

NOTICE OF MEETING

LICENSING SUB COMMITTEE

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

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

Quorum: 3

1. FILMING AT MEETINGS

Please note this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on. By entering the 'meeting room', you are consenting to being filmed and to the possible use of those images and sound recordings.

The Chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual, or may lead to the breach of a legal obligation by the Council.

2. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

3. URGENT BUSINESS

The Chair will consider the admission of any late items of Urgent Business. (Late items will be considered under the agenda item where they appear. New items will be dealt with under item 7 below).

4. DECLARATIONS OF INTEREST

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
- (ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

5. SUMMARY OF PROCEDURE

The Committee will first hear from the Licensing Officer. After that, the objectors will present their case and the Committee and applicant will have the opportunity to ask questions. Then, the applicant will present their application and the Committee and objectors will have the opportunity to ask questions.

All parties will then have the opportunity to sum up, and then the meeting will conclude to allow the Committee to deliberate and reach a decision. This decision will then be provided in writing within five working days of this meeting.

6. APPLICATION FOR A VARIATION OF A BETTING PREMISES LICENCE FOR AN ADULT GAMING CENTRE AT GAME NATION, 450-454 HIGH ROAD, TOTTENHAM, LONDON, N17 (TOTTENAM HALE) (PAGES 1 - 142)

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

7. NEW ITEMS OF URGENT BUSINESS

To consider any items of urgent business as identified at item 3.

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

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

Monday, 24 October 2022

Report for: Licensing Sub Committee - 1 November 2022

Item number: 6

Title: Determination of Application for the Variation of a Betting Premises Licence for an Adult Gaming Centre for Game Nation, 450-454 High Road Tottenham London N17

Report authorised by : Director of Community and Environment.

Lead Officer: Daliah Barrett – Licensing Team Leader

Ward(s) affected: Tottenham Hale

**Report for Key/
Non Key Decision:** Non key

1. Describe the issue under consideration

The purpose of this report is to advise the Sub-Committee that an application has been received for a Premises Licence, (Adult Gaming Centre) under the Gambling Act 2005 (“the Act”). The application has drawn representations from a responsible authority and interested parties, therefore a hearing is required.

2 Principles to be applied:

This application must be considered under the three licensing objectives:

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

2. Recommendations

The Sub-Committee is asked to determine whether to grant the variation application seeking a 24 hour operation for an existing Adult Gaming Centre Premises Licence at 450-454 High Road Tottenham London N17

A copy of the application for the variation of the premises licence and Accompanying documentation that the applicant submitted with their application is at **App1**.

- 2.1 On considering an application for a premises licence (whether at a hearing or not) a licensing authority shall
- (A) Grant it or
 - (B) Reject it.
- 2.2 A Licensing Authority shall not determine an application for a premises licence made in reliance on section 159(3)(b) until the relevant operating licence has been issued in a form which authorises the applicant to carry

on the activity in respect of which the premises licence is sought.

3. Reasons for decision

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 think it-

- (a) In accordance with the any relevant code of practice under section 24
- (b) In accordance with any relevant guidance issued by the Commission under section 25
- (c) Reasonably consistent with the licensing objectives (subject to paragraphs (a) and (b)); and
- (d) In accordance with the statement published by the authority under section 349 (subject to paragraphs (a) to (c))

4.2 In determining whether to grant a premises licence a licensing authority may not have regard to the expected demand for the facilities which it is proposed to provide.

4. Alternative options considered

None

5. Background information

5.1 This report concerns an application made under section 159 of the Gambling Act 2005 (the Act) by City Gaming Ltd for a Premises Licence (Adult Gaming Centre) at 450-454 High Road Tottenham London N17

5.2 An application for a premises licence may only be made by a person who:

- Holds an operating licence which authorises him to carry on the activity in respect of which the premises licence is sought and
- Who has a right to occupy the premises to which the application relates.

5.3 An Adult Gaming Centre (AGC) premises licence authorises a premises to be used for making available Category B, C and D gaming machines. An AGC premises licence may make available for use a number of Category B machines not exceeding 20% of the total number of gaming machines that are available at the premises and any number of Category C or D machines. Category B machines should be restricted to sub category B3 or B4 machines but not B3A machines.

5.4 Taken from the Gambling Commission Guidance to Local Authorities, attached at **Appendix 2** is the Summary of Machine Provisions by premises.

5.6 Attached at **Appendix 3** is Part 9 from the Gambling Commission Guidance to Local Authorities which concerns Premises Licence conditions.

5.7 Attached at Appendix 4 is Part 21 from the Gambling Commission Guidance to Local Authorities which concerns Adult Gaming Centres and this also

includes the Mandatory conditions that would automatically be attached to an Adult Gaming Centre Premises Licence, if granted. Some types of gambling premises licence also have default conditions attached to them but there are currently no default conditions specific to Adult Gaming Centres.

- 5.8 Attached at **Appendix 5** is a copy of the Councils Statment of Gambling Policy and the Local Area Profile which is made reference to by the applicant in their risk assessment.

6. Relevant representations

- 6.1 A responsible authority (the Licensing Authority) & interested parties have made representations on this application and copies are attached at **Appendix 6**.
- 6.2 An interested party is defined in the Gambling Act 2005 as someone who –
- lives sufficiently close to the premises to be likely to be affected by the authorised activities
 - has business interests that might be affected by the authorised activities
 - represents persons in either of these two groups.
- 6.3 The applicant has been provided with a copy of the representations made and both the applicant and those making representations have been made aware of the date, time and details of joining the Sub Committee hearing.
- 6.4 The representations raise concerns about the following licensing objectives:
- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
 - protecting children and other vulnerable persons from being harmed or exploited by gambling

7 Legal implications

- 7.1 The Section 153 of the Gambling Act 2005, provides that in determining applications the licensing authority shall aim to permit the use of the premises for gambling in so far as it thinks it is–
- (a) in accordance with any relevant code of practice under section 24,
 - (b) in accordance with any relevant guidance issued by the Commission Under section 25,
 - (c) reasonably consistent with the licensing objectives (subject to paragraphs (a) and (b)), and
 - (d) in accordance with the statement published by the authority under section 349 (subject to paragraphs (a) to (c)).
- 7.2 A copy of the Gambling Commission’s sector specific Conditions and Codes of Practice applicable to Adult Gaming Centres can be seen at **Appendix 4**.
- 7.3 The latest version of the Gambling Commission’s Guidance to Licensing

Authorities is available on line at :-

<https://www.gamblingcommission.gov.uk/PDF/GLA5.pdf>

Parts 1 (General), 9 (Premises licence conditions) and 21 (Adult Gaming Centres) are relevant to this application.

7.4 A copy of the Council's Statement of Gambling Policy, published in accordance with section 349 of the Gambling Act 2005 can be seen at **Appendix 5**.

8 Determination

8.1 Where a licensing authority grants or reject an application for a premises licence, they shall as soon as is reasonably practicable give notice to –

- The applicant
- The Gambling Commission
- Any person who made representations about the application
- The Chief Officer of Police for the area
- Her Majesty's Commissioners of Customs and Excise

8.2 If the application is granted, this notice –

(a) must be in the prescribed form,

(b) if the licensing authority have attached a condition to the licence under section 169(1)(a) or excluded under section 169(1)(b) a condition that would otherwise have attached by virtue of section 168, must give the authority's reasons, and

(c) if representations were made about the application under section 161, must give the authority's response to the representations.

8.3 If the application is rejected, this notice –

(a) must be in the prescribed form, and

(b) must give the authority's reasons for rejecting the application.

Where a licensing authority rejects an application for a premises licence, the applicant may appeal.

8.4 Where a licensing authority grant an application for a premises licence, either of the following may appeal –

- (a) a person who made representations in relation to the application
- (b) the applicant

8.5 Appeals must be instituted in the Magistrates Court for the area within 21 days beginning with the day on which the appellant receives notice of the decision against which the appeal is brought.

9. FOR DECISION

9.1 The Sub-Committee must consider and determine the application.

9.2 **The effect of the decision**

The decision of the Sub-Committee may be subject to appeal and/or Judicial Review

9.3 **Risks**

An appeal against a decision of the Sub-Committee or a Judicial Review of the application process may present financial risks to the Council with regard to any award of costs against it.

10. **EQUALITIES IMPACT**

10.1 The arrangements for the Licensing Hearings seek to ensure that all applicants and other interested parties receive a fair hearing and that the process is accessible to all groups within the community.

11. **ENVIRONMENTAL AND DESIGN IMPACT**

11.1 The effective implementation of the Gambling Act 2005 will contribute to an improved environment for local residents and other stakeholders.

12 **HUMAN RIGHTS IMPACT**

12.1 The Human Rights 1998 (HRA) requires public bodies to ensure everything they do is compatible with Convention Rights and makes it unlawful for a public authority to act incompatibly with those Rights. **Article 6 (A6)** of the European Convention on Human Rights (ECHR) is the right to a fair trial. The key elements of this include:

- The right to a *fair* hearing;
- The right to a *public* hearing;
- The right to a hearing before an *independent and impartial tribunal*;
- The right to a hearing *within a reasonable time*.

12.2 When hearing an application, the proceedings of a non-judicial body such as the Licensing Sub Committee, as opposed to an actual Court, need not meet the full requirements of A6 where there is a right of appeal from the Licensing Sub Committee to a Court that does meet the full A6 standards and can consider all aspects of the case (even if that does not include a full re-hearing of the facts).

12.3 While it is good practice to make a hearing before the Licensing Sub Committee as A6 compliant as possible, it will not be a breach of the HRA if it is not. Further, the hearing of all applications is subject to the principles of Natural Justice and the requirement for decisions to be 'Wednesbury reasonable'.

13. **FREEDOM OF INFORMATION/DATA PROTECTION CONSIDERATIONS**

13.1 Protocols agreed in relation to Licensing Hearings are within the Council's Constitution and will be accessible as part of the Council's Publication Scheme

maintained under the Freedom of Information Act.

CONTACT OFFICER: Daliah Barrett , Licensing Team Leader .

BACKGROUND DOCUMENTS:

App 1 Application Forms & risk assesment

App 2 is the Summary of Machine Provisions by premises.

App 3 is Part 9 from the Gambling Commission Guidance to Local Authorities which concerns Premises Licence conditions.

App 4 Part 21 from the Gambling Commission Guidance

App 5 Council's Statement of Gambling Policy & Local risk assessment

App 6 Relevant representations

Appendix 1

This page is intentionally left blank

London Borough of Haringey
Application to vary a premises licence under the Gambling Act 2005

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Part 1 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual applicant

1. Title: Mr Mrs Miss Ms Dr Other (please specify)

2. Surname: _____ Other name(s): _____

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

3. Applicant's address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant's operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation: **City Gaming Limited**

7. The applicant's registered or principal address:

4 Cavendish Square, London (Previously 91 Wimpole Street, London, W1G 0EF)

Postcode: **W1G 0PG**

8(a) The number of the applicant's operating licence (as given in the operating licence):

000-052732-N-329729-007

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: **N/A**

9. Tick the box if the application is being made by more than one organisation.

Part 2 – Premises Details

10. Trading name used at licensed premises: **Game Nation**

11. Give the address of the premises or, if none, give a description of the premises and its location. Where the premises are a vessel, give the place indicated in the premises licence as the place in the licensing authority’s area where the vessel is wholly or partly situated. Where possible this should include an address with a postcode:

450-454 High Road, Tottenham

Postcode: **N17 9JN**

12. Telephone number at premises (if known):

13. Type of premises licence to be varied:

- | | | |
|---|--|---|
| Regional Casino <input type="checkbox"/> | Large Casino <input type="checkbox"/> | Small Casino <input type="checkbox"/> |
| Converted Casino <input type="checkbox"/> | Bingo <input type="checkbox"/> | Adult Gaming Centre <input checked="" type="checkbox"/> |
| Betting (track) <input type="checkbox"/> | Betting (other) <input type="checkbox"/> | Family Entertainment Centre <input type="checkbox"/> |

14. Premises licence number (if known): **LN/000023786**

15. If you are making this application alongside an application for transfer or reinstatement of the premises licence into your name, please give the name of the current licence holder as it appears on the premises licence (if known):

Surname: _____ Other name(s): _____

Part 3 – Details of variations applied for

16(a) Please give details of any variation which is being applied for. Where the application includes an application to exclude or vary a condition of the premises licence, identify the relevant condition here (unless it relates to hours of operation which are dealt with in questions 16(b) and 16(c)):

To remove condition 1 on the current Premises Licence which states:

The opening hours of the premises to be limited to 0900 to 2400 on Monday – Saturday and 0900 to 2300 on Sundays.

To update the registered address of the Premises Licence holder to 4 Cavendish Square, London W1G 0PG

16(b) Do you want the licensing authority to exclude or vary a condition of the licence so that the premises may be used for longer periods than would otherwise be the case?

No

16(c) If the answer to question 16(b) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon			

Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

17. Please indicate any particular date on which you want the variation to take effect if approved:
ASAP

18. Please set out any other matters which you consider to be relevant to your application:

Part 4 – Declarations and Checklist (Please tick as appropriate)

We confirm that, to the best of our knowledge, the information contained in this application is true. We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

We confirm that the applicant(s) have the right to occupy the premises.

Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- The existing premises licence is enclosed
- The existing premises licence is not enclosed, but the application is accompanied by –
 - A statement explaining why it is not reasonably practicable to produce the licence and,
 - An application under the Section 190 of the Gambling Act 2005 for the issue of a copy of the licence
- We understand that if the above requirements are not complied with the application may be rejected
- We understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

Part 5 – Signatures

19. Signature of applicant or applicant’s solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: Poppleston Allen

Date: 26/05/2022

Capacity: Solicitors for & on behalf of applicant

20. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: _____

Date: _____ (dd/mm/yyyy)

Capacity: _____

Part 6 – Contact Details

21(a) Please give the name of a person who can be contacted about the application:

Felix Faulkner

21(b) Please give one or more telephone numbers at which the person identified in question 21(a) can be contacted:

22. Postal address for correspondence associated with this application:

Postcode:

23. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

Premises

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

Company

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

Assessment Completion

Original Assessment completed by (Signature):		Updated Assessment completed by (Signature):	
Original Assessment completed by (Print):	Darren Russell	Updated Assessment completed by (Print):	G Glanfield
Position within the Company:	Regional Director	Position within the Company:	Consultant
Date of completion of Original Assessment:		Date of completion of Updated Assessment:	29 th March 2022

Requirement to Comply

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

Effective as at 6 April 2016

Social responsibility code provision 10.1.1

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

Ordinary code provision 10.1.2

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

COMPANY OVERVIEW

1. Senior Management of City Gaming Limited have worked in the gaming industry for approximately 30 years. In addition to being a Board Members of multiple gambling operating companies, they have also operated large scale Holiday Park FEC's, including AGCs.
2. City Gaming Limited is a leading operator of AGC premises in London and the South East and has full authority to provide AGC facilities through the grant of an Operating Licence by the Gambling Commission. The Gambling Commission has approved the measures which City Gaming Limited has put in place to ensure that it implements effective anti-money laundering procedures, security procedures and trades responsibly in accordance with gambling legislation, the licensing objectives and the licence conditions and codes of practice.
3. The City Gaming Group has twelve Personal Management Licence holders throughout their operational structure. All in key, high profile positions.
4. The Executive Board of Directors is formed of highly experienced operators and management. The Executive Chairman, Sina Azeri, was also a Partner in a private equity firm and has extensive experience in the gambling industry.
5. The entire management team from head office to premises level are fully aware of their roles and responsibilities in regards to the Licence Conditions and Codes of Practice (LCCP).
6. City Gaming Group employs a highly recognised individual within industry as Compliance Officer, reporting directly to the CCO to carry out compliance checks and audits to ensure that the Company's responsibilities and procedures relating to the LCCP are upheld.
7. City Gaming Group employs over 350 people in London and the South East. The Company also employs a Training Manager with industry experience to focus on ensuring that staff understand their key role in the Company's social responsibility and customer interactions.
8. In addition to the Training Manager, City Gaming also utilises an E-Learning platform to under pin the emphasis we apply to our learning culture.
9. City Gaming engages with a reputable 3rd Party Security Business. We have worked extensively with Incognito (our security advisor and agent) the following policies have been established in order to ensure provision of the very best advice and practical solutions, for the benefit to deliver high quality engagement and effective problem resolution.

EXPLANATORY NOTE

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

Local Area Profile

Image of Premises



Location Plan



Description of Local Area

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

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

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

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

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

Betting Shops – Ladbrokes, William Hill and Betfred

Adult Gaming Centres – Admiral

Pawn Shops – H&T Pawnbrokers

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

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

Post Office – Bruce Grove Post Office is very close by

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

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

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

SELF EXCLUSION

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

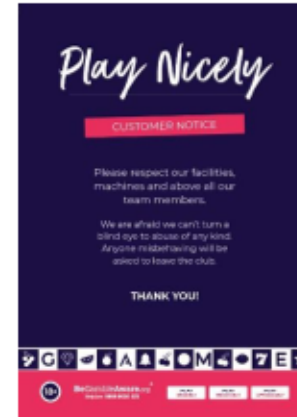
Self-exclusions may also occur through the interaction process whereby a member of staff sees a change in a customer's behaviour that causes concern, and the staff member interacts accordingly. During these interactions, Self-exclusion would be discussed along with spending limits, time-outs, referral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

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

SIGNAGE

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

Over 18s Only messaging will also be prominently displayed.



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

Schools

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

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

Junior Schools

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

Secondary Schools and Colleges

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

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

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

Other areas of interest to children and young persons

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

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

Centres for vulnerable people

- BUBIC drug and alcohol dependency unit – Bruce Grove
- Blenheim CDP drug and alcohol dependency unit – Bruce Grove
- Haringey drug & alcohol service – Bruce Grove
- Barnet, Enfield & Haringey Mental Health Trust – St Ann’s Road
- HAGA, Action on Alcohol – Park Lane
- Ashness Care – Philip Lane
- Citizen’s Advice Haringey – Waltheof Gardens
- OK Foundations Soup Kitchen – Holcombe Road
- Home Start Children’s Home – Tower Gardens Road
- CARIS Haringey Homeless Shelter – Philip Lane
- St Mungo’s Homeless Shelter – Tottenham High Road
- St Mungo’s Homeless Shelter – High Cross Road
- Highway House Homeless Shelter – Fountayne Road

Residents Associations and other groups

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

Risk from gambling related harm

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

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

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

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

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

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


GAME NATION





4K ColorVu PoC Fixed Mini Bullet Camera

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






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


Camera	
Image Sensor	1/2" Progressive Scan CMOS
Min. Illumination	Color: 3.0Lux @ FCL, AGC ON, 1 Lux with IR
Shutter Speed	1/3 to 1/100,000s
Slow Shutter	Yes
Wide Dynamic Range	120dB
Day & Night	IRCut Filter
Angle Adjustment	Pan: 0° to 352°, tilt: 0° to 70°, rotate: 0° to 352°
IRIS	
Focus	Fixed
Lens Type	Fixed lens, 2.8/4.5 mm
IRV	
2.8 mm: horizontal FOV: 102°, vertical FOV: 57°, diagonal FOV: 124° 4 mm:	
horizontal FOV: 71°, vertical FOV: 42°, diagonal FOV: 91° 5 mm: horizontal FOV:	



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

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








CCTV Information

Door Control

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

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

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

GAMBLING ACT 2005
Licence Conditions and Codes of Practice

SUMMARY OF STAFF TRAINING

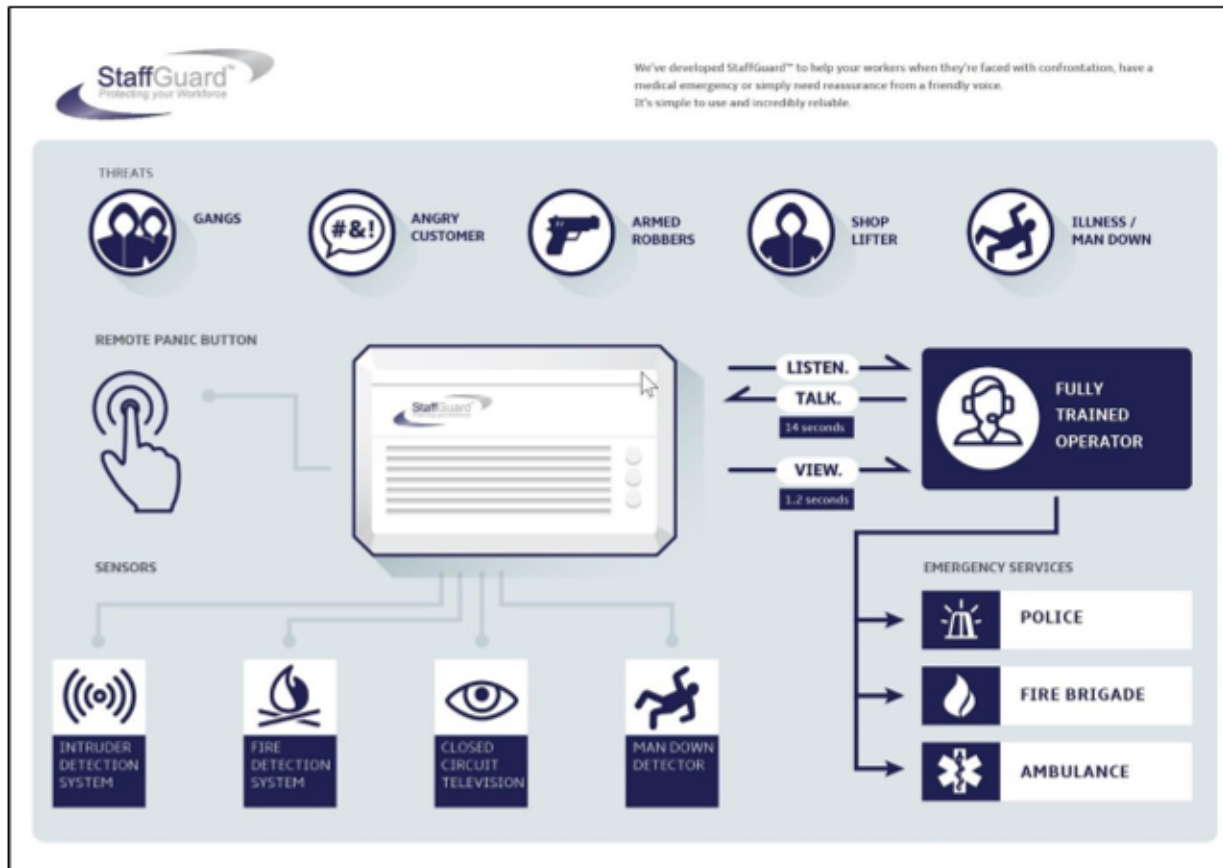
Management and Staff, as appropriate, declare that they have read and understood the following documents, are fully aware of Company policy and procedures and their own respective requirements in relation to them:

