

ADDITIONAL PAPERS

LICENSING SUB COMMITTEE

Thursday, 22nd May, 2025, 7.00 pm - Microsoft Teams (watch the live meeting [here](#) and watch the recording [here](#))

Councillors: Anna Abela, Sheila Peacock and one other councillor to be named

Quorum: 3

6. APPLICATION FOR THE VARIATION OF AN ADULT GAMING CENTRE LICENCE AT LITTLE VEGAS, 17 HIGH ROAD, LONDON, N22 6BN (NOEL PARK) (PAGES 1 - 106)

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

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Wednesday, 14 May 2025

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**APPLICATION FOR THE VARIATION OF AN ADULT GAMING CENTRE
PREMISES LICENCE GAMBLING ACT 2005
17 HIGH ROAD, WOOD GREEN, N22 6BH**

CASE OUTLINE

INTRODUCTION

1. Chongie Entertainment UK Limited make an application for the variation of a Gambling Act premises licence for an Adult Gaming Centre (“AGC”) at 17 High Road, Wood Green, N22 6BH.
2. The premises was first granted its AGC premises licence on 4th June 2021 and the premises opened for trading on 9th November 2021. The premises licence operator accepted the hours of operation at that stage, which are less than those permitted by primary legislation due to a restriction on planning permission. Conditions were also agreed as part of the application process.
3. Having now traded at the premises for 4 years with no issue, the applicant seeks to vary their planning permission to be allowed to operate for the default hours of 24/7. The planning process is underway. To mirror those hours requested in planning terms, an application is now made to vary the premises licence to allow the premises to open 24/7 as permitted by primary legislation and regulation.
4. Due to the level and nature of the planning and licensing applications, an independent licensing consultant and former high ranking police officer has been instructed to spend time in the area, look at the representations raised, and will be available to answer any questions needed to be asked by the Licensing Sub-Committee. His report has been circulated. He has also looked at the potential impact of 24 hour trading at other premises operated by the applicant.
5. The company has an operating licence issued by the Gambling Commission - 062728-N-337784-003. All due diligence being carried out by the Gambling Commission, the operating licence is a benchmark of fitness and propriety to operate premises of this

nature. This also deals with the licensing objective of “ensuring that gambling is conducted in a fair and open way.”

6. The applicant has had Gambling Act premises licences granted for:

- Unit 1, Broadgate, The Broadway, Crawley, RH10 1HD
- 134/135 Friar Street, Reading, RG1 1EX
- 7-8 Park Street, Luton, Bedfordshire, LU1 3EP
- 3-5 Wardour Street, London, W1D 6PB
- 574 High Road, Wembley, HA0 2AA
- 16 Broadway, Peterborough, PE1 1RS
- 8-10 George Street, Croydon, CR0 1PA
- 29a Union Street, Aldershot, GU11 1EP
- 370-372 Green Street, Upton Park, London, E13 9AP
- Part of Ground Floor & Basement, Nos 1/5 (odd) and Nos 2/6 (even) Bath Road, Hounslow, TW3 3HJ
- 320 Station Rd, Harrow HA1 2DX
- 842-844 High Rd, Leyton E10
- 36 King Street, Thetford, IP24 2AP
- 45 Market Place, Doncaster, DN1 1NJ
- 9 High St Boston PE21 8SH
- 2 Market Place, Wisbech PE13 1DT
- 133 High St Walthamstow E17 7DB
- 73 High Street, Bedford, MK40 1NE

- 141-143 King Street, London W6 9JG
 - 172-174 High Road, Ilford IG1 1LL
 - 78 Week Street, Maidstone ME14 1RJ
 - 58-58a Abington Street, Northampton NN1 2AP
 - 214 Station Road, Edgware, HA8 7AR
 - 179 Fore St, Edmonton N18 2XB
 - 144 High Road Woodgreen, London N22 6EB
 - 4-6 Cricklewood Lane, London, NW2 1EX
 - 14 & 16 Station Road, Harlington, Hayes, UB3 4DA
 - 92 Lewisham High Street, Lewisham, London, SE13 5JH
7. Every premises licence application has been granted (many against strenuous opposition). There have been no regulatory concerns at any of the premises since they have opened. Chongie has faced no reviews of granted premises licences and all trade in accordance with the legislation and have had no impact on the licensing objectives.
8. Importantly and of note, the applicant has appeared before the Haringey authority for the grant of the premises licence at 17 High Road, Wood Green, N22 6BH and 144 High Road Woodgreen, London, N22 6EB.
9. Darren Hughes fulfils the compliance role at Chongie. He has significant experience in the sector, having been with Chongie since 2022 as part of the operations team. Prior to this, Darren was an Area Manager at Novomatic, managing multiple sites in an operational and HR function. He has also been an HR Director and fulfils the same function at Chongie.
10. Darren holds a Personal Management Licence with the Gambling Commission.

11. The company's regulatory procedures and compliance documentation are up to date, detailed and at the forefront of best practice. We have submitted those documents with this case outline.
12. The Metropolitan Police Service have no objection to the variation as granted, and they are the statutory advisors on crime and disorder.

THE LAW

13. As an experienced licensing sub-committee with legal advice will be aware, the Gambling Act sets out a different approach to the question of grant than the Licensing Act 2003. The approach relevant to gambling is detailed at Section 153 of the Gambling Act 2005:

*“In exercising their functions under this Part, a licensing authority **shall aim to permit** the use of premises for gambling in so far as the authority thinks it:*

(a) in accordance with any relevant code of practice [issued by the Gambling Commission]

(b) in accordance with any relevant guidance issued by the Commission

(c) reasonably consistent with the licensing objectives (subject to (a) and (b))

(d) in accordance with the [authority's statement of licensing policy] (subject to (a) to (c)).”

14. The following points should be noted:

- a. The test is mandatory: “*a licensing authority shall*”
- b. The obligation to “*aim to permit*” where (a) – (d) are satisfied is described by the Gambling Commission in its Guidance as “*the licensing authority's primary obligation*”

15. The Gambling Commission Guidance says:

“Licensing authorities should not turn down applications for premises licences or variations where relevant objections can be dealt with through use of conditions”

- Conditions should only be added where it is necessary to do so, and even then such conditions need to be proportionate to the circumstances requiring a response, relevant, directly related, fair and reasonable.
- As the Guidance states: *“Any refusal should be for reasons which demonstrate that the licensing objectives will not or are unlikely to be met”*. That means demonstrate by evidence.
- There is a need for real evidence as to why the variation should not be allowed as per Daniel Thwaites plc v Wirral Borough Magistrates’ Court [2008] EWHC 838 (Admin). In her conclusions, Black J stated that the Justices should have looked for “real evidence” that greater regulation was required in the circumstances of the case. Their conclusion that it was required was, in her judgment, not a conclusion to which a properly directed bench could have come. Here, it was said, they proceeded without proper evidence, gave their own views excessive weight and the police views none at all.
- Conversely, the following considerations are legally irrelevant to the determination of an application for a premises licence:
 - i. A dislike of gambling.
 - ii. A general notion that it is undesirable to allow gambling premises in an area.
 - iii. Moral or ethical objections to gambling.
 - iv. The demand for gambling premises (see s 153 Gambling Act 2005). As such, objections which state that there are enough gambling establishments in a locality may be relevant to planning, but they are irrelevant to licensing.
 - v. Planning considerations (see section 210 Gambling Act 2005).

- vi. Nuisance (see Guidance by Gambling Commission.

BACKGROUND - AGC

16. AGC premises are subject to a high degree of regulation to ensure they promote the licensing objectives.

- Premises and their management and operation are subject to the Gambling Commission's extensive Licence Conditions and Codes of Practice applicable to adult gaming centre operating licences.
- Premises licences are subject to mandatory conditions which are deemed as being appropriate for premises of this nature.
- The operation - stake and prize limits of machines - are strictly regulated through the Gambling Act 2005 and subsequent regulations. At least 80% of the machines in AGCs have the same stake and prize limits as pub fruit machines, with 20% having the same limits as high street bingo premises.

17. Chongie will ensure compliance through:

- Robust policies (attached).
- Training of all staff.
- Independent age verification testing.
- Mystery shopping.
- Venue audits.

AGC PREMISES AND THE LICENSING OBJECTIVES

Licensing Objectives under the Gambling Act 2005

18. In this Act a reference to the licensing objectives is a reference to the objectives of—
(a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,

- (b) ensuring that gambling is conducted in a fair and open way, and
- (c) protecting children and other vulnerable persons from being harmed or exploited by gambling.

Crime and Disorder

- 19. Gambling on the high street is principally dominated by betting offices, with a ratio of 5:1 betting offices to AGCs. Occasionally betting shops can bring with them anti-social problems including street drinking, disorder and loitering. AGCs do not experience these issues which occasionally are found at betting premises.
- 20. The style of operation between betting shops and AGCs are very different. There are no TV screens showing sports and therefore not football matches to watch live within them. As a result there is no communal seating area and no reason to gather or loiter at the premises.
- 21. The demographic who use an AGC is far more mixed than betting offices.
- 22. The physical layout of the premises are significantly different with staff walking the floor and greeting/supervising customers. They are not positioned behind a counter.

Children

- 23. No under 18s are permitted. There will be prominent Think 25 signage in the premises and those appearing under 25 will be requested to provide a valid ID. In addition, there will be periodic mystery shopping and venue audits to ensure that underage policies are being complied with.

Vulnerable people.

- 24. The applicant is sensitive to the presence of vulnerable people in the area. The applicant will ensure that alcohol/drugs/intoxication is not permitted on the premises. Sufficient staff will be at the premises to provide oversight of customers and gambling. They will engage with the customers. Drug and alcohol awareness and conflict management training will take place where necessary. There will be CCTV throughout the premises and social responsibility messaging. Significant information will be provided to help with problem gambling and liaison with gambling care providers. There will not be an

ATM at the premises. The Local Area Risk Assessment will regularly be updated to incorporate any changes in local risk.

CHONGIE AS AN OPERATOR

25. Chongie have recently liaised with the Gambling Commission over their policies (those which are relevant to this application have been circulated). These policies are the final versions as agreed with the Gambling Commission as being robust following this liaison.

LOCAL AREA RISK ASSESSMENT

26. The Local Area Risk Assessment has been relied upon in relation to the initial grant on 4th June 2021 and has been updated frequently since then, most recently on 5th March 2025. It is a robust, thorough and up to date Local Area Risk Assessment. It is submitted on behalf of the applicant that it is an example of best practice from an operator who has traded without incident at the premises since they opened.

HARINGEY STATEMENT OF GAMBLING POLICY 2025-2028

27. The applicant and their legal advisors have taken careful consideration to the Local Licensing Policy. Most importantly they have considered Chapter 2 - Promotion of the Licensing Objectives and Chapter 3 - Dealing with Adult Gaming Centres and would say that the premises clearly from their track record fit within the local policy.
28. Representations have been made to the application to vary the premises licence and they will be dealt with in oral submissions.
29. The current premises licence circulated with this case outline has conditions attached to it which can be seen and are as follows:
1. A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following:

- (a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions;
 - (b) The areas of the premises to which the public have access (excluding toilets);
and
 - (c) Gaming machines and the counter area.
2. The CCTV shall continue to record activities 24 hours a day for 31 days.
 3. CCTV shall be made available for police viewing at any time with minimum delays when requested.
 4. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.
 5. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering exiting the premises.
 6. The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the Police or Licensing Authority forthwith on request.
 7. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.
 8. Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.
 9. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
 10. No external advertising at the premises shall be targeted at children.

11. A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which must be operated from the ground floor cashier counter by staff to allow entry at all times.
12. There will be a minimum of 2 staff present at all times when the premises are open after 19.00 hours or at other times after a risk assessment deems that necessary.
13. The licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
14. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.
15. The licensee shall install and maintain an intruder alarm on the premises.
16. The premises shall install and maintain a panic button behind the cashier's counter.
17. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documented stating the time and member of staff who made the checks.
18. Prominent GamCare documentation will be displayed at the premises.
19. The licensee shall: provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme, periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives. Participation in this training shall be formally recorded on each member of staff's training records which, if requested, will be presented to the Licensing Authority as soon as practicable.
20. The licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in this training shall be formally recorded and the records produced to the police or Licensing Authority upon request.
21. New and seasonal staff must attend induction training and receive refresher training every six months.

22. The licensee shall monitor the area immediately outside the premises which will be covered by the CCTV system. Homeless people and street drinkers will not be permitted to enter the premises.
23. The licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.
24. An incident log shall be kept for the premises and made available on request to an authorised officer of the Licensing Authority or the Police which will record the following:
- (a) All crimes reported to the venue;
 - (b) Any complaints received regarding crime and disorder;
 - (c) Any incidents of disorder;
 - (d) Any faults in the CCTV system; and
 - (e) Any visit by a relevant authority or emergency service.
25. There shall be no cash point or ATM facilities on the premises.
30. These conditions were deemed necessary to be attached to the premises licence when it was first granted and have assisted in ensuring that the operator trades in a way which is reasonably consistent with the Licensing Objectives.

CONCLUSIONS

31. As a result of the above, it is argued on behalf of the applicant that:
- The applicant has significant experience in gambling regulation, is licensed by the Gambling Commission, and trades in many other jurisdictions in the AGC sector without issue.
 - The operator has an operating licence and is regulated by the Gambling Commission.

- They have traded safely and with no issues for 4 years at this location.
- The applicant has fully assessed the local risks (as seen in the Local Area Risk Assessment attached), they are happy to engage with community representatives.
- Conditions have been agreed with the police and licensing authority at the grant of the licence.
- They have never had issues with crime associated with the gambling at any of their premises.
- The applicant will ensure vulnerable people are protected through staffing levels and training and social responsibility measures.
- The applicant has produced extensive due diligence and compliance documentation, which is regularly updated.
- This is an application to vary the premises licence to allow it to trade at the hours permitted by legislation. It is submitted that there is no evidence to support a rejection of the application before the Licensing Sub-Committee.

32. For all of the above reasons, it is submitted that the variation to the licence can be granted under Section 153 of the Gambling Act 2005. Accordingly, the Sub-Committee is requested to grant the application as applied for.

PADDY WHUR

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Chongie Entertainment UK Ltd



Customer Interaction Policy

- 1 INTRODUCTION**
- 2 IDENTIFY**
- 3 INTERACT**
- 4 EVAULATE**
- 5 CUSTOMER INTERACTION FLOW CHART**
- 6 CUSTOMER DUE DILIGENCE**
- 7 ENHANCED DUE DILIGENCE**
- 8 RECORDING**
- 9 REVIEWS**

1 INTRODUCTION

Chongie Entertainment UK Ltd (“CEL”) takes its responsibility to protect its customers seriously. This policy is to be read in conjunction with the Social Responsibility Compliance Pack.

Customer Interaction is a vital part of protecting customers and monitoring the customer journey, and is a requirement under LCCP 3.4.1.

CEL has taken into account the Gambling Commission’s guidance on customer interaction and follows an Identify-Interact-Evaluate framework. This procedure is undertaken by staff across all venues but is heavily monitored by the Senior Compliance Team. All staff are trained on this procedure, along with all other company policies and procedures, annually. Refresher training is provided when necessary.

CEL are aware that what they must put together what they know about the customer, with any relevant indicators of harm, to decide whether they need to interact. More knowledge about what to look for, with effective processes for monitoring customer behaviour, can mean quicker and better-informed decisions.

CEL’s customer base is predominantly regular customers who have identifying demographical data listed in the site specific Local Area Risk Assessment (LARA) at each location. The LARA for each premises identify the make up of the area, including levels of deprivation, crime levels and community facilities which may heighten the risk of vulnerable people being exposed to gambling environments/harm.

Affordability is a key topic when considering customers and vulnerability. What may be affordable for one customer might be unaffordable for another and consequently a risk based approach rather than fixed thresholds is crucial to protect all customers from the potential harms of gambling. Staff training and a proactive Senior Compliance Team allow CEL to undertake an effective risk based approach.

2 IDENTIFY

Whilst there is no ‘one size fits all’ description of a person who may be vulnerable or at risk of problem gambling, there are several signs which can indicate a potential problem and consequently warrant further investigation. All customers are observed and monitored whilst they are in CEL premises and staff are trained to be curious about their customers.

In order to Identify individuals who are vulnerable or at risk, staff are trained to look out for the following Identifying Triggers:

- Vulnerability factors such as ill health, disability, change in life circumstances such as bereavement, homelessness and loss of a job, financial difficulties, dyslexia, brain injury or the taking of medication
- Previous self-exclusions or customer interactions
- Time and spend indicators: observed amount and frequency of time spent or large

losses. For example a customer increasing their usual game play by playing on multiple machines, or by becoming more agitated as they attempt to play faster.

- Customer contact and potential social problems: information or hints from customers, frequent complaints, or signs of distress. This might include a customer discussing serious life changes, unemployment or financial struggles, death or illness in their family, or a traumatic event.
- Play indicators: chasing losses or erratic gaming patterns
- Finding it hard to manage or stop gambling
- Such as signs of distress, agitation, or changes which could be an indication that gambling is having a negative impact on a customer's wellbeing. Customers may target aggression at staff following a loss.
- Customer contacts CEL management regularly to express dissatisfaction with gaming outcomes and overall gameplay. This can include actions such as complaining about "rigged" machines Customer-led contact
- May not be displaying obvious signs of, or overt behaviour associated with, problem gambling, however the staff member has suspicions that they are gambling beyond their means
- Have triggered session reminders, present on most B3 machines. these alerts highlight spend and time for specific gaming sessions. Although these alerts are not always specific to each individual customer, as best practice venue staff should always interact with a customer when seen. These alerts also provide a timeout period where players are unable to gamble (up to 30 seconds) which allows staff time to engage during this pause in play.
- Multiple interactions with the same customer regarding any of the above

CEL recognises how important it is to Identify any customers where there may be problems early and proactively reach out and offer support.

Every event listed above constitutes an Identifying Trigger and an Interaction must be carried out.

3 INTERACT

A customer Interaction can take on many forms of action, depending on the circumstances and the individual. Staff members are not provided with a script, or questions which they must ask, as this does not tend to warrant honesty from customers due to the impersonal feel. Staff members are trained on how to interact with customers, and the below constitutes suggestions on how to initiate and carry out conversations.

