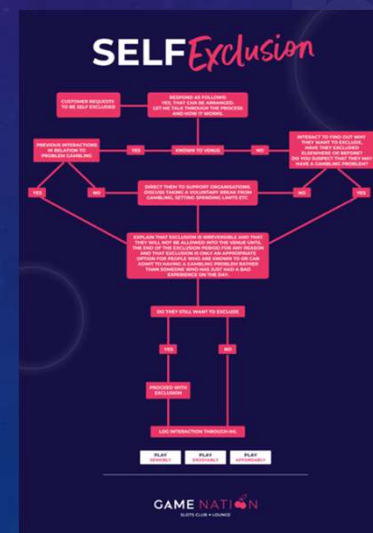
FRONT OF HOUSE OF NOTICES

- Our “IT’S ALL UNDER CONTROL’ Bi-Fold leaflets, available throughout the venue for anyone to take away, including the toilets for customers to take discreetly
- The leaflets are there to help our customers and anyone who asks for help, highlight potential problems and signpost facilities that can help and support.



- Back of house posters as a constant visual reminder of important messages and information. Smaller versions available for venues with limited wall space

- Customer greeting, age checking process, repeated friendly interactions to monitor the customers well being.



GAME NATION FRONTAGE WINDOW GRAPHICS

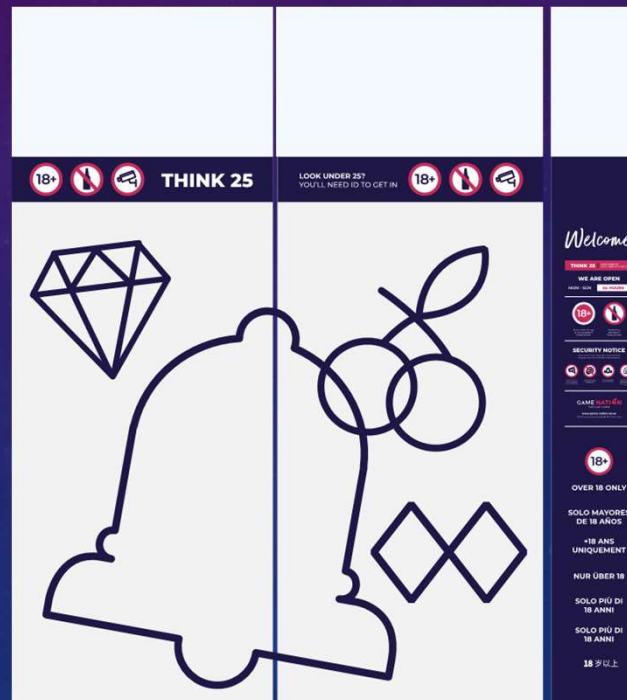
- The venue window graphics allow us to add important messages to our customers and access restrictions before they entry.
- These restriction messages are presented in multiple languages, a required.
- We also utilise the window mounted monitors to scroll messages



GAME NATION FRONTAGE

WINDOW GRAPHICS EXAMPLES

Messaging in multiple languages as required



GAME NATION BACK OF HOUSE

- Each venue will have their information station white board, this visual notice shows all staff the rolling performance of the venue, required tasks, notes and training requirements.
 - But it also reminds all staff that whilst venue performance is important, we need to always have our licensing objectives in mind.
- One of our company values is SAFE & FUN, noted on the 'Our Vision & Values' poster, this states that we take our legal and regulatory responsibilities extremely seriously, another reminder to all staff of the importance of SR.

OUR VENUE INFORMATION STATION

QUARTLEY INCOME ACTUAL		QUARTLEY BONUS TARGET		DIFFERENCE	

LAST WEEK	BUDGET TARGET	ACTUAL	DIFFERENCE	YTD DIFFERENCE

THIS WEEK	BUDGET TARGET	ACTUAL	DIFFERENCE	YTD DIFFERENCE

TOURNAMENT

TASKS

TRAINING REQUIREMENTS	OTHER REQUIREMENTS

HERE ARE YOUR 3 MAIN LICENSING OBJECTIVES FOR YOUR VENUE

- 1 Promoting gambling to over 18s or 21s as desired
- 2 Ensuring gambling is conducted in a fair & open way
- 3 Ensuring a safe & secure environment

GAME NATION
SLOTS CLUB & LOUNGE

OUR VISION & VALUES

OUR VISION

TO BE THE VENUE OF CHOICE FOR
LOW STAKE FUN & TO BE THE BEST
IN EVERYTHING WE DO.

OUR VALUES

ONE TEAM

We are a **FAMILY** of fun and supportive people who pull together and always **HELP** one another.

GET BETTER EVERYDAY

We continue to **LEARN** everyday, working constantly and **SHARING** our ideas and knowledge with one another. We are the experts in our field.

SAFE & FUN

We promote a **HAPPY** environment, listening and engaging with people. We create **EXCITING** and memorable venues with the best service for our customers enjoy.

We take it as our legal and regulatory responsibilities extremely seriously creating a **SAFE** environment for everyone.

PRIDE & PASSION

We are flexible, energetic and strive to go **ABOVE AND BEYOND**.

We take pride in what we do, delivering a first class experience and customer offer.

GAME NATION
SLOTS CLUB & LOUNGE

GAME NATION STAFF

- All venue staff have name badges to identify themselves to customers.
- Think 25 badges pinned to their uniforms
- All venue staff have their credit card size Tri Fold with important information.
 - Reminders of our company values and IHL recording.
 - Importance of customer interactions and logging details on IHL
 - Constant reminder of their 3 licensing objectives





StaffGuard Features

We've developed StaffGuard™ to be simple and incredibly reliable to use. Helping your workers in conflict situations, medical emergencies or when they simply need reassurance from a friendly voice.