1. Access to Gambling by Children and Young Persons	6. Fair and Open Practice and Dispute Resolution
2. Access to Premises by the Gambling Commission's Enforcement Officers	7. Information on how to Gamble Responsibly and Help for Gamblers with problems
3. Advertising Standards and Marketing	8. Money laundering, Cash handling & Suspicious Transactions
4. Customer Interaction	9. Self-Exclusion
5. Employment of Children and Young Persons	

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

In addition to CCTV

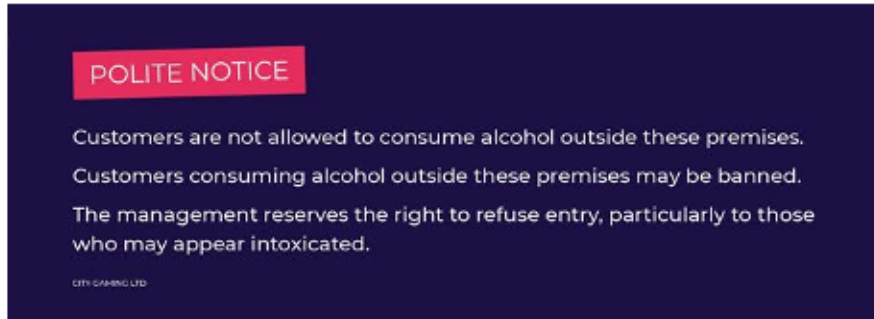
We've developed StaffGuard™ to help create a safe environment for our Customers and Staff when they're faced with an incident, have a medical emergency or simply need reassurance from a friendly voice. It's simple to use and incredibly reliable. Staff Guard is a supplementary remote managed service from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



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

- Access controlled by staff
- UV lighting to deter drug abuse by injection. Switchable to normal lighting by staff only for inspection and cleaning
- Toilets inspected after every use to identify those individuals involved in drug or alcohol abuse
- Zero tolerance to drug or alcohol abuse with appropriate signage
- Toilet facilities designed so that no areas are accessible to hide drugs, syringes or alcohol.
- Also disabled facility

Zero tolerance to alcohol abuse with appropriate signage



Local Factors

Crime statistics – (Source Police.uk)

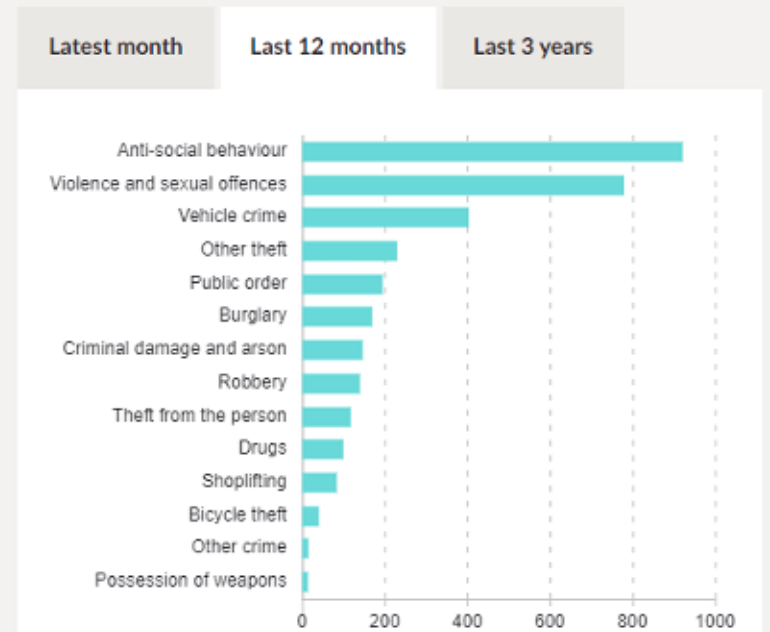
Crime levels overview

for the last 12 months (from Mar 2021 to Feb 2022)



Crime types description

for the last 12 months (from Mar 2021 to Feb 2022)



Between March 2021 and February 2022 an average of 282 crimes were reported each month in the Tottenham High Road area.

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

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

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

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

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

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

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

Ethnic and Religious Demographics

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

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

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

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

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

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

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

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

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

Gambling Act 2005 – The Licensing Objectives

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

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

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

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

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

					<ul style="list-style-type: none"> ✓ Effective CCTV coverage with data stored for a minimum of 30 days 	
				Exterior Design	<ul style="list-style-type: none"> ✓ Toughed glass windows and door to limit criminal damage ✓ Outdoor CCTV with full coverage of all entrances 	March 2022
				Systems	<ul style="list-style-type: none"> ✓ Limited cash desk and personal floats ✓ Regular liaison with local law enforcement agencies ✓ Log maintained should Police be called to assist. All incidents reviewed weekly by Commercial Team and reported to senior management ✓ Keep abreast of local crime trends 	March 2022
Awareness of heightened local crime in the local area.	1			Systems	<p>Higher than average crime statistics although an increase in the level is not higher than similar areas or the Metropolitan Police Area in total</p> <p>https://www.police.uk</p>	March 2022
Awareness of students learning facilities (schools & colleges) in the local area	3			Systems	<ul style="list-style-type: none"> ✓ Local research identified schools as listed earlier in the assessment ✓ Challenge 25 process and systems ✓ No gaming visible to children or your persons from outside of the venue 	March 2022
Awareness of residential facilities for the vulnerable in the local area	3			Systems	<ul style="list-style-type: none"> ✓ Care homes as listed earlier in the assessment ✓ Door controls, CCTV and training in place 	March 2022
Awareness of gambling care agencies in the local area	3			Systems	<p>No physical facilities for problem gambling in the vicinity</p> <p>http://www.gamecare.org.uk</p> <p>http://www.gordenmoody.org.uk</p>	March 2022

26 May 2022

Licensing Team
London Borough of Haringey
1st Floor River Park House
225 High Road
Wood Green
London
N22 8HQ

FF/FF/P55583-206
Doc Ref: 2148352127

f.faulkner@

Dear Sirs

Game Nation , 450-454 High Road, Tottenham
Variation to AGC Premises Licence - Hours

We act for City Gaming Limited and have been instructed to submit an application to vary the Adult Gaming Centre Premises Licence for the above premises.

We therefore enclose:-

1. Application form
2. Notice of application
3. Copy of Adult Gaming Centre Premises Licence
4. Certificate of Service in the name of Felix Faulkner
5. Updated copy of Local Area Risk Assessment

Please can you contact me to take payment ASAP on xxxx xxxx.

We have arranged for the notice to be displayed on the premises from **26/05/2022** and published within an appropriate local newspaper within 10 working days

This application has been sent to you by email to arrive at your offices **on 26/05/2022 and to begin on 27/05/2022** and the last date for representations will therefore be **23/06/2022**.

Paragraph 15(2) of the Gambling Act 2005 (Premises Licence and Provisional Statements) Regulations 2007 state that the period for representations shall begin on the date on which you receive the application.

We confirm we have served notice of the application to the Responsible Authorities as specified in Section 157 of the Gambling Act 2005.

If there is anything in the way that we have completed the attached forms that causes you concern, or if you believe there is some omission, please contact **Felix Faulkner** on the above number so we can discuss it with you.

We should be grateful if you would acknowledge safe receipt of this letter and the relevant enclosures.

Yours faithfully

Poppleston Allen

Enc

NOTICE OF APPLICATION TO VARY A PREMISES LICENCE

This notice is issued in accordance with regulations made under section 160 of the Gambling Act 2005

Notice is hereby given that **City Gaming Limited**

of the following address:

Postcode:

the number of whose operating licence is **000-052732-N-329729-007**

who applied for an operating licence on **N/A**

has made an application to vary a premises licence of the following type:
Adult Gaming Centre

The application relates to the following licensed premises:

Game Nation (AGC)

Tottenham

N17 9JN

Details of the variation sought:

To remove condition 1 on the current Premises Licence regarding the opening hours of the premises.

To update the registered address of the Premises Licence holder to -----

The application has been made to the following licensing authority:

London Borough of Haringey

Licensing Team

Level 1

River Park House

225 High Road

Wood Green

London

N22 8HQ

Website: **www.haringey.gov.uk**

The current licence holder(s) is/are: **City Gaming Limited**

The following person connected with the applicant is able to give further information about the application:

Felix Faulkner

Tel : Email :

Any representations under section 161 of the Gambling Act 2005 must be made no later than the following date: 23 June 2022

This page is intentionally left blank

GAMBLING PREMISES LICENCE

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

ADULT GAMING CENTRE PREMISES LICENCE

Haringey Council Licensing Authority

Premises Licence Number:

LN/000023786

Commencement Date:

6th October 2020

Signature:



Part 1 – Details of person to whom licence is issued

This premises licence is issued to:

City Gaming Limited

of the following address:

**91 Wimpole Street
London
W1G 0EF**

Part 2 – Details of the premises in respect of which the licence is issued

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

**Game Nation
450-454 High Road
Tottenham
London
N17 9JN**

Part 3 – Premises Licence Details

This licence commenced on:

6th October 2020

This licence is of unlimited duration:

The Committee resolved to:

Hours

1. The opening hours of the premises to be limited to 0900 to 2400 on Monday – Saturday and 0900 to 2300 on Sundays.

Staff

2. There shall always be a minimum of 2 members of staff on duty when the premises are open.
3. In addition to the 2 members of staff the Licensee will have a third staff member who will be an SIA registered Security Guard on duty between the hours of 1700 and closing.
4. All staff shall be trained in recognizing drug use, conflict management and restricting service to persons under 18 years of age. 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 program. Periodically provide refresher training to its entire 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 staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.
5. 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.
6. New and seasonal staff must attend induction training and receive refresher training every six months.
7. Training records shall be maintained and made available, within reasonable time, for inspection by the Police or Licensing Authority.

CCTV

8. A comprehensive 4K High Definition CCTV System will be provided installed and maintained throughout the building. 12 x 4K High Definition cameras will cover all key locations, as agreed with the Police, within the premises, including:
 - a. All entry and exit points;
 - b. All public areas;
 - c. Gaming machine areas and the counter area.
9. 3 x 4K cameras will be specifically focused on the High Street. One on each corner of the premises and the third focused over the doorway.

10. The Licensee will install a large “spotter screen” inside the entrance showing the live CCTV images which can be viewed by customers as they enter the premises. Included will be images from the external CCTV cameras.
11. Ensure that sufficient lighting is installed outside the premises.
12. All CCTV images will be recorded on a Hard Drive and retained for 30 days.
13. All CCTV images to be made available for Police and Licensing Authority inspection, images to be made available in reasonable time.
14. A staff member from the premises who is conversant with the procedure for making a request to the appropriate person to obtain CCTV images shall be on the premises at all times when the premises are open to the public and shall make such a request with the absolute minimum of delay when requested by an authorised officer of the Licensing Authority or the Police.
15. The premises shall display notices near the entrance to the venue stating that CCTV is in operation.
16. The Licensee to devise, in concert with SNT and residents, a scheme of CCTV and lighting for Albert Place which is to be operational when the premises open.

Connection to Conflict Management Centre

17. The premises are to be connected to the City Gaming Limited Conflict Management Centre (CMC) (or equivalent external conflict management facility), such facility to be staffed by SIA licensed conflict Management Operators.
18. Each member staff in the venue must be provided with a remote-control key fob or keyring, which on activation alerts the CMC. Colour coded lights must be fitted at the premises to reassure the member of staff that they are connected to the CMC centre.
19. The system must provide 2-way communications which enables the CMC operator to speak to the member of staff and the customer causing concern.
20. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
21. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.

Access control

22. A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable

by staff.

23. The front door will be locked between 1900 and closing time each day.
24. Access between those hours available at the discretion of the staff with a buzzer being provided at the front door for customers to seek access.
25. Front Door Entry Security system to include video images on internal screen to allow the staff member to identify those requesting access and engage with them via audio.
26. The toilets will be always locked, and access controlled by staff.
27. The toilet design will be created in such a way that it will have flush fittings to ensure no storage space can be gained to conceal drugs, or flat surfaces to consume drugs.

Engagement with the local community

28. The Licensee will engage with the local centres for the vulnerable, and provide them with Safer Gambling information and contact details of the premises, to enable those centres for the vulnerable to contact the Licensee, should they have any concerns about an individual.

Crime

29. A Gang Management Policy will be implemented, in conjunction with the Police.
30. All staff shall receive training on the Gang Management Policy.
31. 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;
 - e. any visit by a relevant authority or emergency service;
 - f. challenge 25 refusals;
32. The licensee shall install and maintain an intruder alarm on the premises.

Under 18s

33. 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.

34. Posters will be prominently displayed in the premises which advise customers that no Antisocial behaviour will be tolerated, that a Challenge 25 policy is in existence and that Drinking Alcohol is not permitted on the premises.
35. 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.

Toilets

36. 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.

Gamcare Signage

37. Prominent GamCare documentation will be displayed at the premises and available in discrete areas such as the toilet.

Homeless and Street Drinking

38. The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.
39. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises are not permitted and those who do so will be banned from the premises.

ATM

40. There shall be no cash point or ATM facilities on the premises.

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

N/A

A scale plan is attached as an annex to this licence



I, **Felix Faulkner** in the firm of Messrs, refer to the following:-

1. Letter to London Borough of Haringey dated **26/05/2022**
2. Application Form
3. Updated Local Area Risk Assessment
4. Notice of Application served upon all the Responsible Authorities.
5. Copy of Adult Gaming Centre Premise Licence
6. Payment made via telephone

I FURTHER CERTIFY that I have served documents 1 - 6 upon the following:-

1. Licensing Team, London Borough of Haringey, 1st Floor River Park House, 225 High Road, Wood Green, N22 8HQ

I FURTHER CERTIFY that I have served a true copy of documents 1 & 3 upon the following:-

2. Edmonton Police Station, Edmonton Police Station, 462 Fore Street, Edmonton, London , N9 0PW
3. HM Revenue & Customs, Business, Tax and Customs, HM Revenue and Customs, BX9 1GL
4. London Fire & Emergency Planning Authority, Fire Safety Regulation North West Area 1, London Fire Brigade, 169 Union Street, London, SE1 0LL
5. The Gambling Commission, 4th Floor, Victoria Square House, Victoria Square, Birmingham, B2 4BP
6. Child Services and Vulnerable Adults service, Edmonton Police Station, 462 Fore Street, London, N9 0PW
7. Planning & Regeneration, London Borough of Haringey, Development Control, Level 2 - River Park House, 225 High Road, N22 8HQ
8. Health and Safety - Haringey Council, Commercial Environmental Health, Level 1 North - River Park House, 225 High Road London, N22 8HQ

I effected service by sending the said documents to the licensing department by email and the other authorities by first class post addressed to them on **26/05/2022**

SIGNED.....Felix Faulkner.....DATED.....26/05/2022.....

This page is intentionally left blank

14 October 2022

Ref: 016485-00206

Doc Ref: 6565

Dear Sir / Madam

Game Nation, 450-454 High Road, Tottenham
Variation to AGC Premises Licence

I am acting for City Gaming Limited on their application to vary the Adult Gaming Centre Premises Licence at Game Nation, 450-454 High Road, Tottenham N17 9JD.

My client and I are in receipt of your representation and we can assure you that we understand the concerns raised by yourself and other interested parties. This application was made after a lot of thought had been given to the licensing objectives and the management controls in place at the premises. City Gaming Limited are a compliant and responsible operator and based on their experience at this premises and across their entire estate we are confident that the proposed extension of operating hours will not have a detrimental impact on the licensing objectives or the local area.

My client and I would be grateful for the opportunity to discuss your representation further with you. If you would like to discuss this then please feel free to contact me on the details below:

Email: [REDACTED]

Telephone: [REDACTED]

Yours faithfully

David Inzani
Poppleston Allen

List of partners and associates available on request

Address: [REDACTED]

This page is intentionally left blank

Appendix 2

This page is intentionally left blank

Summary of Machine Provisions by Premises

Premises type	Machine Category						
	A	B1	B2	B3	B4	C	D
Large casino (machine/table ratio of 5-1 up to maximum)		Maximum of 150 machines Any combination of machines in categories B to D within the total limit of 150 (subject to machine/table ratio)					
Small casino (machine/table ratio of 2-1 up to maximum)		Maximum of 80 machines Any combination of machines in categories B to D within the total limit of 80 (subject to machine/table ratio)					
Pre-2005 Act casino (no machine/table ratio)		Maximum of 20 machines categories B to D or any number of C or D machines instead					
Betting premises and tracks occupied by pool betting		Maximum of 4 machines categories B2 to D					
Bingo premises			Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4**			No limit on category C or D machines	
Adult gaming centre			Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4**			No limit on category C or D machines	
Family entertainment centre (with premises licence)						No limit on category C or D machines	
Family entertainment centre (with permit)						No limit on category D machines	
Clubs or miners' welfare institute (with permits)					Maximum of 3 machines in categories B3A (only one may be of B3A) or B4 to D*		
Qualifying alcohol-licensed premises					1 or 2 machines of category C or D automatic upon notification		
Qualifying alcohol-licensed premises (with gaming machine permit)					Number of category C-D machines as specified on permit		
Travelling fair						No limit on category D machines	
		B1	B2	B3	B4	C	D

* It should be noted that members' clubs and miners' welfare institutes are entitled to site a total of three machines in categories B3A to D but only one B3A machine can be sited as part of this entitlement. Commercial clubs are entitled to a total of three machines in categories B4 to D.

** Adult gaming centre and bingo premises are entitled to make available a number of Category B gaming machines not exceeding 20% of the total number of gaming machines which are available or use on the premises. Premises in existence before 13 July 2011 are entitled to make available four (adult gaming centre premises) or eight (bingo premises) category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. Adult gaming centre premises and bingo premises licences granted on or after 13 July 2011 but before 1 April 2014 are entitled to a maximum of four or eight category B gaming machines or 20% of the total number of gaming machines, whichever is the greater; from 1 April 2014 these premises will be entitled to 20% of the total number of gaming machines only. But not B3A machines.

This page is intentionally left blank

Appendix 3

This page is intentionally left blank

Part 9: Premises licence conditions

1 - Introduction

9.1 The Act provides that licences may be subject to conditions in a number of ways:

- they may attach automatically, having been set out on the face of the Act
- they may attach through regulations made by the Secretary of State or Scottish Ministers
- they may be attached to operating and personal licences by the Commission
- they may be attached to premises licences by licensing authorities.

9.2 Conditions may sometimes be general in nature attaching to all licences or all licences of a particular class, or they may be specific to a particular licence.

9.3 Conditions on premises licences should relate only to gambling, as considered appropriate in the light of the principles to be applied by licensing authorities under s.153. Accordingly, if the Commission's [Licence conditions and codes of practice](#) (LCCP) or other legislation places particular responsibilities or restrictions on an employer or the operator of premises, it is not appropriate to impose the same through conditions on a premises licence.

2 - Conditions and authorisations by virtue of the Act

9.4 The following paragraphs set out specific sections of the Act that provide for conditions to be attached automatically to premises licences, or for authorisations to be granted automatically. The Secretary of State/Scottish Ministers may make regulations requiring these conditions to be set out on the premises licence, and there is no discretion to decide not to include them or to modify them. The table after paragraph 9.18 summarises which sections of the Act apply to which types of premises licences.

S.172 – number of gaming machines

9.5 S.172 provides for premises licences to permit a specified number of gaming machines of particular categories in each type of gambling premises. These permissions are set out in detail in Part [16](#) of this guidance.

S.173 – betting on virtual events

9.6 S.173 authorises the holder of a casino premises licence or a betting premises licence to make facilities available for betting on virtual events. This is separate from betting on virtual events by means of a gaming machine. It is intended to cover facilities such as virtual horse

and greyhound racing which are person-to-person transactions, involving virtual images that are not displayed on a machine.

S.174 – gambling in addition to casino games

9.7 S.174 authorises the holder of a casino premises licence for a small or large casino to make available the following types of gambling in addition to casino games:

- equal chance games
- betting – but not in pre-2005 Act casinos with grandfather rights and only with a betting operating licence
- bingo – but only in large casinos and only with a bingo operating licence.

9.8 For the purposes of the Act, equal chance games are ones which do not involve playing or staking against a bank and in which the chances are equally favourable to all players.

Licensing authorities must not restrict the equal chance gaming available nor prohibit casino games that have not been prohibited by the Commission. Part [17](#) of this guidance provides details of the casino games authorised by the Commission.

S.176 – access by children and young persons to casinos

9.9 S.176 requires the Commission to issue at least one code of practice about access to casino premises for children and young persons. In particular, the code must:

- specify steps that the premises licence holder must take to ensure that under-18s do not enter casino premises, including ensuring that each entrance to the casino is supervised by at least one person who is responsible for compliance with the code of practice
- require that, unless the supervisor is certain that a person seeking admittance is an adult, evidence of age must be provided by those seeking to enter the casino or gambling area.

9.10 S.176 makes it a condition of the premises licence that the licensee must comply with the code of practice issued by the Commission. Licensing authorities should note that the requirement under s.176 for supervision at each entrance is separate to any other condition that may be attached relating to ‘door supervision’ more generally.

S.177 – giving of credit

9.11 S.177 attaches a condition to casino premises licences and bingo premises licences that prohibits the licensee from:

- giving credit in connection with the gambling taking place on the premises
- participating in, arranging, permitting or knowingly facilitating the giving of credit in connection with the gambling on the premises.

9.12 However, s.177 does not prevent the licensee from contracting a third party to install cash dispensers (ATMs) on their premises, which may accept both credit and debit cards. Such an arrangement is subject to requirements that the premises licence holder has no other commercial connection in relation to gambling with the provider of the ATMs (aside from the agreement to site the machines), does not profit from the arrangement, and does not make any payment in connection with the machines. All premises licences also include a mandatory condition which requires that any ATM made available for use on the premises must be located in a place that requires any customer who wishes to use it to cease gambling in order to do so (Part 1(5) of The Gambling Act 2005 (Mandatory and Default Conditions) Regulations).