The staff member should start any interaction by:

- Engaging the customer in friendly conversation to ascertain how the customer is feeling
- Offering the customer refreshments as a way to prolong the engagement from the customer.
- Asking the customer if they are comfortable with their level of gambling, helping the customer to think about their gambling activity

A customer may then demonstrate to the staff member that they are happy with their level of gambling, or provide some explanation as to the Identifying Trigger they have inadvertently hit.

In any event, a customer who demonstrated an Identifying Trigger must continue to be monitored.

If the staff member is still concerned by the customer's behaviour they must continue the interaction with the customer. This may include asking Further Follow Up Questions such as:

- Do you feel that your gambling spends are controlled?
- Do you acknowledge that your activity may result in losses and can withstand these losses?
- When you lose, do you feel you the need to return as soon as possible to win back your losses?
- Do you ever borrow to finance your gambling?

The interaction, along with the customer's description/details must be logged for the purposes of further interaction including further gambling management options including up to possible exclusion from future participation, should any similar incidents re-occur. This recording will also be reviewed by a member of the Senior Management Team to assess whether the interaction was appropriate in the circumstances, and whether the correct course of action was taken.

Where appropriate, the member of staff will explain the various management tools in place such as self-exclusion, and will provide information on GamCare, to any customers with whom an interaction has taken place. Information regarding self-exclusion and GamCare is clearly displayed throughout the venue.

4 EVALUATE

CEL consider the Evaluate step to be the most important in this framework as it is the outcome of the interaction. There are 6 options open to staff following an Interaction:

- Allow the customer to continue gambling under observation
- Provide information on available gambling management options

- Conduct Customer Due Diligence on the customer
- Conduct Enhanced Due Diligence on the customer
- Self-Exclusion
- Barring the customer from the premises.

The circumstances of the customer interaction will dictate which of the above takes place. The staff in the premises are well trained and get to know their customers each time they visit the premises. Senior Management are always involved in the evaluation of a customer when Further Questions have been asked.

By way of example, the following would normally result in a customer being asked to consider self-exclusion, and if they refuse they will likely be barred:

- Serious aggression, refusal to engage with staff, refusal to discuss gambling tools such as self-exclusion
- Openly discussing that they are unable to stop
- Openly discussing that they cannot afford to be gambling

This is not an exhaustive list. A combination of any of the indicators listed, repeated observations of any of the indicators or any extreme behaviour can also result in a customer self-excluding or being barred.

Staff members are all well trained and consequently knowledgeable and confident to make these decisions, however the Senior Management Team are available 24/7 to discuss a customer or an interaction to help evaluate the best outcome for that customer in the circumstances.

The Corporate Governance policy sets out who is responsible for assessing Customer interactions and how they are escalated through the company.

Any customer interaction may also be assessed from a Money Laundering or POCA perspective as well if information listed or identified raises a concern in this area

5 Customer Interaction Flow Chart

Identify

A member of staff **IDENTIFIES** a customer who they believe may be experiencing problems with their gambling. This is completed by using the risk triggers listed along with additional observations where present.



Interact

The member of staff **INTERACTS** with the customer by approaching them and striking up a conversation. Full details of the conversation are recorded in the Customer Interaction Log.



Evaluate

The member of staff then **EVALUATES** the Customer Interaction with the assistance of the Senior Management Team (where required) and decides on the appropriate follow up action.



The appropriate follow up action may be:

- The customer continues to gamble
- The customer agrees to think about their gambling habits
- Customer Due Diligence or Enhanced Due Diligence is undertaken
- The customer Self-excludes
- The customer is barred



Monitoring

The customer is continuously monitored regardless of the outcome of the interaction and the interaction is recorded.



Review

The Venue Manager and Senior Management team will review the interaction respectively and ensure that specific cases are advised on. A wider evaluation to enhance and consistently improve the Company interaction process is also undertaken on an ongoing basis.

6 CUSTOMER DUE DILIGENCE

In the event a customer is evaluated as requiring Customer Due Diligence (“CDD”), this will likely be

carried out by the Area Manager or a member of the Senior Team.

The customer due diligence includes:

- Name, verified with ID such as a driving licence or passport
- Address, verified with ID as above or a utility bill no older than 3 months
- Any other information which a customer might offer during an interaction, for example their employment, any family business, their financial circumstances generally, any financial problems they may be experiencing, any address history (such as a recent move from overseas).

This must be recorded on the IHL tablet.

7 ENHANCED DUE DILIGENCE

In the event a customer is evaluated as requiring Enhanced Due Diligence (“EDD”), this will be carried out by a member of the Senior Team.

Enhanced Due Diligence is likely to vary between customers but should normally include:

- A secondary piece of ID
- A recent Bank Statement
- Source of Wealth
- Background checks using open sources
- Any other information which a customer might offer during an interaction

This must be recorded on the IHL tablet.

8 RECORDING

All staff are trained to make meaningful records of all interactions with customers which are then available to staff to use to aid decision-making. Customer interaction recordings are also made when an interaction has been ruled out, for example, because the customer is displaying signs of agitation.

These interactions are retained on the SmartHub tablet. Staff are trained to include as much detail as possible on the SmartHub, including but not limited to:

- the behaviour or activity before the interaction.
- the change in behaviour or prompt for the interaction.
- how the staff member 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, and

- what happened next.

9 REVIEWS



A weekly review of customer interactions is carried out by the Venue Managers in each location with the Senior Management review on a monthly basis, with considerations to the following points:

- Did the customer start using gambling management tools?
- Did the customer read the responsible gambling information?
- Was there a positive change in behaviour? Did the customer's gambling seem to change after the interaction?
- Was the Customer Interaction carried out appropriately and effectively
- Was the Evaluation of the Customer Interaction appropriate in the circumstances

In the event the Senior Management Team identifies an interaction which ought to have been evaluated differently, or should have resulted in a different outcome, they will liaise with that venue

and ensure that customer is interacted with on their next visit. Additional staff training will also be provided ad hoc.

10 DOCUMENT REVIEW

The Customer Interaction Policy is always measured against the Formal Guidance and in particular the following questions:

- Where concerns arise, are staff able to intervene early and engage with a customer at the right time?
- How do CEL ensure its staff are prepared and able to carry out interactions?
- Are CEL staff able to carry out customer interactions discreetly?
- Are CEL staff aware of and trained to carry out different levels of interaction?
- Have CEL allocated the right level and kind of resources to be able to interact with customers effectively when there are concerns?

The Venue managers have a monthly compliance review and training session held by the PML holder for regulatory compliance. This ensures a full feedback loop for the interaction process as well as being supported by ad hoc training, spot checks and compliance Audits.

Document Review

Date Reviewed	Reviewed by
10/12/2024	Darren Hughes & Woods Whur
23/04/2025	Woods Whur

Chongie Entertainment UK Ltd



ML and Terrorist Financing Risk Assessment

1 RISK ASSESSMENT PURPOSE

The purpose of this document is to establish a separate Money Laundering and Terrorist Financing ("ML TF") risk assessment for Chongie Entertainment UK Limited ("CEL"). This risk assessment will be implemented to ensure that sufficient focus is given to ML TF risk. It is noted that in section 17 of the Proceeds of Crime and Anti-Money Laundering policy, reference is made to ML risk assessment, and this document is intended to be read in conjunction with the Proceeds of Crime and Anti-Money Laundering policy whilst operating as a standalone document.

This document is regularly reviewed to take into account changes to circumstances, the introduction of new products or technology, new payment methods and changes to customer demographic. This can be seen on the Document Review table at the end of this Risk Assessment.

2 GUIDANCE DOCUMENTS: DUTIES & RESPONSIBILITIES UNDER THE PROCEEDS OF CRIME ACT

An addendum to this document is the Gambling Commission guidance advice to operators dated November 2020 'Duties and Responsibilities under the Proceeds of Crime Act 2002'. All gambling staff will be trained on the contents of this document as part of their Anti-Money Laundering and Proceeds of Crime training. Along with its importance in terms of applying the ML TF risk assessment. A risk based approach will be adopted by CEL, as set out at section 18 of the guidance document, and a number of steps will be established to assess the most proportionate way to manage and mitigate the money laundering risks faced by CEL.

The possibility of gambling facilities being used by criminals to assist in money laundering poses many risks for operators. These include criminal and regulatory sanctions for operators and their employees, civil action against the operator and damage to the reputation of the operator leading to a potential loss of business.

All gambling staff must continually identify, assess and manage these risks, assess the level of risk in the context of how their business is structured and operated, and put in place controls to minimise the risk posed to businesses by money launderers.

This money laundering risk assessment is based on methodology and sets out attempts to identify, analyse and understand money laundering risks. It serves as the first step in addressing the risks, and involves making judgements about threats, vulnerability and consequences.

This document will be reviewed every 12 months during an audit of policies, procedures and all internal documents, or as a result of any changes in circumstances, including for example operational changes or changes to the LCCP.

3 IDENTIFYING AND ASSESSING THE RISKS

This section of the document sets out potential risks and the assessment of the risk posed to this particular business. The risks considered include the country and geographical risks, customer risks, transaction risks and product risks.

The risk assessment is conducted by identifying the potential risk (denoted below as 'Risk') and then an analysis of the potential risk to the operator and an evaluation of how any potential risk will be dealt with (denoted below as 'Assessment').

The operator carries the following risk profile which has been considered for each of the below risks identified:

- The operator has a non-remote Adult Gaming Centre operating licence issued by the Gambling Commission
- The operator contracts directly with customers and has a number of customer facing staff
- The operator utilises experienced individuals in the industry to advise on their operations, particularly for regulatory and compliance matters

As a consequence of the above profile this risk assessment is appropriate to the nature of the operator's business.

Risk	Assessment and Mitigation	Overall Risk Category
Operator Risks		
Operators failing to comply with prevention of money laundering and terrorist financing legislation and guidance	CEL has a robust set of policies and procedures based on the legislation and guidance which are continuously monitored and updated by senior management. Staff training occurs on induction and at a minimum of 12 monthly intervals.	Low
Arcade businesses being acquired by organised crime to launder criminal proceeds	CEL is approved and regulated by the Gambling Commission. Any change in ownership would	Low

	require a Change of Corporate Control.	
Lack of competency of key personnel and licence holders which can then be exploited by criminals seeking to launder the proceeds of crime	CEL is careful to train staff on induction and at regular intervals. It employs a Director of People Strategy who is responsible for Regulatory Compliance and who hold the key management role for Regulatory Compliance. Key personnel are all PML holders	Low
Third party business relationships and business investors	CEL implements a thorough due diligence procedure in relation to all third party business relationships and contracts. Any potential investors are carefully investigated and key events made to the Gambling Commission whenever appropriate	Low
Customer Risks		
What risk is posed by the business profile and the profile of customers using the gambling facilities? Is there a risk of anonymous customers laundering proceeds of crime through gaming machines? Is there a risk posed by customers using forged or stolen identities to remain anonymous?	CEL's premises tend not to attract more than 10 individuals at any one time in any individual premises, the customer profile is normally evenly split between male and female and tends to be middle aged. The staff are trained to interact with all customers entering the premises and the risk of anonymous customers is medium. Staff are trained on the types of ID they can accept therefore the risk of forged or stolen identities is low.	Low - Medium
Is the business local with regular and generally well-known customers? Is there any concerns relating to country/geographical risk?	CEL operates small shops in specific localities. The staff in each venue get to know their regular customers. Staff do not sit	Low - Medium

	<p>behind a screen or a desk, but walk the shop floor and interact with every customer who enters the shop. There are no concerns relating to country of geographical risk,</p> <p>in any venues with a high proportion of non-English speakers, signage (including Terms and Conditions and GamCare) will be in the most commonly used languages. In addition CEL actively seeks to employ individuals who speak a wide range of languages to ensure that CEL's customer base is represented in the venues. Senior management are aware of the international sanctions list and will utilise this if they are ever concerned about a customer.</p>	
Is the business high volume consisting of many low spending consumers? Is the business low volume with high spending consumers?	CEL operates Adult Gaming Centres which tend to be low stake high volume. There are usually machines in the venue with stakes ranging 10p to a maximum of £2, with jackpots of up to £500. Customers tend to spend short periods of time in the venue.	Low - Medium
Is the business a mixed portfolio? That is, consumers are a mix of high spenders and lower spenders and/or a mix of regular and occasional consumers?	CEL generally has customers who are low spenders due to the nature of the machines.	Low - Medium
Product Risk		

<p>Are automated ticket redemption (ATR) machines used to facilitate the laundering of criminally derived funds?</p>	<p>ATR machines are used and staff are carefully trained on the specific risks of these machines and monitor their use to minimise the risk of them being abused. At the moment it is not possible to return any winnings on the card. Low Risk.</p> <p>With regards to the ATR machines the following should be noted as also helping to minimize the risks:</p> <ul style="list-style-type: none"> - There is £500 daily limit per card to match the ATM restrictions. - No use of credit cards - Contactless payment is disabled to stop people from using stolen cards- chip and pin only - Designated CCTV camera solely covering the GeWeTe machine to prevent any potential fraud or theft. - £1500 ticket limit, above that staff needs to authorise the payment - Ticket can only be redeemed in the venue, not across the whole estate. 	<p>Low</p>
<p>What risk is posed by the products generally on offer to the customers?</p>	<p>Generally low risk, the products on offer are low stakes. The stake and prize limits of machines are strictly regulated through the Gambling Act 2005 and subsequent regulations. At least 80% of the machines in AGCs have the same stake and prize limits as pub fruit machines, with 20% having the same limits as</p>	<p>Low</p>

	high street bingo premises. The maximum stake is £2. This will be monitored and may be amended in light of any changes to the legislation as a result of the white paper.	
Are gaming machines, particularly category B3, being used to launder criminally derived funds?	The premises are all designed to ensure staff, and CCTV, have full view of the premises. The staff also walk the floor continuously and are not sat behind screens, meaning they interact with all customers. The risk is therefore low.	Low
Are Privacy booths available?	No, CEL does not have any privacy booths. The premises are designed to ensure there are no blind spots for the staff and the venue is fully covered by modern CCTV equipment throughout.	Low
Ticket-in-ticket-out (TITO) facilities used to launder funds when used in conjunction with ATR machines	Staff are trained on the risks of TITO machines and they are careful to monitor any use of them. The Local Area Risk Assessment also deal with any such risks, particular in terms of the physical design of the premises and the CCTV layout. There is a ticket limit of £1,500 across all venues and machines and the GeWeTe machines will not redeem any tickets at a higher value. Any requests for higher value payouts can only be assessed and authorized by the Area Managed	Low
Customers inserting money then attempting to withdraw it without playing	CEL have implemented a new threshold whereby if a customer inserts more than £300 and attempts to play less than 10% Senior	Low - Medium

	Management is alerted and must communicate with the Area/Venue Manager who will then conduct an investigation to assess why such a low amount has been played. Only Senior Management can authorize any outcome from this customer interaction. Staff members are all aware of the offence of 'tipping off'.	
Means of Payment Risk		
Are there likely to be situations where the source of funds cannot easily be established or explained by the customer?	CEL adheres to a KYC policy and procedure where any signs of concern are observed and escalated as appropriate. The majority of customers are returning clientele, which allows staff to monitor any suspicious changes in behaviour or spending habits or any unusual behaviour that could be linked to Proceeds of Crime. No forms of Cryptocurrency are accepted.	Low- Medium
Are there a large proportion of over-seas consumers using foreign currency or over-seas based bank cheques or debit cards?	CEL does not accept foreign currency or cheques in any capacity from customers	Low
Are consumers likely to be engaged in a business which involves significant amounts of cash?	This will vary from customer to customer and premises to premises, as to what their consumer base will look like. CEL will assess each customer individually and will operate a risk based approach.	Low - Medium

Cash transactions	CEL risk assesses each customer and particular caution is given to cash transaction. All staff members are trained on cash transactions and ML procedures.	Low - Medium
Scottish notes	Scottish notes have not caused any issues within CEL premises. The machines and ATR have a high threshold for fraudulent currency recognition to identify if this ever occurs.	Low
Contactless Payments	There are no machines within the premises which accept contactless payments. The central change machine, GeWeTe machine, does allow contactless payments however Staff are trained on the risks of these machines and they are careful to monitor any use of them. The PDQ machines have a limit of £500 in a 24 hour period and they do not allow contactless payments. Further, no refund or payouts can be made to a bank account.	Low
Other Risks		
Inadequate/lack of due diligence checks on any third party providers (e.g., machine providers).	CEL will carry out due diligence checks on any third party providers of gambling product, and only those licensed by the UK Gambling Commission will be used to provide facilities for gambling.	Low
Are procedures in place to monitor consumer transactions across outlets, products and	CEL does not operate remotely, it only operates Adult Gaming Centres. They are monitored by	Low

<p>platforms to mitigate any money laundering potential? Is there a potential transaction risk?</p>	<p>central management as well as venue managers and floor staff. All staff are regularly trained and continuously supported. There is a Customer Due Diligence/KYC policy in place which ensures all staff know how to communicate with customers, minimising any potential transaction risk.</p> <p>TiTo tickets cannot be redeemed across venues, they must always be redeemed in the venue from which they have been issued.</p>	
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4 CUSTOMER RISK

The following are categories of potential CEL customers whose activities may indicate a higher risk:

- Unknown or anonymous customers
- High spending customers
- Disproportionate spenders
- Regular customers or casual customers with changing or unusual or inconsistent spending patterns

In assessing the risk of the above posed to this particular business, the main risk tends to be casual or regular customers with unusual or inconsistent spending patterns. However CEL operates a Social Responsibility and Customer Due Diligence/KYC policy which all staff are trained on and implement. This helps to minimise this risk.

5 TRANSACTION RISKS

The following are potential transaction risks:

- Proceeds of crime
- Larger cash transactions
- Transfers between customers/in particular customers borrowing money from other customers

CEL does not operate account based play and staff are trained to identify and manage any such transactional risks, as well as adherence to the relevant policies and procedures which are updated as necessary with the relevance of any transactional risks to the products it operates.

There are also risks surrounding dyed notes within Adult Gaming Centres and staff are trained to look out for any such occurrences and are aware of the SAR procedure.