- An attractive slimline white impact resistant casing
- Audio verification available on any or all four alarm channels
- Built-in high volume audio verification speaker
- Built-in high sensitivity boundary microphone
- Radio single push-button key fob
- Intruder detection system monitoring as standard
- Fire detection system monitoring as standard
- Optional CCTV transmission interface
- Optional Man down Detection



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Hikvision ColorVu Cameras' powerful ability to capture details in low lighting comes from two specific breakthroughs in hardware technologies: advanced lenses and high-performance sensors.

Coupled with a supplemental light for extremely dark scenarios, ColorVu cameras guarantee video with colourful details when you need them.

We have committed to provide high quality CCTV covering the street from left- and right-hand side perspectives, with additional CCTV covering the main entrance. CCTV Spotter screens will be installed with live streaming of internal and external images.

We will use 4k / 8-megapixel cameras inside the premises and 4-megapixel DarkFighter cameras (Hik vision - ColorVu) externally, which means that the external cameras will provide full colour images in any light condition.

The Key Benefits of Full-colour Video

- True Colour Information – Helps to clearly identify individuals.
- Accurate colour rendering – Helps to determine clear clothing colours.
- Excellent performance in low-light environments
- Captures clear information and richer details compared to black and white imaging. The benefits of Colour over Black and White imagery is truly transformational.
- Better visual recording and playback experience
- Balanced brightness
- Advanced sensors guarantee realistic rendering.
- All the above enhancements help local enforcement clearly identify people or incident that may be of interest.

We intend to monitor entrances, along with front elevations as well as dimly-lit exterior areas where people may have lingered without being detected.

We now enjoy better illumination with ColorVu cameras while they protect our employees, customers, and our immediate vicinity, helping them to feel safe, around and within our property.

The combination of our sophisticated CCTV system and high-quality spotter screens, located within the entrance, now means people know they are being recorded and are far more likely appropriately.



4K ColorVu PoC Fixed Mini Bullet Camera

- High quality imaging with 8 MP, 3840 × 2160 resolution
- 24/7 color imaging
- Clear imaging against strong back light due to 130 dB true-WDR technology
- 3D DNR technology delivers clean and sharp images
- 2.8 mm, 3.6 mm fixed focal lens
- Up to 20 m white light distance for bright night imaging
- Water and dust resistant (IP67)



4K, also called *4K resolution*, refers to a horizontal display resolution of approximately 4,000 pixels.

With up to four times higher resolution than standard HDTV 1080p resolution, 4K has not only been adopted by the television industry as a standard but is also becoming the new norm for video-based security systems, promising better image quality and richer detail.



4K WDR Fixed Dome Network Camera with Build-in Mic New

- High quality imaging with 8 MP resolution
- Efficient H.265+ compression technology
- Clear imaging against strong back light due to 120 dB true-WDR technology
- Built-in microphone for real-time audio security
- Water and dust resistant (IP66) and vandal proof (IK10)
- Robust structure design with full metal materials



Camera	
Image Sensor	1/1.5" Progressive Scan CMOS
Min. Illumination	Color: 0.028 lux @ F2.0, AGC ON, 30s with IR
Shutter Speed	1/5 to 1/100,000 s
Slow Shutter	Yes
Wide Dynamic Range	120dB
Day & Night	IR CUT Filter
Angle Adjustment	Pre-set: 0° to 355°, 0° to 355° rotation; 0° to 355°
Lens	
Focal	Fixed
Lens Type	Fixed lens, 2.8/4.0 mm
FOV	2.8 mm, horizontal FOV: 100°, vertical FOV: 53°, diagonal FOV: 124.7°; 4.0 mm, horizontal FOV: 90.2°, vertical FOV: 42°, diagonal FOV: 95.5°; 5 mm, horizontal FOV: 71.5°, vertical FOV: 33.7°, diagonal FOV: 74.5°

GAME NATION - CUSTOMER CARE

COMPLAINTS & DISPUTES POLICY

We take complaints and comments very seriously at Game Nation.

If a customer has a complaint about the outcome of a gambling transaction or quality of service, good or bad, a member of our venue staff will do their very best resolve in venue.

All complaint/comment will be electronically logged on to our **“Customer Care”** portal via the venue IHL tablet, those resolved and those unresolved that need to be escalated to high management, the customer will be sent an email acknowledging their unresolved complaint with a unique reference code, a member of management will then be alerted of complaint/comment and respond within 72 working hours to hopefully fully resolve.

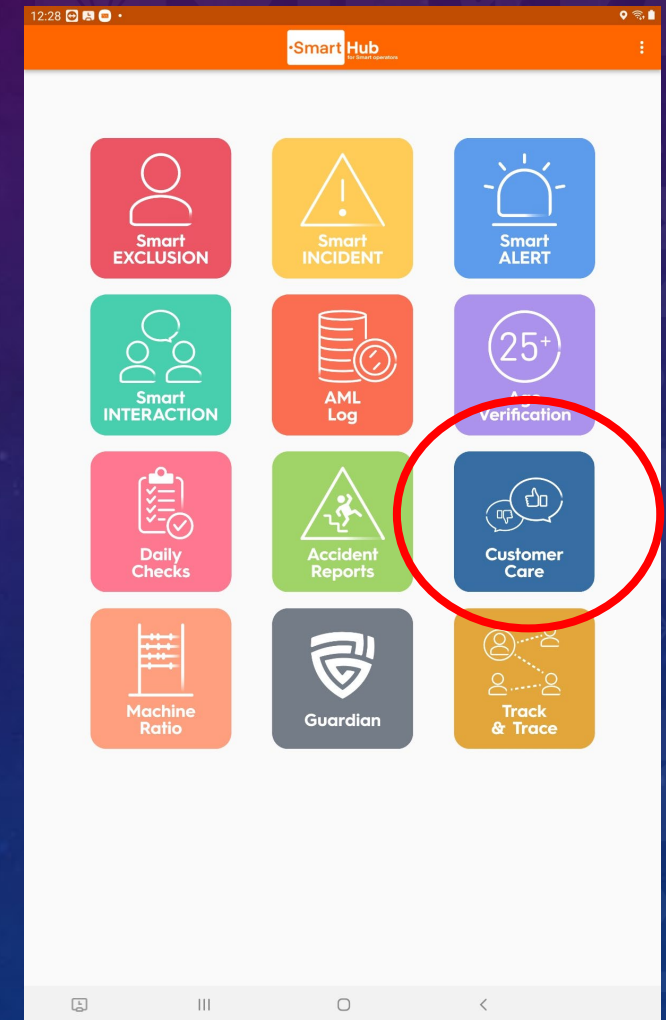
The customer can make a complaint or comments via several mediums, but all will be logged onto our Customer Care system, this will ensure we capture information for means of reportage, service improvements and training requirement