9.13 S.177 deals with the prohibition of credit in respect of casino and bingo premises licences. However equivalent prohibitions are placed on bingo and casino operating licences, as set out in s.81 of the Act, credit and inducements.

S.178 – door supervision

9.14 If a licensing authority attaches a condition relating to door supervision, and the person carrying out those duties are required by the [Private Security Industry Act 2001 \(opens in new tab\)](#) (PSIA) to hold a licence, s. 178 of the [Gambling Act 2005 \(opens in new tab\)](#) prescribes that the requirement under PSIA will be treated as if it were a condition of the premises licence. There is, however, an exemption from the PSIA licensing requirement for in-house employees working as door supervisors at casino and bingo premises, details of which can be found in Part [33](#) of this guidance.

9.15 S.178 defines door supervision as requiring someone to be responsible for ‘guarding the premises against unauthorised access or occupation, against outbreaks of disorder or against damage’.

S.179 – pool betting

9.16 S.179 provides that a betting premises licence in respect of a track may not authorise pool betting to take place, other than in respect of dog or horse racing and only where the acceptance of bets is by the holder of the betting premises licence, or in accordance with arrangements made by them. In the case of dog racing, this preserves the existing arrangements at dog tracks where the totalisator is operated by or on behalf of the occupier of the track.

S.182 – access by children and young persons to tracks

9.17 S.182 applies only to a betting premises licences in respect of tracks. It requires the licensee to ensure that children and young persons are excluded from any area in which facilities for betting are provided and from any area where a gaming machine (other than a category D gaming machine) is situated. The exception to this, for betting areas only, is on race days at dog and horse racing tracks, that is on those days when racing occurs or is expected to take place. In those cases, under-18s may have access to betting areas but

licensing authorities should note that this exception does not affect the prohibition on betting by children and young persons.

S.183 – Christmas day

9.18 S.183 applies a condition to all premises licences that facilities for gambling must not be provided on Christmas day, namely the period of 00.01 hours on 25 December until 00.00 hours on 26 December.

3 - Conditions attached through regulations made by the Secretary of State or Scottish Ministers – all premises

9.19 The Secretary of State and Scottish Ministers have set out conditions to be attached to all premises licences in the [Gambling Act 2005 \(Mandatory and Default Conditions\) \(England and Wales\) Regulations 2007 \(opens in new tab\)](#) (SI 2007/1409), and the [Gambling Act 2005 \(Mandatory and Default Conditions\) \(Scotland\) Regulations 2007 \(opens in new tab\)](#) (SSI 2007/266).

9.20 Conditions under these regulations fall into two categories:

- mandatory conditions made under s.167 of the Act that must be attached to premises licences
- default conditions made under s.168 of the Act, that attach to the premises licence unless the licensing authority decides to exclude them, using its powers under s.169.

9.21 Licensing authorities should note that mandatory conditions made under these regulations are set with the intention that no further regulation in relation to that matter is required. Therefore, it is extremely unlikely that licensing authorities will need to impose individual conditions in relation to matters that are already dealt with by mandatory conditions. Licensing authorities should only consider doing so where there are regulatory concerns of an exceptional nature, and any additional licence conditions must relate to the licensing objectives.

9.22 Mandatory conditions applying to all premises licences are set out at paragraph 9.25 onwards. In addition, there are mandatory conditions that relate to particular category of premises licences. Details of these can be found in Parts [17](#) to [22](#) of this guidance.

9.23 Licensing authorities have more flexibility in relation to default conditions and may exclude a default condition and substitute it with one that is either more or less restrictive. Licensing authorities should note, however, that default conditions are intended to reflect normal industry operating practices. In circumstances where default conditions are excluded, the Commission would generally expect them to be replaced by other conditions, given the requirements of s.153. Where the condition is more restrictive, the licensing authority should ensure that they have clear regulatory reasons for doing so.

9.24 Default conditions under the regulations set out above relate to particular categories of premises licence and details can be found in Parts [17](#) to [22](#) of this guidance.

Mandatory conditions

9.25 The following mandatory conditions apply to all premises licences:

- the summary of the premises licence issued by the licensing authority must be displayed in a prominent place on the premises. In England and Wales this must include a summary of the terms and conditions of the premises licence.
- the layout of the premises must be maintained in accordance with the plan that forms part of the premises licence.
- neither National Lottery products nor tickets in a private or customer lottery may be sold on the premises in England and Wales. Sale of National Lottery and private lottery tickets are prohibited in Scotland.

9.26 There are also mandatory conditions attaching to each type of premises licence controlling access between premises. There can be no direct access between one premises licensed under the Act and another premises licensed under the Act, with the following exceptions:

- between licensed betting premises
- between bingo premises and alcohol-licensed premises/clubs with a club gaming or club machine permit/family entertainment centres (FECs) and tracks
- between tracks and alcohol-licensed premises/clubs with a club gaming or club machine permit/FECs/betting premises and bingo premises
- between FECs and alcohol-licensed premises/bingo halls/clubs with club gaming or club machine permit and tracks.

Default conditions

9.27 S.169 of the Act gives licensing authorities:

- the ability to exclude from premises licences any default conditions that have been imposed under s.168
- the power to impose conditions on premises licences that they issue.

9.28 Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.

9.29 Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high

crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.

9.30 Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.

9.31 Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:

- relevant to the need to make the proposed building suitable as a gambling facility
- directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
- fairly and reasonably related to the scale and type of premises
- reasonable in all other respects.

4 - Conditions that may not be attached to premises licences by licensing authorities

9.32 The Act sets out certain matters that may not be the subject of conditions:

- s.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition
- s.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation
- s.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)
- s.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.

Appendix 4

This page is intentionally left blank

Part 21: Adult gaming centres

1 - Introduction

21.1 Persons operating an adult gaming centre (AGC) must hold a gaming machines general operating licence ([adult gaming centre](#)) from the Commission and a premises licence from the relevant licensing authority. They are able to make category B, C and D gaming machines available.

2 - Protection of children and young persons

21.2 No-one under the age of 18 is permitted to enter an AGC. The Act sets out offences at s.46 and s.47 of inviting, causing or permitting a child or young person to gamble, or to enter certain gambling premises. In addition, Social Responsibility (SR) code [3.2.3\(3\)](#) in the [Licence conditions and codes of practice](#) (LCCP) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises in order to prevent underage gambling'.

21.3 Licensing authorities will wish to have particular regard to the location of and entry to AGCs to minimise the opportunities for under-18s to gain access. This may be of particular importance in areas where young people may be unsupervised for example, where an AGC is in a complex, such as a shopping centre or airport. Licensing authorities should consider whether their statement of policy can be used to reflect such locally based considerations.

3 - Self-exclusion

21.4 [Social Responsibility Code Provision 3.5.6](#) requires that all non-remote casino and bingo and betting licences (except those at a track) and holders of gaming machine general operating licences for adult gaming centres must offer self-exclusion schemes to customers requesting such a facility. There is also an [Ordinary Code provision at 3.5.7](#). The full details can be found within the LCCP¹⁸.

References

¹⁸ [LCCP Online](#)

4 - Gaming machines

21.5 Gaming machine provisions by premises are set out at Appendix A. S.172(1) of the Act, as amended, provides that the holder of an AGC premises licence may make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises and any number of category C or D machines. For example, a premises with a total of 25 gaming machines available for use can make five or fewer category B3 gaming machines available on those premises.

21.6 Premises subject to a licence granted before 13 July 2011 are entitled to make available four category B3/B4 gaming machines, or 20% of the total number of gaming machines, whichever is the greater. AGC premises licences granted on or after 13 July 2011 are entitled to 20% of the total number of gaming machines only. Regulations specify that the category B machines should be restricted to sub-category B3 and B4 machines, but not B3A machines (S1 2158 [The Categories of Gaming Machine Regulations 2007 \(opens in new tab\)](#)). Licensing authorities should ensure that gambling machines are made available for use in a manner consistent with our guidance within [Part 16](#). For the purpose of calculating the category B machine entitlement in gambling premises, gaming machines should only be counted if they can be played simultaneously by different players without physical hindrance. This includes tablets.

21.7 Where the operator of an existing AGC premises licence applies to vary the licence and acquire additional AGC premises licences - so that the area that was the subject of a single licence will become divided between a number of separate licensed premises - each separate licensed premises must only contain the permitted machine entitlement. For example, where two separate AGC premises have been created adjacent to each other by splitting a pre-existing premises, it is not permissible to locate eight category B3 gaming machines in one of the resulting premises and none in the other, as the gaming machine entitlement for that premises would be exceeded. [Part 7](#) explains in greater detail what constitutes premises.

5 - AGC premises licence conditions

21.8 [Part 9](#) of this guidance discusses the mandatory and default conditions that attach to premises licences. Currently there are no default conditions specific to AGCs.

Mandatory conditions

21.9 A notice must be displayed at all entrances to AGCs stating that no person under the age of 18 years will be admitted to the premises.

21.10 There can be no direct access between an AGC and any other premises licensed under the Act or premises with a family entertainment centre (FEC), club gaming, club machine or alcohol licensed premises gaming machine permit. (England and Wales only). There is no definition of 'direct access' in the Act or regulations, although licensing authorities may consider that there should be an area separating the premises concerned, such as a street or cafe, which the public go to for purposes other than gambling, for there to be no direct access.

21.11 Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling at any gaming machine in order to do so.

21.12 The consumption of alcohol in AGCs is prohibited at any time during which facilities for gambling are being provided on the premises. Additionally in Scotland the sale of alcohol on the premises is specifically prohibited. A notice stating this should be displayed in a prominent place at every entrance to the premises.

This page is intentionally left blank

Appendix 5

This page is intentionally left blank

HARINGEY

Statement of Gambling Policy 2022-2025

Gambling Policy and Local Area Profile on locations likely to be at risk from gambling harm



Foreword – Cllr Bevan (Cabinet Member)

The UK has one of the most accessible gambling markets, with opportunities to gamble available on most high streets and, with the increase in online gambling, in virtually every home. Most people in the UK have gambled at some point and most of those who gamble have no issues with keeping their gambling within sensible and manageable limits, but it is not the same for all. We appreciate that there is a lot of public concern and interest in this policy, and the public should be assured that we have built in the best safeguards that we are permitted to utilise within the government legislation.

Some gambling can be problematic, affecting a person's ability to live and work. People with gambling problems often experience a range of negative effects, including health issues, relationship breakdown and difficulties with debt. In more severe cases, gambling problems can lead to crime, thoughts of suicide or suicide itself.

When the Gambling Act 2005 (the Act) came into force in late 2007, it brought in a new, comprehensive system for gambling regulation in Great Britain. The Act established a dedicated national regulator in the form of the Gambling Commission and recognised the potential local impact and importance of gambling.

The regulatory environment in Great Britain is changing, becoming more focused on risk. Licensing authorities are expected to take the lead on local regulation of gambling. As such, policy is becoming more focused on understanding and mitigating gambling-related harm rather than focusing on problem gambling alone.

Haringey is an exciting, vibrant borough with a wide range of leisure and cultural opportunities. This includes gambling, a legal entertainment activity that brings enjoyment to many Haringey residents. The Council's policy is that residents should have the opportunity to enjoy gambling in a safe, controlled way, free from harm. Integral to this has been the analysis of gambling related harm which informs this policy. The analysis explores local area-based vulnerability to gambling related harm and, as such, provides context to both this policy and the 'local area profile'. This enables consideration to be given to local issues that must be addressed by local operators and to the extent to which any further development of a gambling offer within the borough may be appropriate.

The risks we are concerned about include those covered by the licensing objectives of the Gambling Act 2005 – crime and disorder and the harm/exploitation of children and other vulnerable persons. There are also Haringey-specific risks – we are particularly concerned about the clustering of betting shops in Haringey's most deprived communities, where there is also a higher incidence of crime, mental health conditions and demand for debt advice. Haringey is particularly concerned about the health impacts of problem gambling. We will work to ensure that the local risk assessments produced by gambling operators are meaningful and reflective of the real risks in Haringey.

For these reasons, this Authority has set out to establish a gambling licensing policy which recognises good industry practice and intends to support responsible operators, but also sets out to offer adequate protections to our local community.

We will continue to monitor the impact of gambling on our communities in detail and listen to the views of our residents, public sector partners and the voluntary sector. Whilst self-regulation is important, if operators consistently fail to respond to Haringey's specific risks and exercise social responsibility and governance, we will not hesitate to lead the call for greater licensing powers to be granted to Local Authorities.

Table of Contents

Foreword

Introduction	5
Consultation	5
Local Area profile	7
Areas of vulnerability	7
No Casino resolution	8
Part 1 – General Principles	8
The Licensing Objectives	8
Responsible Authorities	8
Interested Parties	9
Licensing Authority Functions	10
Exchange of Information	13
Enforcement	13
Gaming Machines	14
Part 2 – Premises Licences	
Licensing Objectives	13
Location of Premises	16
Division of Premises and Primary Usage.....	18
Door Supervisors	20
Provisional Statements	20
Reviews	21
Categories of Premises Licence.....	22
Casino Premises Licences	22
Adult Gaming Centre Premises Licences	22
Betting (Other) Premises Licences	23
Betting (Track) Premises Licences	23
Bingo Premises Licences	24
Family Entertainment Centre Premises Licences	25
Processes for application and review of gambling premises licences	26
Part 3 – Permits and Notices	27
Alcohol Licensed Premises Gaming Machine Permits & Notifications	27
Club Gaming Permits and Club Machine Permits	28
Unlicensed Family Entertainment Centre Gaming Machine Permits	29
Prize Gaming Permits	31
Temporary Use Notices.....	31
Occasional Use Notices	32
Travelling Fairs	32
Part 4 – Lotteries	34
Free Prize Draws & Skill Competitions	
5 Legislation, Policies and strategies	
6 Decision making	36
6.7 Delegation of Functions	36

1 Introduction

- 1.1 This document is the Statement of Gambling Policy, for the London Borough of Haringey Under section 349 of the Gambling Act 2005 (the Act), the Council is required to publish a Statement of Principles which it proposes to apply when exercising its functions under the Act. The form of the Statement of Gambling Policy is set out in The Gambling Act 2005 (Licensing Authority Policy Statement) (England and Wales) Regulations 2006. The Gambling Commission's Guidance to licensing authorities (5th Edition) (Commission's Guidance) contains further detail on the form of the council's Statement of Principles.

In producing this Statement of Gambling Policy, the Licensing Authority has had regard to the licensing objectives of the Gambling Act 2005, the guidance issued by the Gambling Commission, and any responses received from those consulted upon the policy.

- 1.2 The main function of the Council as a Licensing Authority, through its licensing committee, will be to licence premises where gambling is to take place and issue a range of licences, permits and authorisations for gambling in its area. The Licensing Authority will also have power to impose conditions and review licences.
- 1.3 The Council will be empowered by the Act to take enforcement action when an offence under the legislation has been committed. Offences include when premises or activities are unlicensed, or licence conditions are not complied with; to support this enforcement there are powers of entry and inspection.
- 1.4 This policy refers to the Gambling Commission, which has wider functions under the Act and with whom the Council will work alongside as a dual regulator. However, it does not discuss the role and responsibilities of the Commission and any references in this policy will only be insofar as it impacts on, or clarifies, this Authority's functions. For example, the Commission is exclusively responsible for issuing operator and personal licences, which is a necessity before the Council can consider an application for a premises licence.
- 1.5 The Gambling Commission is mentioned in this policy as being responsible for issuing Codes of Practice and Guidance to licensing authorities regarding the manner in which they are to exercise their functions. This policy endorses the principles set out in the Gambling Commission Guidance and key licensing objectives and confirms that the Council will take account of all such guidance. This statement must be published at least every three years. The statement must also be reviewed from "time to time" and any amended parts re-consulted upon. The policy must then be re-published.

1.6 Consultation

- 1.7 Haringey Council consulted widely upon this Policy statement before finalising and publishing. A list of those persons consulted is provided below, in line with the Act and the Gambling Commission's Guidance.
- The Chief Officer of Police;
 - The Fire Authority
 - One or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority's area;

- One or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under the Gambling Act 2005.
- Services within the Council with an interest in the gambling process (Responsible Authorities)
- Local Safeguarding Children Board
- Councillors
- H.M Revenue and Customs
- Other organisations that appear to be affected by licensing matters covered in the Policy.
- Neighbouring boroughs.
- Local resident's association/General public

1.8 Our consultation took place between 9th July 2021 and 06th September 2021 and we followed the HM Government Code of Practice on Consultation (published July 2012).

1.9 The full list of comments made and the consideration by the Council of those comments is available/will be available by request to: Licensing@haringey.gov.uk / via the Council's website at: www.haringey.gov.uk/licensing

1.10 The policy was approved at a meeting of the Full Council on 22nd November 2021 and was published via our website on. Copies were placed in the public libraries of the area as well as being available in River Park House.

1.11 Should you have any comments as regards this policy statement please send them via e-mail or letter to the following contact:

Licensing Team
Level 1 River Park House
225 High Road, Wood Green
London
N22 8GH
licensing@haringey.gov.uk

1.12 It should be noted that this statement of licensing policy will not override the right of any person to make an application, make representations about an application, or apply for a review of a licence, as each will be considered on its own merits and according to the statutory requirements of the Gambling Act 2005. The council acknowledges that it may need to depart from this policy and from the guidance issued under the Act in individual and exceptional circumstances, and where the case merits such a decision in the interest of the promotion of the licensing objectives. Any such decision will be taken in consultation with the appropriate legal advisors for the Licensing Authority, and the reasons for any such departure will be fully recorded.

1.13 Local Area Profile

1.14 The national body for regulating gambling in the UK, the Gambling Commission, advises that local authorities, acting as licensing authorities under the Gambling Act 2005, complete a Local Area Profile. Haringey has produced a Local Area Profile (LAP). The Haringey LAP assesses locations' vulnerability to gambling-related harm, by taking into account the latest data on deprivation, public health risks and current locations of gambling establishments.

Effective LAPs enable the Gambling Commission, licensing authorities and applicants to have a better awareness of the local area and any risks. Applicants are required to take into account the information in the LAP in their risk assessments and set out how they will address these in any new licence application or in an application to vary a licence. Although not a statutory requirement, the benefits of the inclusion of the Local Area Profile within the Policy include:

- Greater clarity on the relevant factors the Council, acting as the Licensing Authority under the Gambling Act 2005, will take into account when making decisions;
- Applicants are aware of the factors and risks that they will need to address within any applications and are required to set out controls and measures to address these;
- The Licensing Authority can make robust and fair decisions with reference to the published, clear LAP (therefore decisions are less likely to be challenged); and
- It encourages a proactive approach to risk that is less likely to result in reduced compliance.

The Local Area Profile is attached at Appendix 1 within this Statement of Gambling Policy.

1.15 Areas of Vulnerability

1.16 The Local Area Profile (LAP) identifies the areas in the borough which are the most vulnerable in terms of people at risk from gambling-related harm. These areas are considered to be at risk for vulnerable in terms of the potential from gambling harm. Under the Gambling Act, each case (e.g. application) is determined on its own merits by the Licensing Authority, however operators are required to address the specific increased risks of harm posed from an existing or potential premises being located within one of these identified areas. Research shows that higher problem gambling risk prevalence rates exist where there are high concentrations of Gambling premises in the same locality.

1.17 The Local Area Profile (LAP) has identified several clusters of gambling premise (where three or more are located within 400m of each other) within Haringey. These are in:

- Noel Park Ward
- Woodside Ward
- Bruce Grove Ward
- Tottenham Hale Ward
- West Green Ward
- Tottenham Green Ward
- Northumberland Park Ward
- White Hart Lane Ward
- Haringay ward

1.18 Existing and potential operators will be expected to bear these specific areas in mind in setting out how they will mitigate risks on the vulnerable people in these areas. How they will manage their gambling operation, design the layout of any new premises and how relevant appropriate control measure will be put in place to limit and reduce potential harm on those likely to be affected.

1.19 No Casinos resolution

1.20 Section 166 of the Gambling Act 2005 enables the Council, as the Licensing Authority under the Act, to issue a resolution not to issue casino licences for the duration of the document, and to consult on this proposal via the public consultation exercise. There are currently no casinos within the borough. This resolution continues into the revised policy.

Part 1 – General Principles

1.1 The Licensing Authority in carrying out its functions under s153 of the Gambling Act 2005 ('the Act') will aim to permit the use of premises for gambling in so far as it 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 Gambling Commission;
- c) reasonably consistent with the licensing objectives; and
- d) in accordance with the Authority's Statement of Principles

1.2 It should be noted that this policy statement will not override the right of any person to make an application, make representations about an application, or apply for a review of a licence, as each will be considered on its own merits and in accordance with the statutory requirements of the Act. The sole exception to this rule is for Casino premises licences – as the borough has adopted a 'no- casino' resolution, the Authority will not consider any application for a new casino premises licence.

The Licensing Objectives

1.3 In exercising our functions under the Act, the Authority must have regard to the licensing objectives as set out in the Act. These licensing objectives are:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

1.4 The objectives do not include considerations in relation to public safety or public nuisance, while the requirement in relation to children and vulnerable persons is explicitly to protect them from being harmed or exploited by gambling, rather than from more general forms of harm or exploitation. In its guidance to licensing authorities, the Commission advises that this will involve "preventing them from taking part in gambling and for there to be restrictions on advertising so that gambling products are not aimed

at children or advertised in such a way that makes them particularly attractive to children, excepting Category D gaming machines.

Responsible Authorities

1.5 Responsible authorities are bodies that must be notified of applications, and that are entitled to make representations in relation to applications for, and in relation to premises licences. The responsible authorities are:

- the Licensing Authority in whose area the premises is situated
- the Gambling Commission
- the Metropolitan Police
- the London Fire Brigade
- Planning Service
- HM Revenue and Customs.
- Children's Safeguarding Board

Interested Parties

1.6 Interested parties are people or businesses who can make representations about premises licence applications, or apply for a review of an existing licence. They are defined in s158 of the Act as:

- a) living sufficiently close to the premises to be likely to be affected by the authorised activities,
- b) having business interests that might be affected by the authorised activities
or
- c) representing persons who satisfy paragraph (a) or (b)

1.7 The Licensing Authority is required by regulations to state the principles it will apply in exercising its powers under the Gambling Act 2005 to determine whether a person is an interested party. Each case will be decided upon its merits, and the Licensing Authority will not apply a rigid rule to its decision making. It will consider the examples of relevant factors provided in the Gambling Commission's guidance to licensing authorities.