6 PRODUCT RISK

Product risks particularly relate to the potential for a money launderer to place funds anonymously such as by using third parties.

Staff at CEL are trained to look out for warning signs of any fraudulent activity taking place in its premises, for example money lending.

In the event a member of staff knows or suspects money lending has taken place or is proposed this matter would be dealt with including a likely possibility of banning those individuals from the premises.

These risks have been considered as part of the assessment and have not been identified as being present risks. They are also analysed and monitored as part of the Local Area Risk Assessments carried out for each individual premises.

A potential emerging risk for Adult Gaming Centres is 'Bring Your Own Devices' or cashless apps. CEL's Customer Due Diligence/KYC policy is designed to minimise any such risks due to the presence of and

communication with staff.

7 SUMMARY OF ASSESSMENT OF RISK AT CEL

The AML risks of CEL are limited to the customers visiting its premises. CEL keeps a set of robust and viable policies and procedures which are designed to support and guide its staff in dealing with any potential situations which may arise. This includes any situation which may involve money laundering or terrorist financing.

The overall risk rating to money laundering and terrorist financing is low-medium.

This is corroborated by the Gambling Commission money laundering and terrorist financing risks within the British gambling industry which states Adult Gaming Centres are medium risk.

This document is reviewed annually as a minimum, however it reviewed as a result of any changes within the industry or within CEL's customer base. Internal and External audits are conducted as and when required to ensure this document is robust and is being implemented correctly.

Document review:

Date Reviewed	Reviewed by
21.02.2022	Woods Whur/Dobromir Baltadzhiev
10.03.22	Joanne Craig
29.03.23	Joanne Craig
31.03.2023	Dobromir Baltadzhiev
12.04.2023	Woods Whur
04.12.2023	Woods Whur/Dobromir Baltadzhiev
02.07.2024	Woods Whur/Darren Hughes
13.08.2024	Woods Whur/Darren Hughes
05.12.2024	Woods Whur/Darren Hughes
23.12.2024	Dobromir Baltadzhiev
23.04.2025	Woods Whur
01.05.2025	Dobromir Baltadzhiev

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Chongie Entertainment UK Limited



Proceeds of Crime and Anti Money Laundering Policy

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1 POLICY PURPOSE

The purpose of this document is to detail the responsibilities of the Company and its staff in relation to the Proceeds of Crime Act 2002 (POCA), Terrorism Act 2000 and to uphold the licensing objective of 'Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime' as outlined within the Gambling Act 2005.

In addition, the contents of the document will outline our Company's policies and procedures to prevent the Company being used in connection with money laundering or terrorist financing as well as our continued compliance with anti-money laundering, counter terrorist financing, licensing and legislative requirements.

Chongie Entertainment UK Limited is committed to ensuring that all necessary safeguards are in place in regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.

This document is based on the guidance issued by the Gambling Commission from time to time, as well as the findings of the Money Laundering and Terrorist Financing Risk Assessment (LCCP 12.1.1)

2 PROCEEDS OF CRIME & MONEY LAUNDERING

2.1 Proceeds of Crime

The Proceeds of Crime can be broadly defined as property from which a person benefits directly or indirectly, by being party to criminal activity -e.g. stolen money, money from drug dealing, tax evasion or stolen property. It includes property that a person gains by spending the proceeds of criminal activity, for example, if a person used money gained in a bank robbery to gamble.

2.2 Money Laundering

Money Laundering is a term used to describe the practice of converting money that has been unlawfully or criminally obtained into legitimate funds, concealing and disguising the original source of the funds.

2.3 Differences

The law does not make any distinction between these two activities. The action we should take, and the penalties for not taking action are the same for both.

Staff will be trained according to their seniority and role in the business.

3 PROCEEDS OF CRIME ACT (POCA) OFFENCES & PENALTIES

There are 3 key offences under the POCA that are applicable to anyone who knows or suspects that property relates to the Proceeds of Crime:

- Section 327 states that a person commits an offence if they conceal, disguise, convert, or transfer criminal property in the UK.
- Section 328 provides that a person commits an offence if he or she enters into or becomes concerned in an arrangement which he or she knows or suspects facilitates,

by whatever means, the acquisition, retention, use or control of criminal property to or on behalf of another person.

- Section 329 states that a person commits an offence if he or she acquires, uses, or has possession of criminal property.

The above offences can be committed by any person, including employees who have knowledge or suspicion that a customer is using the POC. The penalty upon conviction of these sections is a maximum term of 14 years imprisonment, a fine, or both.

There is a defence available for a person to show that they made an authorised disclosure under sections 338 and 339, either for an employee to report to the Nominated Officer (Dobromir Baltadzhiev), and further for responsible parties in senior management to assess and report where they believe knowledge or suspicion exists to the National Crime Agency (NCA).

Once a report has been made, the Nominated Officer (Dobromir Baltadzhiev) will consider whether they hold knowledge or suspicion based on the information provided. However, responsible parties in senior management may commit an offence under section 332 if there is a failure to report knowledge or suspicion to the NCA as soon as reasonably practicable after the information has been received. The sanction under POCA is a prison term up to 5 years, a fine, or both.

It is also an offence under section 342 to disclose knowledge of the existence of any investigation prior to or following a report which could prejudice the investigation' (this is often related to as 'tipping off' though this is not to be confused with the actual offence of tipping off which is only an offence in the regulated sector). The penalty upon conviction is a maximum of 5 years imprisonment.

4 KNOWLEDGE OR SUSPICION

Chongie Entertainment UK Limited and its employees have an obligation to report when we either have knowledge or suspicion that another person is using the POC or engaged in ML.

The POCA regulations do not define knowledge or suspicion, but case law has provided guidance.

Common sense provides that if, for example, a customer confirms they are laundering money or using money from a robbery, the member of staff would in fact know rather than suspect. Courts have previously gone further and also defined knowledge to include situations where the facts would be clear to an honest and reasonable person. It could also include a member of staff turning a blind eye, for example, if staff do not make normal enquiries of a customer where they believe they already know the answer and do not want to hear it.

Suspicion is subjective and may be based on picking up something unusual or where facts do not tally up. Suspicion does not need to be based on actual facts, but there needs to be some satisfaction beyond speculation that the customer is involved in the use of the POC or ML. A feeling of unease does not amount to suspicion.

5 RESPONSIBILITIES

The POCA and AML regime within Chongie Entertainment UK Limited is managed by the Nominated Officer (Dobromir Baltadzhiev) and supported by senior management.

All staff have a role to play in combatting the use of criminal proceeds and ML, and are trained to pick up triggers which may lead to concern and further suspicion or knowledge.

Staff are also trained to report general concerns or otherwise knowledge or suspicion to the Nominated Officer (Dobromir Baltadzhiev). Where knowledge or suspicion of money laundering is believed to exist, the Nominated Officer (Dobromir Baltadzhiev) will determine whether a Suspicious Activity Report (SAR) should be raised with the NCA.

6 PRODUCTS & RISK MITIGATION

Chongie Entertainment UK Limited runs Adult Gaming Centre facilities in the UK.

To identify and manage the risks associated with the above products, Chongie Entertainment UK Limited applies controls in four broad ways.

RISK TRIGGERS: Training key staff to be aware of risk triggers which may be indicative of ML or the use of POC and how to report concerns.

CUSTOMER MONITORING: Providing facilities to allow Chongie Entertainment UK Limited to monitor customers, allowing staff to log consumer information, transactions and emerging concerns. These records are kept in the tablets on site and in the cloud.

SYSTEM CONTROLS: Implementing controls to mitigate areas of potential risk and highlight potential irregularities.

PROACTIVE ANALYSIS: Carrying out proactive analysis of purchasing activity to help detect unusual activity and risk triggers. This is supported by record keeping, monitoring and customer reviews.

Each is considered in turn below. This policy is supplemented by the Customer Due Diligence and “Know Your Customer” Procedures set out below and in the Compliance Pack and the Customer Interaction Policy.

7 RISK TRIGGERS

Considering the above product type, there are different types of activity or customer behaviours which could lead to cause for concern leading to the possible formulation of knowledge or suspicion that an individual is participating in gambling activity with the POC or involved in ML.

Some examples of risk triggers are:

- Geographical Risk - a customer being located in a high risk jurisdiction. A high risk jurisdiction includes those on the FATF Black List and the FATF Grey list, both of which can be accessed online by the MLRO
- A customer behaving in a secretive manner, refusing to speak to staff or concealing funds
- Customers appearing to engage in potential criminal activity, or discussing potential criminal activity
- Customers appearing to have a sudden change in financial circumstances without a reasonable explanation

- Staff knowledge or reasonable suspicion of local crime, or individuals engaged in local crime
- Asking to or attempting to lend money between customers, staff with a reasonable knowledge or suspicion of money lending taking place
- Attempting to cash out another customer's ticket
- Customers playing with a large volume of coins, or attempting to exchange a large volume of coin for notes
- Attempting to scan a gaming machine by using a "note fishing technique" (by attaching a small rope to the note to fool the machine into registering it, despite the note being pulled back out of the machine). This could be identified by frequent large wins on category C machines
- Machine play which indicates a possible involvement in POC or ML include:
 - Loading credit and trying to cash the ticket after little or no play.
 - Trying to use cash to load credit and asking for cheque or debit card payment (not possible on the CEL system).
 - Asking or attempting to use one debit card to load credit and then using another to collect winnings (not possible on the CEL systems)
 - Requesting receipts/copies of their tickets from their pay outs.

These behaviours may be identified by any employee, and are most likely to be recognised by staff working in the Adult Gaming Centres. Full training is carried out on induction and at 6 monthly refreshers. All staff are therefore fully equipped with the skills they need to identify any suspicious behaviour.

Staff are encouraged to ask themselves the following questions to help them understand the nature of the situation. In some circumstances these may be more appropriate for EDD conducted by management (Please see below) however it is useful for staff to be alive to them as ML issues:

- Is the customer located in a high risk jurisdiction, or are there any other geographical risks
- Is the customer employed?
- Are they seeking to play gaming machines with large sums of money?
- Is the customer gambling significant amounts of money and has a lavish lifestyle with no visible means of legitimate support?
- Is the family wealthy?
- Have they been in prison, if so, did their lifestyle continue as before, after being released?
- Are they known to have criminal connections?
- Is there any local knowledge (newspaper articles, gossip, etc.) that may indicate their

involvement in criminal activities?

- Is there any background knowledge about the customer that would give concern?
- Who do they talk to in the arcade?

In the event the member of staff has any concerns as a result they must report the customer to the Nominated Officer (Dobromir Baltadzhiev) and continue to monitor the customer, being careful not to commit the offence of 'tipping off'. This monitoring must include making notes in the customer observation log.

The Nominated officer (Dobromir Baltadzhiev) must then assess the situation and make a decision as to whether a SAR should be submitted, the business relationship with that customer should be terminated, conduct Enhanced Due Diligence, conduct Basic Due Diligence or to continue monitoring.

8 CUSTOMER MONITORING

Chongie Entertainment UK Limited will record any concerns they have with its customers by using the data provided for its own internal records. This is detailed in the Compliance Pack and the Customer Interaction Policy. Customer interactions are recorded on the tablets on site and in the cloud.

The Customer Interaction policy further sets out who staff must escalate a matter to if they have any concerns. The company's Nominated Officer is Dobromir Baltadzhiev and all staff are aware of this.

Any assessment of a customer for Money Laundering purposes will also include a Social Responsibility assessment of the customer in line with the Social Responsibility and compliance Pack and Customer Interaction Policy.

9 SYSTEM CONTROLS

General system controls exist to mitigate the risk of our products and business being used from a POC or ML perspective, and create an environment in which suspicious activity may be effectively detected.

Cash Handling

Location specific operating policies and procedures may be put in place with regards to accounting practices and record keeping, in particular in respect of the following:

- Monetary stakes
- Customer refunds (due to machine malfunctions)
- Money removed from machines
- Ticket in ticket out functions

This is not an exhaustive list and the risks of each location will be analysed.

The cash at each Adult Gaming Centre will be collected and stored in a safe. The external cash collection will take place every 7-10 days. Adult Gaming Centre managers/assistant managers are

required to send an email confirmation to the senior team and attach a signed copy of the customer receipt as soon as the external cash collection takes place. Managers are also required to maintain a special external cash collection log, which must be presented to the senior team in an unlikely case of cash discrepancies investigations or ad hoc spot checks.

External accredited auditors check the CEL cash handling policies and do an unannounced Adult Gaming Centre collection spot check to supervise the process once a year during the annual external audit. Takes place once per annum during our annual external audit.

TiTo software is installed on all category B3 and C machines across the CEL estate. most machines.

A system control has now been implemented on the machines to alert Senior Management if a customer inserts £300 with less than 10% game play. The system operates as follows:

- Senior Management receives an email notification with the following information (by way of example):
 - Type: VTP_DEPOSIT
Details: 34.00 / 360.00 = 9.44% (VTP/Deposit Alert)
Asset number: [xxx], Machine name: [xxx]
Serial No.: [xxx]
Adult Gaming Centre name: [xxx]
Company name: [xxx]
Time: dd/mm/yyyy 00:00:00 GMT
- Senior Management will review each notification and the corresponding CCTV. In the event it is deemed a high risk transaction or an immediate threat, for example multiple notifications in a short period of time, or an unusually high value transaction, they will investigate as soon as practically possible.
 - If Senior Management calls the Adult Gaming Centre they discuss the situation and make a decision on the outcome, which will usually result in the customer being barred (all staff are trained on the offence of tipping off) or a SAR being submitted to the NCA by the MLRO.
- If Senior Management does not assess the notification to be high risk, the notification will be analysed in due course. This can be done using CCTV, Customer Interaction logs and conversations with the staff on duty. This analysis has several outcomes:
 - No further action (for example if the customer simply moves between machines)
 - Further monitoring, with customer interaction procedures to be initiated
 - Area Manager to be called if customer returns to assess the situation
 - Banning the customer
 - A report to the MLRO, or a SAR reported by the MRO to the NCA

Senior Management will remain in constant communication whilst any interactions are taking place and guide the member of staff through.

All staff members are aware of the offence of tipping off.

10 PROACTIVE ANALYSIS

Senior management proactively analyse the Chongie Entertainment UK Limited's Adult Gaming Centres and the industry as a whole and are always aware of potential or arising problem areas. Senior management monitors the data recorded and keeps up to date with industry news to look out for any abnormal or concerning issues arising. This ensures they are able to be proactive and continue to adopt best practice across all areas of the business.

11 SUSPICIOUS ACTIVITY REPORTS (SARs)

POCA requires SARs to be raised to the NCA in the event of knowledge or suspicion of the use of the proceeds of crime.

A SAR will be raised with the NCA by the MLRO/Nominated Officer (Dobromir Baltadzhiev) or appropriate deputy as soon as is reasonably practicable where suspicion is held that the customer is engaged in money laundering.

A Defence Against Money Laundering (DAML) request can be made to the NCA if the MLRO suspect that continuing with a transaction might involve money laundering.

12 SAR MONITORING AND TERMINATION OF CUSTOMER RELATIONSHIPS

If the level of concern leading to the SAR is maintained in future transactions or has increased thereafter, then further SARs will be considered.

Chongie Entertainment UK Limited understands that SAR reporting and the defence of making a disclosure under section 338 of POCA is not intended to be used repeatedly in respect of the same customer.

Wherever knowledge or suspicion exists, the Nominated Officer (Dobromir Baltadzhiev) will make an assessment with regards to the continuation of the customer relationship. This decision is made with awareness of the potential offences under POCA if transactions are allowed to continue where knowledge or suspicion exists.

In accordance with Gambling Commission guidance, advice may be sought from the NCA around the most effective approach in respect of terminating a customer relationship.

Where a relationship is terminated, steps will be taken to uphold this as effectively as possible.

13 PREJUDICING AN INVESTIGATION (TIPPING OFF)

Staff are trained that subsequent to a report to the Nominated Officer (Dobromir Baltadzhiev), or a SAR being raised with the NCA, it is a criminal offence under section 342 of POCA to release information about the knowledge of the existence of an investigation that may prejudice that investigation.

The Nominated Officer (Dobromir Baltadzhiev) will work particularly closely with customer facing staff to ensure that investigations are not disclosed when a payment is being held pending consent,

or during the process of ceasing the relationship with a customer.

14 ADVERSE INFORMATION & POLICE INVOLVEMENT

14.1 Previous Convictions or Previous Police Involvement

Where information is obtained which indicates previous Police interest or convictions for a financial crime or related offence, a file will be created and steps may be taken to gather customer information from the stages above. Where concerns remain, the customer may be requested to provide proof of identity and source of funds.

14.2 Current Police Investigation

All relevant Police requests for information are logged and a file is created in respect of customers subject to the enquiry (where a file does not already exist), and information provided.

If Police request information in respect of a financial crime enquiry, contact will be made to understand the current status of the investigation.

Provided that the following criteria are met, and there is no overriding knowledge of laundering activity, Chongie Entertainment UK Limited will support and formally cooperate with the Police if there is an explicit request to continue business to preserve the case and evidence.

- The Police must submit a Data Protection Act request for information;
- A formal timeframe for engagement must be established with Police;
- Assurances must be provided by Police that there is a formal investigation, and that the case will be subject to regular review dates. RIPA authority (to provide Police with investigatory and surveillance powers) must be obtained within the first 28 days of engagement;

A Disclosure may be made to the Gambling Commission to advise.

Suspicious Activity Reports will be considered by Chongie Entertainment UK Limited at the point of Police engagement and at each subsequent Police review date.

This cooperative approach seeks to help to ensure that crime is kept out of gambling in the longer term.

15 INTERNAL RISKS

The internal risks of an Adult Gaming Centre include, but are not limited to, the following:

Money lending

Chongie Entertainment UK Limited recognises the risks presented by customers who may seek to transfer money to other customers or third parties or receive funds from other customers or third parties. In order to mitigate this risk, identified transfers between customers and third parties must be assessed by senior management who must satisfy themselves that systematic, organised or commercial money lending is not taking place. Staff will be trained on identifying factors to look

out for and customers may be banned if it is discovered that money lending is taking place.