- In venue reporting via our IHL tablets, assisted by venue staff
- From our website, link will take customer to our Customer Care Portal, same interface as the IHL tablet.
- Writing direct to head office, this would be manually entered on to portal.



GAME NATION CUSTOMER CARE

- Selecting the **Customer Care** icon on the venue IHL tablet will open the facility to add and issue or view issues, specific to that venue.
- The venue staff member is then prompted to select from several common categories that best describes the issue, complaint or comments
- The customer can raise an issue of concern, but also highlight excellent service from our team.
- Each category then has a series of sub-categories to best identify the issue.
- Many issues are resolved in venue by listening to the customer, receiving feedback and following company procedures, this facility ensures that all issues are recorded, and we learn from the feedback.



GAME NATION CUSTOMER CARE

TABLET INTERFACE

- Selecting a category and subcategory until their issue is hopefully resolved and logged.
- Should the customer feel that their issue was not resolved in venue, they can provide their contact details, the complaint is then logged as unresolved and escalated to the venues Area Manager
- Once the issue is submitted, the customer will receive an acknowledgment email with unique ticket number.
- The issue is then escalated to the venue's Area Manager who receives an email alert, the Area Manager then has 72 working hours to log into portal and respond to customer with acknowledgment email and hopefully resolve the issue.
- The issue is automatically escalated to the Regional Director if the Area Manager does not respond in a timely manner, or is the AM feels that the RD needs to be involved. The RD does have full visibility of their region's tickets via portal
- All correspondents is completed within the Customer Care service, ensuring no loss of data and full traceability.

The screenshots illustrate the 'New Customer Care Issue' workflow on a tablet. The top-left screen shows a list of categories for the customer's issue, including Product, Venue Service, Website, Health and Safety, Membership, Gambling related help, Report another customer, and Feedback and suggestions. The top-right screen shows a list of specific issues related to 'Product (Game Nation)', such as 'The machine did not pay out when I had a win' and 'I have been unable to cash out my ticket'. The bottom-left screen provides instructions for the Area Manager to discuss a resolution with the customer and refers to general guidance, including a specific example about a machine not paying out. The bottom-right screen is a form for the Area Manager to enter customer details (First Name, Last Name, Email, Mobile) and issue details, with a checkbox to confirm the details with the customer.

New Customer Care Issue

Which category best describes the customer's issue

Product (Game Nation)

Venue Service (Game Nation)

Website - App and Online Services (Game Nation)

Health and Safety - Maintenance (Game Nation)

Membership (Game Nation)

Gambling related help (Game Nation)

Report another customer (Game Nation)

Feedback and suggestions (Game Nation)

New Customer Care Issue

Which best describes the issue relating to 'Product (Game Nation)'

The machine did not pay out when I had a win

I have been unable to cash out my ticket

Issues with promo offer

Machine fault or out of order

Game was unavailable

Issue with the change machine

Issue with the ATM

New Customer Care Issue

Please discuss a resolution with the customer where possible.

Please refer to the general guidance below.

The machine did not pay out when I had a win
Listen to the Customer's Issue / Complaint / Feedback and follow the procedures to resolve. If you have resolved in venue, record the action taken on the next screen. If unable to resolve then follow the instructions to log the issue.

New Customer Care Issue

Customer First Name *

Customer Last Name *

Email *

Mobile

Issue: **Game Nation - Brian Hunt : 13-05-2022 12:28 : Product (Game Nation) : The machine did not pay out when I had a win**