1.8 Concerns need to be clearly expressed or identified in the body of the representation. There is no requirement for a representor to produce a recorded history of problems at a premises to support their representations, in fact it is recognised that this would not be possible for new premises. However, case law established through the Licensing Act regime in relation to pubs etc. advises that evidence such as speculation and unsubstantiated points cannot be considered.

The representation must explain the basis, or grounds, for the concern raised and certain parts of the Councils Gambling Policy Statement as well as the Gambling Commission Guidance issued under Section 24 of the Act, may assist in assuring that the representation is as effective as possible.

1.9 In considering whether a person lives 'sufficiently close to the premises', the following factors will be taken into account:

- the size of the premises;
- the nature of the premises;
- the distance of the premises from the location of the person making the representation;

- the potential impact of the premises (number of customers, routes likely to be taken by those visiting the establishment); and
 - the circumstances of the person and nature of their interests, which may be relevant to the distance from the premises.
- 1.10 For example, it could be reasonable for an Authority to conclude that “sufficiently close to be likely to be affected” could have a different meaning for (a) a private resident (b) a residential school with children who have poor school attendance and (c) a residential hostel for vulnerable adults.
- 1.11 When determining whether a person has business interests that be may be affected the Commission suggest that factors that are likely to be relevant are:
- the size of the premises;
 - the ‘catchment’ area of the premises (i.e. how far people travel to visit); and
 - whether the person making the representation has business interests in that catchment area that might be affected.
- 1.12 It will also consider the Gambling Commission's guidance that "business interests" should be given the widest possible interpretation and include partnerships, charities, faith groups and medical practices. Trade associations, trade unions, residents and tenants’ associations will normally only be viewed as interested parties if they have a member who can be classed as an interested party – i.e. who lives sufficiently close to the premises to be likely to be affected by activities being applied for.
- 1.13 Persons whose business interests are within the same gambling sector as the subject of their representation (or review application) will be expected to satisfy the Licensing Authority that their representation (or application) is not made with the intent of limiting competition to their own business, particularly given that the Act does not replicate the previous requirement for satisfaction of a ‘demand test’. The Licensing Authority will disregard representations that are thought to be vexatious, frivolous, or that will not influence the determination of the application.
- 1.14 Interested parties can be persons who are democratically elected such as Councillors and Members of Parliament (MPs). No specific evidence of being asked to represent an interested person will be required as long as the Councillor / MP represents the ward likely to be affected. Other than these however, this Authority will generally require written evidence that a person/body (e.g. an advocate or relative) ‘represents’ someone who is an interested party. Members who are asked by an interested party to represent them should not sit on the Sub-Committee considering that application.
- 1.15 Although an area may have some localised social issues that cause valid concerns for residents, there is often existing legislation in force and other enforcement mechanisms available for dealing with them. For this reason, the Gambling Act makes clear that certain considerations may not form the basis of relevant representations in relation to gambling applications.

They include:

- Anti-social behaviour;
- Litter;
- Street drinking;
- Homelessness;
- Unmet demand;

- The possible effect the grant of an application may have on property value;
- Moral or ethical views of gambling;
- Congregation of people in the vicinity;
- Nuisance

In respect of each of these issues, the Gambling Commission makes clear that regulatory authorities must look to other legislation and powers, and not the Gambling Act 2005, to deal with them. Representations based on the above concerns cannot be taken into account.

Licensing Authority Functions

1.16 Licensing authorities have responsibilities under the Act for:

- the licensing of premises where gambling activities are to take place, through the issuing of Premises Licences;
- the preliminary approval of proposed premises for gambling activities, through the issue of Provisional Statements;
- the regulation of members' clubs, commercial clubs and miners' welfare institutes who wish to undertake certain gaming activities, through Club Gaming Permits and/or Club Machine Permits;
- the receipt of notifications and the issue of permits for the provision of gaming machines at premises licensed to supply alcohol for consumption on the premises, under the Licensing Act 2003;
- the regulation of family entertainment centre premises providing gaming machines;
- the regulation of prize gaming through the issue of permits;
- the receipt and endorsement of Temporary Use Notices, for infrequent gaming activities;
- the receipt of Occasional Use Notices, for infrequent betting activities;
- the registration of non-commercial societies for the provision of small society lotteries;
- the exchange of information with the Gambling Commission regarding details of licences, permits and notices and enforcement issues (see section below on 'exchange of information'); and the maintenance of registers of the applications, licences, permits and notices received and issued by the Authority
- Maintain registers of the permits and licences that are issued under these functions

1.17 The Licensing Authority will not involve itself in any matters relating to the regulation of remote gambling (for example, telephone betting or internet casino gaming), the responsibility for which lies with the Gambling Commission.

1.18 Duplication of other regulatory regimes, such as health and safety or fire safety, will be avoided in so far as is possible. This Authority will not consider whether a premise that is the subject of a licensing application is likely to be awarded planning permission or building regulations approval, in its consideration of that application.

1.20 Exchange of Information

1.21 The Licensing Authority will act in accordance with the provisions of the Gambling Act 2005 in its exchange of information, which includes the provision that the Data Protection Act 2018 will not be contravened. The Licensing Authority will also have regard to any guidance issued by the Gambling Commission on this matter when it is published, as well as any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005.

1.22 Where required by law applicants will receive copies of any representations made in respect of their application, although sensitive or personal information not required to be disclosed will be redacted.

1.23 **Enforcement**

1.24 The Licensing Authority's enforcement principles will be guided by the Gambling Commission's guidance to licensing authorities in respect of the inspection of premises and the powers to institute criminal proceedings. The Licensing Authority will endeavour to be:

- Proportionate: regulators should only intervene when necessary: remedies should be appropriate to the risk posed, and costs identified and minimised;
 - Accountable: regulators must be able to justify decisions, and be subject to public scrutiny;
 - Consistent: rules and standards must be joined up and implemented fairly;
 - Transparent: regulators should be open, and keep regulations simple and user friendly;
 - Targeted: regulation should be focused on the problem, and minimise side effects
 - Within the principles of the Regulators Code issued by the Better Regulation Delivery Office of the Department for Business Innovation and Skills
- a. The Licensing Authority may arrange for the inspection of premises, both licensed or otherwise, in response to specific complaints about those premises and the provision of unauthorised gambling activities therein. Should officers witness offences or breaches of an authorisation, appropriate action will be taken in accordance with our enforcement policy.
- b. The main enforcement and compliance role for this Licensing Authority in terms of the Act will be to ensure compliance with the premises licences and the other permissions that it issues. The Gambling Commission will be the lead enforcement body for operating and personal licences. It is also noted that all issues relating to forms of remote gambling, as well as issues relating to the manufacture, supply or repair of gaming machines, will not be dealt with by the Licensing Authority but will be notified to the Gambling Commission.
- c. This Licensing Authority will also keep itself informed of developments regarding the work of the Better Regulation Delivery Office in its consideration of the regulatory functions of local authorities. The Gambling Commission have highlighted that local authorities in general are likely to receive very few, or no complaints about gambling. Unlike other regulated areas, such as alcohol, gambling is much less visible as a concern for residents. As a result, the Gambling Commission advises the Council to proactively conduct inspections, to build up the picture of whether a premises can establish true compliance, and can assess whether the necessary protections, especially for the young and vulnerable are in place and working effectively.

- d. The Council's Inspection programme requires all new licensed premises to be inspected shortly after the licence has been issued, and every premises should expect at least one inspection per year. Inspections of premises are also undertaken if complaints are received, if variation applications are received or there is some other intelligence that suggests an inspection is appropriate. Compliance will be checked in a daytime or evening inspection. Where a one-off event takes place under a Temporary Use Notice or Occasional Use Notice, the Council may also carry out inspections to ensure the Licensing Objectives are being promoted.

- e. High-risk premises are those premises that have a history of complaints, a history of non-compliance and require greater attention. The Council will operate a lighter touch in respect of low-risk premises so that resources are more effectively targeted to problem premises. We will also target enforcement towards illegal gambling as it is potentially higher risk/harm due to the lack of regulation. The council will also keep itself informed of developments as regards the work of the Better Regulation Executive in its consideration of the regulatory functions of local authorities. The council's enforcement/compliance protocols/written agreements will be available upon request.

1.25 Gaming Machines

- f. Throughout this document, references are made to gaming machines as being within categories A, B, C or D, or in some cases, sub-categories such as B1, B2, B3 or B4.
- g. Gaming machines are categorised according to the nature of their operation, the maximum charge to use and the maximum prize available, and the legislation sets out the categories and sub-categories of machines that may be made available under each type of licence or permit. The Secretary of State is responsible for establishing the applicable values of each category and sub- category by way of statutory instrument.
- h. The categories and values applicable to each category are subject to change and are therefore not included in this document. Current information is available from the Council's website at [gaming-machine-permits-guide](#) link here.

1.26 Gambling Risk Assessments

- i. The Gambling Commission introduced a new licensing condition within the Licence Conditions and Codes of Practice (LCCP) which came into effect in April 2016. This resulted in the requirements for premises based gambling operators to undertake a local gambling risk assessment of their premises and the potential impact that the premises and its operation may have on the licensing objectives. This condition made it a requirement for all gambling operator to consider local area information provided by the Licensing Authority via their Statement of Gambling Policy.
- j. These provisions in the social responsibility code within the LCCP encourages local authorities, the Commission and the industry to work in partnership to address local issues and concerns. The risk based approach provides a better understanding of, and enables a proportionate response, to risk. This approach includes looking at future risks and thinking about risks in a probabilistic way. Risk is related to the probability of an event happening and the likely impact of that event. In this case it is the risk of the impact on the licensing objectives.
- k. The council has produced a Local Area Profile (LAP) to assist applicants to conduct, assess and complete a premises based gambling risk assessments. All gambling operators within the borough or new operators applying for a new licence must have regards to the LAP when completing or revising their risk assessments.
Appendix 1
- l. The council views these risks as an important component of the overall assessment and management of local risks. It will assist operators in this process by providing specific information on the concerns surrounding gambling within the borough and the impact on the licensing objectives. These local risk assessments are specific to the potential harm that gambling premises can have on one or more of the licensing objectives under the Act. They are specific to the premises, the local area and the local community.

Part 2 – Premises Licences

Licensing authorities determine applications with reference to the three licensing objectives under the Gambling Act 2005.

2.1. LICENSING OBJECTIVE 1:

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

- 2.2. This Licensing Authority will expect applicants to consider the measures necessary to be reasonably consistent with 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.
- 2.3 This Licensing Authority is aware that the Gambling Commission will be taking a leading role in preventing gambling from being a source of crime, and that regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, which is the remit of the Licensing Authority. The Gambling Commission's guidance does however envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. Where an area is known to have high levels of crime, this Authority will consider carefully whether gambling premises are suitable to be located there, taking into account such factors as:
- levels of recorded crime;
 - the type of that crime;
 - levels of anti-social behaviour-related complaints.
- 2.4 Applicants are advised to examine crime and anti-social behaviour statistics that relate to the vicinity of their application. They will be expected to have a good understanding of the local area in which they operate, or intend to operate, a gaming premises. The applicant must evidence that they meet the criteria set out in this policy. Operators must be aware of how their operation may impact this objective. Applicants will be expected to provide details of their crime prevention measures and any associated risk assessments carried out.
- 2.5 Applicants for premises licences must meet the requirements of the Commission to obtain and hold an operator's licence. Applicants will have to hold such licence (except occupiers of tracks who do not propose to offer gambling themselves). The Licensing Authority will not (unless evidence to the contrary comes to light) have to ascertain if the applicant is suitable to hold a premises licence. The Licensing Authority will have to be satisfied that the premises will not adversely affect the licensing objectives and is compliant with the Commission's Guidance, codes or practice and this Statement of Gambling Policy.
- 2.6 This Licensing Authority accepts that issues of nuisance cannot be addressed via the Gambling Act provisions, although preventing gambling from being a source of disorder is a licensing objective. The Licensing Authority is also mindful that what starts as nuisance may subsequently escalate to disorder, and that such disorder can have a serious effect on the lives of local residents. If an application for licence review were to be made on the basis of disorder the Authority will then distinguish between disorder and nuisance, considering factors such as:
- whether police assistance was required

- how threatening the behaviour was to those who could see it
- how frequently it is reported
- prevalence of persons loitering outside
- the times of day when disorder is reported
- the impact on residents

2.7. LICENSING OBJECTIVE 2

Ensuring that gambling is conducted in a fair and open way

- 2.8 This Licensing Authority will expect applicants to consider the measures necessary to be reasonably consistent with the licensing objective of ensuring that gambling is conducted in a fair and open way.
- 2.9 The Gambling Commission is the primary body concerned with ensuring that each operator conducts gambling in a fair and open way. This Licensing Authority will consider each application on its own merits and will look more closely at operator where an operator's licence is not required. Track owners do not require an operator's licence and any application for such a licence will be scrutinised to ensure this objective is met. In these circumstances, the applicant would be expected to address how they intend to ensure that gambling will be conducted fairly and openly. The Licensing Authority may consider imposing conditions to ensure that the environment in which betting takes place is suitable.

2.10 LICENSING OBJECTIVE 3

Protecting children and other vulnerable persons from being harmed or exploited by gambling

- 2.11 This Licensing Authority will expect applicants to consider the measures necessary to be reasonably consistent with the licensing objective of protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 2.12 The Gambling Commission's guidance for this objective means preventing children from taking part in gambling (as well as restrictions on advertising so that gambling products are not aimed at or are particularly attractive to children). The Licensing Authority will therefore consider, as suggested in the guidance, whether specific measures are required at particular premises, with regard to this licensing objective.
- 2.13 The Licensing Authority is also aware of the Codes of Practice that the Gambling Commission has issued in respect of this licensing objective, in relation to specific categories of premises.
- 2.14 It is noted that the Act and Commissions Guidance does not define the term "vulnerable persons". It is noted that the Gambling Commission states that "it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs". This Licensing Authority will consider the promotion of this licensing objective on a case by case basis.
- 2.15 In a borough with both high alcohol and drug dependency the Licensing Authority are particularly concerned about both the health and social the health and social wellbeing of residents. Applicants must be able to demonstrate within their application how they

will protect vulnerable persons, possibly by providing information on how they operate exclusion schemes, the way in which they identify those gambling beyond their means and the measures they take to stop those suffering from any impairment from participating in gambling, and also the training provided to staff to support these aims.

- 2.16 It is appreciated that, in accordance with the Gambling Commission's guidance, moral objections to gambling are not a valid reason to reject applications for premises licences, and also that unmet demand is not a criterion for a Licensing Authority to consider.
- 2.17 The Licensing Authority expects applicants to take appropriate measures to promote the licensing objectives, which may include such issues as proof of age schemes, supervision of entrances and gaming machine areas, CCTV, physical separation of areas, self-exclusion schemes, and provision of information leaflets / helpline numbers for organisations such as GamCare. This list is not mandatory, nor exhaustive, and is merely indicative of example measures.
- 2.18 The issue of a premises licence must be reasonably consistent with the promotion of the licensing objectives. With regard to these objectives, this Licensing Authority has considered the Gambling Commission's guidance to licensing authorities.

Conditions

- 2.19 Premises licences issued by the Licensing Authority will be subject to mandatory and/or default conditions and conditions imposed by the council. The council may also impose further conditions in response to specific issues, which will be decided on a case by case basis.
- 2.20 Any conditions attached to licences will be proportionate and will be:
- relevant to the need to make the proposed building suitable as a gambling facility;
 - directly related to the premises and the type of licence applied for;
 - related to the scale and type of premises; and
 - reasonable in all respects.
- 2.21 An applicant can request that default conditions are excluded from a licence, and in these circumstances the Licensing Authority may instead impose an appropriate condition that addresses a similar matter to the excluded condition (for example, if a default condition relating to permitted trading times is excluded, the Licensing Authority may attach a condition permitting longer trading hours). The Licensing Authority will give a full explanation of the rationale behind the decision to attach any additional condition, although there will be a number of measures this Licensing Authority will consider utilising should there be a perceived need, such as the use of door supervisors, appropriate signage for adult only areas etc. This Licensing Authority will also expect the licence applicant to offer his/her own suggestions as to way in which the licensing objectives can be met effectively.
- 2.22 It is noted that there are conditions that the Licensing Authority cannot attach to premises licences. These are conditions:
- which make it impossible to comply with an operating licence.
 - as to gaming machines that contradict the provisions in the Act.
 - making activities, premises or parts of them operate as a membership club
 - on fees, winnings, stakes or prizes.

2.23. The Licensing Authority recognises that betting shop premises may only offer gambling facilities between the hours of 07.00 and 22.00, these being the default hours. The Licensing Authority will expect new applicants to consider if these hours are appropriate for the location subject to the application. The Authority is aware that in some areas early morning start times can cause anti-social behaviour problems, and the Authority is keen to ensure that newly granted licences do not exacerbate existing problems.

2.24 Location of Premises

2.25 Applicants for new or variation applications of premises licences within a gambling vulnerability ward must include detailed information as to how the proposals will be reasonably consistent with the gambling objectives and policies. Applicants are expected to establish whether there are any sensitive premises or locations within close proximity to the premises and what the risk level is for the area based on vulnerability. Where this is the case, applicants should submit information as to how they plan to be reasonably consistent with the strand of the licensing objectives concerned with the protection of children and other vulnerable persons from being harmed or exploited by gambling. The additional supporting information may contain the following:

How the premises operate will restrict access to children, young people or other vulnerable persons:

- whether a proof of age scheme is being used
- will the appropriate number of security staff be employed at appropriate times;
- will opening times be set so that the premises are not adding to any anti social behaviour; and
- what procedures and staff training are in place to identify vulnerable persons such as problem gamblers, those who are inebriated through drink or drugs, etc.

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

2.26 The applicant for a premises licence will have to specifically consider how the location of the premises will impact on the objectives. Applicants will have to clearly show that they have considered the potential impact of their proposed business on the licensing objectives and propose ways that will reduce or remove any likely adverse impact on them.

2.27 The council will consider proposals for new gambling premises that are in close proximity to hostels or other accommodation or centres catering for vulnerable people, including those with mental disabilities or learning difficulties, and those with problem gambling or with alcohol or drug abuse problems, as very likely to adversely affect the gambling objectives.

2.28 The council considers that 'sensitive locations' will include locations which have been identified as having a higher concentration of vulnerable groups and where there are concentrations of gambling premises in an area where children or other vulnerable persons are likely to be harmed or exploited.

2.29 It should be noted that this policy does not preclude any application being made and that every application will be decided on its individual merits, with the opportunity given for the applicant to show how potential concerns can be overcome.

- 2.30 The Licensing Authority will also ensure that where category C or above machines are on offer in premises to which children are admitted:
- all such machines are located in an area of the premises which is separated
 - from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;
 - only adults are admitted to the area where these machines are located;
 - access to the area where the machines are located is supervised;
 - the area where these machines are located is arranged so that it can be observed by the staff or the licence holder; and
 - at the entrance to and inside any such areas there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.
- 2.31 These considerations will apply to premises including buildings where multiple premises licences may have effect.
- 2.32 The council has produced a Local Area Profile (LAP) to assist operators. The profile outlines the possible risks to gambling-related harm. The LAP sets out the information that gambling operators need to consider for new applications or when updating their risk assessments for existing premises. The council considers that these local risk assessments are a key component of the overall assessment and management of the local risks. Applicants are able to refer to the Local Area Profile to establish the risks for the area and what vulnerable groups are present. This will inform the consideration and implementation of any control measures that would mitigate the risk to the vulnerable. The applicant must set out the risks, their consideration and adequate control measures within their premises risk assessments. The Licensing Authority will assess the risks presented and determine whether the proposed steps are suitable to mitigate the risks of harm within the area. The Licensing Authority will expect all applicants for a new licence to submit the completed assessment with their application.
- 2.33 Haringey's Local Area Profile has been produced based on the Gambling Commission's recommendations; in order to:
- Enable licensing authorities to better serve their local community, by improving Haringey's understanding of the community and the local risk profile
 - Provide improved clarity for operators as to the relevant factors in Licensing Authority decision-making. This aims to lead to improved premises licence applications, with the potential operator already incorporating controls and measures to mitigate risk in their application;
 - Enable Licensing Authorities to make robust but fair decisions, based on a clear, published set of factors and risks, which are therefore less susceptible to challenge; and
 - Encourage a proactive approach to risk that is likely to result in reduced compliance and enforcement action.
 - Encourage the use of Challenge 25 on relevant premises.

2.34 **Division of Premises / Primary Usage**

- 2.35 In the Act, 'premises' is defined as including 'any place'. Section 152 of the Act prevents more than one premises licence applying to any single place. But a single building could be subject to more than one premises licence, provided they are for different parts of the building and the different parts of the building can be reasonably regarded as being different premises. This approach has been taken to allow large, multiple unit premises

such as a pleasure park, tracks or shopping centres to obtain discrete premises licences, where appropriate safeguards are in place.

2.36 This Licensing Authority takes particular note of the Gambling Commission's guidance which states that licensing authorities should take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non- gambling) purposes. In particular they should be aware of the following:

- The third licensing objective seeks to protect children from being harmed by gambling. In practice that means not only preventing them from taking part in gambling, but also preventing them from being in close proximity to gambling. Therefore premises should be configured so that children are not invited to participate in, have accidental access to or closely observe gambling where they are prohibited from participating.
- Entrances to and exits from parts of a building covered by one or more premises licences should be separate and identifiable so that the separation of different premises is not compromised and people do not "drift" into a gambling area. In this context it should normally be possible to access the premises without going through another licensed premises or premises with a permit.
- Customers should be able to participate in the activities identified on the premises licence.

2.37 The Licensing Authority will also consider specific measures that may be required for buildings that are subject to multiple premises licences. Such measures may include the supervision of entrances; segregation of gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises in order to pursue the licensing objectives. These matters are in accordance with the Gambling Commission's guidance.