Collusion

Collusion can be the agreement between people to act together secretly or illegally in order to deceive or cheat someone. Chongie Entertainment UK Limited are aware of the risks collusion present to both the Adult Gaming Centre and in the context of money laundering and proceeds of crime. All staff are trained to be aware of the signs of collusion and to report such signs to management immediately.

Machine Fraud

Machine fraud is an ever present threat and all staff must be aware of the ways in which fraud can take place and what to do in the event they spot a customer defrauding a machine.

Management will ensure the Adult Gaming Centre floor is never left unattended and that customers who are not known, or with whom the staff are not familiar with, are given due consideration. The Senior Compliance team subscribe to the BACTA Crime Bulletin and receive information and photos of known fraudsters on a regular basis. They ensure that photos of known fraudsters are available to all members of staff. Staff must take special care to be aware of situations where large amounts of credit are being played with, machines are regularly going empty, suspicious activity such as large numbers of customers entering a Adult Gaming Centre trying to distract employees takes place and customers covering parts of machines.

In the event a machine is defrauded, floor staff must inform a manager immediately. Employees must take care not to endanger themselves when dealing with a fraudster.

16 CUSTOMER DUE DILIGENCE AND ENHANCED DUE DILIGENCE

Staff must approach customers on a risk based approach. This may differ between Adult Gaming Centres and will be informed by the Money Laundering Risk Assessment, which is required under LCCP 12.1.1, and the Local Area Risk Assessment.

The customer due diligence includes:

- Name, verified with ID such as a driving licence or passport
- Address, verified with ID as above or a utility bill no older than 3 months This must be recorded on the AML portal on the IHL tablet

ENHANCED DUE DILIGENCE

Staff must approach customers on a risk based approach. This may differ between Adult Gaming Centres and will be informed by the Money Laundering Risk Assessment which is required under LCCP 12.1.1.

A customer may require enhanced due diligence if the Nominated Officer (Dobromir Baltadzhiev) deems it appropriate in the circumstances, or if a member of staff, having consulted with senior management, deems it appropriate in the circumstances. Enhanced due diligence can only be carried out by the Area Manager or above. The EDD process will always be supervised either by the CEO or the COO as well as the MLRO.

Enhanced Due Diligence may be carried out on any individuals based in or with strong connections to a high risk jurisdiction.

Enhanced Due Diligence is likely to vary between customers but should normally include:

- A secondary piece of ID
- A recent Bank Statement
- Source of Wealth
- Background checks using open sources such as World Check

This must be recorded on the AML portal on the IHL tablet.

Staff must ensure they also consider the behaviour of established customers when deciding when enhanced due diligence may be appropriate.

In the event there is increasing level of suspicion of money laundering, or even actual knowledge of money laundering, the MLRO must be alerted immediately and a decision made on a case by case basis whether or not the customer may be allowed to continue gambling, whether the MLRO must be notified or whether any other action is to be taken. The MLRO will then decide whether a SAR is appropriate. The MLRO is Dobromir Baltadzhiev.

RECORDING

All customer due diligence and enhanced due diligence interactions must be recorded not only on the AML portal, but also the Customer interaction portal on the IHL tablet.

Further, these interactions must be monitored and reviewed monthly in order to ensure that any patterns emerging are noticed and dealt with if appropriate. This review must be conducted by senior management.

Should the customer refuse to provide the requested documents the business relationship with the customer will be terminated and the customer banned.

16 TRAINING AND SCREENING

Chongie Entertainment UK Limited are committed to ensuring that all key staff understand their responsibilities in respect of POCA and this policy, including internal risks, and in particular the triggers to be alert to and the requirement to report concerns, knowledge, or suspicion to the MLRO/NO immediately.

Staff are trained as follows:

All employees of Chongie Entertainment UK Limited are required to undertake and complete AML training and understand our policy and reporting processes.

Head Office

Key customer facing head office staff, including the Nominated Officer (Dobromir Baltadzhiev), are required to understand and adhere to the Company's POCA & AML policy.

Training refreshers will be held every 6 months and new starters are trained upon induction. Ad

hoc training sessions may be provided to react to developing risks in particular areas.

Furthermore, spot checks take place at all Adult Gaming Centre by members of the Senior Compliance team. These can range from 'mystery shopping' to a series of basic questions asked whenever a member of the team attends the Adult Gaming Centre.

Any weakness identified in staff knowledge are then addressed with additional training or an Improvement Form as part of the HR Disciplinary process.

17 MONITORING THE POLICY

To ensure that the policy continues to be fit for purpose:

Chongie Entertainment UK Limited are committed to carrying out an ongoing risk assessment of its POC & ML regime, tailoring this policy and training around new products and newly identified risks as appropriate.

In the course of day to day activities and in reaction to any POC or ML cases, Chongie Entertainment UK Limited will continue to seek best practices and new techniques to improve the processes and procedures in place.

This policy is subject to review following any new guidance published by the Gambling Commission.

Document review:

Date Reviewed	Reviewed by
05.05.2021	Woods Whur
08.03.2022	Dobromir Baltadzhiev
10.03.2022	Joanne Craig
14.03.2023	Joanne Craig
31.03.2023	Dobromir Baltadzhiev
12.04.2023	Woods Whur
18.04.2023	Dobromir Baltadzhiev
17.05.2023	Woods Whur/Dobromir Baltadzhiev
13.08.2024	Woods Whur/Darren Hughes
05.12.2024	Woods Whur/Darren Hughes
23.12.2024	Dobromir Baltadzhiev
23.04.2025	Woods Whur

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Customer interaction: formal guidance for premises-based operators

Formal guidance note for premises based on customer interaction under SR Code 3.4.1

Published: 1 July 2019

Last updated: 12 September 2022

This version was printed or saved on: 19 April 2024

Online version: <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/customer-interaction-formal-guidance-for-premises-based-operators>

Overview: > This guidance applies to premises-based operators and is currently in effect.

This is an HTML version of this guidance. You can also view or download the [original customer interaction guidance for premises-based operators \(PDF\)](#) published in July 2019.

Premises-based licensees 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 Provision 3.4.1](#) of the Licence Conditions and Codes of Practice (LCCP).

A requirement to LCCP with effect from 31 October 2019 (as amended 12 September 2022) requires premises-based licensees to take into account the Commission's guidance on customer interaction. This guidance is structured along the three key outcomes operators are expected to meet.

These are, to:

- **identify**
- **interact**
- **evaluate.**

This guidance sets out why customer interaction is a requirement, makes our expectations clear, and suggests ways you could meet them. This includes learnings from research and some ways that gambling operators have found worked for them and their customers.

How to use this guidance

The purpose of this guidance is to share knowledge based on research, current practice and lessons learned in order to support licensees in determining how they can meet the outcomes. It sets out why customer interaction is important and makes our expectations clear. Not all of the content of the guidance will be relevant to all operators, but licensees must take it into account and be able to demonstrate how they have done so.

Following the guidance is no guarantee that all customers experiencing or at risk of harm will be identified. The guidance is not the only source of information which operators should use to help them develop their own processes, and licensees should also keep up to date with published research and other sources.

How we will use this guidance

For compliance and enforcement purposes, we will expect licensees to demonstrate how their policies, procedures and practices meet the required outcomes. This can be through implementing relevant parts of the guidance or demonstrating how and why implementing alternative solutions equally meet the outcomes.

Our 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, we will update and re-issue guidance where new evidence or risks emerge which may have a meaningful impact on how the outcomes can be met.

Identifying the right customers

You need to know:

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

You need to put together what you know about the customer, with the relevant indicators of harm, to decide whether you need to interact. More knowledge about what to look for, with effective processes for monitoring customer behaviour, can mean quicker and better-informed decisions.

Some indicators of harm, such as high staking behaviour, can look similar to VIP and high-value customer activity. Even if you think the customer can afford it, they may still be experiencing gambling harms. Your enhanced contact with your VIPs means you have many opportunities to get to know them well and make better informed decisions.

Identify

We expect you to:

- Use a range of indicators relevant to your business that you can observe and monitor. Do 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 you are able to interact early and quickly. Invest in appropriate systems and staff to manage your customer interaction process effectively.
- Make sure your process keeps pace with any increase in demand – through general growth or seasonal, promotional or other variations which might mean you are busier than usual.

- Train your staff 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, including those among your VIP and monitored customers.
- Ensure that your customers are not put at any greater risk of harm as a result of your premises being busier or quieter than usual. You need to protect your customers regardless of these factors.
- Think about the protection of new customers – you know less about them, so you may not know what their regular gambling pattern looks like. This means that alternative measures must be applied.
- Take safer gambling seriously for all customers including VIPs and not let commercial considerations override customer protection.
- Make meaningful records of all interactions with customers. Make these records available to staff and use them to aid decision-making. This should also take place in circumstances where an interaction has been ruled out. For example, because the customer is displaying signs of agitation.
- Even if you think your sector is 'lower risk', all forms of gambling present risks and you should understand the prevalence of gambling harms for the type of gambling products you offer and implement appropriate processes.
- Actively promote tools such as voluntary machine alerts, and ensure all your customers have access to information about safer gambling and the support available.

Understanding the impact of gambling harms

In 2018 the Gambling Commission published research (Wardle et al 2018) on understanding the full range of gambling harms and the impact this can have on society. This research defined gambling harms as the 'adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society'. This can include loss of employment, debt and crime – gambling harms can also have detrimental impacts on physical and mental health and relationships, and at its worst, gambling can contribute to loss of life through suicide.

Gambling harms cannot be solely measured in terms of finance and resources. This is why we expect you to use a range of indicators in order to identify customers who may be experiencing harms.

Using the right indicators for your business

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

You should use a range of indicators. This is not an exhaustive list, but your indicators should include the following.

Time indicators

Amount of time spent gambling, visit frequency or length of stay on the premises, leaving and then returning to the premises.

Spend

Amount and frequency of deposits, large losses, using multiple or more expensive payment methods, declined payments, appearing to spend more than they originally intended.

Behaviour or appearance

Such as signs of distress, agitation, or changes which could be an indication that gambling is having a negative impact on a customer's wellbeing.

Use of gambling management tools

Previous self-exclusions or previous customer interactions, or playing through machine alerts.

Customer-led contact

Information or hints from the customer, frequent complaints about not winning, or talking about the negative impacts of their gambling.

Play indicators

chasing losses, erratic betting patterns and gambling on higher risk products, or unusual markets or outcomes on which the customer is unlikely to have been able to make an informed choice. People who bet in-play may place a higher number of bets in a shorter time period than people who bet in other ways, as [in-play betting](#) offers more opportunities to bet.

A 'big win' or a windfall

Research (Parke and Parke 2017) shows 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. Many have used deposit or loss thresholds as a main or sole prompt for a customer interaction, but these have often been set at levels that were inappropriately high, in comparison to the average amount of money that the majority of people have available to spend on leisure activities.

This has led to a number of examples of customers spending more than they could afford, and this not being identified sufficiently early, as seen in much of the Commission's compliance and enforcement casework since 2017.

Operators should aim to identify those experiencing or at risk of harm and intervene to try to reduce harm at the earliest opportunity. Reliance on deposit or loss thresholds that are set too high will result in failing to detect some customers who may be experiencing significant harms associated with their gambling. It is therefore imperative that threshold levels are set appropriately.

Open source data exists which can help operators assess affordability for their British customer base and improve their risk assessment for customer interactions. Thresholds should be realistic, based on average available income for your customers. This should include the Office of National Statistics (ONS) publications on levels of household income. See the [ONS information on personal and household finances \(opens in new tab\)](#).

In considering these thresholds, you 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, as follows. It will not always be obvious or clear to an operator when such events have occurred, but knowing your 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' and developing customer interaction policies and procedures, operators should consider the factors that might make an individual more vulnerable to experiencing gambling related harms.

Factors include:

- **personal and demographic** - 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
- **situational** - 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
- **behavioural** - if an individual has a higher than standard level of trust or high appetite for risk
- **market-related** - 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
- **access** - if an individual has difficulty accessing information because of poor literacy or numeracy skills, knowledge, dyslexia.

We have seen examples through our casework of customers who should have received some interaction but did not, including customers who were particularly vulnerable, and more susceptible to experiencing gambling harms.

Spotting harmful gambling

How you monitor activity depends on your business. For some very small operators, manual monitoring may work. Larger operators will need comprehensive systems, which could include a mix of automated and manual processes and should draw on all available sources of data to give a comprehensive picture of the customer's gambling.

Options for spotting harmful gambling include:

- Reports on activity where relevant, for example from observation or loyalty carded play, particularly if the play is linked to online play
- 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 you keep should give staff a more complete picture of the customer's previous activity, which will help to inform decisions.

Your customers should not be at more risk because your 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.

Because VIP customers can also experience harm, it is good practice to carry out a safer gambling check when upgrading customers to VIP status and keep this under review. You should also use these opportunities to carry out checks for Anti-Money Laundering (AML). This could also help you to support customers who have had major wins.

The role of staff

It is important that all staff 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:

- Staff 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. Staff should know how to escalate a situation if they are unsure or require support.
- Staff understand how indicators of harm could be displayed differently in VIP or 'high-value' customers and know how to spot the signs.
- As a minimum, staff receive training at induction as well as refresher training.

Identify: questions to consider

These include:

- Are you curious about your customers?
- Are your indicators relevant to your gambling facilities and customers?
- How do you decide the right level of your thresholds?
- Do all appropriate staff have access to customer interaction records?
- How do you assess the risks posed by new and unfamiliar customers?
- Is staff training on customer interaction meaningful and engaging?
- Do you take into account all relevant information and act quickly?
- Does the structure and layout of your premises help or hinder identifying customers you need to interact with?
- Do you have any blind spots which mean that you are unable to monitor all customer activity?
- Is spend monitored across different products for individual customers?
- Do you offer the same level of protection for all your customers, no matter how long they have been a customer, or whether they are VIPs?

Interacting with the customer

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.

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

Interact

We expect you to:

- Be curious, and if you spot behaviour or vulnerabilities that could indicate harm, to act on it.
- Ensure your staff 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. You should trial and evaluate different approaches to achieve this. **Importantly, this may include refusing service or ending the business relationship.**
- Think about what information you 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.

In gambling premises, many of your interactions are likely to be face-to-face, so it is important for staff 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 you want to give them?
- How many times have you already interacted with the customer?
- What outcome do you want to achieve?
- Is the customer behaving in a way which might inhibit an interaction at this point?

A customer interaction has three parts

These are:

1. Observation – behaviour or activity you have spotted or something the customer tells you.
2. Action – contact to prompt the customer to think about their gambling, for you to find out more, and an opportunity for you to offer information or support.
3. Outcome – what you or the customer did next. In some cases, you may need to monitor the customer's gambling to spot any change which may prompt further action.

Offering help and support

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

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

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

You will need to interact with some customers a number of times. Your records of previous interactions with customers will help you decide how to provide the right help and support.

Feedback from consumers shows that they 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 staff

You should ensure that your staff:

- understand the types of interaction that could take place and how to interact appropriately. For example, they may only need a brief intervention.
- know the type of help or support to offer, such as information, signposting customers to specialist support or the gambling management tools which are available. These may be the minimum required under the LCCP or tools you offer which go beyond minimum requirements.
- 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 staff 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, staff 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 you to demonstrate when and why you have interacted with customers and helps with ongoing monitoring of customers.

You 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 your 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 you 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, and
- what happened next.

You 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.

Interact: questions to consider

- Where concerns arise, are you able to intervene early and engage with a customer at the right time?
- How do you ensure your staff are prepared and able to carry out interactions?
- Are your staff able to carry out customer interactions discreetly?
- Are your staff aware of and trained to carry out different levels of interaction?
- Have you allocated the right level and kind of resources to be able to interact with customers effectively when you have concerns?

Evaluate

By evaluate, we mean to understand impact and effectiveness in two ways:

- did an individual customer interaction have a positive outcome for the customer, and
- does your overall approach to customer interaction work?

To help with the latter, the Advisory Board for Safer Gambling published an evaluation protocol in 2016 for the industry to use when designing evaluations.

Find out more about the [National Strategy to Reduce Gambling Harms](#), including the [evaluation protocol](#) and further research on gambling-related harms.

Evaluate

We expect you to:

- Understand the impact of individual interactions on a consumer's behaviour and whether, or 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 you gave.

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, and
- what happened next.

Some ways to work out impact include:

- Did the customer start using gambling management tools independently or following your advice?
- If you use email, did the customer click through to safer gambling information from your tracked links?
- Was there a positive change in behaviour? Did the customer's gambling seem to change after the interaction?
- You 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?

You may already quality assure individual customer interactions by spot- checking records. As well as checking that customers are getting the right support, this can also identify staff development needs and highlight good practice that you can share across your business and across the industry.

Evaluating the effectiveness of the approach

Records of interactions can provide useful evidence of what types of indicators, methods of interacting and options for providing support work well for customers. They will help to inform an evaluation of the effectiveness of your overall approach to customer interaction. Good evaluation helps you to understand which aspects of your 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, and the type of gambling you offer, as follows.

You should know and understand the prevalence of at-risk gambling among your customer base. A starting point is the [combined health surveys](#) of England, Scotland and Wales (Gambling Commission 2018). This data is broken down to gambling activity type, and by region.

However, rates will vary significantly between geographical areas and localities, and research shows that problem gambling rates in urban areas are likely to be higher than the national average. Further information on this topic can be found in the Research Report Problem Gambling in Leeds (Kenyon et al 2016). When looking at the potential percentage of your customers who may be experiencing harm, remember to consider the percentage of gamblers participating in that activity and not the percentage of the adult population.

Currently the only industry-wide quantitative measure of identifying and interacting with customers who may be experiencing harms associated with gambling is data on the numbers of customers who received an interaction, submitted to the Commission as part of regulatory returns. We have clarified the definitions in regulatory returns to offer guidance on what should be included in a customer interaction (incident) log and make clearer what should be recorded.

Your log should include as a minimum:

- the identity or other identifier of the customer involved
- the behaviour or activity that prompted the interaction
- the advice or support given, and
- the outcome of the interaction.

Keeping your policies and procedures under review and up to date by taking into account research and industry best practice will help you to identify customers you should be interacting with, which will help you target your resources where they are most needed, in ways which may lead to better outcomes.