Issue Details: *

Please enter details of the customers issue

Action Taken: *

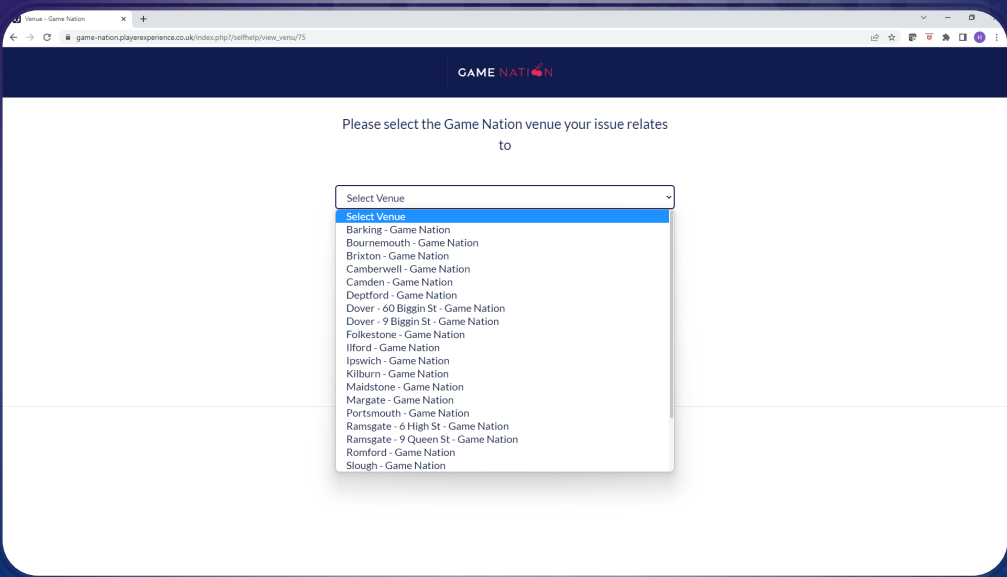
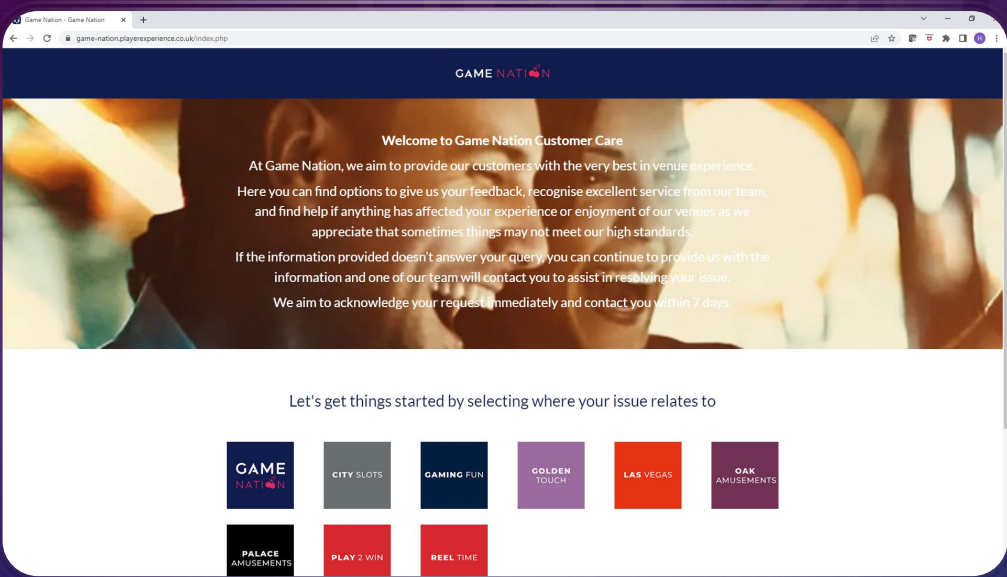
Please provide details of any actions taken to resolve to date

I have confirmed these details with the customer ☐

Cancel Next

GAME NATION CUSTOMER CARE WEBSITE

- Our customers can make a complaint, comments via our website.
- Selecting the venue, taking the customer through the same series of simple selections that best the represents the issue.



GAME NATION CUSTOMER CARE WEBSITE

Venue selection and date stamping

GAME NATION

Please select the venue your issue relates to

Barking - Game Nation

Please tell us when this issue occurred

May-23, 2022 10:50

Back Next

Privacy Policy | Cookie Policy

First category selection

GAME NATION

Your issue relates to: Barking - Game Nation Change Date / Time: May-23, 2022 10:50 Change

What area best describes your issue?

Product (Game Nation)

Venue Service (Game Nation)

Website - App and Online Services (Game Nation)

Health and Safety - Maintenance (Game Nation)

Membership (Game Nation)

Gambling related help (Game Nation)

Report another customer (Game Nation)

Feedback and suggestions (Game Nation)

Sub-category selection

GAME NATION

Your issue relates to: Barking - Game Nation Change Date / Time: May-23, 2022 10:50 Change

What best describes issue related to 'Product (Game Nation)?

The machine did not pay out when I had a win

I have been unable to cash out my ticket

Issues with promo offer

Machine fault or out of order

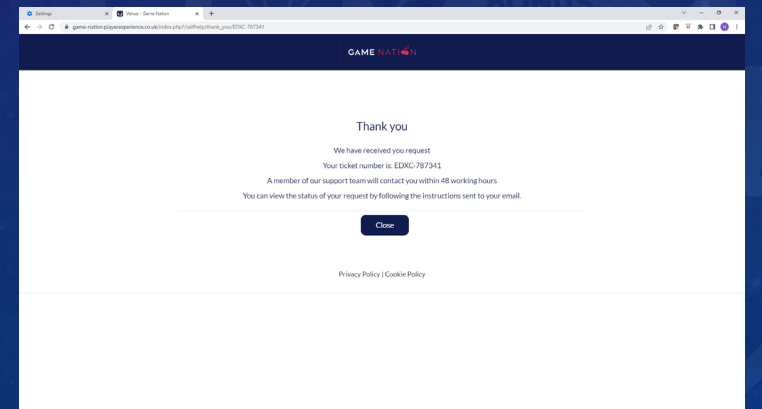
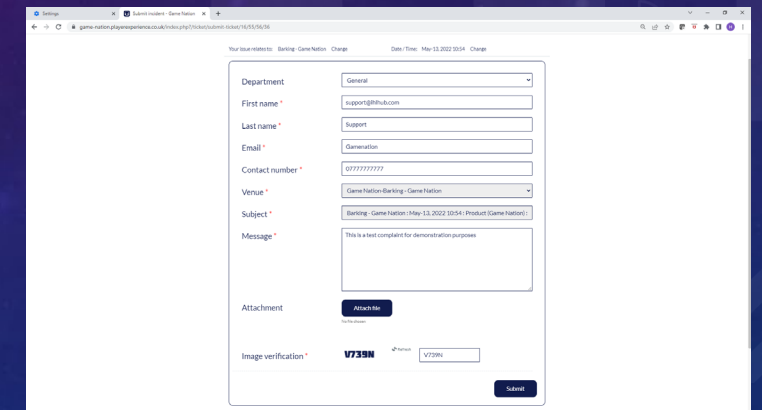
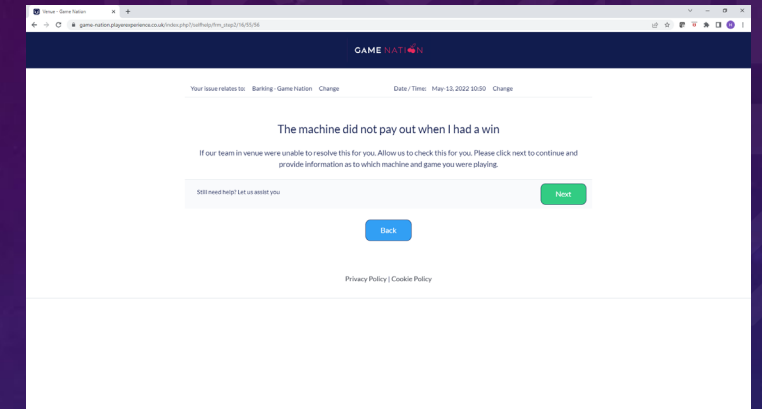
Game was unavailable