2.38 This Licensing Authority is also aware that an issue has arisen in some parts of the country, where operators have sought to sub-divide existing single licensed premises, and obtain further premises licences in respect of each sub-division. It has been observed that this practice has been used predominantly in respect of categories of premises licences which allow the operation of a small, fixed number of high-value gaming machines – in effect, using multiple premises licences in respect of different areas of a single business to artificially increase the permitted number of category B machines that can be made available.

2.39 The Licensing Authority notes the Commission’s guidance that in most cases the expectation is that a single building/plot will be the subject of an application for a licence. Whether different parts of a building can properly be regarded as being separate premises will depend on the circumstances. When assessing whether premises can be regarded as separate, the Licensing Authority proposes to apply the following criteria:

- Does each premises have its own external entrance, or is this accessed via another premises?
- Does each premise trade as a separate entity, or under a single banner?
- Are the premises subject to separate non-domestic rateable valuations?
- Is each premises operated by different persons, or by the same proprietor?
- What is the quality of separation (i.e. if dividing barriers are to be used, are they temporary or permanent, do they provide floor to ceiling division or are they of a fixed height, are they transparent or opaque, etc)?
- Is there a genuine need to establish a division between premises, or is the division aimed solely at artificially increasing the permitted number of high-value gaming machines?

2.40 If it is proposed to utilise sterile, non-gambling areas to create sub-divisions, then the Licensing Authority will apply the following criteria to those areas:

- Is the area proposed for non-gambling activities a token separation?
- Is it genuinely an area which the public would go to for purposes other than gambling?
- Is it in effect a device to introduce artificial separation or genuinely a functionally separate area?
- Is there in effect direct access between the divisions or is there a place from which access can be gained to two premises?

2.41 The Licensing Authority also notes that any premises subject to multiple discrete premises licences must be able to comply with the mandatory conditions restricting access to each licensed premises, as follows:

Premises type	Access restrictions
Adult gaming centre	No direct access from any other licensed gambling premises, or from premises with a family entertainment centre gaming machine permit, a club gaming/machine permit, or an alcohol licensed premises gaming machine permit
Betting (other)	Access from a street or another betting premises only. No direct access from any premises used for retail sale of goods or services
Betting (track)	No direct access from licensed casino or adult gaming centre premises
Bingo	No direct access from licensed casino, adult gaming centre or betting (other) premises
Family Entertainment Centre	No direct access from licensed casino, adult gaming centre or betting (other) premises

2.42 In the case of some divided premises, it appears that the intended primary use of a premises licence had not been offered, with operators solely making use of the additional machine entitlement (for example, holding a Bingo premises licence but not making any facilities for playing bingo available). The Gambling Commission consulted on this issue and subsequently issued a revision to the Licence Conditions and Codes of Practice affecting Bingo, Betting and Casino operating licences. Holders of these licences are now mandated to provide suitable and sufficient facilities for their primary gambling activity in any of their associated premises.

2.43 **Door Supervisors**

The Gambling Commission advises in its guidance that if a Licensing Authority is concerned that a premises may attract disorder or be subject to attempts at unauthorised access (for example by children and young persons) then it may require that the entrances to those premises are supervised, and impose a condition to that effect. Consideration must also be given to whether that supervisor needs to be licensed or not, as the statutory requirements vary by premises type. This Licensing Authority notes the contents of Part 33 of the Commission's guidance, which outlines a limited relaxation of the licensing requirement for door supervisors at licensed bingo and casino premises – however, operators are encouraged to use door supervisors who are licensed by the Security Industry Authority at these venues. Any other venue using door supervisors must use qualified staff registered with the Security Industry Authority.

2.44 **Provisional Statements**

The Act provides for a person to make an application to the Licensing Authority for a provisional statement in respect of premises that he or she:

- expects to be constructed;
- expects to be altered; or
- expects to acquire a right to occupy.

2.45 Developers may wish to apply to this Authority for a provisional statement before entering into a contract to buy or lease property or land, to judge whether a development is worth taking forward in light of the need to obtain a premises licence. There is no need for the applicant to hold an operating licence in order to apply for a provisional statement, nor do they need to have a right to occupy the premises in respect of which the application is made.

2.46 The process for considering an application for a provisional statement is the same as that for a premises licence application. The applicant is obliged to give notice of the application in the same way as applying for a premises licence. Responsible authorities and interested parties may make representations and there are rights of appeal.

2.47 The holder of a provisional statement may subsequently apply for a premises licence once the premises are constructed, altered or acquired. The Licensing Authority will be constrained in the matters it can consider when determining the premises licence application, and in terms of representations about premises licence applications that follow the grant of a provisional statement, no further representations from relevant authorities or interested parties can be taken into account unless:

- they concern matters which could not have been addressed at the provisional statement stage, or
- they reflect a change in the applicant's circumstances.

2.48 In addition, the Authority may refuse the premises licence (or grant it on terms different from those attached to the provisional statement) only by reference to matters:

- which could not have been raised by objectors at the provisional statement stage;
- which in the Authority's opinion reflect a change in the operator's circumstances; or
- where the premise has not been constructed in accordance with the plan submitted with the application. This must be a substantial change to the plan and this Licensing Authority notes that it can discuss any concerns it has with the applicant before making a decision.

2.49 If a developer has already acquired a premise and has a right of occupation, and holds an appropriate operating licence, there is no requirement for them to obtain a provisional statement prior to making an application for a premises licence, this will be a matter of choice. However, where premises are likely to require construction or development work prior to being ready for use for gambling (and as such are not in a state where they can be inspected during the application process), the Licensing Authority may seek to attach the following additional conditions to any licence granted:

- The premises are to be constructed in accordance with the deposited plans and shall not trade until such time as they have been inspected and approved by officers of the Licensing Authority.
- The licence is to be offered for surrender should the premises not have been completed in accordance with the deposited plans within the period of 24 months starting on the day that the licence first takes effect.

2.50 **Reviews**

Applications for a review of a premises licence can be made at any time by interested parties or responsible authorities, including the Licensing Authority. The Licensing Authority must grant an application for review, unless it considers that the grounds on which the review is sought:

- Raise issues that are not relevant to Gambling Commission Guidance/codes of practice, the Licensing Authorities Statement of Policy or the licensing objectives.
- Are frivolous
- Are vexatious
- Will certainly not cause this Authority to wish to alter/revoke/suspend the licence
- Are substantially the same as grounds cited in a previous application relating to the same premises
- Are substantially the same as representations made at the time of the application for the premises licence was considered.

2.51 The Licensing Authority can also initiate a review of a licence on the basis of any reason that it thinks is appropriate. In particular, the Licensing Authority may initiate a review of a premises licence on the grounds that a premises licence holder has not provided facilities for gambling at the premises. This is to prevent people from applying for licences in a speculative manner without intending to use them.

2.52 Once a valid application for a review has been received by the Licensing Authority, representations can be made by responsible authorities and interested parties during a 28-day period, that will begin 7 days after receipt of the application. The Licensing Authority will publish notice of the application on the website within this initial 7-day period.

2.53 The Licensing Authority must carry out the review as soon as possible after the 28 day period for making representations has passed.

2.54 The purpose of the review will be to determine whether the Licensing Authority should take any action in relation to the licence. If action is justified, the options open to the Licensing Authority are:

- to add, remove or amend a licence condition imposed by the Licensing Authority;
- to exclude a default condition imposed by the Secretary of State (e.g. opening hours) or remove or amend such an exclusion;
- to suspend the premises licence for a period not exceeding three months; or
- to revoke the premises licence.

2.55 In determining what action, if any, should be taken following a review, the Licensing Authority will have regard to the principles set out in section 153 of the Act, as well as any relevant representations.

2.56 Following the completion of the review, the Licensing Authority will notify its decision in writing to the licence holder, the applicant for review (if any), any person who made representations in respect of the review, and the responsible authorities designated in regulations made under the Act.

2.57 Categories of Premises Licence

2.58 Casino Premises Licences

The London Borough of Haringey has resolved, under section 166 of the Act, not to issue any Casino premises licences. This resolution shall have effect from 31st January 2022 until 30th January 2025, unless revoked prior to this date.

2.59 At present, the Act only allows for a fixed number of 'regional', 'large' and 'small' casinos to be licensed nationally. Licensing authorities must be expressly authorised by the Secretary of State to issue new licences for any of these categories, to ensure that the national limits are not exceeded. Haringey is not amongst the authorities that have been so authorised.

2.60 Adult Gaming Centre Premises Licences

Adult gaming centres (AGCs) premises licences allow the holder of the licence to make gaming machines available for use on the premises. Persons operating an AGC must hold a gaming machines general operating licence from the Commission and must seek a premises licence from the Licensing Authority.

2.61 This Licensing Authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling, and will expect the applicant to satisfy the Authority that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises.

2.62 Betting (Other) Premises Licences

The Authority notes the difference between betting terminals, which are designed to receive bets on real events, and gaming machines such as fixed odds betting terminals (FOBTs), which are reliant upon the outcome of a virtual event. It is further noted that betting premises are entitled to offer up to four gaming machines in total, which may include category B2 (FOBT) machines. There are no statutory limits on the number of betting terminals that may be made available in betting premises, although the Licensing Authority notes that it may attach a condition to a licence limiting the number if concerns

exist over the availability of machines to children or vulnerable persons which cannot be satisfied through alternative means.

2.63 This Licensing Authority will, as per the Commission's guidance, take into account the size of the premises, the number of counter positions available for person-to-person transactions, and the ability of staff to monitor the use of betting terminals by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number, nature and circumstances of betting terminals an operator wants to offer.

2.64 Betting (Track) Premises Licences

The Licensing Authority is aware that tracks may be subject to one or more premises licences, provided each licence relates to a specified area of the track. As per the Gambling Commission's guidance, this Licensing Authority will consider the impact upon the third licensing objective and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas which they are not permitted to enter.

2.65 The Authority will therefore expect the premises licence applicant to demonstrate suitable measures to ensure that children do not have access to adult-only gaming facilities. It is noted that children and young persons will be permitted to enter track areas where facilities for betting are provided on days when football matches/darts championship, dog-racing and/or horse-racing takes place, but that they are still prevented from entering areas where gaming machines (other than category D machines) are provided.

2.66 Parliament amended section 55 of the Act, to allow the employment of persons under the age of 18 years at track premises, in functions not associated with gambling (for example, as ticket checkers, concession kiosk staff, litter collectors, and so on). However, the offence under section 51, prohibiting the employment of children and young persons to provide facilities for gambling, is unaffected. Proprietors of track premises must ensure that any persons under the age of 18 employed at their premises are not called upon to assist with the operation of betting facilities.

2.67 The entitlement to make up to four gaming machines available for use at the track premises may only be utilised if the holder of the premises licence also holds a pool betting operating licence. In situations where this is the case and it is proposed to make gaming machines available for use, any gaming machines (other than category D machines) should be located in areas from which children are excluded. If the track premises is licensed for the sale of alcohol, a further two gaming machines may be made available by way of the automatic entitlement for alcohol-licensed premises, upon payment of the appropriate notification fee.

2.68 Betting terminals may also be made available for use at track premises, and this Licensing Authority proposes to apply the same principles as set out in the Betting (other) Premises Licence section above to track premises.

2.69 A condition to track premises licences is that the track operator is to ensure that the terms for placing bets are prominently displayed in or near the betting areas, or that other measures are taken to ensure that they are made available to the public.

2.70 Applicants are required to submit plans of the premises with their application, in order to ensure that the Licensing Authority has the necessary information to make an informed judgement about whether the premises are fit for gambling. The plan will also be used for the Licensing Authority to plan future premises inspection activity. Plans for tracks

do not need to be in a particular scale, but should be drawn to scale and should be sufficiently detailed to include the information required by regulations.

2.71 This Authority appreciates that it is sometimes difficult to define the precise location of betting areas on tracks. The precise location of where betting facilities are provided is not required to be shown on track plans, both by virtue of the fact that betting is permitted anywhere on the premises and because of the difficulties associated with pinpointing exact locations for some types of track. Applicants should provide sufficient information that this Authority can satisfy itself that the plan indicates the main areas where betting might take place.

2.72 Bingo Premises Licences

This Licensing Authority notes the Gambling Commission's guidance, that licensing authorities will need to satisfy themselves that it is possible for bingo to be played in any premises for which they issue a bingo premises licence. This will be a relevant consideration where the operator of an existing bingo premises applies to vary their licence and/or apply for new licences, as discussed in the Division of Premises and Primary Usage section above.

2.73 Should children be allowed to enter premises licensed for bingo, they are not permitted to participate in the bingo, nor may they make use of any category of gaming machine, other than those in category D. Where category B or C machines are made available in premises to which children are admitted it is expected that:

- all such machines will be located in an area of the premises separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;
- only adults will be admitted to the area where the machines are located;
- access to the area where the machines are located will be supervised;
- the area where the machines are located is arranged so that it can be observed by staff of the operator or the licence holder; and
- at the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

2.74 Family Entertainment Centre Premises Licences

The Licensing Authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the Authority, for example, that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machine areas.

2.75 This Licensing Authority will, as per the Gambling Commission's guidance, refer to the Commission's website and make itself aware of any conditions that apply to operating licences covering the way in which the area containing the category C machines should be delineated.

Part 3 – Permits and Notices

3.1 While the proprietors of dedicated, high-value gambling outlets will generally be required to complete a comprehensive application process to obtain Premises and Operating Licences, the Act also makes provision for simpler processes for incidental and low-value gambling opportunities, such as gaming machines in pubs, bars and clubs, and small-stakes prize gaming. This part of the Statement outlines the Principles that we will apply to applications for gaming and gaming machine permits, and notifications of temporary or occasional gambling usage.

Alcohol Licensed Premises Gaming Machine Permits & Notifications

3.2 Since September 2007, a premises wishing to operate with category C or D gaming machines under section 282 of the Gambling Act 2005 must apply to its Licensing Authority for either a gaming permit or a gaming notification. Gaming permits and notifications have superseded section 34 permits.

3.3 Permits can only be used for premises licensed under the Licensing Act 2003 to sell alcohol for consumption on the premises. A premises licensed to sell alcohol under the Licensing Act 2003 is automatically entitled to two gaming machines of category C and/or D. The holder of the on-premises licence under the Licensing Act 2003 must notify the council (a 'notification') of their intention to make the gaming machines available for use and they must pay the prescribed fee.

3.4 Holders of licensed premises gaming machine permits will be required to pay an annual fee.

3.5 If the premises licence holder under the Licensing Act 2003 changes, the permission falls, therefore a new notification must be sent to the Licensing Authority.

3.6 The Licensing Authority **can remove the automatic authorisation** in respect of any particular premises if:

- provision of the machines is not reasonably consistent with the pursuit of the licensing objectives;
- gaming has taken place on the premises that breaches a condition of section 282 of the Act (i.e. that written notice has been provided to the Licensing Authority, that a fee has been provided and that any relevant code of practice issued by the Gambling Commission about the location and operation of the machine has been complied with);
- the premises are mainly used for gaming; or
- an offence under the Gambling Act 2005 has been committed on the premises.

3.7 **Permit for 3 or more gaming machines**

If a licensed premises wishing to have 3 or more gaming machines of category C or D, they must apply to the council for a licensed premises gaming machine permit. When considering that application, the Licensing Authority must have regard to the licensing objectives and any guidance issued by the Gambling Commission. The Licensing Authority may also consider "such other matters as they think relevant."

3.8 This Licensing Authority will decide upon the interpretation of "such other matters" on a

case by case basis but generally there will be regard to the need to protect children and vulnerable persons from harm or being exploited by gambling. The Licensing Authority will expect the applicant to satisfy the Authority that there will be sufficient measures to ensure that under-18 year olds do not have access to the adult-only gaming machines (category C). Examples of measures to satisfy the Authority may include the gaming machines being positioned in sight of the bar, or in the sight of staff who will monitor that the machines are not being used by those under 18. Notices and signage may also assist. Regarding the protection of vulnerable persons, applicants may wish to consider the provision of information leaflets / helpline numbers for organisations such as GamCare.

- 3.9 It is recognised that some alcohol-licensed premises may apply for a premises licence for their non-alcohol licensed areas. Any such application would most likely need to be made for, and dealt with as, an Adult Gaming Centre premises licence. The Council when determining an application for an alcohol-licensed premises gaming machine permit will consider each application on its own merits.
- 3.10 It should be noted that the council may cancel a permit or may vary the number or category (or both) of gaming machines authorised by it if:
- (a) it would not be reasonably consistent with pursuit of the licensing objectives for the permit to continue to have effect;
 - (b) gaming has taken place on the premises in purported reliance on the permit but otherwise than in accordance with the permit or a condition of the permit;
 - (c) the premises are mainly used or are to be used for making gaming machines available; and/ or
 - (d) an offence under the Gambling Act 2005 has been committed on the premises.
- 3.11 Before the council cancels or varies a permit it will give the permit holder 21 days' notice of its intention and allow them the opportunity to make a representation. If the permit holder requests a hearing the council will arrange a Licensing Sub-Committee hearing to consider the permit holder's representation and any other evidence available before making its determination.

3.12 Club Gaming Permits and Club Machine Permits

Members' clubs and miners' welfare institutes may apply for a Club Gaming Permit or a Club Machine Permit, while commercial clubs may apply for a Club Machine Permit only. A Club Gaming Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D), equal chance gaming and games of chance as set-out in regulations. A Club Machine Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D) only.

- 3.13 A club must meet the following criteria to be considered a members' club

- It must have at least 25 members;
- It must be established and conducted wholly or mainly for purposes other than gaming (unless the gaming is permitted by separate regulations);
- It must be permanent in nature;
- It must not be established to make a commercial profit;
- It must be controlled by its members equally.

Examples of these include working men's clubs, branches of the Royal British Legion and clubs with political affiliations.

- 3.14 The council may only refuse an application on the grounds that:
- a) the applicant does not fulfil the requirements for a members' or commercial club or miners' welfare institute and therefore is not entitled to receive the type of permit for which it has applied;
 - b) the applicant's premises are used wholly or mainly by children and/or young persons;
 - c) an offence under the Act or a breach of a permit has been committed by the applicant while providing gaming facilities;
 - d) a permit held by the applicant has been cancelled in the previous ten years; and/
or
 - e) an objection has been lodged by the Commission or the police.

3.15 There are statutory conditions on club gaming permits that no child may use a category B or C machine on the premises and that the holder complies with any relevant provision of a code of practice about the location and operation of gaming machines.

3.16 Unlicensed Family Entertainment Centre Gaming Machine Permits

Premises that are proposed to be used as Unlicensed Family Entertainment Centres (UFECs) are those that offer only category D machines and a permit allows any number of these machines to be made available at the premises (subject to other considerations such as health and safety and fire regulations). Given that category D machines have no age restrictions, these premises will particularly appeal to children and young persons. Therefore, the council will give particular weight to matters relating to child protection Issues. The council will grant an application for a permit only if it is satisfied that the premises will be used as an unlicensed FEC, and following consultation with the Chief of Police. Applicants must demonstrate:

- a full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs;
- that the applicant has no relevant convictions (those that are set out in Schedule 7 of the Act); and
- that staff are trained to have a full understanding of the maximum stakes and prizes (as referred to in the relevant Gambling Commission Guidance)

Any application for a permit will be considered with regard to the licensing objectives and to any relevant guidance issued by the Commission. Particular weight will be given to child protection

3.17 The applicant will be expected to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations. The efficiency of such policies and procedures will each be considered on their merits; however, they may include appropriate measures / training for staff as regarding suspected truant school children on the premises, measures / training covering how staff would deal with unsupervised very young children being on the premises, or children causing perceived problems on / around the premises. This Licensing Authority will also expect, as per Gambling Commission guidance, that applicants demonstrate a full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs; that the applicant (or company directors if the applicant is a limited company) has no relevant convictions and that staff are trained to have a full understanding of the maximum stakes and prizes.

3.18 Applicants will also be asked to supply a plan of the internal layout of the family entertainment centre, drawn to an appropriate scale, that shows the location of the area(s) where category D gaming machine will be made available for use.

3.19 It is noted that a Licensing Authority cannot attach conditions to this type of permit.

3.20 A licensed family entertainment centre is entitled to make both category C and D machines available. A full premises licence will be required from the Licensing Authority and an operating licence from the Gambling Commission.

Prize Gaming Permits

3.21. In any application for a prize gaming permit the applicant should set out the types of gaming that he or she is intending to offer, and should also be able to demonstrate:

- that they understand the limits on stakes and prizes that are set out in Regulations;
- that the gaming offered is within the law; and
- that appropriate measures will be taken to ensure that children are protected from being harmed or exploited by gambling – in particular, the measures that will be taken to ensure that children cannot participate in the gambling offered.

3.22 In making its decision on an application for this permit the Licensing Authority does not need to have regard to the licensing objectives but must have regard to any Gambling Commission guidance.

3.23 There are conditions in the Gambling Act 2005 with which the permit holder must comply, but the Licensing Authority cannot attach further conditions. The conditions in the Act are:

- the limits on participation fees, as set out in regulations, must be complied with;
- all chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played;
- the prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
- participation in the gaming must not entitle the player to take part in any other gambling.

Temporary Use Notices

3.24 Temporary Use Notices allow a gambling operator the use of a premises for gambling where there is no premises licence but where a gambling operator wishes to use the premises temporarily for providing facilities for gambling. Premises that might be suitable for gambling would include hotels, conference centres and sporting venues.

3.25 The Licensing Authority can only accept a Temporary Use Notice from a person or company holding a relevant non-remote operating licence.

3.26 The types of gambling activities that may be authorised by a Temporary Use Notice are set out by the Secretary of State in regulations made under the Act. Currently, the only permitted activity is the provision of facilities for equal chance gaming, where the gaming is intended to produce a single overall winner. Possible examples of this could include

gaming tournaments with such games as backgammon, mah-jong, rummy, dominoes, cribbage, bingo and poker.

- 3.27 Temporary Use Notices are subject to a statutory limit that a set of premises may be used for no more than 21 days in any 12 month period. As with "premises", the definition of "a set of premises" will be a question of fact in the particular circumstances of each notice that is given. In considering whether a place falls within the definition of "a set of premises", the Licensing Authority will look at, amongst other things, the ownership/occupation and control of the premises.
- 3.28 This Licensing Authority expects to object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises, as recommended in the Gambling Commission's Guidance to Licensing Authorities.