You should also review your internal controls following the publication of a regulatory settlement, to address any similar weaknesses which could exist in your own processes.

The role of staff

Your staff have an important role to play to understand whether your approach works.

As a minimum, you should:

- Ensure that records of all customer interactions are made by staff and used to aid decision making. Such records should be used for evaluation purposes, for example, dip sampling for quality assurance purposes. Or, to assess whether a customer changed their behaviour as the result of an interaction.
- Train staff to recognise when follow-up activity to an interaction is required.
- Ensure that staff use customer interaction records as a decision-making tool.
- Ensure that staff are properly supported in carrying out effective interventions.

Evaluate: questions to consider

- Do you know how many of your customers may be experiencing some level of harm associated with gambling?
- How do you know you are delivering positive outcomes for your customers?
- How could you improve on your policies and procedures?
- How could you share your good practice with the industry?

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WITNESS STATEMENT

(CJ Act 1967, s. 9, MC Act 1980, s.s.5A (3a) and 5B MC Rules 1981, r70)

Statement of: Darrell John
Butterworth

Occupation: Licensing and Security
Compliance Manager

Age if under 18: Over 18

(if over 18 insert "over 18")

This statement (consisting of 22 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Dated the 8th April 2025

Signature: D J Butterworth

1. My name is Darrell John Butterworth and I currently operate as a self-employed Licensing and Security Authority Compliance Consultant. I have conducted this business since creating a company, Edmund Locard Licensing and Security Solutions, on the 1st January 2011. I make this statement in relation to my previous and current experiences as they relate to an application to increase the operating hours at Little Vegas Wood Green High Road.

Experience

2. Prior to taking up this role with Edmund Locard Ltd I completed 30 years service with the Greater Manchester Police in a variety of uniform and non-uniformed roles. The longest period of attachment to a department was between 1998 and 2006 when I performed the role of Force Licensing Inspector. This role involved the supervision of 12 divisional licensing officers, tasking and management of a covert licensing unit comprising a sergeant and six constables, developing force policy and enforcement in relation to all licensed units and employment and briefing of a licensing solicitor to act on behalf of the force in more complex licensing hearings.
3. During the period as the Force Licensing Inspector I was responsible for the good conduct and compliance of premises operating under a variety of licences, including outlets involved in selling alcohol, but also those that provided gambling, betting and bingo facilities. I have represented Greater

Signature *D J Butterworth*

Manchester Police at Magistrates Court hearings, Crown Court Appeals, The High Court, The Court of Appeal and Council Licensing Committee hearings, to oppose unsuitable applications and to take enforcement action against those premises whose standards had fallen below an acceptable level.

4. Throughout my period in the central licensing role Assistant Chief Constable Robert Taylor, also from the Greater Manchester Police, was the Association of Chief Police officers (ACPO) lead spokesman on Alcohol and Licensing matters. As a result of this connection I became secretariat to the ACPO National Licensing officers' group and National Licensing Forum (NLF).
5. During my time in charge of the Licensing Unit I worked very closely with David Thornton, the local Gambling Commission Inspector, conducting joint operations on both legal and illegal gaming establishments.
6. In 2006 on leaving the Central Licensing Unit I received a Chief Officers Commendation, recognising the contribution I had made to licensing enforcement across Greater Manchester, particularly in relation to my leadership and commitment shown in developing force policy and training in response to the Licensing Act 2003 and Gambling Act 2005.
7. Between 2006 and my retirement from the Greater Manchester Police in December 2010 I took up the role of Neighbourhood Inspector for the town of Heywood on the Rochdale division. This involved the supervision of over 50 police officers, community support officers and civilian support staff. Within my role as a Neighbourhood Policing Team Inspector I was required to conduct analysis of crime and incident trends to ensure that resources and tactics were deployed appropriately. The outcome of this analysis ensured that resources were deployed in the right numbers, in the right areas at the right time. On a monthly basis I also presented these statistics to the town's multi agency tasking group to ensure all agencies had the relevant information on crime trends.
8. I have continued my professional development regarding licensing knowledge by taking and passing the National Licensees Certificate and National Door Supervisors course. This enabled me to successfully apply for a Personal Licence and become approved by the Security Industry Authority (SIA) as a front line operative. In September 2011 I successfully applied to become a nominated tutor with the BII enabling me to carry out training in the award for responsible alcohol retailing and award for personal licence holders. In October 2018 I attended a training course on Licensing Hearings and Appeals and in November 2019 I attended a seminar for Licensing Consultants.

Signature *D J Butterworth*

9. Between 2013 and the present date I have conducted investigations nationally on behalf of operators. I estimate that I have visited in excess of 1000 venues licensed under the Gambling Act 2005. A complete list of the dates and areas visited is attached to this report (Exhibit reference letter DJB 1 refers). I have also conducted observations nationally in relation to premises licensed under the Alcohol Licensing Act 2003, outlets often in areas close to gambling establishments and often the source of alcohol related crime and disorder. These visits often concluded in the early hours of the morning, a period when Betting Offices are closed, but 24-hour Adult Gaming Centres continue to operate.
10. In addition to acting on behalf of operators I have also conducted observations on behalf of residents, and in September 2017 I conducted 2 days of investigations on behalf of the London Borough of Camden. In August 2021 I conducted independent observations on behalf of the Home Office in relation to asylum seekers and their impact on Crime and Disorder in the West Midland area.
11. I have previously visited the Wood Green area in relation to Gambling Applications and provided a written statement in the original application for the Little Vegas venue.
12. I have conducted investigations in many City centre locations where Gambling premises are located as well as in town centre and suburban high street locations. In all of these different types of locations, I did not observe anything that altered my previously held views, formed during my police service as outlined below, nor did I witness any of the current gambling premises contributing to social, criminal or disorderly issues.
13. It is important to stress that when conducting my observations, I act totally independently of those instructing me and record accurately what I observe. To ensure that my visits accurately reflect the true situation I always insist that local operators are not made aware of my visits taking place. I am informed by those instructing me that this was the case for the current investigation.

Overview

14. I have been requested by Chongie Entertainments Ltd. to formalise an overview of my experience in relation to how Gambling Act applications have developed under the Gambling Act 1968 and Gambling Act 2005 legislation.
15. Although the Gambling Act and Planning applications are two entirely different processes, in my experience, many of the crime, disorder, noise and anti-social behaviour concerns raised in representations are applicable to both processes. As a result, the purpose of this report is to outline my

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experiences and how they reflect the true position on the high street in respect of AGC/Bingo venues, which is relevant to both Gaming and planning applications.

16. As noise and public nuisance is not a licensing objective under the Gambling Act, it is however, often raised at planning hearings as a reason why such an application should be refused. This often-expressed fear of disturbance does not, in my experience materialise, following the grant of a licence or following a variation to a planning application once approved.
17. In my experience of conducting Gambling Act investigations and attending Gambling Sub-Committee hearings, no statistical or video evidence has ever been produced to show that the current betting shops and AGC premises in an area create any of the crime and disorder problems alluded to in the representations. When conducting observations at Alcohol licensed premises, often in the early hours of the morning and in areas where Gambling premises are also located I have had the opportunity to note any conduct by customers of both types of premises.
18. My conclusion from these visits and observations is that the majority of crime, disorder and anti-social behaviour occurring in City Centres and Towns across the country is generated from late night alcohol licensed premises, to a lesser extent from betting shop premises and an even lower contribution from AGC type premises. My conclusions have remained unchanged since my service with Greater Manchester Police, despite the increase of the AGC/Bingo premises on the high street, as well as in motorway service stations and airport lounges.
19. There are several reasons for the differences alluded to above, including the fact that people tend to go to high street bingo and AGC venues on their own or in small numbers. An adult gaming centre regardless of floor space attracting more than 10 customers at one time would be highly unusual.
20. The actual number of customers is even lower between the hours of midnight and 0800 hours. Other than playing the machines there is no event taking place for customers to engage with each other, nor use the venues as a social meeting place. The demographic profile of the customers attending Betting shops and AGC/Bingo venues tends to be older and more mature than those visiting alcohol led premises.
21. During my overnight observations on high streets across the country I have not observed AGC/Bingo venues causing noise or disturbance issues in the early hours of the morning due to the age profile of the customer and the small number of clientele who use this type of premises during these hours.

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This is the opposite of what I have found in large bar/ nightclub venues on the high street where large numbers of young customers attend events involving the playing of loud entertainment and alcohol.

22. A group of young people attempting to enter and remain inside gaming venues would immediately be identified by staff. I have never encountered a situation during any of my extensive observations at these types of venues where young people sought to enter or remain inside any AGC or bingo licensed venues. On entering this type of premises staff immediately engage with you and often offer soft drinks, refreshment or other forms of courtesy. Another subtle but pleasing aspect of AGC's and Bingo type premises is the standard of their toilet facilities. These are always clean, unlike toilets in betting offices and alcohol venues which are often out of order or if open are uncleaned, disrespected by clientele and unhygienic. I believe this reflects the standards of behaviour and expectations of customers visiting an AGC.
23. The staff employed at a high street bingo or AGC premises are not engaged or distracted by taking or paying out on bets so they can spend more time on the "shop floor" observing customer behaviour and resolving any low level issues before they can escalate. This customer interaction allows the staff at these premises to be proactive in identifying vulnerable customers and intervene if necessary. The environment of a high street machine type premises is also generally cleaner and tidier than ordinary bookmakers as there are no need for betting slips, newspapers and pens which often get discarded on the floor.
24. As a result of this less intimidating environment many of the managers of high street machine premises are female and this was certainly the case in the high street premises I have visited. A further difference between high street machine premises and traditional betting offices are people tend to spend less time at a venue on each visit. They do not wait around the venue for an event to start or to finish. As a result of this, customers of high street machine premises do not tend to loiter at a premise other than when playing the machines and do not smoke at the front of the venue between events taking place. I have not observed any issues regarding customers congregating outside the high street machine premises observed during these periods of observations
25. In my capacity as a police officer, and more recently as a licensing consultant I have visited the Rochdale town centre area where a 24-hour machine type premises currently operates. The premises has operated at this location continuously for over 30 years, without creating concerns to the local police or licensing authority. The Rochdale town centre is consistently in the top 50 most deprived areas in the country.

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Gambling Act 1968

26. Under the Gambling Act 1968 application for a new premises licence would be submitted to the Magistrates Court for the area in which the premises would operate. Any person wishing to object to an application could present evidence and the Gambling Committee, guided by the local Gaming Board Inspector would consider the application and grant or refuse the application. Due to the restrictions on the published number of gambling premises in a location, the majority of objections to the new applications came from local operators who sought to prevent new businesses operating in their area. Any party who was not content with the Committees decision could appeal the matter to the Crown Court, decisions of which were used to formulate the licensing framework and afforded a consistency of approach which applicants and objectors could follow.

Gambling Act 2005

27. With the introduction of the Gambling Act 2005 jurisdiction on the grant or refusal of a new application for a premises licence came under the scope of the local authority with any appeal made to the Magistrates Court whose decisions were not binding. In my experience, one of the detriments of the new act was the removal of this evidence-tested approach to the decision-making process. A further consequence of the new legislation was a reduction in the role of the local gaming inspector.
28. Section 153 of the Act requires the Gambling Commission and Licensing Authorities to aim to permit the granting of a licence so far as is in keeping with the legislation and gambling commission guidance. Had Licensing Authorities adopted this section the onus on proving that a licence should not be granted would rest on those making representations against an application. In my experience, the majority of Licensing Authorities adopt the opposite position as that outlined in the legislation and aim to refuse an application unless the applicant is able to satisfy the committee that they will not undermine the licensing objectives.
29. Between 2010 and 2025 I attended licensing applications at local authority gambling act licensing sub committees and on rare occasions on appeals to Magistrates Court. During this period the grounds of the representations were predominantly made under the Crime and Disorder licensing objective, and to a lesser extent the protection of vulnerable people and protection of Children from harm objectives. The main evidence in support of such objections was the crime and disorder currently occurring in an area generally, and not the crime and disorder that is currently occurring at betting shops and AGC/Bingo premises; Nor what crime and disorder is likely to occur should a new application be granted in these areas.

30. As stated above during my 30 years police experience and 15 years as an independent licensing consultant I have never seen any evidence that AGC's/ Bingo type premises undermine the Crime and Disorder licensing objective. It is therefore unsurprising that when challenged to provide evidence to support their position, those making representations, have been unable to do so.

31. This lack of evidence that AGC/Bingo venues create Crime and Disorder was illustrated in a 2022 case in Newcastle. Newcastle City Centre has a cumulative impact zone (CIZ) under the alcohol Licensing Act due to the high levels of alcohol related crime and disorder. A freedom of information request identified that the three AGC/ Bingo type premises in Clayton Street (within this CIZ) had only been the creator of 4 incidents in the previous 12 month period despite one of the units having a 24-hour licence to operate.

Jan-Dec 2021

Venue 1 (24-hour licence)	2 crimes recorded. 2 incidents
Venue 2 (Not 24-hour licence)	No crimes. 2 incidents
Venue 3 (Not 24-hour licence)	No crimes or incidents

32. It is unsurprising that requests for Freedom of Information relating to the number of incidents and crimes occurring at gambling premises are now being refused by police forces stating that it is a breach of data protection legislation. As a result, the only public access records that are available to operators and consultants is the police crime websites. A review of these websites can show the number and nature of crimes and incidents occurring in a location but are not venue identifiable, nor can the information be extracted to obtain causal factors.

33. In recent years, perhaps as a result of the number of cases being approved by Licensing Committees or overturned on appeal, those local authorities who seek to refuse applications and those who wish to make representations against new AGC/ Bingo licences have sought to prevent the application via the planning application stage. However, often the grounds of the representation against the application still relies on the misheld belief that these types of premises create crime, disorder and public nuisance in an area. Also, that beggars, street drinkers and other vulnerable members of society will be attracted to them and that children will try to gain entry to a premises.

34. As outlined above I have never observed any of these occurring in the numerous areas I have taken observations and given evidence to committees on what I have witnessed. Also, restrictions have been placed via the planning regime on the opening hours that venues can operate based on the same evidence that the premises will undermine the crime and disorder

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licensing objectives. In my experience of visiting 24-hour AGC/Bingo venues the premises become even quieter in the early hours of the morning and do not have a negative impact on the high street at peak times, as an alcohol licensed venue may do, between 2300 and 0400 hours on a Friday and Saturday night.

35. In a number of cases, where an application has been granted and representations feared the impact of the opening of an AGC/ Bingo premises, I have offered to return to the area on behalf of residents, local businesses and the local licensing department to conduct an investigation free of charge, should an area not continue in the same manner following the opening of a venue. At no time has any individual or group contacted me following the granting of an application requesting me to revisit an area.
36. I am also unaware of any licence that was granted despite representations being made that the Crime and Disorder, vulnerability or the children's Licensing Objectives would be breached, having their licence reviewed having failed to operate in the manner which I expected or consider to be the norm.
37. A further issue often raised in representations is the harm that is caused by irresponsible gambling in general. As this usually manifests itself away from the premises, I am not able to quantify this in regard to individual premises or the different operators that engage my services.
38. I have visited the Wood Green area in relation to both gambling and alcohol licence applications on numerous occasions and I am aware of the crime and social challenges in the area. I am familiar with the Licensing Authorities gambling policy. The purpose of this latest investigation was to assess the likely impact of extending the operating hours at Little Vegas, The High Road, Wood Green. The methodology used was to compare the current operation of the 24-hour Little Vegas venues in Ilford and Walthamstow with the current 24-hour operations on Wood Green. I therefore conducted each period of observations between 0100 hours and 0500 hours on both weekdays and weekends.

Little Vegas Wood Green

39. Little Vegas, Wood Green operates between 0800-0200 daily. It currently operates under a temporary planning permission for these hours. It is seeking to operate for 24 hours daily. A similar previous application was refused because insufficient material had been provided regarding numbers attending, numbers smoking outside, potential noise issues and if customers visited in vehicles or on foot. The remit of this investigation is to provide evidence which addresses those concerns.

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40. Also operating AGC's on Wood Green High Road are Admiral (x2), Merkur Slots and Palace. These other 4 AGC's operate 24 hours, 7 days a week.
41. Little Vegas Wood Green High Road has operated until 0200 hours daily since the 17th November 2023. I am unaware of any complaints that have been made regarding the management of the premises or noise nuisance created by its customers up to the current date.
42. To verify my conclusion that an increase in operational hours will have little or no impact on the amount of crime or anti-social behaviour in the area I have conducted a review of the recorded crimes and incidents in that location. Wood Green High Road comes within the Noel Park policing area of the Metropolitan force. Between December 2022 and October 2023 (prior to operating until 2am) the area recorded 4,049 crimes. After opening until 0200 the area recorded 194 fewer crimes between December 2023 and October 2024. During the same period the area recorded 4 fewer incidents (730 to 726) of anti-social behaviour than was recorded prior to operating until 0200 hours (source:police.uk website)

Little Vegas Ilford

43. The Ilford unit is in a pedestrianised area on Ilford High Road. It is predominantly business use with limited residential accommodation. The nearest residents being in apartments directly above the premises. There is a local authority-controlled Pan, Tilt and Zoom (PTZ) CCTV camera directly opposite the venue which appears to give a line of sight to the whole frontage and entrance. Other AGC's in the area are Admiral, Merkur, Game Nation and Royal. The unit has been operated at this location with a 24-hour licence since 26th October 2023.

Little Vegas Walthamstow

44. The Walthamstow unit is located in a pedestrianised area on Walthamstow High Road. It is a mixed-use area in terms of planning with both business and residential accommodation in flats above the ground floor shop units. There is a local authority controlled PTZ camera located at the junction of High Road and Palmerston Road, which appears to give a line of sight to the front of the premises. Other AGC's in the area are Admiral and Game Nation which also operate 24/7. The unit has operated at this location since 15th December 2023.

Observations

Ilford, Friday 21st March 2025

45. My first visit to Ilford town Centre took place on Thursday 20th March 2025. My observations on this evening commenced at 0050 hours and concluded at 0500 hours the following morning. My observations were recorded into a

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notes document from which I have extracted the incidents of note for this report.