Issue with the change machine

Issue with the ATM

GAME NATION CUSTOMER CARE WEBSITE

- The issue acknowledgment process is the same as with the tablet, submitting your issue then corresponding by secure email.
 - Category and subcategory selection
 - Input customers contact details,, mobile number is optional
 - Submit ticket
- The email chain with full details is visible to customer and responding team.



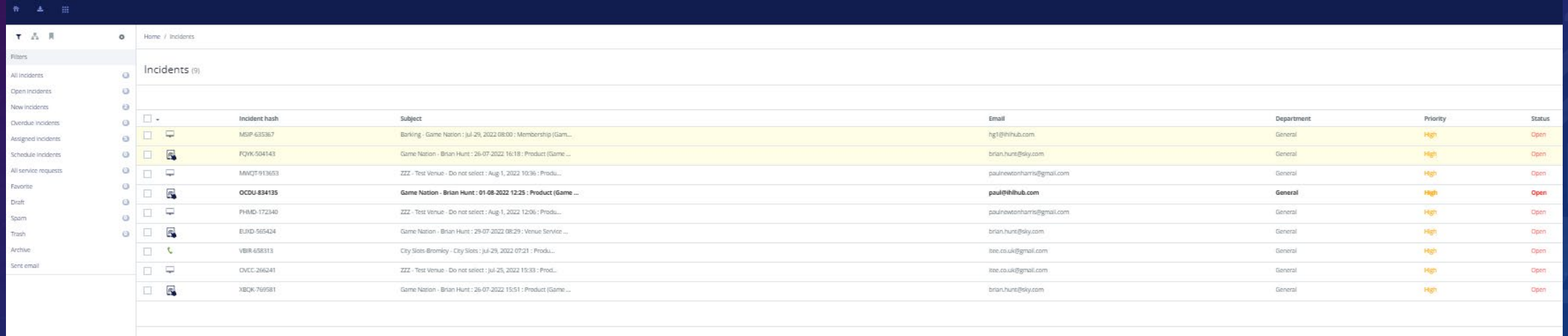
GAME NATION CUSTOMER CARE

PC PORTAL

- The Area Managers and Senior Management have access to the Customer Care portal, giving them full visibility of complaints relevant to their area, showing all reported complaints/comments, their current status (open/in progress/resolved) and response times.
- Area Managers can only view their venues, Regional Directors can only view their regions, this ensures focus in dealing with issues appertaining to their venues.
- Senior Management/Admin have full visibility of all venues.
- Reports can be run by region, nationally, by entity or category, the reportage suit is quite extensive with graphical presentations

GAME NATION CUSTOMER CARE PC PORTAL

- Portal Incident page showing current (test) incidents, modes of entry, brief subject details and current status
- Selecting an incident line will open more details showing full conversation history and allow responses