Occasional Use Notices

- 3.29 Occasional Use Notices may be used to authorise infrequent betting at track premises, on no more than 8 days in any calendar year. They cannot be used to authorise any other form of gambling activity (e.g. gaming machines). Providing that the 8-day limit is not breached, there is no provision for correctly-served notices to be refused by a Licensing Authority.
- 3.30 The Licensing Authority notes that the definition of track premises is not restricted to permanent premises, but can include any premises or land on which a race or sporting event is to take place. Consideration will therefore be given to the nature of the premises specified in a notice, in addition to whether the person giving the notice is an occupier of the track, or is responsible for the administration of events at the track.
- 3.31 It is further noted that Occasional Use Notices do not relieve any person accepting bets at the track premises from the requirement to hold an appropriate Betting operating licence, nor from the requirements of any conditions imposed upon that licence.

Travelling Fairs

- 3.32 The Act defines a travelling fair as 'wholly or principally' providing amusements and they must be on a site that has been used for fairs for no more than 27 days per calendar year. Travelling fairs do not require a permit to provide gaming machines but must comply with legal requirements about the way the machines are operated. The Licensing Authority will also consider whether the applicant falls within the statutory definition of a travelling fair.
- 3.33 It is noted that the 27-day statutory maximum for the land being used as a fair, is per calendar year, and that it applies to the piece of land on which the fairs are held, regardless of whether it is the same or different travelling fairs occupying the land. This Licensing Authority will work with its neighbouring authorities to ensure that land that crosses our boundaries is monitored so that the statutory limits are not exceeded.
- 3.34 It will fall to this Licensing Authority to decide whether, at travelling fairs where category D machines are to be made available for use and / or equal chance prize gaming without a permit is offered, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.

Part 4 – Lotteries

- 4.1 The Gambling Act 2005 regulates all forms of fund-raising lotteries promoted in the UK. With the exception of the National Lottery, which is not regulated under this Act, it is illegal to promote a lottery for private or commercial gain.
- 4.2 While the term 'lottery' is used within the legislation, these provisions are also likely to apply to raffles, prize draws, tombola's, sweepstakes, scratch-card sales, and so on, any arrangement in which a ticket is sold for a random chance of winning a prize. For the sake of simplicity, 'lottery' is used to define all of these.
- 4.3 Broadly speaking, there are two categories of lottery established under the Act –
- **Licensed lotteries** include those run by societies that aim to raise more than £20,000 in a single draw, or £250,000 in a calendar year, as well as any lotteries promoted by a Local Authority. An operating licence must be held by the promoter(s) of these lotteries.
 - **Exempt lotteries** fall into one of four sub-categories, each with its own limits on the amounts that can be raised, the purposes for which it can be promoted, and the manner in which it must be run. These sub-categories comprise Incidental Non-Commercial Lotteries, Customer Lotteries, Private Lotteries, and Small Society Lotteries.
 - The administration and enforcement of licensed lotteries is carried out solely by the Gambling Commission, although local authorities may provide information and intelligence to assist in these processes. Of the four sub-categories of exempt lotteries, only Small Society Lotteries require registration with a Local Authority – no authorisation is required for the other three categories. Both the Commission and local authorities may carry out enforcement checks to ensure that any exempt lotteries are carried on in accordance with the relevant legal restrictions.
- 4.4 Should a society registered with a Licensing Authority for the promotion of small society lotteries promote a lottery which causes either on the statutory limits on proceeds to be exceeded, then any subsequent lotteries promoted by that society in the current calendar year or any of the following three calendar years will be deemed to be large society lotteries, and will require the society to obtain a relevant operating licence from the Gambling Commission. The registration with the Licensing Authority will remain in force, but will not serve to authorise any lottery schemes during this period – it is open to the society as to whether to cancel the registration.

Free Prize Draws & Skill Competitions

- 4.5 The Gambling Act 2005 does not include any measures to regulate prize draws where there is no charge to enter, nor any competition where the outcome relies significantly upon a participant's skill, judgement or knowledge. Generally, the Licensing Authority will be unable to become involved in any matters relating to these schemes.
- 4.6 However, on some occasions, schemes that are presented as skill competitions will actually fall under the definition of lotteries, or prize (chance) gaming, and would therefore need to comply with the statutory requirements. Alongside the Gambling Commission, licensing authorities are obliged to monitor the boundaries between lotteries and skill competitions, and will provide advice and assistance to ensure that any competitions are run in compliance with the relevant laws. This Licensing Authority

notes the criteria set out in section 14 of the Act relating to the characteristics of a skill competition, and, when called upon to assess a particular scheme, will seek to ensure that the competition includes a suitable challenge of skill, judgement or knowledge that will:

- prevent a significant proportion of people who wish to participate from doing so; or
- prevent a significant proportion of people who participate from receiving a prize.

5. Legislation, Policies and Strategies

In undertaking its licensing function under the Gambling Act 2005, the Council is also bound by other legislation, including: -

1. Section 17 of the Crime and Disorder Act 1988;
2. Human Rights Act 1998;
3. Health and Safety at Work Act 1974;
4. Environmental Protection Act 1990;
5. The Anti-Social Behaviour Act 2014;
6. The Equality Act 2010

However, the policy is not intended to duplicate existing legislation and regulation regimes that already place obligations on employers and operators.

5.1 National Strategies

The Council will also seek to discharge its responsibilities identified by other Government Strategies, in so far as they impact on the objectives of the licensing function.

5.2 Local Strategies and Policies

Where appropriate, the Council will consider applications with reference to other adopted local strategies and policies, including the following: -

1. Working Together with Communities
2. The Haringey Safer Communities Strategy
3. Enforcement Policies.

5.3 Integrating Strategies

There are many stakeholders involved in the Leisure industry and many are involved in the promotion of the licensing objectives. A number of stakeholders' plans and strategies deal with matters related to the licensing function. Where this is the case, the Council will aim, as far as possible, to co-ordinate them.

The Council considers that where appropriate and in so far as is consistent with the Gambling Act, Guidance and Codes of Practice issued under sections 24 and 25 of the Gambling Act 2005, it is desirable that this Policy complements other relevant plans and strategies aimed at the management of town centres and the night-time economy.

5.4 Relevant plans and strategies include: -

Crime and Disorder Strategy – The Council will fulfil its duty under section 17 of the Crime and Disorder Act 1998 to do all it reasonably can to prevent crime and disorder in

the Borough. As far as possible, licensing decisions will aim to contribute to the targets set in the Crime and Disorder Strategy and conditions attached to licences and certificates will reflect local crime prevention strategies.

5.5 Community Safety Strategy

The Community Safety Strategy is committed to tackling the key areas of crime and building prevention initiatives into neighbourhoods. The licensing authority will support the work of the Community Safety Strategy within the scope of the licensing objectives under the Act.

- Haringey Council – A Community Plan – As far as possible, any licensing decisions will be in line with the aspirations of this community plan.
- Local Transport Plan – the Council aims to work with the local transport authority and will consider ways in which the public can be dispersed from licensed premises and events so as to avoid disturbance, crime and disorder. The Police will be encouraged to report on matters related to the swift and safe dispersal of people from licensed premises.
- Racial Equality – The Council is required under the Equality Act 2010 to have due regard to the need to;
 - Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - Foster good relations between people who share a protected characteristic and those who do not.
 - ‘Protected characteristics’ are defined by the Act as: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation
- Domestic Violence Strategy – The Council will ensure consultation to ensure that any correlation between gambling and domestic violence can be detected at the earliest opportunity.
- Children and Young Persons Strategy – The Council will have regard to the impact on this strategy and the criteria for safeguarding children from becoming addicted.
- Anti-Poverty Strategy – As far as possible, any licensing decisions will have regard to this strategy. It will support the work of the Anti-Poverty Strategy as they are developed within the scope of the licensing objectives under the Act.
- Proper integration will be assured by the Licensing Authority’s Licensing Committee providing reports, when appropriate, to its Planning Committee on the situation regarding licensed premises in the area, including the general impact of gambling related crime and disorder, to enable the Planning Committee to have regard to such matters when taking its decisions.
- The Council will ensure that the Licensing Committee receives reports, when appropriate, on the needs of the local tourist economy to ensure that these are reflected in their considerations.

- Economic Strategies – The Council will ensure that the Licensing Committee is appraised of the employment situation in the area and the need for new investment and employment where appropriate.
- Enforcement Policy – All licensing enforcement will be conducted in accordance with the Enforcement Concordat, and the Haringey Enforcement Policy.

These links to other corporate strategies will be formulated in detail as a result of the consultation process.

6 Decision Making

Committee Terms of Reference

Licensing Sub-Committee of Councillors will sit to hear applications where representations have been received from interested parties and responsible authorities. Ward Councillors will not sit on a Sub-Committee involving an application within their ward.

6.1 The Licensing Committee

The Licensing Committee will also sit to determine general licensing matters that have been delegated to it by the full Council that are not associated with the Gambling Act 2005. Where a Councillor who is a member of the Licensing Committee is making or has made representations regarding a licence on behalf of an interested party, in the interests of good governance they will disqualify themselves from any involvement in the decision making process affecting the licence in question.

6.2 The Licensing Sub-Committee will also refer to the Licensing Committee any matter it is unable to deal with because of the number of its members who are unable to take part in the consideration or discussion of any matter or vote on any question with respect to it.

6.3 Every determination of a licensing decision by the Licensing Committee or a Licensing Sub-Committee shall be accompanied by clear, cogent reasons for the decision. The decision and the reasons for that decision will be sent to the applicant and those who have made relevant representations as soon as practicable. A summary of the decision shall also be posted on the Council's website as soon as possible after the decision has been confirmed, where it will form part of the statutory licensing register required to be kept by the Council.

6.4 The Council's Licensing Officers will deal with all other licensing applications where either no representations have been received, or where representations are irrelevant, frivolous or vexatious will be made by Council Officers, who will make the decisions on whether representations or applications for licence reviews should be referred to the Licensing Committee or Sub-Committee. Where representations are rejected, the person making that representation will be given written reasons as to why that is the case. There is no right of appeal against a determination that representations are not admissible.

6.5 Allocation of Decision Making Responsibilities

The Council will be involved in a wide range of licensing decisions and functions and has established a Licensing Committee to administer them. Appreciating the need to provide a speedy, efficient and cost-effective service to all parties involved in the licensing

process, the Committee has delegated certain decisions functions and has established a Sub-Committee to deal with them. Many of the decisions and functions will be purely administrative in nature and the grant of non-contentious applications, including for example those licences and permits where no representations have been made, will be delegated to Council Officers. This form of delegation is without prejudice to Officers referring an application to a Sub-Committee or Full Committee if considered appropriate in the circumstances of any particular case.

6.6 Delegation of Functions

6.7 The table shown below sets out the agreed delegation of decisions and functions to Licensing Committee, Sub-Committee and Officers in accordance with the Act. This form of delegation is without prejudice to Officers referring an application to a Sub-Committee or Full Committee if considered appropriate in the circumstances of any particular case.

Matter to be dealt with	Council	Licensing (Sub-) Committee	Officers
Final approval of Statement of Principles		✓	
Resolution not to issue casino licences		✓	
Fee setting (where appropriate)		✓	
Application for a provisional statement	Where representations have been received and not withdrawn		Where representations were not received or have all been withdrawn
Application for a premises licence	Where representations have been received and not withdrawn		Where representations were not received or have all been withdrawn
Application for variation of a premises licence	Where representations have been received and not withdrawn		Where representations were not received or have all been withdrawn
Application for transfer of a premises licence	Where representations have been received from the relevant responsible authorities		Where representations were not received or have all been withdrawn
Application for reinstatement of a premises licence	Where representations have been received from the relevant responsible authorities		Where representations were not received or have all been withdrawn
Consideration of application for review of a premises licence		✓	
Initiation of review of a premises licence by Licensing Authority		✓	
Application for club gaming / club machine permits	Where objections have been made and not withdrawn		Where objections were not made or have all been withdrawn
Cancellation of club gaming / club machine permits		✓	
Applications for other permits		✓	
Cancellation of licensed premises gaming machine permits		✓	
Consideration of temporary use notice	Where objections have been made and not withdrawn		Where objections were not made or have all been withdrawn
Acknowledgement of occasional use notice		✓	
Registration of non-commercial societies for small society lotteries		✓	
Revocation or cancellation of small society lottery registrations		✓	



**GAMBLING ACT 2005
GAMBLING LOCAL AREA PROFILE
JANUARY 2022**

Introduction

1. This profile is published by Haringey Council as part of its role under the Gambling Act 2005 to assist holders of premises licences produce their local risk assessments required under the Gambling Commission's Social Responsibility Code provisions of the its Licence Conditions and Codes of Practise.
2. Risk assessments are to help operators further the statutory licensing objectives of:
 - preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
 - ensuring that gambling is conducted in a fair and open way, and
 - protecting children and other vulnerable persons from being harmed or exploited by gambling
3. Our definition of vulnerable persons mirrors that of the Commission in that they are:
 - people who gamble more than they want to
 - people who gamble beyond their means; and/or
 - people who may not be able to make informed or balanced decisions about gambling, for example because of mental health problems, learning disabilities, or substance misuse relating to alcohol or drugs.
4. However, for some, gambling can be problematic, affecting their ability to live and work. People with gambling problems often experience a range of negative effects, including health issues, relationship breakdown, and difficulties with debt. In more severe cases gambling problems can lead to crime, thoughts of suicide or suicide itself.
 - **Financial harms:** overdue utility bills; borrowing from family friends and loan sharks; debts; pawning or selling possessions; eviction or repossession; defaults; committing illegal acts like fraud, theft, embezzlement to finance gambling; bankruptcy; etc...
 - **Family harms:** preoccupied with gambling so normal family life becomes difficult; increased arguments over money and debts; emotional and physical abuse, neglect and violence towards spouse/partner and/or children; relationship problems and separation/divorce.
 - **Health harms:** low self-esteem; stress related disorders; anxious, worried or mood swings; poor sleep and appetite; substance misuse; depression, suicidal ideas and attempts; etc...
 - **School/college/work harms:** poor school, college or work performance; increased absenteeism; expulsion or dismissal¹
5. Data from Fingertips shows that an estimated 54% of Londoners aged 16+ have gambled, including the lottery², in the last year in 2012, and 35% have gambled in

¹ Royal College of Psychiatrists: <https://www.rcpsych.ac.uk/mental-health/problems-disorders/problem-gambling>

² <https://fingertips.phe.org.uk/search/gambling#page/1/gid/1/pat/15/ati/6/are/E12000007/iid/92418/age/164/sex/4/cid/4/tbm/1>

some form other than the lottery. If these figures hold true, around 82,000 Haringey residents would have gambled in the past year, excluding playing the lottery.

6. Gambling characteristics - Problem gambling disproportionately affects certain groups such as ethnic minorities, young people, those in the criminal justice system and homelessness. The Adult Psychiatric Morbidity Survey (2007) found that problem gambling is most common among young men, and prevalence generally reduces with age. However, there is also a slight peak among 65–74-year-olds, of both sexes. Overall, over-gambling was found to be more frequent among men, people of white ethnic groups, and for women it is most common among those in the second-lowest level of household incomes.
7. The Gambling Commission recommend, that as part of any policy refresh, which licensing authorities are required to do every three years, that authorities also produce a Local Area Profile. This document is to highlight areas of the borough inhabited or frequented by people who might be at risk of being harmed or exploited by gambling. Betting operators have a specific responsibility to assess local risks to the licensing objectives that come about due to the provision of gambling facilities at each of their premises. Whilst it is not a requirement for licensing authorities to complete a risk assessment of the local area, it is encouraged by the Gambling Commission that such risk assessments, known as the local area profile are a significant benefit to both the licensing authority and the operators. The Commission explains that this will have a number benefits for policy making in the future, including:
 - Enabling licensing authorities to better serve their local community, by improving Haringey's understanding of the community and the local risk profile;
 - Improved clarity for operators as to the relevant factors in licensing authority decision making. This will lead to improved premises license applications, with the potential operator already incorporating controls and measures to mitigate risk in their application;
 - Enabling licensing authorities to make robust but fair decisions, based on a clear, published set of factors and risks, which are therefore less susceptible to challenge; and
 - Encouraging a proactive approach to risk that is likely to result in better compliance and reduced enforcement action.

8. The Borough of Haringey

- 8.1 Haringey is one of London's 32 Boroughs. It is located in the north of the capital and is more than 11 square miles in area. According to the 2011 Census nearly half of its 254,900 people come from ethnic minority backgrounds. It is often said that Haringey is an outer London Borough with inner London challenges.

Map of the London borough of Haringey, showing the 19 wards



- 8.2 Haringey is a vibrant place to live, with many different cultures mixing, and a fantastic variety of characterful High Streets – from the metropolitan centre at Wood Green to the boutiques and restaurants of Muswell Hill and Crouch End – creating a strong sense of local pride.
- 8.3 There are approximately 100,000 dwellings and approximately 8,200 businesses employing 64,700 people. The most recent indices of multiple deprivation (IMD) (2019) show that Haringey is one of the most deprived authorities in the country, ranking 13th out of 326 authorities, and it is ranked 4th in London, yet it is also a borough of contrasts, with great prosperity and affluence in some communities.
- 8.4 Persistent inequalities are manifest in the health and wellbeing of our residents. The life expectancy gap between the most and least deprived wards is 7 years for men and 3 years for women. The borough is facing an obesity crisis with 1 in 4 reception aged children, and 1 in 3 10/11 year olds, measured as overweight or obese. The number of people with long term conditions like diabetes and heart disease is increasing and there are approximately 4,000 adults with severe mental illnesses – three times more than would be expected, even given Haringey’s level of deprivation.
- 8.5 There are also inequalities in educational achievement, access to employment and housing quality. The borough has seen twelve consecutive years of improvement in GCSE performance and A-levels scores, making Haringey one of the top 3 most improved areas. Yet too many of our young people still leave school without the skills needed to secure sustainable employment, blocking their access to one of the world’s most dynamic economics at their doorstep.
- 8.6 The Council’s response to these challenges is to meet them head on with ambition, innovation and a commitment to work ever more closely with residents, businesses and public sector partners. Nowhere is our ambition greater than in our most deprived communities in Tottenham. We are determined that regeneration will be shaped by the views of residents.

9. The Haringey Approach

- 9.1 The purpose of the Haringey Local Area Profile is to identify the areas' most vulnerable to gambling related harm. Therefore, the question that this profile attempts to better understand is – who is vulnerable to, or at risk of, gambling-related harm and where are such vulnerabilities likely to manifest in Haringey?
- 9.2 Gambling related harm was defined by the Gambling Commission in their 'Measuring Gambling Related Harms – A Framework for Action' report, published in July 2018: *“Gambling-related harms are the adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society”*
- 9.3 The Gambling Commission in 2012, whilst stating that it would not explicitly define who exactly is vulnerable in relation to gambling, could identify types of people that it is likely to impact more than others. This focuses on people who gamble more than they would want to, some examples include:
- Young people and students
 - Those with Mental Health problems
 - Those afflicted with substance use/misuse issues
 - Those with learning disabilities / difficulties
 - Homeless people
 - Those living in constrained /difficult economic circumstances
 - Those living in deprived areas
 - Those with personality / cognitive impairments
- 9.4 In accordance with the Gambling Commissions recent gambling harms framework and previous publications, the types of harms that have been considered as part of this local area profile are as follows:
- Gambling associated crime (acquisitive and those at a gambling premises)
 - Relationship breakdown/problems (reported domestic incidents)
 - Unemployment, financial stress and income deprivation
 - Health issues
 - Homelessness
 - Children being exposed to gambling (accidental or otherwise)
- 9.5 Haringey has modelled where such risks might be more acute in certain areas in comparison to others. This has included an assessment of the key characteristics of the borough to identify areas of higher risk of vulnerability to gambling-related harm. The approach is based on the possible risk to gambling-related harm and does not mean that just because an area is seen as being at higher risk, that all people in that area will suffer harm or be at risk of suffering harm.
- 9.6 Haringey will take specific note of whether an application relates to a premise that is:
- Close to an educational establishment, including colleges and universities;
 - Close to a centre dealing with addictions;
 - Close to general practitioners and supported housing that focuses on mental health;
 - Situated in an area of high, gambling associated crime;
 - Situated in an area of deprivation;

- Close to locations that are regularly visited by those who are unemployed such as job centres and food banks; or
- Close to the location of businesses providing instant access to cash such as payday loans, pawn shops

9.7 We would expect applicants for a new license to submit the completed assessment with their application. It must identify the risks and state what control mechanisms are to be employed at the premises to ensure that the licensing objectives are being met having regard to the local area profiles produced by this Authority. The assessment must consider at a minimum:

- **The local area**, including but not restricted to the types of premises and operation in the area surrounding the gambling premises; educational facilities; centres for vulnerable people; high crime area; high unemployment area; pawn broker/pay day loan businesses in the vicinity; other gambling premises in the vicinity
- **The gambling operation**, including but not restricted to what gambling products it provides in the premises; the staffing levels within the premises; the level and requirement for staff training; whether loyalty or account cards are used or not; the security and crime preventions arrangements it has in place; how it advertises locally and on the premises; the marketing material within the premises; the display and provision of information
- **The design and layout of the premises**, including but not restricted to whether the staff have obstructed views of gaming machines or entrances; whether the design is such that children can see gambling taking place;
- **The control mechanisms** to be put in place to mitigate the risks, for example; the use of CCTV cameras, the provision of magnetic door locks, employment of door supervisors, employing a challenge 25 scheme, increased number of trained staff.