46. On arrival in Ilford, I noted that 4 other AGC operators (Admiral, Royal, Merkur, Game Nation) were also operating 24-hour licences in the town centre. Two unhoused rough sleepers with associated bedding were sleeping in two empty retail unit doorways. At 0053 4 males were smoking and chatting outside Little Vegas and at 0106 these males got into a vehicle and left the area
47. At 0109 a male and female arrive in a car and enter Little Vegas. An HGV delivered products to Greggs opposite Little Vegas with the associated noise of a large delivery vehicle, metal cages and plastic bread trays being moved by the driver. At 0128 a member of staff sweeps the shop frontage. Between 0100 and 0200 85 pedestrians walk along Ilford High Road past Little Vegas. Six customers arrive (2 in a vehicle and 4 visit the venue on foot). 2 customers are seen to leave on foot. 14 customers are seen to smoke, drink soft drinks or use their mobile phones. The majority of these occasions were single individuals for less than a minute and never more than two at any one time.
48. At 0205 a member of staff is seen sweeping the footpath area outside Little Vegas. At 0240 a Superdrug branded articulated lorry delivers to the premises nearby, with the associated noise of metal cages and pallets being moved using steel wheeled pallet trolleys. The driver continues to unload until it leaves at 0255. Between 0200 and 0300 42 pedestrians walk past Little Vegas. 1 person is seen to arrive on foot. 7 people are seen to leave the venue (3 in a vehicle and 4 on foot). 10 people were observed outside, smoking, using mobile phones and drinking soft drinks.
49. At 0345 two police vehicles and an Ambulance travel through the pedestrianised area with their blue lights operating. They do not stop near Little Vegas but from the blue lights being stationary they appeared to deal with an incident at the town centre side of the pedestrianised area. Between 0300 and 0400 50 pedestrians walk past Little Vegas. 4 customers arrived, all on foot. 6 customers left, all on foot. 1 person was seen to smoke outside. 3 customers left to use the nearby Santander cash machine before returning inside.
50. At 0407 a passing male urinates behind one of the flower beds in the pedestrianised area. The male was not a customer of Little Vegas. At 0446 vehicles started entering the pedestrianised area to unload pop up market stalls and produce. Between 0400 and 0500 35 pedestrians walked past Little Vegas. 5 customers entered the premises (1 in a vehicle and 4 on foot). 5 customers left the venue (1 in a vehicle and 4 on foot). 5 customers were seen to smoke outside.

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51. No further noteworthy incidents occurred and at 0500 I ceased my observations and left the area.

Ilford, Saturday 22nd March 2025

52. My observations on this morning commenced at 0045 hours and concluded at 0500 the same day. The area appeared similar to that observed the previous night and the two rough sleepers were located in the empty unit doorways. At 0116 two males are drinking cans of lager on the public benches outside Little Vegas. They were not customers of Little Vegas and did not try to enter the venue. At 0130 the two males continue drinking from cans as they walk towards Ilford train station. At 0131 the Greggs delivery driver visits their premises opposite with the associated noise of moving metal and plastic cages.
53. Between 0100 and 0200 95 pedestrians walked past Little Vegas. 7 customers arrive, all on foot and 7 customers leave, all on foot. 4 customers were observed smoking outside. At 0215 3 males exit and leave the area on foot. They return at 0236 to collect a suitcase before walking towards Ilford rail station.
54. Between 0200 and 0300 68 pedestrians walk along Ilford High Road past Little Vegas. 2 customers arrive on foot. 3 customers leave on foot. 5 customers are observed smoking outside.
55. At 0334 a member of staff sweeps the footpath outside the venue. Between 0300 and 0400 47 pedestrians walked past Little Vegas. 3 customers arrived on foot. 4 customers left on foot. 1 customer was observed smoking outside. Two customers left to use the cashpoint before returning inside.
56. At 0410 a heavy goods vehicle enters the pedestrianised area near to Little Vegas and its occupants start to unload pallets of produce for the Saturday market. As they were using hand pulled pallet trolleys with metal wheels, they were making a considerable noise. At 0459 the rough sleeper walks away leaving his bedding and property in the shop doorway. Between 0400 and 0500 39 pedestrians walked along Ilford High Road past Little Vegas. One person arrived at the premises on foot. 3 customers left the venue on foot. No one smoked outside the venue during this time. No further noteworthy events occurred and at 0500 I ceased my observations and left the area.

Walthamstow, Sunday 23rd March 2025

57. I arrived in the High Road area of Walthamstow at 0040 hours and commenced my observations. Between 0100 and 0200 47 pedestrians walked past the Little Vegas unit. 5 customers entered the venue, all

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approached on foot. 3 customers were seen to leave on foot. 2 customers were seen to use the nearby cash machine before returning inside. 12 customers were observed smoking. Smokers re-entered after 1-2 minutes and never more than 2 customers were observed outside at the same time.

58. Between 0200 and 0300 31 pedestrians walked past the Little Vegas unit. 7 customers were seen to enter the premises on foot. 12 customers were seen to leave on foot. 10 customers were seen to smoke outside. 2 customers were seen to use the nearby cash machine, and 1 customer was observed using their mobile phone before returning inside.
59. Between 0300 and 0400 34 pedestrians walked past the Little Vegas unit. 6 customers were seen to enter the venue on foot. 8 customers were seen leaving on foot. 4 customers were observed smoking outside.
60. Between 0400 and 0500 16 pedestrians were observed walking past the Little Vegas unit. 2 customers were seen to enter the unit on foot. 4 customers were seen to exit the premises on foot. 3 customers were observed smoking outside. At 0500 I ceased my observations and left the area. Unusually, I did not note any other occurrences to report during this period of observations other than the customers entering and leaving and pedestrians passing by. No noise other than the road traffic along Palmerston Road could be heard. No noise or other nuisance was audible by customers from Little Vegas.

Walthamstow, Monday 24th March 2025

61. I returned to Little Vegas Walthamstow at 0050 hours on Monday 24th March and continued my investigations until 0500 hours when I left the area. The area appeared similar to my previous night's observations.
62. At 0140 hours a refuse collection vehicle travelled through the pedestrianised zone, past Little Vegas. The operatives were throwing bags of garbage and emptying litter bins into the rear of the vehicle. This was the only source of noise nuisance I heard. Between 0100 and 0200 25 pedestrians walked past the site. 3 customers entered the venue on foot. 5 males exited the venue, all on foot. 7 customers went outside to smoke but never more than 2 at one time. One customer exited and used the nearby Sainsbury's cash machine before returning inside.
63. Between 0200 and 0300 hours 23 pedestrians walked past the venue. 3 customers entered on foot. 1 person exited on foot. 7 customers smoked outside the venue, but never in groups larger than 2. 1 customer exited to use the cash point before returning.
64. Between 0300 and 0400 hours 19 pedestrians walked past the venue. 1 customer entered from a vehicle and 5 customers entered on foot. 8

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customers exited, all on foot. 8 customers smoked outside. Never in groups larger than two.

65. Between 0400 and 0500 21 pedestrians walked past the venue. At 0447 a member of staff sweeps the footpath outside the venue. No new customers were seen to enter the premises. 3 customers went outside to smoke, all individually. 1 male went to the cash point before returning inside. No noise nuisance was noted during this period or any incident of note. At 0500 I ceased my observations and left the area.

Admiral (117 High Road, Wood Green), Tuesday 25th March 2025

66. My latest visit to the Admiral unit at 117 Wood Green High Road took place on Tuesday 25th March 2025. My observations commenced at 0045 hours and concluded at 0500 hours the same morning. The area appeared similar to my previous visits to the area although some of the AGC's had changed ownership, and some retail outlets appeared to have closed down or rebranded.
67. At 0112 hours a London fire brigade vehicle with its blue lights operating attended at an incident in the pedestrian area on Lymington Avenue. At 0128 a refuse collection vehicle travelled along the Wood Green High Road past the unit. The operator stopped to throw bags of waste into the rear of the vehicle. At 0137 a police vehicle with blue lights and siren operating travelled at speed along the High Road but did not stop in the area. At 0155 a police vehicle with its blue lights and siren operating travelled along the High Road, but did not stop.
68. Between 0100 and 0200 66 pedestrians were seen passing the venue along the High Road. 4 customers were seen to enter on foot. 1 customer exited and got into a nearby vehicle. 1 customer exited on foot. 1 customer smoked outside.
69. Between 0200 and 0300 22 pedestrians walked past the unit. 1 male entered on foot. 1 male exited in a vehicle parked nearby. 3 customers exited on foot. 2 customers and a female staff member smoked outside. 1 customer used a nearby cash point before returning.
70. Between 0300 and 0400 19 pedestrians walked along the High Road past Admiral. 6 customers entered, all on foot. 7 customers exited the venue, all on foot. 2 customers were observed smoking outside.
71. At 0453 a mobile window cleaner is seen to clean the windows of some of the retail units in the immediate area. Between 0400 and 0500 42 pedestrians walked past the venue. 3 customers entered the venue on foot. 4 customers exited the venue on foot. 1 customer and the female member of

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staff were seen to smoke outside. No noteworthy incidents occurred and at 0500 I ceased my observations and left the location.

Merkur (91 High Road Wood Green) Friday 4th April 2025

72. My investigation continued by conducting observations outside Merkur Slots at 91 Wood Green High Road on Friday 4th April 2025, My observations commenced at 0050 hours that night and concluded at 0500 hours the following morning.
73. At 0140 hours a vehicle with an excessively loud exhaust system travelled along Wood Green High Road. At 0149 a vehicle is attempting to perform doughnuts along Wood Green High Road. Between 0100 and 0200 hours 27 pedestrians walked along the High Road past Merkur. 9 customers entered the venue arriving on foot. 8 customers were seen to exit the venue, all leaving on foot. 5 customers were seen to smoke outside but never in groups larger than two.
74. At 0202 a Metropolitan police vehicle with its blue lights and siren operating travelled at speed along the High Road without stopping. At 0216 a second vehicle with its sirens operating travelled along Wood Green High Road. At 0256 a refuse vehicle reverses from the High Road into Brampton Park Road. The vehicle has a loud audible reversing signal to warn pedestrians that it is reversing. Between 0200 and 0300 hours 21 pedestrians walked along Wood Green High Road. At 0254 4 customers enter from a vehicle and four persons entered on foot. 6 people exited, all on foot. 6 people were seen to smoke outside, all individually.
75. At 0436 a police vehicle with its sirens and blue lights operating travelled along Wood Green High Road. At 0327 a refuse vehicle collects rubbish along the High Road. Between 0300 and 0400 hours 16 pedestrians walked past Merkur Slots. 2 males enter from a vehicle and 2 males exit in a vehicle. 1 customer entered on foot. 6 customers exited on foot and 1 customer left on public transport. 7 customers smoked outside, the largest group being two.
76. At 0436 a Metropolitan police vehicle with blue lights and siren operating travelled along Wood Green High Road without stopping. Between 0400 and 0500 14 pedestrians walked past Merkur Slots. 1 male entered from a vehicle and 4 males exited in two vehicles. 4 customers entered on foot and 2 males exited on foot. 5 males were observed smoking outside. The largest group being three of the four who arrived by car. No other notable incidents occurred and at 0500 hours I ceased my observations and left the area.

Admiral and Little Vegas (9 & 17 Wood Green High Road) Saturday 5th April 2025

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77. I returned to the Wood Green area at 0050 hours on Saturday 5th April 2025 and continued my investigation by observing both the Little Vegas at number 17 (WGHR) and Admiral at number 9 (WGHR). I noted that a loading bay near to Admiral would provide parking for up to 4 vehicles. I noted customers from Admiral and Little Vegas using this parking when visiting the premises. I also noticed staff of the AGC's and non-customers using the parking spaces to visit the nearby cash machines at Tesco Express and Nationwide. At 0104 a Metropolitan police vehicle with blue light and siren operating travelled along Turnpike Lane without stopping. At 0107 a vehicle with an excessively loud exhaust system travelled along Wood Green High Road. At 0122 a further Metropolitan police vehicle travelled along Turnpike Lane and another vehicle with an excessively loud exhaust system travelled along the High Road. At 0143 2 motorcycles with loud exhaust systems travelled along the high Road,
78. Between 0100 and 0200 hours 78 pedestrians walked past the two venues on Wood Green High Road. During the same time period 9 customers entered Little Vegas on foot. 9 customers exited Little Vegas. All on foot. 4 customers were observed to smoke outside during this hour. At 0150 hours the shutters to Little Vegas were pulled down over the window and staff are seen clearing up.
79. Between 0100 and 0200 hours 9 customers were seen to enter Admiral on foot. 1 customer was seen to exit to a vehicle and 14 customers exited on foot. 5 customers were observed to smoke outside.
80. At 0210 and 0217 vehicles with an excessively loud exhaust system travelled along the High Road. Between 0200 and 0300 81 pedestrians walked past the two venues along Wood Green High Road. 4 customers were seen to enter from vehicles and 12 entered on foot. 4 customers were seen to leave in vehicles and 10 on foot. 8 customers were observed smoking outside. The largest group being 2.
81. Between 0300 and 0400 no traffic nuisance other than passing vehicles and buses was heard. 46 pedestrians were seen to walk past the venue. 3 customers arrived in a vehicle and 3 customers exited in vehicles. 6 customers entered on foot and 11 customers exited on foot. 8 customers were observed smoking outside the venue. The largest group was 4 but this was only the case for less than a minute as customers overlapped re-entering and exiting to smoke.
82. At 0417 a vehicle with an excessively loud exhaust system travelled along the High Road. At 0437 a male pedestrian urinated in the alleyway at the side of Admiral. He was not a customer of the venue. At 0448 a vehicle with a loud stereo system travelled along the High Road. Between 0400 and 0500 33

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pedestrians walked along Wood Green High Road past the venue. No customers were observed entering or leaving in vehicles. 9 customers entered on foot and 8 customers exited on foot. 5 customers were observed to smoke outside during this period. Nothing further of note occurred and at 0500 hours I ceased my observations and left the area.

Admiral and Little Vegas (9 & 17 Wood Green High Road) Sunday 6th April 2025

83. I returned to the Wood Green area at 0055 hours on Sunday 6th April 2025 and my observations ceased at 0500 hours that morning. The area appeared to be the same as my previous night's visit. At 0112 a vehicle with an excessively loud exhaust system travelled past the venues. At 0119 a vehicle with a loud stereo system travelled past the venues. At 0128 a police vehicle with its blue lights and siren operating travelled at speed along the High Road. Seconds later a helicopter could be heard in the nearby area. At 0135 a police vehicle with its siren operating travelled along Turnpike Lane. At 0150 a male opened the shutters at North London Hospice to retrieve their pedal cycle before closing the shutters at 0156.
84. At 0153 the shutters to Little Vegas were lowered over the window as staff prepared to close at 0200. At 0157 6 customers exited Little Vegas and immediately entered Admiral.
85. Between 0100 and 0200 hours 95 pedestrians walked past the two venues. During the same time period 1 person was seen to enter Little Vegas from a vehicle and 3 customers were observed leaving into vehicles. 9 customers entered, having arrived on foot and 21 customers were observed leaving on foot. 7 customers were seen to smoke outside.
86. Between 0100 and 0200 hours 1 customer was seen to exit Admiral in a vehicle, 17 customers were seen to enter on foot and 5 customers were seen to exit on foot. 5 customers were observed smoking outside.
87. At 0214 2 female members of staff lock up the venue and leave on foot. At 0233 a police vehicle with blue lights and siren operating travels at speed along the High Road. At 0237 a second police vehicle with blue lights and siren operating travelled along the High Road. At 0246 a vehicle with a loud stereo travelled along the High Road.
88. Between 0200 and 0300 70 pedestrians walked along the High Road past Admiral. 1 customer was seen to enter the venue from a vehicle and 1 customer exited into a vehicle. 4 customers entered on foot and 5 customers exited on foot. 10 customers were seen to smoke outside.

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89. At 0324 and 0326 vehicles with a loud stereo travelled along the High Road. At 0340 a vehicle parked on the pavement outside Little Vegas and the driver delivered mail to several nearby addresses.
90. Between 0300 and 0400 40 pedestrians walked past Admiral. 1 customer was seen to enter from a vehicle. 1 customer entered on foot and 6 customers exited on foot. 9 customers were observed to smoke outside.
91. At 0418 an Ambulance passed through the junction of High Road and Turnpike Lane with its siren operating. At 0422 a police vehicle travelled through the same junction with its siren sounding. At 0435 a male urinated against the wall of Farmfoods. He was not a customer of Admiral. At 0453 and 0456 police vehicles travelled through the junction on Turnpike Lane with their sirens operating.
92. Between 0400 and 0500 39 pedestrians walked past Admiral. 1 customer was seen to exit into a vehicle. 1 person entered on foot and 6 customers exited on foot. 14 customers were observed smoking outside. The largest group was three people at 0458. No further incidents of note occurred and at 0500 hours I ceased my observations and left the area.

Palace Amusements (49 High Road Wood Green) Monday 7th April 2025

93. I continued my observations and investigation on Monday 7th April 2025 outside Palace Amusements 49 Wood Green High Road. I arrived in the area at 0050 hours and my observations ceased at 0500 hours the same morning. On arrival I noted a large refuse vehicle was in the process of collecting rubbish bags from the footpath and waste bins along the High Road.
94. At 0123 a security siren from one of the nearby business premises commenced and continued to sound for exactly 15 minutes before stopping. At 0129 a member of staff from Urban Chocolatiers was observed smoking outside the foyer of Palace Amusements but did not enter. At 0143 a vehicle with a loud exhaust system travelled at high speed along the High Road. At 0155 a police vehicle travelled along the High Road at speed with its blue lights and siren operating. Kaspas Deserts, Urban Chocolatiers and Sweet Town Grill partially closed their shutters but delivery drivers and riders continued to visit the venues to collect take away orders. This was seen to continue up to the conclusion of the observations at 0500 hours.
95. Between 0100 and 0200 hours 31 pedestrians were seen to walk past Palace Amusements. No one entered or left in a vehicle. 9 customers entered on foot and 5 customers exited. 10 customers were observed smoking outside with no groups larger than 2.