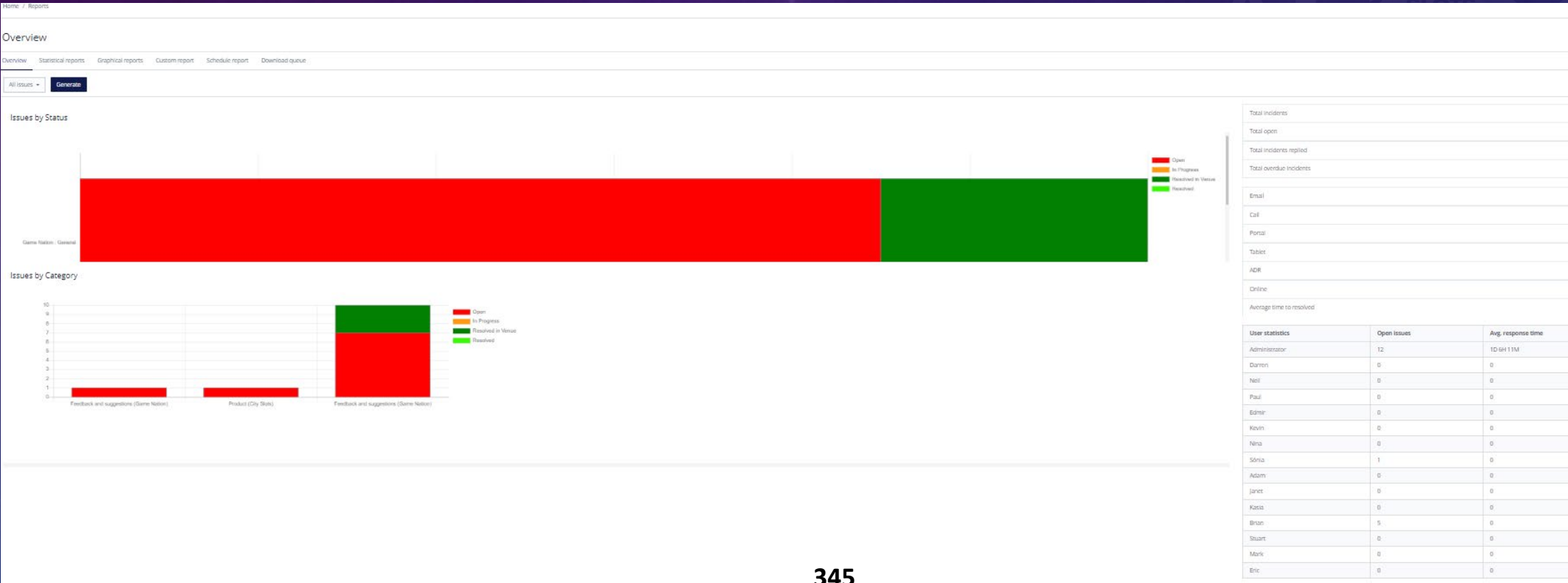
The screenshot displays the 'Incidents' page of the Game Nation Customer Care PC Portal. The interface includes a left-hand navigation menu with options like 'All incidents', 'Open incidents', 'New incidents', 'Overdue incidents', 'Assigned incidents', 'Schedule incidents', 'All service requests', 'Favorite', 'Draft', 'Spam', 'Trash', 'Archive', and 'Sent email'. The main content area shows a table of incidents with columns for Incident hash, Subject, Email, Department, Priority, and Status. The table lists several incidents, including one with hash MSIP-635367 and another with hash FQWK-504143, both with a status of 'Open'.

Incident hash	Subject	Email	Department	Priority	Status
MSIP-635367	Barking - Game Nation : Jul-29, 2022 08:00 : Membership (Gam...	hg1@vhub.com	General	High	Open
FQWK-504143	Game Nation - Brian Hunt : 26-07-2022 16:18 : Product (Game ...	brian.hunt@sky.com	General	High	Open
MWQT-913653	ZZZ - Test Venue - Do not select : Aug-1, 2022 10:36 : Prods...	paulnewtonharris@gmail.com	General	High	Open
OCDU-834135	Game Nation - Brian Hunt : 01-08-2022 12:25 : Product (Game ...	paul@vhub.com	General	High	Open
PHMD-172340	ZZZ - Test Venue - Do not select : Aug-1, 2022 12:06 : Prods...	paulnewtonharris@gmail.com	General	High	Open
EJUD-565424	Game Nation - Brian Hunt : 29-07-2022 08:29 : Venue Service ...	brian.hunt@sky.com	General	High	Open
VBIR-658313	City Slots Bromley - City Slots : Jul-29, 2022 07:21 : Produ...	lbe.co.uk@gmail.com	General	High	Open
OVCC-266241	ZZZ - Test Venue - Do not select : Jul-25, 2022 15:33 : Prod...	lbe.co.uk@gmail.com	General	High	Open
XBCK-769581	Game Nation - Brian Hunt : 26-07-2022 15:51 : Product (Game ...	brian.hunt@sky.com	General	High	Open

GAME NATION CUSTOMER CARE

PC PORTAL

- Reports pages, graphically presenting open and closed status and issues by category.
- Example below details report of open and closed (test) issues, break down by category and issue count, Avg response time by Area Manager, restricted visibility
- Full editing capability for reports and facility to auto generate specific reports



Licence Conditions & Codes of Practice

As a business we are required to interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling, as set out in Social Responsibility Code of the Licence Conditions and Codes of Practice (LCCP). This must include:

- *Identifying customers who may be at risk of or experiencing harms associated with gambling.*
- *Interacting with customers who may be at risk of or experiencing harms associated with gambling.*
- *Understanding the impact of the interaction on the customer, and the effectiveness of our actions and approach.*

A requirement to LCCP requires us to take into account the Commission's guidance on customer interaction. This guidance is structured along the three key outcomes we will be expected to meet:

- **Identify**
- **Interact**
- **Evaluate**

This guidance sets out why customer interaction is a requirement, makes the expectations clear and suggests ways we meet them. It also sets out why customer interaction is important. The gambling commission will expect us to demonstrate how our policies, procedures and practices meet the required outcomes.

What we need to know

The gambling commissions understanding of gambling harms and how they manifest is constantly evolving, so for the purposes of raising standards, protecting consumer interests, and preventing harm to consumers, they will update and re-issue guidance where new evidence or risks emerge. We need to know:

- *The types of markers and behaviours that could indicate harm relevant to the type of gambling we offer, the product and the place*
- *How to spot when those indicators should trigger an interaction.*

We need to ensure our teams are equipped to identify the relevant indicators of harm, to decide whether you need to interact and have effective processes for monitoring customer behaviour, so we can make quicker and better-informed decisions.

Gambling Harms

Gambling harms cannot be solely measured in terms of finance and resources. Therefore, we use a range of indicators in order to identify customers who may be experiencing harms.