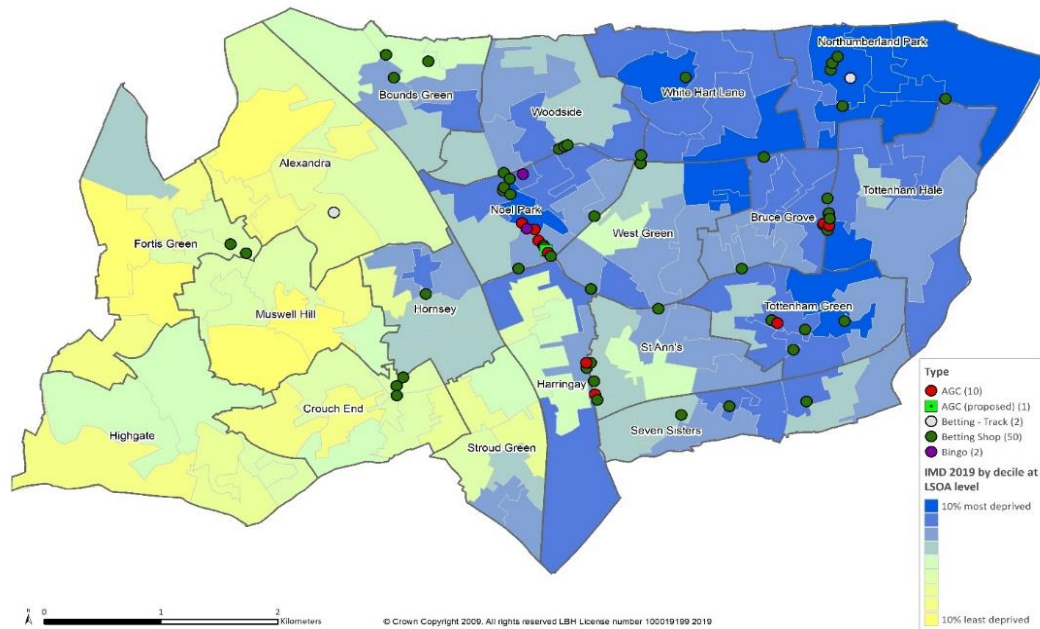
9.8 Problem gambling is defined as “to a degree that compromises, disrupts or damages family, personal or recreational pursuits” and there are many types of gambling activity which can become ‘problem gambling’. The most common gambling activities that become problematic are; spread betting, betting with a betting exchange, playing poker in pubs or clubs, betting offline on events other than sports or horse or dog racing, and playing machines in bookmakers.

9.9 This evidence was produced using research conducted by Natcen Social Research (Gambling Behaviours in Great Britain 2015) and Geofutures in 2016 (now Gambleaware). The latter defined higher concentrations to be locations where three or more betting shops are located within 400 meters of one another.

10. The Haringey Picture

10.1 In Haringey, we currently have 50 betting shops, 10 Adult Gaming Centres, 2 Bingo premises and 2 track betting premises. Gambling is a pressing health inequalities issue. More deprived wards have higher number of betting shops, adult

gaming centres and bingo and this is linked to deprivation levels. The map below (Map 2) shows the areas of deprivation indices across the borough:



10.2 Deprivation in Haringey

10.3 Haringey is the 4th most deprived borough in London, with deprivation more concentrated in the north east. Relative deprivation has reduced since 2015, though Haringey's London ranking has not shifted significantly

10.4 Haringey is ranked 49 out of the 317 local authorities in England with respect to deprivation, and is the 4th most deprived in London as measured by the IMD score 2019 (where 1 = most deprived). The Index takes into account a range of deprivation types, including income, employment, education, health, crime, barriers to housing and services and living environment. The risk factors associated with gambling-related harm in individuals such as a Ward with high deprivation indices, increased number of residents on Universal Credit, high numbers of people who are rough sleeping, high percentage of residents from minority ethnic background, families from very low median household income, high unemployment rates, high level of long-term health condition and disability (which may include mental health issues).

10.5 There is strong research which gives a clearer picture of those who are likely to be more vulnerable to gambling harm. Amongst the groups where the evidence base for vulnerability is strongest include those with a history of mental ill-health, substance abuse or gambling addiction; people with learning disabilities/difficulties; immigrants; homeless people; the unemployed or those on low income. This could include area-based vulnerability, such as demographics and areas of deprivation (London Council A 'whole council' approach to gambling, 2018)³.

10.6 The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough, where more than half of the LSOAs fall into the 20% most deprived in the country. By comparison, in the west a very small proportion of LSOAs fall into that category, and in the westernmost wards – Highgate, Fortis Green, Muswell Hill, Alexandra and Crouch End –there are none. Although Haringey’s overall IMD score has improved since 2015 (where it was ranked 30th in England), improvements have been seen across London meaning that Haringey still ranks among the most deprived boroughs in the capital (ranked 6th in London in 2015)

10.7 Vulnerable areas at risk from gambling harm:

The map above illustrates the wards with the highest betting facilities and the areas of deprivation in the East of the borough. Crime data relating to betting shops within Haringey that will require additional consideration from operators wishing to operate in these areas:

- Noel Park Ward
- Woodside Ward
- Bruce Grove Ward
- Tottenham Hale Ward
- West Green Ward
- Tottenham Green Ward
- Northumberland Park ward
- White Hart Lane.
- Harringay ward

These areas have been chosen due to:

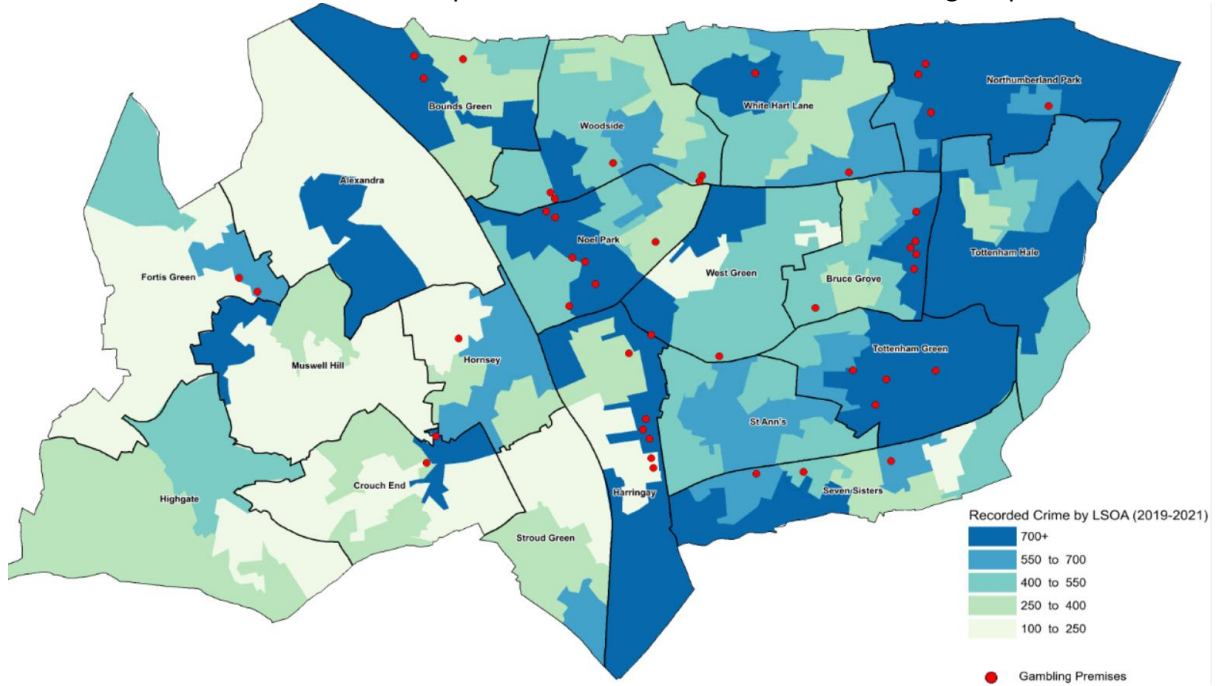
- Higher levels of crime
- Drug dealing and misuse
- Gang activity in the area
- Issues with street drinking and anti-social behaviour
- Issues with street begging
- Homelessness
- Mental health support accommodation

10.7 Based on these risks, gambling vulnerability and harm can be seen to be at risk in these particular areas. The purpose of highlighting these areas to current and future premises operators makes clear where gambling vulnerability is most acute.

10.8 The following maps demonstrate the levels of crime taking place across the borough and again the east of the borough is most affected. There is a further summary map below that shows areas within Haringey identified as being at risk from gambling harm.

10.9 The map below has used the LSOA crime stats, which have been overlaid with the betting shop locations.

Map 3 LSOAs crime stats in relation to betting shops



10.10 The table (Table 1) below shows crime levels in LSOAs which contain betting shops compared to those with no betting shops. The LSOAs with betting shops in them have experienced significantly more crime between 2019 and 2021 than those without.

Average Count of Total Recorded Crime per LSOA (2019-2021)	
LSOAs with no gambling premises	344
LSOAs with one or more gambling premises	572
LSOAs with three or more gambling premises	989

10.11 Table 2. Gambling premises (betting shops, adult gaming centres, bingo only) per 10,000 population in Haringey.

Ward	Ward Population	Number of Betting shops, Adult Gaming centres and Bingo	Premises per 10,000
Alexandra	11,758	1	0.9
Bounds Green	14,998	3	2
Bruce Grove	14,820	5	3.3
Crouch End	12,315	2	1.6
Fortis Green	6,341	2	3.1
Harringay	14,243	3	2.1
Highgate	10,713	0	0
Hornsey	13,003	2	1.5
Muswell Hill	10,636	0	0
Noel Park	12,787	14	10.9
Northumberland Park	9,224	6	6.5
Seven Sisters	17,744	3	1.6
St. Ann's	14,434	5	3.5
Stroud Green	11,568	0	0
Tottenham Green	16,516	4	2.4
Tottenham Hale	10,250	5	4.9
West Green	9,652	3	3.1
White Hart Lane	7,882	1	1.3
Woodside	10,724	5	4.7
	229,608	64	2.8

10.12 An analysis of the number of gambling premises in Haringey illustrates there are 2.8 betting shops, adult gaming centres and bingo per 10,000 of the population (Table 2) which is almost double than the national average of 1.6 per 10,000³

10.13 Gambling has the potential to cause harm to both individuals and to wider society (i.e., unemployment, debt, crime, relationship problems, physical and mental health conditions). This presents a challenge as it is linked to a range of services such as licensing, community safety, children and families and housing/homelessness and therefore it is an issue that cannot be tackled by interventions aimed solely at individuals.

^{3 3} According to the gambling commission there were 10,590 betting shops and bingo halls in the UK in March 2018, and according to population estimates by ONS the UK population in 2017 was 66.05 million; this gives a betting shop/bingo hall per 10,000 people of 1.6 ⁽¹⁵⁾

10.14 It is also estimated that up to seven other people are impacted for every problem gambler. Problem gambling in the UK is now endemic and it should be treated as a public health crisis – reducing gambling related harm is linked to our priorities set in the **Borough Plan** for people and place.

11 Risk factors in Haringey - Data

11.1 Although gambling is a legal entertainment activity it can, in some locations have a negative impact on individuals and the wider community. The Council has tried to understand how gambling can affect its residents and visitors.

11.2 All areas shown within the local area profile as being at high overall risk of Gambling related harm, are generally considered inappropriate for further gambling establishments, which could potentially raise the risk of gambling related harm to vulnerable people living in those areas. Operators are asked to consider very carefully whether seeking to locate new premises or relocating existing premises within these areas would be consistent with the licensing objectives and the local risks identified.

11.3 In order to protect its community's wellbeing and family life, the borough will require significant risk assessments and control methods to be available with any application for a premises licence. The east of the borough has particular heightened risk around anti social behaviour and deprivation, risk assessments for betting premises in these areas will need to show specific measures to deal with these issues that will not exacerbate existing problems. This does not mean that an assessment does not need to be made for the rest of the Borough only that assessments need to be relevant to the risks.

11.4 Haringey will take a robust and proportionate approach to licensing issues. Premises which will impact on the economy of this borough and its community will be expected to build into operational plans, sufficient measures to minimise the impact of the premise's operation on the residential, and other economic based activities. The local area profiles will enable us to better manage the expectations of the betting operator.

12 HEALTH

12.1 Mental Health

12.2 Haringey has one of the highest levels of mental health illnesses in London. Such factors increase the risk to mental health, such as deprivation, unemployment and homelessness, all of which are more concentrated in the east of the borough. 29 per 1,000 living in Haringey are on Employment and Support Allowance (ESA) claimants for mental and behavioural disorders. This is higher than the London (22.5 per 1,000) and England (27.3 per 1,000) averages (PHE, 2019).

12.3 The estimated prevalence of common mental disorders in Haringey for ages 16 and over is 22.3%, which is higher than London (19.3%) and England (16.9%)(PHE, 2017). The proportion of residents living alone (24%) locally is greater than in London and England (22% and 18% respectively). Five in every 1,000 residents in Haringey are homeless, a rate which is higher than the London average (Source: DCLG).

Joblessness is higher in the east and 48% of people claiming allowance have mental health behavioral disorders. Increases in unemployment, debt, overcrowding and homelessness (driven by changes to the temporary accommodation subsidy system, combined with high rents) can potentially further increase the level of mental health problems in Haringey.

12.4 People with mental health conditions experience more physical ill health and earlier mortality than the rest of the population. Mental ill health, and the stigma and discrimination associated with it, can have negative impacts on every aspect of life, including social inclusion, employment and education, with economic hardship and physical ill-health leading to a significant risk of earlier death. Good mental health is also characterized by wellbeing, self-esteem and social inclusion.

12.5 There were 22,752 adults diagnosed with depression, anxiety or both registered with Haringey GP practices in 2018.

- Sixty-one per cent of people aged 18 and over diagnosed with depression and/or anxiety were women in 2013.
- 4,103 adults with a serious mental illness were registered with a Haringey GP practice in 2018.
- 64 suicide deaths were reported in Haringey between 2015-2017

12.6 In Haringey, 3% of people of Black or Black British ethnicity have a diagnosis of serious mental illness, higher than other ethnic groups.

- In Haringey, BME groups and LGBT people are more likely to be diagnosed with a psychotic disorder.
- In Haringey, people living in deprived areas are more likely to be affected by depression.

12.7 Over the past few years there has been a growing recognition of the need to make dramatic improvements to mental health services for CYP. 50% of mental health problems are established by age 14 and 75% by age 24. A child with good mental health is much more likely to have good mental health as an adult, to be able to take on adult responsibilities and fulfil their potential. It is anticipated that the levels of mental ill-health will increase over the coming years as the current economic climate of long term austerity causes more financial hardship and unemployment and fears of destitution. Unfortunately, no models exist which can account for these changes. However, assuming no change in underlying prevalence of mental health conditions, then we estimate that due to population structure changes alone:

- Approximately 300 additional cases of **serious mental illnesses**, rising to around 4,400 diagnosed cases overall.
- The number of adults with **depression and/or anxiety** will increase from 22,752 in 2018 to 30,900 by 2028. A part of this increase will come from the 5,500 16-24 year olds who are currently estimated to have depression or anxiety.

12.8 Access to gambling venues increases gambling activity and problem gambling. Problem and pathological gambling is linked to poor health, low level and severe mental health problems and a co-dependence on alcohol.

13 People Rough Sleeping

13.1 Haringey has also seen an increase in the number of people who are rough sleeping with a range of overlapping and multiple disadvantages, such as addiction, poor physical and mental health, contact with institutions as children or adults and offending

histories and experiences of trauma. In 2020, 280 Streetlink referrals (alerts raised by members of the public) were made about people sleeping rough in the east of the borough and it was a key area of activity for the outreach team.

Gambling problems are more prevalent in the population facing homelessness than the general population, 11.4% of the homeless population is found to have problem gambling. 61.5% of participants with some level of gambling risk had problems before homelessness, 15.4% reported experiencing problems after homelessness

Another research reinforces the assertion that problem gambling is a significant issue within the homeless population and is more commonly a cause than a consequence of homelessness (Sharman, Dreyer & Clark 2012).

13.2 Substance Abuse

13.3 There is frequently a link with alcohol or drugs as a way of coping with anxiety or depression caused by gambling problems (Griffiths, Parke & Wood, 2002). Availability of opportunities to gamble and the incidence of problem gambling within a community are known to be linked. As a result, the proposal use of the premise will attract a high level of residents who are highly dependent on alcohol and drugs. The vulnerable wards are key locations known to have an open drug market for a number of years. The hotspots for arrests for drug offences in Haringey are High Road Tottenham, West Green Road, Wood Green High Road, extending from Green Lanes / Bowes Road, southwards to Turnpike Lane.

14 ECONOMIC FACTORS

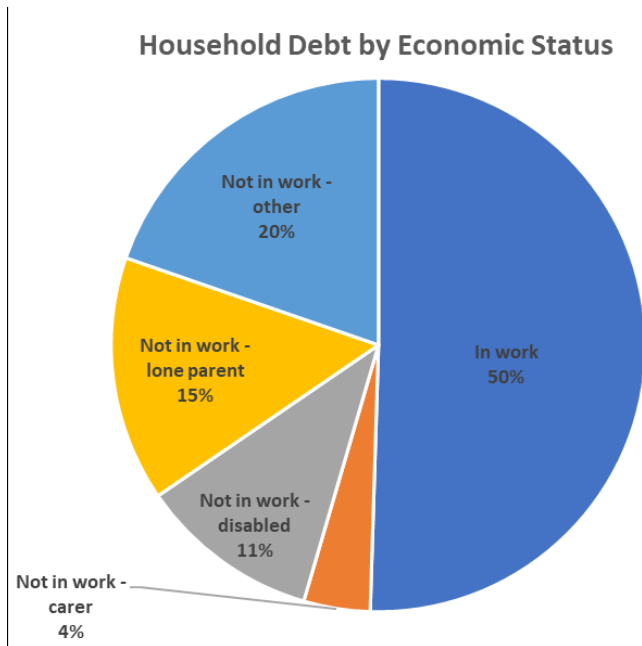
14.1 Haringey also currently has an estimated 5,000 5-16 year olds with an emotional or behavioural disorder. This indicates that hundreds of children will be transitioning to adult services in the coming years. It is estimated that there will be 378 new cases of **dementia** by 2028, as the population aged 65+ increases by 30%.

14.2 Haringey has a large independent supported housing provision for people with mental health issues. This provision is used by local authorities around London which places extensive pressures on Haringey services. Most of these services are placed in east of the borough.

14.3 Unemployment or Low Income Groups

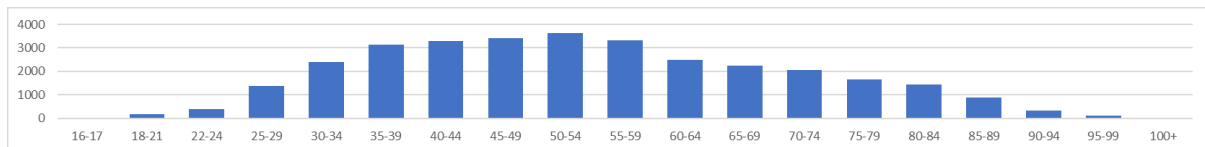
14.4 Increase gambling outlets densely populated in these wards may cause gambling addiction which is likely to fuel lack of money for families in these wards. The rate of claimants in Haringey is almost 25% higher than the London rate. During COVID, Haringey experienced the largest increase in unemployment claimant for benefits among the 11 Central London Boroughs and has now become the 6th highest in the UK. Of those who were in work in February 6% (660 households) had lost their job by May 2019. Tottenham Hale and Noel Park were particularly badly hit relative to the working age population of those Wards. This has become during worse during COVID.

- a. The Low Income Families Tracker (LIFT) draws information from a variety of datasets to enable LBH to examine poverty trends across Haringey's low income households and identify families in danger of crisis.



b. Approximately one third of Haringey households are in receipt of Housing Benefit; collectively these residents have accrued £6,300,000 of debt through rent and council tax arrears as of May 2020. 50% of the debt is owed by families where at least one person is in work, with a further 30% owed by either a lone parent, a carer or a disabled person.

Housing benefit age of claimants



- c. Analysis shows that 19.5% of the Haringey residents who claim housing benefit have
- d. outgoings greater than the amount of money that comes to them each month. When added up this shortfall comes to approximately £2 million per month.

Licensing Guidance

1. Haringey considers that local risk assessments are a key component of the overall assessment and management of the local risks. Each locality has its own challenges and applicants will be expected to address those local challenges in the undertaking of their own independent gambling risk assessments, and when submitting an application to the Local Authority.
2. Gambling operators will be required to undertake a risk assessment for all of their existing premises. Operators must also undertake a review of those assessments when certain triggers are met. These are:
 - New premises applications;
 - Significant changes in local circumstances; and
 - Variations of the premises license
3. If a gambling premises operator does not put forward measures to overcome the local risks, or the mitigate such risks, the council will consider what measures are needed. The Authority expects that each premises will have a copy of its own independent local area risk assessment onsite for authorised officers to view on request.
4. The risk based approach provides a better understanding of, and enables a proportionate response, to risk. Risk is related to the probability of an event happening and the likely impact of that event. In this case it is the risk of the impact on the licensing objectives. This guide will assist gambling operators in undertaking and preparing their local (premises) risk assessments.
5. The policy is reflective of local issues, local data, local risk and the expectations a licensing authority has of operators who either currently offer gambling facilities or wish to do so in the future.
6. The existence of a clear and robust statement of policy provides greater scope for Licensing authorities to work in partnership with operators, other local businesses, communities, and responsible authorities to identify and to proactively mitigate local risks to the licensing objectives.
7. This local risk assessment process, although similar requires a much broader range of considerations when identifying local risk. Operators must consider the local area in which the premises are situated, the gambling operation and the premises both internally and externally.
8. The final control measures relate to specific physical measure that will address an identified risk factor. These physical control measures may, for example, include alarms, CCTV cameras, doors, magnetic locks, time locks on safes, window shutters, UV lights in toilets.
9. The control measures identified to mitigate a perceived risk may involve a combination of systems, design and physical measures. For example to address the risk factors relating to children gaining access to an over 18 restricted gambling premises, the operator may identify the following control measures:
 - Systems: PASS card or age verification policies, challenge 25 scheme, staff training and door staff.
 - Design: Exterior design which will not attract children into the premises, the entrance layout will enable staff and security to watch those entering the premises and challenge them on the grounds of age.

- Physical: Magnetic door locks and ID scans.
10. If an application for a new licence or variation is submitted that is within 400 metres of premises/location where children, young persons and vulnerable persons are operators are encouraged to provide details of the measures to be implemented that would overcome the potential risks in the identified areas.
 11. If the operator does not put forward measures to overcome the risks, or the Council considers that the operator's proposed measures do not adequately mitigate the risk, the Council will consider what measures are needed which can include additional conditions or even refusal of the application if appropriate. The Authority expects that each shop will have a copy of its local area risk assessment onsite for authorised officers to view on request.