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96. Between 0200 and 0300 22 pedestrians were observed walking past Palace Amusements. One customer was seen arriving in a vehicle at 0227 and was seen leaving at 0232. 2 customers were seen to enter on foot and 8 customers were observed leaving. 4 customers were seen to smoke outside.
97. At 0306 a vehicle with a loud stereo system was seen and heard travelling along the High Road. At 0312 the security alarm at a nearby business started again and stops 15 minutes later. Delivery drivers and riders continue to visit the take away venues. At 0339 a further refuse vehicle is heard removing rubbish along the High Road. At 0344 a vehicle with a loud audio system travelled along the High Road.
98. Between 0300 and 0400 hours 11 pedestrians walked past Palace Amusements. No customers were seen to enter the venue from a vehicle. 1 person entered on foot and 5 customers were seen to leave. 1 person was observed smoking outside.
99. At 0405 staff from the venue can be seen to sweep and mop the outside area. The Khyber mini market remains open and deliveries continue to be collected from the Sweet Town Grill and Urban Chocolatiers. No one was seen to enter the venue from a vehicle and 1 person was seen to enter and exit on foot. 1 customer and 2 male staff are seen to smoke outside. At 0456 hours two members of staff were seen to lower the shutters and the premises appeared to close. I conducted a google search of the premises to confirm that it was licensed to operate 24/7. Between 0400 and 0500 hours 8 pedestrians walked past the venue. No further incidents of note occurred and at 0500 hours I left the area.

Summary of observations March 2025 and April 2025

100. From my record of observations, I have produced a table of the venues visited and the results of my observations (exhibit reference letter DJB 2 refers). From these records I can state that the Friday and Saturday nights observations in Ilford were the busiest in terms of people using the gambling venues and general footfall through the area.
101. The area with the loudest ambient sound levels was Wood Green High Road due to the Ilford area being within a pedestrianised area with restricted vehicle access for loading and unloading of goods. The quietest area for ambient sound was Walthamstow due to it also being within a restricted access zone.
102. Having conducted observations in many London Boroughs it is evident that no two areas are identical. However, there are many common factors which I see in all areas similar to those that I observed during this latest and previous investigations in the Wood Green area.

Signature *D J Butterworth*

103. Ambient noise in such areas is always higher than what is found in smaller town centre locations. This is created by many factors including the passing of traffic along a main road and pedestrians passing by who have no connection to the gambling venues. Added to these continuous noise occurrences that a resident may develop a tolerance to are sporadic outbreaks of noise which gambling operators have no control over.
104. Examples of these occurrences observed and heard during this period of observations echo those that I have previously heard in this and other London Boroughs. The largest noise disruption heard was the passing of emergency service vehicle with their sirens sounding and the security alarm of a local business sounding. The collection of rubbish during times when the roads are quieter can often disrupt the sleep of residents, especially those vehicles with warning sirens to alert pedestrians and cyclist that a vehicle is reversing or is turning left.
105. Other noise was regularly created by inconsiderate drivers attempting noisy turns or doughnuts in the High Road or those with loud car stereos. Another noise factor was created by adapted exhaust systems that can be clearly heard above the ambient sound of normal traffic noise. Added to these sounds are the late-night bus services and passing delivery vehicles which also use the early hours to conduct deliveries to premises when less traffic is on the roads.
106. By comparison with these other ongoing external noises the potential of small numbers of customers arriving and leaving gambling venues in vehicles or on foot is negligible. Noise from small numbers of customers smoking outside was also not heard from a short distance away. Any gambling venue may have a customer who shouts out to acknowledge or greet a friend which, when it happens in the early hours of the morning can be disruptive. But in my experience generally, and what was evident from these latest observations, such occurrences are rare.

Planning Inspectors report

107. The purpose of this investigation was to address the questions posed by the previous application. I am unaware of any similar type of research that has been conducted in relation to the usage of customers of Adult Gaming Centres over such a range of locations and across such an extensive time period.
108. Regarding customers arriving in vehicles or on foot during this period of observations 16 customers were seen to exit into vehicles whilst 220 customers exited venues on foot. This did not account for a true reflection of the number of vehicles as on occasion two, three and up to four customers

Signature *D J Butterworth*

would depart in the same car. The actual number of vehicles is therefore much less. It was noted that the parking areas used by customers of gambling establishments was equally used by drivers and riders attending fast-food venues and people withdrawing money from nearby cash points.

109. Regarding customers smoking outside venues the norm was for single or pairs of customers and venue staff to smoke outside at any one time. On rare occasions when smoking periods overlapped three, and on one occasion 4, people were observed outside at the same time. The average length of time a smoker was outside would be between 1-2 minutes, so such occasions were rare and during some periods did not occur at all.
110. The largest congregation of customers observed outside a venue was at 0157 hours on Sunday 6th April 2025 when 6 customers exited Little Vegas at the same time. This occurred because the venue was due to close at 0200 hours. I observed that all six of the customers immediately entered the Admiral at 9 Wood Green High Road. The refusal of the planning permission aiming to reduce the potential for disturbance by customers was not achieved as none of these customers left the area. The direct opposite of what was intended occurred, with 6 customers leaving the venue at the same time due to it closing at 0200.

Conclusion

111. In my experience AGC/ Bingo venues are now common sights in airport lounges, motorway service areas and local high streets. Having visited a large number of these sites in different locations I have never seen any evidence of them creating crime and disorder or being an attractive location to vulnerable individuals or young people. My experience leads me to believe that Gambling in locations where trained staff are available to respond and observe customer behaviour can only be safer than gambling on machines at unstaffed venues or on line where 52% of all gambling now takes place.
112. In many of the areas visited machine companies already operated sites successfully and without criticism from the local enforcement authorities. I have been able to visit operational sites in these other areas and confirm that their operation did not lead to issues of crime and disorder nor did they attract street drinkers, beggars or other vulnerable individuals. I am unaware of any concerns being raised in respect of any of these areas since the licences were approved.
113. There are many social issues, criminality and disorderly conduct visible on most high streets in the country. In my experience the granting or a refusal of an AGC/ Bingo licence in these areas does not increase the likelihood of such instances occurring. It is also unlikely to reduce the number of the occurrences in an area that were previously taking place.

Signature *D J Butterworth*

114. Applications by Chongie Entertainment Ltd to open premises in a location does not normally introduce anything new into an area that is not already available to the local community. I have never seen any evidence produced at Gambling Committee or planning hearings that would lead me to believe that the granting of a 24-hour AGC into most areas would undermine the licensing objectives.
115. At paragraph 16, 17,18 and 19 above I outlined what I consider to be major differences between a betting office premises and a AGC/Bingo premises. What I have observed nationally reinforces my experiences outlined above. Although the main cause for concern appears to be the fear of crime and disorder and protection of vulnerable people, this view is not supported by the record of incidents at their venues collated by Chongie. I have not observed any conduct or received other conflicting evidence which would cause me to reconsider my position. In my experience the change of a premises from a 18-hour daily operation, to a 24-hour operation will provide an increased visible presence to Wood Green High Road and reduce the likelihood of crime, disorder and anti-social behaviour in the area.

Darrell Butterworth
8th April 2025

Appendix

Exhibit reference letter DJB1 - Areas and dates previously visited to conduct gaming investigations
Exhibit reference letter DJB 2 – Table of movement around AGC's during this Investigation

Signature *D J Butterworth*

Exhibit reference letter 1

Areas visited in respect of Gambling investigations

March 2013 I spent 3 days in the London Borough of Newham visiting 111 different betting shop premises to observe customer usage and monitoring their compliance with the Gambling Objectives.

In **April 2013** I spent 7 days in the London Borough of Newham visiting 109 different betting shop premises to observe customer usage and monitoring their compliance with the Gambling Objectives.

In **May 2013** I spent 5 days in the London Boroughs of Brent and Haringey visiting 174 different betting shop premises and monitoring customer usage and their compliance with the Gambling Objectives.

November 2013 I spent 2 days in the London Borough of Newham visiting 13 betting shop premises to observe customer usage and their compliance with the Licensing Objectives.

In **December 2013** I spent 4 days in the London Borough of Newham visiting 24 different betting shop premises to observe customer usage and their compliance with the Licensing Objectives.

In **April 2014** I spent 4 days in the Haringey area of London visiting several betting shop premises and conducting observations on criminal and antisocial behaviour.

August 2018 I spent 1 day in the London Boroughs of Camden, Tottenham and Kilburn visiting Gambling Licensed Premises. In these areas similar concerns had been raised by local councillors and the Public Health Authority that the venues would lead to increased crime and disorder in the area and vulnerable people would be adversely affected. Whilst conducting these visits I did not observe any of the issues raised in the representations submitted in respect of that application.

August 2020 I spent 2 days in the Rochdale and Droylsden suburbs of Manchester, conducting observations. The application subject of those observations received a number of representations from church leaders, residents and local councillors regarding the deprivation in the locality of the proposed venue, crime and disorder and the locality being located near to other gambling type and alcohol led premises. During my observations I found no evidence to support these representations and the licence was granted following a hearing.

September 2020 I spent 2 days in the Harehills area of Leeds conducting observations in respect of an application for a new Gambling Premises licence. The Harehills area is one of the most socially deprived in the City and is prominent in many of the indices used to measure social deprivation. In the same month I also attended the High Road, Tottenham visiting a Licensed Gambling Premises including 4 betting offices.

Signature *D J Butterworth*

October 2020 I spent 2 days in Blackpool conducting observations in respect of an application for a new gambling premises licence. Already in the area were 3 adult gaming centres and 3 betting shops.

At the end of **October 2020** I spent 2 days in Newbury visiting Licensed Gambling Premises.

In **December 2020** I spent 1 day in the Acocks Green area of the West Midlands visiting betting shops and gaming centres.

In **February 2021** I spent 2 days in the Worcester City Centre area conducting observations in respect of an application for a new Bingo licence.

In **February 2021** I spent 1 day in Doncaster town centre conducting observations in relation to a new application there on behalf of the current applicant.

In **April 2021 and August 2021** I spent 2 days in Walsall observing current gambling venues.

In **September 2021** I spent 3 days in Spalding Lincolnshire, observing current gambling venues.

Also, in **September 2021** I spent 1 night in Newcastle observing current gambling venues.

In **October 2021** I spent 1 night in Rochdale observing a 24-hour bingo machine premises and a 24-hour AGC. These observations took place from 2200 hours until 0600 hours. The purpose of this visit was to observe these venues throughout the night to see if they attracted, street drinkers, homeless or other vulnerable groups. Although homeless, street drinkers and beggars were observed around the town centre, none of these groups attempted to gain access to the two units despite them being the only premises open after 0400 hours.

In **October 2021** I spent a weekend in the London borough of Hammersmith observing Adult Gaming centres, Betting Shops and Bingo premises.

In **November 2021** I spent 2 days in the London Borough of Leyton, visiting betting shops and AGC's in relation to a planning application.

In **April 2023** I spent 6 days in the boroughs of Wood Green, Croydon and Crawley visiting AGC's and gathering crime and disorder statistics in relation to a new application.

In **August 2023** I spent 3 days in the London Borough of Edmonton conducting observations and visiting AGC's in respect of a new gambling application. In the same month I spent 3 nights in the London borough of Edgware in relation to a new gambling venue.

In **December 2023** I spent 2 days in the town of Hayes taking observations in and around betting shops and AGC's.

In **April 2024** I spent 5 days in Halifax, Oldham, Bradford and Sheffield visiting betting shops and AGC's in relation to a gambling licence application.

In **June 2024** I spent 2 days in Cricklewood making observations in relation to a planning application.

In January 2025 I spent an over night period of observations in Cricklewood observing AGC's in relation to a new gambling application.

In addition to the above Gambling venues, I have conducted thousands of hours of observations in relation to alcohol led venues. These venues are often located on high streets which contain a mixture of alcohol and gambling licensed premises.

Exhibit reference letter DJB 2

Table 2 Record of observations

*Little Vegas closed at 0200 hours

** Same footfall count and period 0100-0200 for both premises

Date	Vehicle in	Vehicle Out	Enter on foot	Exit on foot	Pedestrians	Smokers	Total
Ilford, Friday 21/03/2025	3 customers	4 customers	13 customers	11 customers	212	30 customers	273
Ilford, Saturday 22/03/2025	0	0	13 customers	16 customers	249	10 customers	278
Walthamstow Sunday 23/03/2025	0	0	20 customers	27 customers	128	33 customers	208
Walthamstow Monday 24/03/2025	0	0	11 customers	14 customers	88	25 customers	138
Admiral (117 WGHR) Tuesday 25/03/2025	0	2	14 customers	15 customers	149	8 customers	180
Merkur (91 WGHR) Friday 04/04/2025	7 customers	6 customers	18 customers	23 customers	78**	23 customers	155
Little Vegas (17 WGHR) Saturday 05/04/2025 *	0	0	9 customers	9 customers	78**	4 customers	100
Admiral (9 WGHR) Saturday 05/04/2025	7	8	36 customers	43 customers	238	26 customers	238
Little Vegas (17WGHR) Sunday 06/04/2025 *	1 customer	3 customers	9 customers	21 customers	95**	7 customers	136
Admiral (9 WGHR) Sunday 06/04/2025	2 customers	3 customers	23 customers	22 customers	95**	38 customers	183
Palace Amusements (49 WGHR) Monday 07/04/2025	0	0	13 customers	19 customers	8	18 customers	43

Signature *D J Butterworth*

Premises

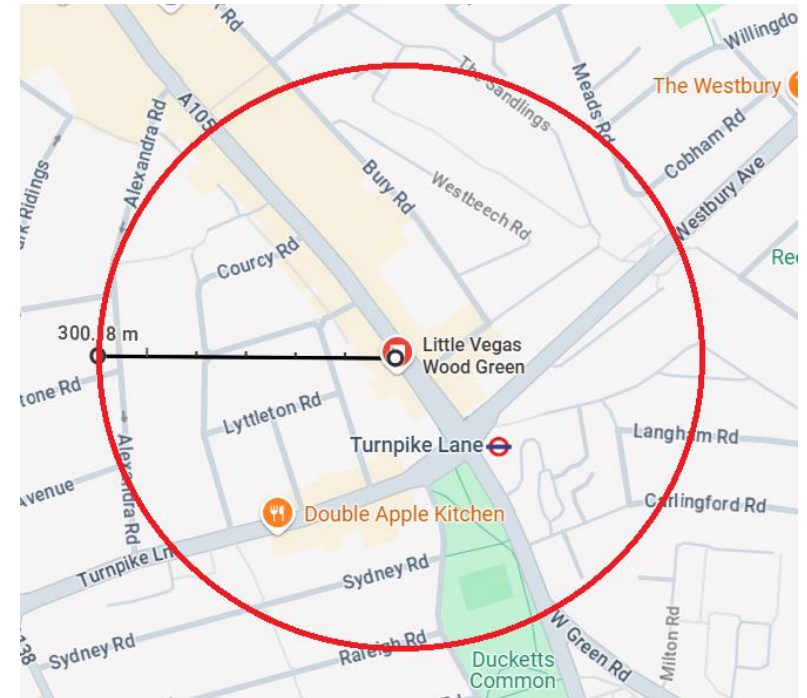
Premises Name (TA)	Little Vegas
Premises Address	17 High Road, Wood Green
Premises Post Code	N22 6BH
Premises License Number	LN/000024354
Category of Premises	Adult Gaming Centre (AGC)

Company

Operating Company	Chongie Entertainment UK Ltd
Company Address	3-5 Wardour St, London, W1D 6PB
Operating License Number	062728-N-337784-003

Assessment Writer

Creator of Assessment	Darren Hughes
Position Held in Company	Director or People Strategy (PML holder for Regulatory Compliance)
Date LARA Version Created	5 th March 2025
Dates Lara Reviewed	



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

Social responsibility code provision 10.1.1

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at **each of their premises**, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.
2. Licensees must review (and update as necessary) their local risk assessments.
 - a. To take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. When there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. When applying for a variation of a premises licence; and
 - d. In any case, undertake a local risk assessment when applying for a new premises licence. **Ordinary code provision**

10.1.2

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

Purpose

The purpose of this document is to assist staff in understanding and carrying out their responsibilities in running the premises including alerting them to any special problems of which they need to be aware in carrying out their duties, for example awareness of potentially vulnerable individuals in the vicinity.

The Operator

Chongie Entertainment UK Limited is licensed by the Gambling Commission. It is familiar with the guidance and information contained in the Borough of Haringey's Statement of Gambling Policy (2025-2028)

The venue has a Smart Tablet which it uses to record Customer interactions, Incidents and age verification challenges. This data is analysed at Head Office and used in the review of the Local Area Risk Assessment, to highlight any emerging trends or increased risks. For example, in the previous 12 months there have been 459 Age verification challenges within the industry standard Think 25 scheme – 348 of these were able to provide valid ID, whilst 101 could not provide valid ID with proof of age and were asked to leave; 10 under 18s accompanied by an adult were also refused entry.

Wood Green

Wood Green is a vibrant area in the London Borough of Haringey, located in north London. It is a key commercial and residential hub, well-connected by transport links, including the Piccadilly Line, providing easy access to central London and Heathrow Airport.

The area is known for its bustling high street and The Mall shopping centre, a major shopping destination with a variety of retail, dining, and entertainment options.

According to the 2021 Census, Haringey has a population of approximately 263,000, with Wood Green being one of its most diverse and dynamic neighbourhoods. The area continues to evolve, with regeneration projects enhancing its appeal as a cultural and commercial destination in north London.

The Local Area

Little Vegas is located on the southern side of High Road near Turnpike lane station. High Road is a major commercial street running through the heart of Wood Green, extending in a north-south direction with a span of roughly 1 km.

The surrounding area features a variety of businesses, including restaurants, cafes, convenience stores, and retail shops. There are also several entertainment and hospitality venues, as well as professional service providers, contributing to the diverse character of the location.

Wood Green benefits from excellent public transport links. With Turnpike Lane Underground Station, a short walk from the site, provides access to the Piccadilly Line, connecting to central London and beyond. Numerous bus routes operate along High Road, offering frequent services to surrounding areas.

The premises themselves are rectangular in shape with an enclosed lobby area and will operate gaming machines on the ground floor along with a disabled toilet and office.

No auxiliary activities will be offered other than Category B3, B4, Category C and Category D gaming machines.