What we are expected to do

- Use a range of indicators relevant to our business that we can observe and monitor. This should not rely on financial indicators alone. Where trigger points or thresholds are used, they should be realistic, and remember that not every customer who is experiencing or at risk of harm will trigger every indicator.
- Monitor customer activity and behaviour so that we are able to interact early and quickly. Invest in the development of our teams to manage our customer interaction process effectively.
- Make sure our process keep pace with any increase in demand – through general growth or seasonal, promotional or other variations which might mean you are busier than usual.
- Train our teams to know their roles and responsibilities, and ensure they are supported and given the tools and skills they need to be able to act promptly when they spot or are alerted to indicators of harm.
- Ensure that our customers are not put at any greater risk of harm as a result of our premises being busier or quieter than usual.
- Think about the protection of our new customers – we know less about them, so we may not know what their regular gambling pattern looks like. This means that alternative measures should be applied.
- Make meaningful records of all interactions with customers. Make these records available to the teams and use them to aid decision-making.
- All forms of gambling present risks and we should understand the prevalence of gambling harms for the type of gambling products we offer and implement appropriate processes.
- Actively ensure all our customers have access to information about safer gambling and the support available.

Using the right indicators

Change compared with previous gambling activity is a general trigger for customer interaction. Building up our knowledge of our regular customers is key to helping us spot changes in their behaviour.

We should use a range of indicators. This is not an exhaustive list, but your indicators should include:

- Amount of time spent gambling, visit frequency or length of stay on the premises, leaving and then returning to the premises.
- Amount and frequency of deposits, large losses, using multiple or more expensive payment methods, declined payments, appearing to spend more than they originally intended.
- Signs of distress, agitation, or changes which could be an indication that gambling is having a negative impact on a customer's wellbeing.
- Previous self-exclusions or previous customer interactions or playing through machine alerts.
- Information or hints from the customer, frequent complaints about not winning, or talking about the negative impacts of their gambling.
- Chasing losses, erratic betting patterns and gambling on higher risk products
- High staking following a win could hide or even lead to harmful behaviour. Suddenly having more money than usual can lead to increasing staking, which can lead to harms not associated with wealth or resources.

Affordability and a customer's personal circumstances

Historically, gambling operators have not systematically considered customer affordability when developing their customer interaction policies. We should aim to identify those experiencing or at risk of harm and intervene to try to reduce harm at the earliest opportunity. We should be aware of the difference between 'disposable income' and 'discretionary income' which refers to the amount left after living costs are taken into account, but it does still include many other unavoidable costs. Most people would consider it harmful if they were spending a significant amount of their discretionary income on gambling.

Vulnerability

Life events or changes to an individual customer's circumstances may mean that a person becomes more or less vulnerable to experiencing gambling harms. Those circumstances could include bereavement, loss of income or other factors. It will not always be obvious or clear to an operator when such events have occurred, but knowing our customers, and ensuring staff ask questions when there are potential signs of vulnerability, will help to determine whether those individual circumstances present an increased risk. As part of 'know your customer' we should consider the factors that might make an individual more vulnerable to experiencing gambling related harms. Factors include:

- If the individual is experiencing poor physical or mental health, physical or cognitive impairment, suffering side effects from a brain injury or medication, or has an addiction.
- If the individual is experiencing financial difficulties, is homeless, is suffering from domestic or financial abuse, has caring responsibilities, experiences a life change or sudden change in circumstances.
- If an individual has a higher than standard level of trust or high appetite for risk.
- If an individual is engaged in an activity which is highly complex; that they have a lack of knowledge and/or experience of the market.
- If an individual has difficulty accessing information because of poor literacy or numeracy skills, knowledge, dyslexia.

Spotting harmful gambling

We should draw on all available sources of data to give a comprehensive picture of the customer's gambling. Options for spotting harmful gambling include:

- *Sharing of information by staff about concerns.*
- *Customer interaction forms, day diary with flags.*
- *Utilising back office systems and alerts where they exist.*

The right information can mean better and quicker decisions. The customer interaction records we keep should give staff a more complete picture of the customer's previous activity, which will help to inform decisions. Our customers should not be at more risk because our premises are either busier or quieter than usual. You should ensure you have appropriate levels of well-trained staff on duty to meet the licensing objectives.

The role of teams

It is important that all the team receive training so that they are aware of the signs that could indicate that a customer may be experiencing harms associated with gambling. This is not an exhaustive list, but you should ensure that:

- *Teams are trained to identify the signs of harm and refer back to documents that include the types of behaviour that may trigger customer interaction at an appropriate moment. Teams should know how to escalate a situation if they are unsure or require support.*
- *customers and know how to spot the signs.*
- *As a minimum, teams receive training at induction as well as refresher training.*

Interact

Customer Interaction

When you are concerned that a customer may be experiencing harm, acting early and quickly could help stop or prevent the harm worsening. It is important in a premises environment that you interact with the customer in a timely manner whilst the opportunity presents itself.

For some customers, making them aware of why you are concerned may be enough to prompt them to think and make a change. Some customers will need more support or advice.

Our interactions should have an outcome. Knowing what impact our interaction has had will help you support the customer and help to keep improving our approach. To achieve this, it is vital to keep good records and make them available to teams to inform decisions.

What we expect

- *We expect our teams to be curious, and if we spot behaviour that could indicate harm, act on it.*
- *Ensure your teams have access to the information and support they need, such as customer interaction records, so that they are able to make decisions about how to interact and can do so discreetly.*
- *Interact in a way that is appropriate to the severity of the potential harm.*
- *Think about what information we should give the customer to help them understand why you are interacting with them, such as describing the type of behaviour they display or practical help or support where appropriate.*

Interacting with a customer

Many of our interactions are likely to be face-to-face, so it is important for teams to be prepared in advance of carrying out a customer interaction. You should consider:

- *What do you need to know from the customer and what do you already know about them?*
- *What information do we want to give them?*
- *How many times have we already interacted with the customer?*
- *What outcome do we want to achieve?*
- *Is the customer behaving in a way which might inhibit an interaction at this point?*

Offering help & support

Encourage customers to think about their gambling. Their responses will help us work out the right kind of help and support to offer.