Appendix 6

This page is intentionally left blank

I am writing as the Licensing Authority Responsible Authority in making this representation against the above named application. It is recognised that local licensing decision making is an administrative and evaluative process requiring a proportionate balancing exercise, that allows all parties to consider the specific locality alongside the details of the application.

The Licensing Authority representations are primarily concerned with the three licensing objectives;

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

As a result of the premises licence application being received by Haringey Council for an Adult Gaming Centre (AGC), the licensing authority has looked at the area of where the AGC is situated. Tottenham High Road is a very busy thoroughfare that runs between Hackney at one end to Enfield at the other end. It has its own unique mix of problems such as street drinkers, high levels of anti social behaviour, crime and disorder for many years.

This area consists of numerous social issues arising from an increased presence of street begging rough sleepers and illegal street gambling. An extension of hours to this premises will provide an additional 'harbour' late into the night for activity the Council and Police are working towards stamping out in this location. A later operation would certainly be a draw for these groups as a place of shelter, it could potentially be a magnet to these individuals already finding it difficult to maintain any kind of day to day social interaction.

It is recognised that the location of the proposed premises is an important consideration. Special consideration should be given to the close proximity of the vulnerable people in the immediate locality.

The venue is in Tottenham Hale Ward in the High Road with a similar venue opposite and nearby Betting Shops. This immediate area has been a crime generator for many years despite patrols and initiatives by the Safer Neighbourhood Team supported by specialist units and Community / Business Groups. Drug dealing is a serious concern and it is known they will loiter in the vicinity and attempt to frequent gambling venues to avoid enforcement and or inclement weather and to target potential clients despite the efforts of the venues to deter them. Drug dealing and street drinking add to the serious anti-social behaviour taking place in this immediate area.

Crime profiles for Betting Shops and similar venues show gaming machines and dealing with clients refused use of facilities generate crime which then leads to a requirement for Police attendance.

The Local Gambling Risk Assessment mentions crime statistics. It does not however include calls to Police not resulting in a crime report are not in the Assessment. Drug dealing, gangs and street drinking are not mentioned.

The concerns in this location have been the reason for a specific crime reduction strategy. The Safer Neighbourhood Teams working with local businesses and the Regeneration Team to combat the crime / anti-social behaviour concerns in this area. Extending the hours of operation will only exacerbate an already concerning situation despite the efforts of the venues owners and its staff to negate them. This concern relates to the venues location. If located away from this area concerns would potentially be lessened.

Within the Councils own Local area profile the location is deemed as being at high overall risk of gambling related harm, and generally considered inappropriate for further gambling establishments, which could potentially raise the risk of gambling related harm to vulnerable people.

Taking into account these matters the licensing authority take the view that there are insufficient conditions that could be offered to meet these concerns. Given these concerns in the locality the LSC is urged to not grant the licence to increase the operation to 24 hours

Licensing Authority

From: Barrett Daliah <Daliah.Barrett@haringey.gov.uk>

Sent: 08 June 2022 10:13

To: 'Felix Faulkner' 'Nick Arron'

Cc: Licensing <Licensing.Licensing@haringey.gov.uk>

Subject: Game Nation Vary Representation

Dear both

Please see Police representation attached.

Regards

Daliah

This page is intentionally left blank



Your reference: WK/535773

Our reference: N/A

Date: 8 June, 2022

Metropolitan Police Service

Haringey London
Licensing Authority, River Park House,
Level 1 North, 225 High Road, Wood Green,
N22 8HQ

Edmonton Police Station
462 Fore Street
London
N9 0PW

Dear Licensing,

Re: License Vary application.

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

With reference to the above licensed premises, the Police Licensing Team (Haringey) is responding with a representation against the application.

Reasons for the objection are as follows –

TOTTENHAM HIGH ROAD N17 junction with HOLCOMBE MARKET N17, attracts a wide range of Anti-Social behaviour ranging from loitering, unauthorised drinking of alcohol (street drinkers), use of/smoking drugs and distribution of drugs.

There are a variety of public order offences continuously being committed; namely, Robberies and Theft's from local shops and recently, a male was GBH'd (stabbed) in McDonalds High Road N17 alongside one of the other local betting shops (within the vicinity) that have reported customers causing criminal damage to the property. Given these incidents, when the current up and running betting shops close at night, it offers the area a chance to slow down, giving local residents, (for example the residents of RIGBY HOUSE N17 which is right above GAME NATION, N17) opportunity to have a peaceful evening.

Police licensing have liased with the local neighbourhood policing team to get an all round idea as to what the implications of this variation could mean (not just from a licensing perspective), and the response in which we have received is that, By the Game Nation store operating for 24 hours a day, 7 days a week, this would mean a greater negative impact in the community and will put strain on what is already a stretched police service.

A representation has been made as the 3 objectives of the gambling Act 2005 are at risk of not being upheld if granted:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime.
- ensuring that gambling is conducted in a fair and open way.
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

If you require further information please do not hesitate to contact me.

Yours Sincerely,



Police Licensing
North Area BCU - Edmonton Police Station

From: Cllr Gordon Ruth <Ruth.Gordon@haringey.gov.uk>
Sent: 30 May 2022 15:35
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Game Nation 450 High Road, Tottenham N17 9JN

Dear licensing team,

I can see from the members' weekly notice that Game Nation has an application to vary the hours of operation. However, I cannot find the application in order to comment on it. Can you send me a link?

**Gambling Act 2005
Game Nation (AGC)
450 High Road
Tottenham
N17 9JN**

Application to vary the hours of operation to 24hrs - the last day of consultation is **23 June 2022**.

As a quick reminder the three licensing objectives which guide the consideration of applications under the Gambling Act 2005 are:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
- ensuring that gambling is conducted in a fair and open way
- protecting children and other vulnerable persons from being harmed or exploited by gambling

Many thanks,

Ruth

**Cllr Ruth Gordon
Labour Member for Tottenham Hale Ward
Cabinet Member for house building, placemaking and development**

Mobile: [REDACTED]
Email Ruth.Gordon@haringey.gov.uk
Twitter: @HaleTottenham

From: [REDACTED] >
Sent: 30 May 2022 16:44
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Game Nation Objection

To whom it May Concern,

I understand there is an application to turn Game Nation into a 24-hour gambling centre. I write to register my opposition to these plans.

My concerns are three-fold:

- Gambling can be an incredibly damaging - members of my own family have suffered with gambling addictions. Extending opening hours would place vulnerable persons and potentially young people at risk of being harmed or exploited by gambling
- Gambling can be a source of crime and disorder in the area - extending opening hours would increase the already unacceptably high level of gambling-related crime.
- There are already far too many adult gaming centres in the area and they shouldn't be made easier to access.

Should you need my details, my name is [REDACTED] and I live at [REDACTED]
[REDACTED]

Many thanks,
[REDACTED]

From: [REDACTED] >

Sent: 30 May 2022 17:15

To: Licensing <Licensing.Licensing@haringey.gov.uk>

Subject: Re: FW: Application to Vary Gambling Premises Licence - Game Nation 450-454 High Road, Tottenham, London N17 9JD (WK/535773)

Dear Licensing team,

I am writing to express my concern at City Gaming Ltd's application to turn Game Nation into a 24 hour establishment. I strongly oppose this.

Under the Gambling Act, these two points are my main area of concern:

- **Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime.**
Local data shows that Tottenham already has high drug dealing, gangs and street drinking problems. In addition to this, over the last 2 years I have reported high levels of prostitution to the authorities - particularly along Tottenham High Road. Having a gambling centre open for 24 hours encourages vulnerable individuals to be out during anti-social hours, and I believe will contribute towards not just drug and alcohol related issues - but prostitution too. Opening day and night for 24 hours round the clock, Game Nation will exacerbate the crime and disorder in Tottenham.
- **Protecting children and other vulnerable persons from being harmed or exploited by gambling.**
Haringey Council's Local Area Profile produced in January 2019 highlights the area as being of high risk from gambling related harm. It further highlights that Haringey has high levels of severe and enduring mental illness. City Gaming acknowledges this is the case and their risk assessment attempts to address this issue through various means. Having read the risk assessment produced by City Gaming, in my opinion no points justify a change to their opening hours.

As a resident of N17, we are already experiencing enough trouble and disturbances at present and strongly disagree with any changes to opening hours.

Many thanks,
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 30 May 2022 18:46
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Game Nation license - oppose application to extend opening hours

TO

Daliah Barrett, Licensing Team Leader

And colleagues

licensing@haringey.gov.uk

Regarding the application for the variation of the adult gaming centre premises licence at Game Nation, 448-454 High Road, Tottenham

I believe Game Nation are seeking permission to open 24 hours. Currently, they must close by midnight Mon to Sat, and 11pm on Sundays.

The three licensing objectives which guide the consideration of applications under the Gambling Act 2005 are:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
- ensuring that gambling is conducted in a fair and open way
- protecting children and other vulnerable persons from being harmed or exploited by gambling

I have concerns relating to this application which fall within the objectives listed above.

The Gambling Commission has introduced Social Responsibility code provisions that require operators of premises-based businesses to consider potential impact or harm from their gambling facility in an area.

Therefore, my major concerns are related to the **negative impact of longer opening hours** on local residents:

- We should work to prevent gambling from being a source of, *or encouragement for*, crime or disorder, or being used to support or facilitate crime
- We should work to prevent any chance of vulnerable persons being exploited by gambling

Unfortunately Tottenham is at a higher than normal risk of negative impact because of the higher than normal rates of alcohol and drug abuse, crime, mental illness, social deprivation, and resident vulnerable adults. In my opinion, Haringey already has too many adult gaming centres compared to other boroughs.

Perhaps if rates of alcohol and drug abuse, crime, mental illness **and** social deprivation all fall significantly in my area, then maybe Game Nation would like to reconsider their application.

But until such time, **I strongly oppose any extension to the opening hours of Game Nation.**

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED] >
Sent: 30 May 2022 19:26
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Objection to Game Nation

[REDACTED]

Hi there,

I am writing to you to share my objection to Game Nation being open 24 hours.

Tottenham High Street is already full of anti social behaviour, I have been followed, threatened and my partner and neighbours have been threatened.

There have been several studies linking gambling with anti social behaviour and I don't think we want to be encouraging more of this in this Borough, which already has a big problem with it anyway.

Many thanks

[REDACTED]

From: [REDACTED]
Sent: 30 May 2022 20:12
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Game Nation licence application

Dear Haringey Council licensing team,

My name is [REDACTED] and I live at [REDACTED].

I would like to object to Game Nation's request to become a 24 hours gambling centre.

My concerns have to relate to the following 3 areas:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
- ensuring that gambling is conducted in a fair and open way
- protecting children and other vulnerable persons from being harmed or exploited by gambling

In 2019 Haringey Council produced a Local Area Profile highlighting that Tottenham is at high risk from gambling related harm. By your own assessment, these kinds of establishments are detrimental to the area and making them 24 hours just extends the number of hours that people can be exploited by this company.

On the basis of this, I'd ask you to please reject their request.

Many thanks,

■

From: ■
Sent: 30 May 2022 20:56
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Objection to 24 hour licensing for Game Nation

Dear Sir or Madam

I am writing to object to the application for Game Nation to be allowed to be open 24 hours.

In 2019 Haringey council produced a Local Area Profile highlighting that Tottenham is at high risk from gambling related harm. There is no doubt Game Nation's presence on the high street will put people at risk from gambling harm. There is no reason for the establishment to be open for 24 hours, particularly given that is already open until midnight (far later than many other places on the High Street).

Granting permission would put residents at risk, encourage anti-social behaviour and at a time when people are suffering financially, put more people at more risk.

Please reject this application.

Kind regards

■

From: ■
Sent: 31 May 2022 11:18
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Objection to Game Nation opening 24 hours per day on Tottenham High Road

I'm writing to object to Game Nation opening 24 hours per day on Tottenham High Road

Having the Game National open all night will encourage more problem gambling and addictive behaviours. This means that it is not possible to ensuring that gambling is conducted in a fair way for customers.

A report says: "The results showed that of those identified by the survey as problem gamblers, one in five (19%) had thought about suicide in the past year, compared with 4% of non-problem gamblers/non-gamblers."

<https://www.gamblingcommission.gov.uk/news/article/new-analysis-shows-problem-gamblers-are-more-likely-than-others-to-have>

Problem gamblers are vulnerable, and will be exploited by extending opening hours.

Having a gambling establishment open 24 hours a day on the High Street may also need to disorder and noise for local residents

Regards,

[REDACTED]

From: [REDACTED]
Sent: 31 May 2022 11:44
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Objection for 24/7 game nation license request for high st n17

Hi there.

This a terrible idea for a deprived area with street ASB, gambling addiction, financial hardship and loitering outside betting shops an increased issue in the area.

We need to be closing these places down, not helping them to expand their revenue to the detriment of the local community

[REDACTED]

[REDACTED]

Sent from my iPhone

From: [REDACTED]
Sent: 31 May 2022 14:18
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Objection to the 24 hour opening times of Game Nation

Hello Haringey Licensing Team,

I live in the local area of Bruce Grove, Tottenham and it's come to my attention that the gambling shop 'Game Nation' situated on Tottenham High Road is proposing a 24 hour license/opening times. This is something is seriously object to for the following reasons:

- No gambling shop should be open 24 hours. Anyone gambling in the early hours of the morning (past midnight) obviously has a problem - gambling is not productive, healthy, or constructive to a nice area and 24-hour gambling at this venue would be harmful to the society and the area we live in. We need to protect the vulnerable in our society and extending the license here is exploiting them.

- Gambling is statistically proven to increase aggression and anti-social behavior. By extending the license for this shop you are only promoting anti-social behavior and aggression within the area. Extending the license at this shop will only increase crime and disorder in the area. If anything the license should be reduced in time so as to reduce disorder on Tottenham High Road.

- I have also seen numerous times, drugs being sold to punters coming out of and going back into Game Nation. When I asked the guy what he was selling the punters he told me stimulants - a common drug of choice for gamblers - I believe giving a 24-hour license to Game Nation will increase the crime on Tottenham High Road which I believe Game Nation is directly contributing to.

Best,

█

From: █
Sent: 31 May 2022 19:30
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Objection to Game Nation's permission to run 24 hours gambling centre

Name █
Address: █

I wish to oppose the licensing of Game Nation to run a 24 hours gambling centre.

My concerns relate to each of the following statements

1. preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime

In 2019 Haringey Council produced a Local Area Profile highlighting that Tottenham is at high risk from gambling-related harm

The risk posed from gambling-related harm in this area is higher than normal because of the higher than normal rates of alcohol and drug abuse, crime, mental illness and social deprivation.

Game Nation can not guarantee any "adequate staff training through E-Learning courses to mitigate increased physical violence, harassment, alcohol-related violence and drug abuse, as these require specialist training and skills such as psychological support, psychosocial support, armed response, medical and nursing response, and educational skills, safeguarding knowledge, which Game Nation are unlikely to offer their staff, especially not through e learning and not at the level that the harm will require. They should prove they do not support crime nor addiction in their clients.

3. protecting children and other vulnerable persons from being harmed or exploited by gambling

Gambling and gambling-like experiences are so widespread that **children see gambling as a normal part of everyday life**, including sport. And gambling advertisements send messages that gambling is fun, exciting and a way to join in with others and get rich easily.

Teenagers might think of gambling as a good social activity. This is because online gambling activities use chat and messaging to encourage people to bet with friends and share gambling stories. 55,000+ children addicted to gambling in the UK.

By having these Game Nation (and other gaming shops) open 24 hours a day (and opened at all!) you extend the exposure to and the opportunity to increase gambling addiction, and have devastating effect as soon as the children reach the age of 18 .and are legally authorised to enter the premises

By having game nation open at all times of the day and night gives even more exposure to carers and parents who could instead be at home with their children if they have any. The violence and economic issues related to gambling would then be passed on to children. Haringey has a duty of safeguarding.

600 lives are lost each year by suicide caused by gambling debt
Since 2020 gambling awareness should be included as part of PSHE. How can you justify authorising licensing these premises on one hand whilst you have the duty to educate against it on the other hand?

Many thanks

[REDACTED]

From: Cllr Brabazon Zena <Zena.Brabazon@haringey.gov.uk>
Sent: 04 June 2022 19:22
To: Barrett Daliah <Daliah.Barrett@haringey.gov.uk>; Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: FW: Application to Vary Gambling Premises Licence - Game Nation 450-454 High Road, Tottenham, London N17 9JD (WK/535773)

Dear Daliah

I am writing to formally object to the application by Game Nation to vary its adult gaming license for its premise at 450-454 High Road, Tottenham, N17 9JD. I am a local resident and also Cabinet Member for Children, Schools and Families.

This centre is very prominently located on Tottenham High Rad, and under its current license is open from 9am-midnight Monday to Saturday and until 11pm on Sundays. These very long hours seem to me to be sufficient.

In drafting my objection I have taken account of the Council's Statement of Gambling Policy and in particular the local area profile (January 2022) which is linked to the policy. I fully appreciate the need for balance in determining applications and welcome the policy which recognises the impact that gambling can have on vulnerable people, especially those living in poorer areas where gambling premises tend to be established.

Tottenham High Road is no exception in that regard, with several betting shops nearby to Game Nation and another adult gaming centre almost opposite. It seems to me that the issue here is whether this extension of hours to create a seven day a week, 24 hour gaming centre on Tottenham High Road is acceptable, given the area profile which lists both Tottenham Hale and Bruce Grove wards (now Tottenham Central) **as most vulnerable to gambling related harm**. As the Local Area Profile states **'These areas have been chosen due to:**

- **Higher levels of crime**
- **Drug dealing and misuse**

- ***Gang activity in the area***
- ***Issues with street drinking and anti-social behaviour***
- ***Issues with street begging***
- ***Homelessness***
- ***Mental health support accommodation***

Game Nation's updated local area risk assessment sets out the mitigations of risk to the most vulnerable. However these are largely technical and administrative in nature., relating to the management of the centre and processes to be followed. Yet the key issue, it seems to me is whether vulnerable people will be protected from harm or exploited by gambling, (which is a statutory licensing objective), if this variation is granted to enable people to gamble effectively 24 hours a day, seven days a week.

To put this in context, the whole country is now facing a cost of living crisis. Tottenham is no exception to this and it is likely our residents will face even more hardship with the exponential rise in energy and other costs. As a council, we have budgeted to provide over 500 primary school children with free school meals where their families do not meet the government's eligibility requirements, but where the families cannot make ends meet.

Indeed, Tottenham saw one of the largest increases in people applying for universal credit during the pandemic. On every indicator – economic, social and health - set out in the local area profile, things got worse during Covid. We have seen inequalities increase during the last two years. Mental ill health has risen, indebtedness is endemic with many people on housing benefit in severe debt.

The Local area profile provides the data to confirm this. It is against this backdrop that any variation to the current license should be considered, and whether it is acceptable to make gambling even more accessible for people in Tottenham.

I appreciate that Game Nation have listed many facilities which support vulnerable people in their risk assessment but regrettably there are even more. The Probation Service which sees vulnerable offenders is located on Lordship Lane and this should be of concern. There are hugely busy food banks at Tottenham Town Hall, at the 7th Day Adventist Church on Philip Lane and in Northumberland Park. The Tottenham Law Centre is also just a short walk away on Holcombe Road, and Mulberry Junction Homelessness Centre is underneath the St Mungo's provision already mention. In addition, there are rough sleepers on Tottenham High Road, some in the immediate vicinity of this gaming centre .

Combined with the list in the risk assessment, and indeed the evidence of increasing social and economic deprivation, would extending the already long hours have no impact on vulnerable people, including children, from being exploited or harmed?

Regards

Zena

Cllr Zena Brabazon
Cabinet Member, Children, Schools and Families

From: [REDACTED]

Sent: 21 June 2022 15:23

To: Licensing <Licensing.Licensing@haringey.gov.uk>

Subject: Game nation 450-454 high road tottenhamlondon n17 9 JD

WK/535773

Thank you for e-mail with regards to the above,I was very

dissappointed when permission was given for game nation to operate in Tottenham reported to be one of the poorest borough's,I therefore I object to permission for 24 hours opening adding more problems to the vulnerable

your sincerely

[REDACTED]

From: [REDACTED]
Sent: 21 June 2022 15:40
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Game Nation 24 Hour License

I am writing as a concerned Tottenham resident about the application from Game Nation to turn the venue at Bruce Grove into a 24 hour gambling centre.

I strongly object to this on the grounds of increased anti-social behaviour. Tottenham High Road is blighted by Gaming and Betting shops and the last thing we need is another 24 hour venue. Gambling in areas of high poverty and deprivation like Tottenham just create more problems for the area.

We also need to protect children and other vulnerable persons from being harmed or exploited by gambling.

Ensure that gambling is conducted in a fair and open way.

Prevent gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime.

I will be extremely disappointed if Haringey Council give the go ahead for this license.

[REDACTED]

From: [REDACTED]
Sent: 22 June 2022 14:31
To: Licensing <Licensing.Licensing@haringey.gov.uk>
Subject: Game Nation 24hr licence objection

Dear sir/madam,

I found out that Game Nation wish to operate for 24hrs a day and I have grave concerns about this.

I work with homeless and marginalised people and am well aware of the harm that problem gambling can cause to individuals, their families and to a community as a whole. Although gambling can be done online 24hrs a day, this is not open to everyone. For example, if they don't have the right ID or a bank account. In a place like Tottenham, this is the case for many people whom I know, and many more others whom I don't, who are problem gamblers. Having a point at which they can no long gamble every day is essential and

perhaps even act as an opportunity to reassess behaviour. having an place that is always open would be extremely detrimental, even if this is not the kind of gambling that these people would normally do.

Furthermore, gaming machines are designed to be very addictive and for winning to be impossible. Having this place open if someone is desperate is a recipe for disaster.

I'm sure others have written to you about the ubiquity of betting shops, gaming shops etc in Tottenham, and how concentrated they are in an area of deprivation and that this is a deliberate strategy by companies seeking to benefit financially from people's vulnerability and financial insecurity. Quite frankly it's disgusting.

Game Nation, if operating 24hrs, would become one of the only 'always open' places on the High Road, attracting potential predators and others who might prey on those who are in a vulnerable situation. It would be out of keeping with other licencing hours.

I hope Haringey Council will see that it is only the owners of Game Nation who will benefit from this. Not the staff, nor the local economy, nor the community. Therefore, I hope you will refuse the licence.

Kind regards,



This page is intentionally left blank