Wood Green Specific LARA consideration

After conducting thorough research and considering advice from relevant source materials, we have decided to maintain the standard 300-meter radius surrounding the venue. However, given the substantial size and diverse range of businesses along High Road, we have also included locations further away that remain situated on High Road itself. This approach ensures a comprehensive representation of the surrounding community and allows this Local Area Risk Assessment to provide all pertinent and relevant information.

Gambling Premises:**LBO's**

- Ladbrokes - 13 High Road
- Paddy Power - 33 High Road
- Betfred - 64 High Road
- Betfred – 679 Green Lanes,
- William Hill – The Broadway, High Road
- Ladbrokes – 12 The Broadway, High Road
- Paddy Power – Unit 4, Hollywood Green, 180 High Road
- Ladbrokes – 742, 744 Lordship Ln

Adult Gaming Centres & “High Street Bingo”

- Admiral – 9 High Road
- Palace Amusements - 49 High Road
- Merkur slots – 91 High Road
- Admiral – 117 High Street
- Little Vegas – 144 High Road

Bingo

There are no Bingo Halls located within the search parameters, it has been noted Mecca Bingo closed its premises at 707 -725 Lordship lane in June 2024.

Casinos

There are no Casinos located within the locality and it is also noted of the details of the “policy not to permit casinos” in Haringey Statement of Gambling Policy 2025-2028

Pawnbrokers

- H&T Pawnbrokers - 12 Cheapside High Road
- Pickwick Jewellers and Pawnbrokers - 123 High Road

A number of additional locations identified have been listed due to clear advertisement for the immediate purchase of technological hardware (phones, laptops etc)

- CEX – 5 Cheapside High Road
- MCX – 37 High Road
- Zee Mobile Exchange – 95 High Road
- AR Phones - 83 High Road
- Hot Spot Mobile – 70 High Rd

Public Houses & Licensed Premises for the Primary sale of Alcohol.

There are a number of pubs and licensed premises within the local area:

- The Toll Gate - 26-30 Turnpike Lane
- Jani – 31 Westbury Avenue
- Spouters Corner – 180 High Road

- The Nag's Head – 203 High Road
- PJ O'connors Irish Sport Bar, 239 High Road
- Ludo's – Blue House Yard, 5 River Park Road
- Rattle n Hum – 232 High Road

There are also a number of off licenses and restaurants licenced for the sale of alcohol in the vicinity.

It is illegal to consume alcohol on Adult Gaming Centre premises and Chongie Entertainment UK will not allow access to anyone appearing to be under the influence of alcohol.

Banks & ATM machines

- Nationwide Building Society - 25 High Road
- Santander - 28 High Road
- Barclays Bank - 62 High Road
- Halifax – 7 Cheapside High Road
- Metro Bank – 136A High Road
- Lloyds Bank – 149-153 High Road
- NatWest – 14 The Broadway
- TSB Bank POD Location, The Mall
- The Co-operative Bank – 195 High Road

- Tesco Bank (ATM) - Tesco Express, 1-3 High Road
- Sainsbury's Bank (ATM) - 26 High Road

- Sainsbury's Bank (ATM) – Unit 4, Hollywood Green, 180 High Road
- Post Office (ATM) - 105 Turnpike Lane

It is also noted in this risk assessment there is an unbranded largely advertised ATM location next to Sports Direct at Unit 44, Wood Green Shopping City. In addition, it was also noted that a number of the AGC premises have ATM functions available inside.

Schools/Educational Establishments:

There are a number of schools, nurseries and other educational facilities around the area of the AGC site. This list notes a number of them, but is not exhaustive. The list factors locations outside of the 300m radius to factor reasonable commutable distances.

- Belmont Junior School – 30 Rusper Road N22 6RA
- Lordship Lane Primary School – Ellenborough Road, N22 5PS
- Park View School – Wood Green Road, N15 3QR
- Alexandra Primary School – School Caretaker, Western Road, N22 6UH
- Greig City Academy – High St, N8 7NU
- North Harringay Primary School – Falkland Road, N8 0NU
- Rokesly School – Rokesly Ave, N8 8NH
- Chestnuts Primary School – La Rose Ln, N15 3AS
- St Paul's Catholic Primary School – Bradley Road N22 7SZ
- Wood Green Central Library, N22 6XD (First Class Learning)
- The Grove School – Downhills Road, N17 6AR
- Noel Park Primary School – Gladstone Ave, Noel Park, N22 6L
- St John Vianney Primary School – Stanley Road, N15 3HB
- Belmont Junior School – 30 Rusper Road N22 6RA

It is not unusual to see college and school children in High Road and the Mall shopping centre after school hours and using the nearby bus / train links. The risk of these children entering the licensed premises or gambling is mitigated by the processes outlined in our Risk Matrix.

Churches/meeting places for vulnerable people.

At the time of this Assessment the following premises were noted as being in close proximity to the AGC site. The list is not exhaustive:

- UCKG Help Centre - 51A High Road
- St Michael's Church – Bounds Green Road
- Cathedral of the Dormition of the Moher of God – 22 Trinity Road
- St Paul the Apostle RC Church – 22 Bradley Road (CARIS, Homeless support)
- Jubilee Church – The Mall, Cineworld Cinema
- Wood Green Faith Mosque – 1D Caxton Road
- Taiba Community Centre – 30 Willoughby Road
- Grace Baptist Church Support – 48-50 Park Riding
- The Community Hub – 8 Caxton Road
- Church Hall 60-62 Alexandra Road (Alcoholics Anonymous)
- Salvation army, 24 Lymington Avenue

It is noted by this report that Gamblers Anonymous do not meet within the Wood Green area, the nearest in person session can be found in North Finchley.

Risks to the Vulnerable

All the above establishments (banks & ATM's, pubs and bars, betting shops, pawnbrokers, AGC & Bingo premises, churches, advice centres, centres for the homeless) might potentially have links to people who are vulnerable from gambling related harm such as establishments which provide gambling services, to source of funds to gamble such as ATM's. Pubs and bars create a risk of customers becoming inebriated and therefore potentially not in control of their gambling. Pubs may also offer the ability to play gaming machines.

Churches and advice centres might offer meetings or advice to those who may have potential issues with their gambling. Centres for the homeless will likely attract those that are potentially vulnerable and at risk.

Chongie Entertainment UK Ltd are aware that there are risks posed from gambling related harm and to the vulnerable. However, these risks will be mitigated and reduced by the company's excellent levels of staff training and the procedures identified in the Risk Matrix.

CCTV Systems

A CCTV system of a standard required by the police and/or the premises license will be installed on the site with cameras covering all public areas (excluding toilets). The required customer signage will be in place. The CCTV system will also have the capacity to be viewed remotely by Senior Management.

An external CCTV camera will also be installed, subject to Data Protection requirements, to monitor activity directly outside the premises.

Door Control

Chongie Entertainment UK realise that management of door control is an important consideration. Decisions relating to the levels of staff and any potential night security required are detailed below:

- Possible external CCTV coverage
- Potential night time Mag lock controls
- SIA registered Night Security will be considered if required via ongoing Risk Assessment

Toilet Facilities

The toilet facilities will be designed to deter individuals from attempting to inject drugs on the premises. Controls in place will be:

- Access controlled by staff.
- Toilets inspected after every use where any suspicion arises, to identify individuals potentially involved in drug use.
- Zero tolerance to drug or alcohol abuse with appropriate signage.

We believe this Local Area Risk Assessment (and future updates) identifies all necessary steps required in both complying with the Borough of Haringey's Statement of Gambling Policy (2025-2028), upholding the Licence Conditions and Codes of Practice and promoting the 3 Licensing Objectives. The Risk Matrix details how we as the operator, deal with key points identified.




Gambling Act 2005 – The Licensing Objectives



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



- (A) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- (B) Ensuring that gambling is conducted in a fair and open way; and
- (C) Protecting children and other vulnerable people from being harmed or exploited by gambling.

Risk Assessment Matrix

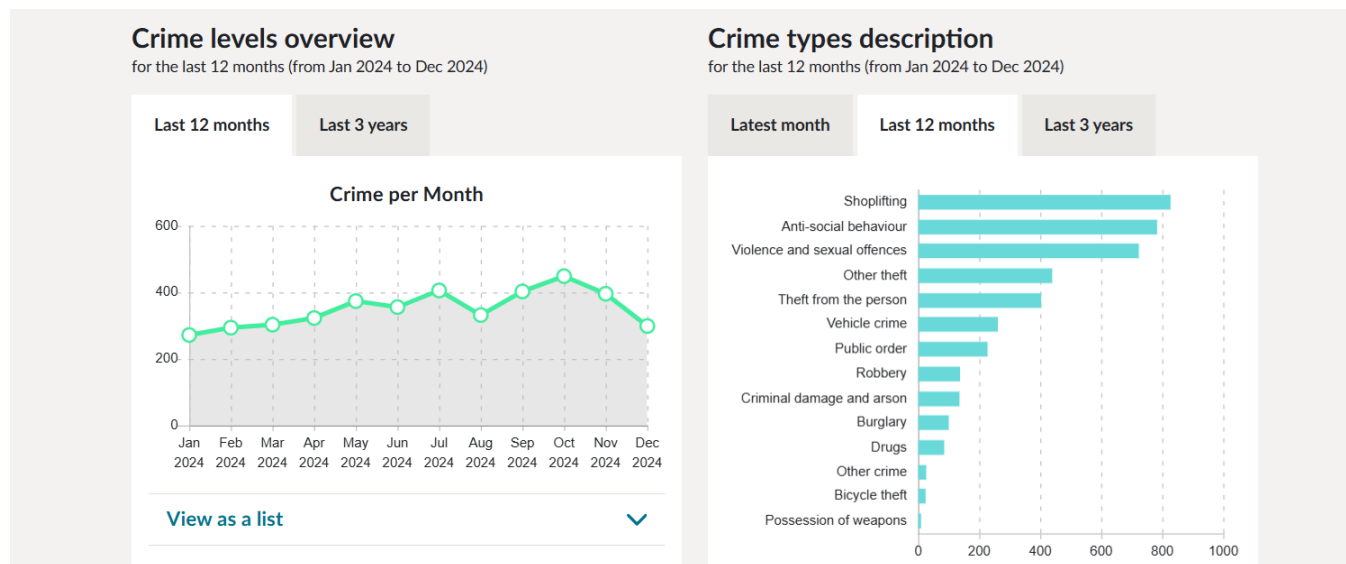
A) Preventing Gambling from Being a Source of Crime or Disorder

	Risk Reduced by measures in place
	Risk remained at same level
	Risk increased by measures in place

Risk Assessed	Level of Risk	Impact	Risk Management Measures	New Level of Risk	Change
Failure to identify attempts to launder money on the premises (e.g. dye stained notes) and to follow correct reporting procedure.	Moderate	Severe to business	<ul style="list-style-type: none"> Pay station and note acceptors regularly inspected and updated to the latest security and detection software available. All machines have a maximum collection limit with the highest amount possible being £1500 on B3 machines, which then require staff intervention and authorisation to process. Weekly collection process in place with cash (notes & coins) identified to each machine present. Staff regularly trained on AML importance, reporting process and potential signs of abuse. Fully compliant with LCCP requirements. Particular the reporting procedure to NCA by way of SARs. AML warnings built into Tito systems. TITO tickets cannot be transferred or used in other premises. Any AML suspicious activity to be immediately reported to the MLRO, then also logged on the SmartHub tablet. 	Low	
Poor security increasing vulnerability to crime.	Low	Severe to business	<ul style="list-style-type: none"> Staff provided with personal alarms. 3rd Party monitoring in place, where they have the ability once notified from the personal alarm, to contact the police without further staff engagement. All senior team have remote CCTV access Intruder alarm installed and regularly serviced Effective CCTV coverage with data stored for 31 days. Mag-lock entrance to be used between 23:00 – 2am as required on the premises licence. Regular liaison with local law enforcement agencies. Subscribe to BACTA's crime bulletins. 	Low	




Awareness of heightened local crime in the area	Low	Severe to business	<ul style="list-style-type: none"> 4k High Resolution CCTV cameras present at the front and back of the building (as appropriate) to monitor external factors. Regular reviews of Police Crime Stats for local area along with proactive engagement to local schemes that may be on offer. Proactive engagement with local town officials and police for known issues or individuals of concern. 	Low	
Issues arising from Proceeds of Crime failings	Moderate	Severe to business	<ul style="list-style-type: none"> Staff trained at induction and regular intervals to understand all relevant aspects of POCA (Proceeds of Crime Act) along with examples of incidents they could be witness too, that would arouse suspicion and in turn inform senior management about. The business has a zero tolerance approach to any type of criminality with even reasonable suspicion resulting in a ban from all relevant premises. These individuals photos are stored in the Banned Customer Log at the service desk and reviewed at the start of each shift to ensure compliance. 	Low	




Local Crime Data (Police.UK Statistical Data)



Risk Assessment Matrix




B) Ensuring Gambling is Fair and Open



	Risk Reduced by measures in place
	Risk remained at same level
	Risk increased by measures in place

Risk Assessed	Level of Risk	Impact	Risk Management Measures	New Level of Risk	Change
. Failure to provide or manage the complaints procedure correctly (Gambling related complaints)	Moderate	Severe to business Severe to Individual	<ul style="list-style-type: none"> Clear and present complaints form and procedure available both on the shop floor, for all customers to read but also kept in the compliance folder which staff read and sign as part of their training. On the entrance notice board a clear sign is displayed with our complaints number should this be required for any customer or member of the public. The procedure ensures clear and direct communication with all rights regarding ADR and reasonable support for gambling prevention highlighted to the individual on first written correspondence as well as in person if complaint taken verbally. Our complaints policy is regularly reviewed and updated where required by the senior team and 3rd party gambling solicitors. 	Low	
Failure to provide clear or correct terms and conditions	Low	Severe to business Moderate to Individual	<ul style="list-style-type: none"> General terms and conditions, as well as specific terms and conditions for individual promotional activity, are available for all customers on the shop floor. These are checked on a regular basis by venue management and members of the senior team. Our terms and conditions are regularly reviewed by the senior teams and relevant PML holders but also externally verified by 3rd party gambling solicitors. 	Low	
Opportunity for incorrect or misleading marketing materials	Moderate	Severe to business Moderate to Individual	<ul style="list-style-type: none"> Marketing for the business is strictly controlled and only authorised by a PML holder, Venue teams including venue management are not permitted to create, change or amend any promotional material. 	Low	


Risk Assessment Matrix

C) Protecting Children and the Vulnerable

	Risk Reduced by measures in place
	Risk remained at same level
	Risk increased by measures in place

Risk Assessed	Level of Risk	Impact	Risk Management Measures	New Level of Risk	Change
Children entering site unnoticed or unchallenged.	Moderate	Severe to business Severe to child	<ul style="list-style-type: none"> Venue designed to ensure no aspects of shop front or exterior appeal to children or youth culture Exterior signage present from the street displaying think 25 and no under 18's notices Constant & effective monitoring of entrance by venue staff CCTV in place throughout venue with clear camera angles of exterior and internal entrance points. An additional CCTV monitor is located at the entrance, displaying the extensive CCTV coverage of the venue system. Staff are trained to ensure entrance is constantly monitored at all times with clear sight lines from service station to entrance/lobby Staff are trained via E-learning, in person training session and 6 monthly refreshers for all venue staff on all compliance matters. Venues are also regularly visited by Area Managers and Members of the HQ/Senior Team for training assessment and performance reviews. 	Low	
Potentially vulnerable people being able to gamble.	High	Severe to business Severe to Individual	<ul style="list-style-type: none"> Staff constantly circulating on the shop floor and always 1 person monitoring the entrance in order to interact with all customers at the point of entry. Customer interaction policy and procedures are in place to identify signs of potential vulnerability which is completed during induction and at regular intervals. 	Moderate	

			<ul style="list-style-type: none"> All customer interactions recorded in the Interactions log within the SmartHub, which details the action(s) taken. This also assists in attempting to identify repeat attempts. SmartHub, Staff training and staff development reviewed on a regular basis by the Venue Manager, the Compliance Dept and Operations Management. Staff constantly circulating on the shop floor and always 1 person monitoring the entrance in order to interact with all customers at the point of entry. 		
Failure to recognise signs associated with problem gambling or substantial changes in gambling style.	High	Severe to business Severe to Individual	<ul style="list-style-type: none"> Player positions effectively monitored by the staff along with a Players behaviour for any signs of distress. Physical financial transactions are also monitored by staff members i.e. consistent trips to the ATM or erratic financial behaviour. Staff are trained upon induction and at regular intervals throughout their employment following the interact, identify, evaluate framework. Customer interaction logs are reviewed by the venue manager and a member of the senior team, this forms a full feedback and accountability chain through the business to enhance training and feedback to venue staff. High resolution CCTV cameras allow for remote viewing or historical review for training purposes. Internal audits of adherence to policy and procedures are conducted by the PML holder for regulatory compliance along with 3rd party checks by a gambling solicitor. 	Moderate	↓
Failure to provide information to players on responsible gambling.	Moderate	Severe to business Severe to Individual	<ul style="list-style-type: none"> Stay in Control posters displayed prominently Sufficient quantity of Stay in Control leaflets available in racks and discretely located in the toilet area for people to view or take privately. Machine labelling displaying National Gambling Helpline Staff regularly trained and assessed to ensure full Compliance to GC guidelines and Licence Conditions & Codes of Practice (LCCP) Staff also trained on using material as part of the customer interaction process where required. 	Low	↓

Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements.	High		<ul style="list-style-type: none"> • Staff trained upon induction and at regular intervals to be aware of the right of immediate self exclusion and the processes involved. • Clear self exclusions policies and are consistently reviewed and trained out to the business accordingly. • Once an exclusion has been generated either by us or a qualifying business as part of the Multi Operator Self Exclusion Scheme M.O.S.E.S) these people are then reviewed at the beginning of every shift by every staff member in the Venue. • Internal audit process to ensure full adherence to Gambling Commission policy, process and understanding. • All data subject to regular review and as part of the quarterly review returns process. • Staff trained to understand and to have the ability to inform the individual regarding re-instatement requirements and 24 hour cooling off period. 	Moderate	
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