We will need to direct some customers to information about safer gambling and/or suggest appropriate gambling management tools. We might need to signpost them to sources of help and specialist support from organisations which deal with advice and treatment for problem gambling.

We must also make information about safer gambling readily available to customers, as well as information about problem gambling.

We will need to interact with some customers a number of times. Our records of previous interactions with customers will help us decide how to provide the right help and support.

Customers often respond better to being informed about their behaviour and why, rather than being “told” what to do. But for some customers, and particularly if the behaviour continues to cause concern, you may need to take a more proactive approach. In some cases, you may need to take action for the customer, which could mean refusing service.

The role of the team

We should ensure that our teams:

- *Understand the types of interaction that could take place and how to interact appropriately e.g. they may only need a brief intervention.*
- *Know the type of help or support to offer, such as information, signposting customers to specialist support.*
- *Know the circumstances and process for refusing service to customers, such as requesting a customer to leave or barring a customer.*
- *Understand their respective responsibilities and who is designated to carry out customer interactions, if only certain team members are authorised to interact.*
- *Are advised how to deal with situations where customers demonstrate signs of agitation, distress, intimidation, aggression or other behaviours that may inhibit customer interaction, and what to do if the interaction does not take place at that time.*

Whilst training on the legislative framework is important, teams also need to be trained on the skills and techniques they need to help them carry out customer interactions.

Keeping Records

Good record keeping allows us to demonstrate when and why we have interacted with customers and helps with ongoing monitoring of customers. We should:

- *Keep records of all customer interactions and, where an interaction has been ruled out, the reasons for this. Where an interaction has taken place at a later date, this should also be recorded.*
- *Make use of all relevant sources of information to guide and deliver effective customer interactions, including our records of previous interactions.*

Good records should include:

- *The behaviour or activity before the interaction.*
- *The change in behaviour or prompt for the interaction.*
- *How we interacted and what was said or done, for example advice or suggestions to help the customer manage their gambling, or to take a break from their gambling*
- *What happened next.*

We should also record situations where an interaction was prompted but did not take place, and how you followed that up. In some cases, you will need to monitor the customer's gambling to spot behaviours which could indicate further harm.

All interactions should be entered on the IHL hub

Evaluate

What is expected

- *Understand the impact of individual interactions on a consumer's behaviour and whether/ what further action is needed.*
- *Evaluate the effectiveness of your approach by trialling and measuring impact.*
- *Embed lessons learned and best practice across the business and collaborate to share across the industry.*

Understanding the impact of individual interactions

In this context, by impact we mean a change in the customer's gambling activity which could be attributed to the interaction. An important part of this is whether the customer has understood the information or advice given.

Not every customer who receives an interaction will require active follow up, but many will. In these cases, follow up activity should be proportionate to the severity or extent of the harm being displayed. This approach will help you target your resources where they are most needed.

Understanding the impact of the interaction on the customer includes being able to look at and compare:

- *The behaviour before the interaction.*
- *The change in behaviour or prompt for the interaction.*
- *How you interacted – what was said or done*
- *What happened next.*

Some ways to work out impact include:

- *Was there a positive change in behaviour? Did the customer's gambling seem to change after the interaction?*
- *We could also follow up and ask the customer whether they found the interaction helpful or not.*
- *Is there a need for further or follow up action?*

Evaluating the effectiveness of the approach

Good evaluation helps us to understand which aspects of our approach are the most effective at identifying the right customers, and the types of tools or support that work well to help customers manage their gambling in a way that works for them. The following measures could help to work out whether your approach is working well:

- *Customer retention.*
- *Reduction in complaints.*
- *The appropriate number of customer interactions in relation to the size of your customer base or footfall*

Keeping your policies and procedures under review and up to date by taking into account research and industry best practice will help us to identify customers you should be interacting with, which will help us target our resources where they are most needed, in ways which may lead to better outcomes. We should also review our internal controls following the publication of a regulatory settlement, to address any similar weaknesses which could exist in our own processes.

The role of our teams

Our teams have an important role to play to understand whether our approach works, and as a minimum, We should:

Records

Ensure that records of all customer interactions are made by teams and used to aid decision making. Such records should be used for evaluation purposes e.g. dip sampling for quality assurance purposes or to assess whether a customer changed their behaviour as the result of an interaction.

Training

Ensure that records of all customer interactions are made by teams and used to aid decision making. Such records should be used for evaluation purposes e.g. dip sampling for quality assurance purposes or to assess whether a customer changed their behaviour as the result of an interaction.

Support

Ensure that teams are properly supported in carrying out effective interventions.

GAMBLING PREMISES LICENCE

This licence is issued under section 164 of the Gambling Act 2005 by

ADULT GAMING CENTRE PREMISES LICENCE**Haringey Council Licensing Authority**

Premises Licence Number:

LN/000005700

Commencement Date:

1st September 2007

Signature: ...

Part 1 – Details of person to whom licence is issued

This premises licence is issued to:

Talarius Limited

of the following address:

**Fifth Avenue Plaza
Queensway
Team Valley Trading Estate
Gateshead
Tyne and Wear
NE11 0BL**

Operating Licence:

000-001191-N-103508-001**Part 2 – Details of the premises in respect of which the licence is issued**

Facilities for gambling may be provided in accordance with this licence on the following premises:

**Admiral
475 High Road
Tottenham
London
N17 6QA**

Part 3 – Premises Licence Details

This licence commenced on:

1st September 2007

This licence is of unlimited duration:

The following conditions have been attached to the licence by the issuing authority under section 169(1)(a) of the Gambling Act 2005:

N/A

The following conditions, which would otherwise attach to the licence by virtue of regulations made under section 168 of the Gambling Act 2005, have been excluded by the issuing authority under section 169(1)(b) of that Act:

N/A

A scale plan is attached as an annex to this licence

Lodged with Licensing Authority